

Carl Montbaine
Honeywell International
3520 Westmoor Street
South Bend, IN 46228

Re: **141-12090**
First Administrative Amendment to
CP 141-8761-00172

Dear Carl Montbaine:

Honeywell International was issued a permit on July 02, 1998 for an aircraft landing system manufacturing operation. A letter requesting decommissioning of two Electric Carbonization Furnaces was received on March 30, 2000. The permit is hereby administratively amended as follows (changes marked with **Bold** and ~~Strikeout~~ method):

Two (2) Electric Carbonization Furnaces, identified as ECF-2 and ECF-3 are decommissioned. Therefore, Permittee has requested for removal of all conditions and references to these Furnaces in this permit.

Section A.2 is amended as follows:

A.2 Emission Units and Pollution Control Equipment Summary

The source is hereby authorized to construct the following emission units and pollution control devices:

- (a) **Four (4) Two (2)** electric carbonization furnaces, each with a maximum capacity of 2,900 pounds of preforms of brake discs per batch at a maximum rate of 91 batches per year, including:
 - ~~(1) Two (2) previously permitted electric carbonization furnaces (ID Nos. ECF-2 and ECF-3), both controlled by one (1) natural gas fired thermal oxidizer (ID No. TO-1) rated at 1.5 million (MM) Btu per hour, exhausting through one (1) stack (ID No. 470).~~
 - (2) Two (2) new electric carbonization furnaces (ID Nos. ECF-4 and ECF-5), both controlled by one (1) natural gas fired thermal oxidizer (ID No. TO-2) rated at 1.5 MMBtu per hour, exhausting through one (1) stack (ID No. 471);**

Section D.1 is amended as follows:

SECTION D.1 FACILITY OPERATION CONDITIONS - Electric Carbonization Furnaces

~~Four (4)~~ **Two (2)** electric carbonization furnaces (ID Nos. ECF-~~24~~ through ECF-5), each with a maximum capacity of 2,900 pounds of preforms of brake discs per batch at a maximum rate of 91 batches per year. ~~ECF-2 and ECF-3 are both controlled by one (1) natural gas fired thermal oxidizer (ID No. TO-1), rated at 1.5 million (MM) Btu per hr, exhausting through one (1) stack (ID No. 470).~~ ECF-4 and ECF-5 are both controlled by one (1) natural gas fired thermal oxidizer (ID No. TO-2), rated at 1.5 MMBtu per hour, exhausting through one (1) stack (ID No. 471).

Emission Limitations and Standards

D.1.1 BACT Condition [326 IAC 8-1-6]

~~Each~~ **The** thermal oxidizer shall operate at all times that the ~~corresponding~~ electric carbonization furnaces are operated. When operating, the thermal incinerators shall maintain a minimum 90% overall destruction of the volatile organic compound (VOC).

D.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and control devices.

Compliance Determination Requirements

D.1.3 Testing Requirements [326 IAC 2-1-3]

~~Compliance stack tests shall be performed for VOC emissions from each of the two (2) sets of electric carbonization furnaces (ID Nos. ECF-2 and ECF-3, and ECF-4 and ECF-5) with each set of two (2) furnaces controlled by one (1) 1.5 MMBtu per hour natural gas fired thermal oxidizer, within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up. The tests on the electric carbonization furnaces shall be performed before and after control to confirm the control efficiency of the thermal oxidizer. These tests shall be performed according to 326 IAC 3-6 (Source Sampling Procedures) using the methods specified in the rule or as approved by the Commissioner. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.~~

Compliance Monitoring Requirements

D.1.4 Monitoring

To assure compliance with Condition D.1.1, the thermal incinerators shall maintain a minimum operating temperature of 1,600° F until the minimum temperature, fan amperage and duct velocity necessary to maintain a minimum 90% overall destruction of the volatile organic compound (VOC) is determined in the compliance tests (described in Operation Condition D.1.3). A continuous monitoring system shall be installed and operated to monitor and record the operating temperature. This system shall be accurate to ±5.0 percent.

Record Keeping and Reporting Requirements

D.1.5 Record Keeping Requirements

(a) To document compliance with Condition D.1.1, the Permittee shall maintain a log of daily thermal incinerator temperatures, and those additional inspections prescribed by the Preventive Maintenance Plan.

- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Gurinder Saini, at (800) 451-6027, press 0 and ask for Gurinder Saini or extension 3-0203, or dial (317) 233-0203.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments

GS

cc: File - St. Joseph County
St. Joseph County Health Department
Northern Regional Office
Air Compliance Section Inspector - Rick Reynolds
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner