

**FEDERALLY ENFORCEABLE STATE  
OPERATING PERMIT (FESOP)  
and NEW SOURCE REVIEW**

**OFFICE OF AIR MANAGEMENT**

**Allomatic Products Company  
609 East Chaney Street  
Sullivan, Indiana 47882**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: NSR/FESOP 153-12504-00015	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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## SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-8-3(b)]

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The Permittee owns and operates a stationary that manufactures automotive clutch plates and transmission parts.

Authorized individual:	Robert Clark
Source Address:	609 East Chaney Street, Sullivan, Indiana 47882
Mailing Address:	609 East Chaney Street, P. O. Box 267, Sullivan, Indiana 47882
Phone Number:	(812) 268-0322
SIC Code:	3714
County:	Sullivan
County Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD or Emission Offset Rules; Minor Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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This stationary source consists of the following emission units and pollution control devices:

(a) Proposed New Construction:

- (1) One (1) adhesive coating line, to be identified as RM2002, which is capable of coating 300 torque rings per hour. The adhesive will be applied through a curtain coater. The VOC and HAP emissions will be controlled by a new 1.0 million British Thermal per hour (mmBtu/hr) catalytic oxidizer (S/V- ID S10).

(b) The source consists of the following permitted emission units and pollution control devices:

- (1) Various natural gas-fired space heater, ID5 with a maximum total heat input capacity of 16 million British Thermal Units per hour (mmBtu/hr);
- (2) Two (2) etching lines M2002 and M2027, which are capable of etching a total of 10,200 steel plates per hour, and have a maximum usage of 4 pounds of acid per hour. The particulate matter emissions from these facilities are controlled by a packed tower scrubber (S/V -ID S1);
- (3) Two (2) adhesive coating lines identified as M2003 and M2028, which are capable of coating a total of 10,200 steel friction cores per hour. The adhesive is applied through roll coater. The volatile organic compounds (VOC) and hazardous air pollutant (HAP) emissions are controlled by a 1.5 mmBtu/hr catalytic oxidizer (S/V -ID S2);

- (4) Two (2) OD sanders, identified as M2010.1 and M2010.2 capable of grinding a total of 11,400 bonded assemblies per hour. The particulate matter emissions from these sanders are controlled by baghouse (S/V - ID S6); and
- (5) Two (2) opposed disk grinders, identified as RM1012 and RM1013 capable of grinding a total of 19,000 friction assemblies per hour. The PM emission is controlled by baghouse (SV- ID S14).

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Various natural gas-fired heaters, burners/ovens, including the incinerators with a total heat input capacity of 6.5 mmBtu/hr.
- (b) Combustion source flame safety purging on startup.
- (c) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (d) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughput less than 12,000 gallons.
- (e) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (f) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (g) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (h) Cleaners and solvents characterized as follows:
  - (1) Having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38 degrees C (100°F) or;
  - (2) Having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20 degrees C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (i) The following equipment related to manufacturing activities not resulting in the emissions of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (j) Closed loop heating and cooling systems.
- (k) Activities associated with the treatment of wastewater streams with an oil and greases content less than or equal to 1% by volume.
- (l) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.
- (m) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other filtration equipment.

- (n) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as bag filter or cyclone.
- (o) Paved and unpaved roads and parking lots with public access.
- (p) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks and fluid handling equipment.
- (q) On-site fire and emergency response training approved by the department.
- (r) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying and woodworking operations.
- (s) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees C).
- (t) A laboratory defined in 326 IAC 2-7-1(20)(C).
- (u) Other Categories not previously identified:
  - (1) Three (3) induction bonders, M2033, M2045, and M2046 with a total rate of 1,800 pounds of clutch per hour, venting to Stack S/V- ID S3.
  - (2) Two (2) rotary bonders, identified as M2008, with a rate of 270 pounds per hour and M2009 with a rate of 230 pounds per hour, venting to stack S/V- ID S4 and S/V- ID S5 respectively.
  - (3) S-11 Bonding oven.
  - (4) S-7 Electric batch oven.
  - (e) One (1) degreaser, identified as RM6012 with two (2) compartments, one compartment has a capacity of 336 gallons of liquid was and the other compartment has capacity of 336 gallons of liquid rinse. The degreaser has a 1.8 mmBtu/hr liquid heater and 0.8 mmBtu/hr dryer.
  - (6) Fugitive - steel blanking (die lubricant, rust prevention application).
  - (7) Two (2) paper blanking facilities, identified as M5001 and M5002 with a total capacity of 290 friction paper per hour, and 11,000 paper rings per hour. The particulate matter emissions from facilities are controlled by a cyclone (S/V- ID S9).

#### A.4 FESOP Applicability [326 IAC 2-8-2]

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This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) for a Federally Enforceable State Operating Permit (FESOP).

#### A.5 Prior Permit Conditions

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- (a) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.
- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a

compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued.

## SECTION B GENERAL CONDITIONS

### B.1 Definitions [326 IAC 2-8-1]

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Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

### B.2 Permit Term [326 IAC 2-8-4(2)]

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This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

### B.3 Enforceability [326 IAC 2-8-6]

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Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

### B.4 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

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The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

### B.5 Severability [326 IAC 2-8-4(4)]

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The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

### B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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This permit does not convey any property rights of any sort, or any exclusive privilege.

### B.7 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]

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(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, then the Permittee must furnish record directly to the U. S. EPA. The Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

**B.8 Compliance Order Issuance [326 IAC 2-8-5(b)]**

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IDEM, OAM may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

**B.9 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]**

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- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and is grounds for:
- (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; and
  - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

**B.10 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]**

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- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

**B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]**

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- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:
- Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015
- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

- (2) The compliance status;
- (3) Whether compliance was continuous or intermittent;
- (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
- (5) Such other facts as specified in Sections D of this permit, IDEM, OAM, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.12 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAM, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAM. IDEM, OAM, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.13 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Management, Compliance Section), or  
Telephone Number: 317-233-5674 (ask for Compliance Section)  
Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3-(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules. 326 IAC 2-8-12 (f)
- (g) Operations may continue during an emergency only if the following conditions are met:
  - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015.

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.

The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
- (2) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

**B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination**

[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM determines any of the following:
  - (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

**B.16 Permit Renewal [326 IAC 2-8-3(h)]**

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, IN 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
- (1) A timely renewal application is one that is:
- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due.
- (2) If IDEM, OAM upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]  
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAM takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, any additional information identified as needed to process the application.

B.17 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015
- Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1) only if a certification is required by the terms of the applicable rule.
- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.18 Operational Flexibility [326 IAC 2-8-15]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional conditions:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) Emission Trades [326 IAC 2-8-15(c)]  
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAM or U.S. EPA is required.

B.19 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the applicable provisions of 326 IAC 2-8-11.1.

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.  
[326 IAC 2-8-5(a)(4)]

B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request.  
[326 IAC 2-8-11(b)(3)]

B.22 Annual Fee Payment [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.

- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

B.23 Advanced Source Modification Approval [326 IAC 2-8-4(11)] [326 IAC 2-1.1-9]

- (a) The requirements to obtain a permit revision under 326 IAC 2-8-11.1 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3.
- (b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if failure to commence construction of the emission unit within eighteen (18) months from the date of issuance of the permit, or if during the construction of work is suspended for a continuous period of one (1) year or more.

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

### Emissions Limitations and Standards [326 IAC 2-8-4(1)]

#### C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:
- (1) The potential to emit of any regulated pollutant from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)).
  - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
  - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.
- (c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

#### C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

#### C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.

#### C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) Procedures for Asbestos Emission Control  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

- (f) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

### **Testing Requirements [326 IAC 2-8-4(3)]**

#### **C.8 Performance Testing [326 IAC 3-6]**

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- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAM of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, within forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAM, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

### **Compliance Requirements [326 IAC 2-1.1-11]**

#### **C.9 Compliance Requirements [326 IAC 2-1.1-11]**

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The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

### **Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

#### **C.10 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]**

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All monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management

100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule with full justification of the reasons for inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

**C.11 Maintenance of Emission Monitoring Equipment [326 IAC 2-8-4(3)(A)(iii)]**

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- (a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.
- (c) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary opacity monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

**C.12 Monitoring Methods [326 IAC 3]**

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Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

**C.13 Pressure Gauge Specifications**

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Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( $\pm 2\%$ ) of full scale reading.

**Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

**C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]**

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If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
- (c) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted

as required by 40 CFR 68.

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.15 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:
- (1) This condition;
  - (2) The Compliance Determination Requirements in Section D of this permit;
  - (3) The Compliance Monitoring Requirements in Section D of this permit;
  - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
  - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:
    - (A) Reasonable response steps that may be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
    - (B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied; or

- (3) An automatic measurement was taken when the process was not operating; or
- (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.
- (f) If for reasons beyond its control, the Permittee fails to perform the monitoring and record keeping as required by Section D, then the reasons for this must be recorded.
  - (1) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent of the operating time in any quarter.
  - (2) Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]  
[326 IAC 2-8-5]

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- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the corrective actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline.
- (c) IDEM, OAM reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]**

C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

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- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner

within a reasonable time.

- (b) Records of required monitoring information shall include, where applicable:
  - (1) The date, place, and time of sampling or measurements;
  - (2) The dates analyses were performed;
  - (3) The company or entity performing the analyses;
  - (4) The analytic techniques or methods used;
  - (5) The results of such analyses; and
  - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
  - (1) Copies of all reports required by this permit;
  - (2) All original strip chart recordings for continuous monitoring instrumentation;
  - (3) All calibration and maintenance records;
  - (4) Records of preventive maintenance.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period.  
  
The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the

certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

**SECTION D.1 FACILITY OPERATION CONDITIONS**

**Facility Description [326 IAC 2-8-4(10)]:**

(a) Proposed New Construction:

(1) One (1) adhesive coating line, to be identified as RM2002, which is capable of coating 300 torque rings per hour. The adhesive will be applied through roll coater. The VOC and HAP emissions will be controlled by a new 1.0 million British Thermal per hour (mmBtu/hr) catalytic oxidizer (S/V- ID S10).

(b) The source consists of the following permitted emission units and pollution control devices:

(1) One (1) natural gas-fired space heater, ID5 with a heat input capacity of 16 million British Thermal Units per hour (mmBtu/hr);

(2) Two (2) etching lines M2002 and M2027, which are capable of etching a total of 10,200 steel plates per hour, and have a maximum usage of 4 pounds of acid per hour. The particulate matter emissions from these facilities are controlled by a packed tower scrubber (S/V -ID S1);

(3) Two (2) adhesive coating lines identified as M2003 and M2028, which are capable of coating a total of 10,200 steel friction cores per hour. The adhesive is applied through roll coater. The volatile organic compounds (VOC) and hazardous air pollutant (HAP) emissions are controlled by a 1.5 mmBtu/hr catalytic oxidizer (S/V -ID S2);

(4) Two (2) OD sanders, identified as M2010.1 and M2010.2 capable of grinding a total of 11,400 bonded assemblies per hour. The particulate matter emissions from these sanders are controlled by baghouse (S/V - ID S6); and

(5) Two (2) opposed disk grinders, identified as RM1012 and RM1013 capable of grinding a total of 19,000 friction assemblies per hour. The PM emission is controlled by baghouse (SV- ID S14).

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

**Emission Limitations and Standards [326 IAC 2-8-4(1)]**

**D.1.1 Particulate Matter Less Than Ten Microns (PM10) [326 IAC 2-8]**

The PM10 emissions from the following facilities shall be limited as follows:

Process/facility	PM10 Emissions (lbs/hr)
Etching Lines M2002 & M2027	0.45
Opposed Disk Grinders RM1012 & RM1013	11.8
OD Sanders M2010.1 & M2010.2	9.4

Compliance with these limits shall make 326 IAC 2-7 (Part 70 Permit Program) not applicable.

**D.1.2 Particulate Matter (PM) [326 IAC 6-3-2]**

This rule mandates a PM emissions limit using the following equation:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$  where E = rate of emission in pounds per hour and

P = process weight rate in tons per hour

Facility/Process	Process Weight Rate (tons/hr)	PM Limit (lb/hr)
Acid Etching, M2002 & M2027	0.51	2.6
OD Sanders, M2010.1 & M2010.2	0.57	2.8
Opposed Disk Grinders, RM1012 & RM1013	0.95	3.96

#### D.1.3 Volatile Organic Compounds (VOC) Emissions Limitations

---

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) emissions from the application of adhesive to torque rings and steel plates shall be limited to 3.0 pounds of VOCs per gallon of coating less water, for any calendar day, for all other types of coatings.
- (b) Pursuant to 326 IAC 8-1-2(c), the owner or operator is required to operate the new adhesive coating line, RM2002 catalytic oxidizer (S/V- ID S10) at an overall control efficiency of 79% and the VOC content of the adhesives shall not exceed 5.36 pounds per gallon of coating solids delivered to the applicator.
- (c) Pursuant to 326 IAC 8-1-2(c), the owner or operator is required to operate the two (2) existing adhesive coating lines, M2003 and M2028 catalytic oxidizer (S/V- ID S2) at an overall control efficiency of 85% and the VOC content of the adhesives shall not exceed 5.0 pounds per gallon of coating solids delivered to the applicator.
- (d) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

#### D.1.4 Volatile Organic Compounds (VOC)

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Any change or modification which may increase the potential VOC emissions to 100 tons per year or more from the equipment covered in this permit must be approved by the Office of Air Management (OAM) before such change may occur.

#### D.1.5 Hazardous Air Pollutants Limitations

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- (a) The single HAP input usage (before the catalytic oxidizers) from all the emission points, including insignificant activities shall be limited to 43 tons per twelve month period, rolled on a monthly basis.
- (b) Any change or modification which may increase the combined HAPs potential emissions to 25 tons per year or more from the equipment covered in this permit must be approved by the Office of Air Management (OAM) before such change may occur.

Compliance with (a) and (b) of this Condition and Condition D.1.10 will make 326 IAC 2-7 Part 70 Operating Permit not applicable.

#### D.1.6 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

### Compliance Determination Requirements

#### D.1.7 Catalytic Oxidizers (S/V- ID S10, S/V -ID S2)

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Pursuant to 326 IAC 8-1-2 (VOC Compliance Methods), the VOC emissions from the proposed new adhesive coating line (RM2002) and the VOC emissions from the existing two coating lines (M2003 and M2028) shall be vented to each dedicated catalytic oxidizer for destruction in order to comply with the limit of 3.0 pounds per gallon less water as required in Condition D.1.2 of this permit.

#### D.1.8 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

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- (a) Compliance stack tests shall be performed for the new adhesive coating line's catalytic oxidizer (S/V -ID S10) within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up. Compliance stack tests shall be performed, to establish the operating temperature, fan amperage, and duct velocity that will corresponds to the required minimum overall control efficiency of 79% in 326 IAC 8-1-2(c). The stack tests shall be performed utilizing Method 25 (40 CFR 60, Appendix A), or other methods as approved by the Commissioner.
- (b) Compliance stack tests shall be performed for the two (2) adhesive coating lines identified as M2003 and M2028 Catalytic Oxidizer S/V - ID S14 after five (5) years from the initial tests conducted on July 2, 1999. Compliance stack tests shall be performed, to establish the operating temperature, fan amperage, and duct velocity that will corresponds to the required minimum overall control efficiency of 85% % in 326 IAC 8-1-2(c). The stack tests shall be performed utilizing Method 25 (40 CFR 60, Appendix A), or other methods as approved by the Commissioner.
- (c) The Permittee shall perform PM-10 testing on the Opposed Disk Grinders, RM1012 & RM1013 utilizing Methods 201 or 201A and 202 (40 CFR 51, Appendix M), or other methods as approved by the Commissioner. PM-10 includes filterable and condensable PM-10.
- (d) The tests shall be repeated at least once every five (5) years from the date of the valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

#### D.1.9 Capture System

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The volatile organic compound (VOC) capture system for the adhesive lines RM2002, M2003 and M2028 shall meet the following criteria of a permanent total enclosure. Permanent total enclosure is defined - a permanently installed enclosure that completely surrounds a source of emissions such that all VOC emissions are captured and contained for discharge through a control device:

- (a) Any NDO shall be at least four (4) equivalent opening diameters from each VOC emitting point. Natural Draft Opening (NDO) is any permanent opening in the enclosure that remains open during operation of the facility and is not connected to a duct in which a fan is installed.
- (b) The total area of all NDO's shall not exceed five (5) percent of the surface area of the enclosure's four walls, floor, and ceiling.
- (c) The average facial velocity (FV) of air through all NDO's shall be at least 3,600 m/hr (200 fpm). The direction of air through all NDO's shall be into the enclosure.
- (d) All access doors and windows whose areas are not included in condition (b) and are not included in the calculation in condition (c) shall be closed during routine operation of the

process.

- (e) All VOC emissions must be captured and contained for discharged through a control device.

### **Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

#### **D.1.10 Catalytic Oxidizer Operating Parameters**

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- (a) The new Catalytic Oxidizer S/V- ID S10 and existing Catalytic Oxidizer S/V- ID S2 shall be in operation at all times the respective adhesive coating line is in operation.
- (b) When operating, the new Catalytic Oxidizer, S/V- ID S10 shall be operated at a minimum operating temperature of 600 °F or a minimum operating temperature, duct velocity or fan amperage established during the compliance stack tests that will correspond to the overall control efficiency of 79%, required by rule 326 IAC 8-1-2(c), necessary to achieve the limit of 3.0 pounds of VOC per gallon of coating less water in rule 326 IAC 8-2-9.
- (c) When operating, the existing Catalytic Oxidizer, S/V- ID S2 shall be operated at a minimum operating temperature of 650 °F or a minimum operating temperature, duct velocity or fan amperage established during the compliance stack tests that will correspond to the overall control efficiency of 85%, required by rule 326 IAC 8-1-2(c), necessary to achieve the limit of 3.0 pounds of VOC per gallon of coating less water in rule 326 IAC 8-2-9.

#### **D.1.11 Visible Emissions Notations**

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- (a) Daily visible emission notations of the baghouse SV- ID S14 stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

#### **D.1.12 Pressure Drop Monitoring**

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The Permittee shall record the total static pressure drop across baghouse SV- ID S14 used in conjunction with the disk grinders, identified as RM1012 and RM1013, at least once weekly when any of the disk grinders is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 0.5 and 2.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

#### D.1.13 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the Opposed Disk Grinders (RM1012 & RM1013), and OD Sanders (M2010.1 & M2010.2) when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.

#### **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

#### D.1.14 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.3, D.1.4 and D.1.5 the Permittee shall maintain records in accordance with (1) through (8) below. Records maintained for (1) through (8) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits and/or the VOC and HAP emission limits established in Conditions D.1.3, D.1.4 and D.1.5.
- (1) The amount and VOC and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) The cleanup solvent usage for each month;
  - (4) The total VOC and HAP usage for each month; and
  - (5) The weight of VOCs and HAPs emitted for each compliance period.
  - (6) The continuous temperature records for the catalytic oxidizers and the temperature used to demonstrate compliance during the most recent compliance stack test.
  - (7) Weekly records of the duct pressure or fan amperage.
- (b) To document compliance with Condition D.1.11, the Permittee shall maintain records of daily visible emission notations of the disk grinders (RM1012 and RM1013) baghouse SV- ID S14 stack exhaust.
- (c) To document compliance with Condition D.1.12, the Permittee shall maintain the following:
- (1) Weekly records of the following operational parameters during normal operation when venting to the atmosphere:
    - (A) Inlet and outlet differential static pressure; and
    - (B) Cleaning cycle: frequency and differential pressure.
  - (2) Documentation of all response steps implemented, per event .
  - (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.
  - (4) Quality Assurance/Quality Control (QA/QC) procedures.

- (5) Operator standard operating procedures (SOP).
  - (6) Manufacturer's specifications or its equivalent.
  - (7) Equipment "troubleshooting" contingency plan.
- (d) To document compliance with Condition D.1.13, the Permittee shall maintain records of the results of the inspections required under Condition D.1.13.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.15 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.5 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
CERTIFICATION**

Source Name: Allomatic Products Company  
Source Address: 609 East Chaney Street, Sullivan, Indiana 47882  
Mailing Address: 609 East Chaney Street, P. O. Box 267, Sullivan, Indiana 47882  
FESOP/NSR No.: 153-12504-00015

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) \_\_\_\_\_
- 9 Report (specify) \_\_\_\_\_
- 9 Notification (specify) \_\_\_\_\_
- 9 Affidavit (specify) \_\_\_\_\_
- 9 Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION  
P.O. Box 6015  
100 North Senate Avenue  
Indianapolis, Indiana 46206-6015  
Phone: 317-233-5674  
Fax: 317-233-5967**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
EMERGENCY OCCURRENCE REPORT**

Source Name: Allomatic Products Company  
Source Address: 609 East Chaney Street, Sullivan, Indiana 47882  
Mailing Address: 609 East Chaney Street, P. O. Box 267, Sullivan, Indiana 47882  
NSR/FESOP No.: 153-12504-00015

**This form consists of 2 pages**

**Page 1 of 2**

**9** This is an emergency as defined in 326 IAC 2-7-1(12)  
    CThe Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and  
    CThe Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

**Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency?    Y    N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
 OFFICE OF AIR MANAGEMENT  
 COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Allomatic Products Company  
 Source Address: 609 East Chaney Street, Sullivan, Indiana 47882  
 Mailing Address: 609 East Chaney Street, P. O. Box 267, Sullivan, Indiana 47882  
 NSR/FESOP No.: 153-12504-00015

**Months:** \_\_\_\_\_ **to** \_\_\_\_\_ **Year:** \_\_\_\_\_

<p>This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<p><b>9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.</b></p>	
<p><b>9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD</b></p>	
<p><b>Permit Requirement</b> (specify permit condition #)</p>	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<p><b>Permit Requirement</b> (specify permit condition #)</p>	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

Form Completed By: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**FESOP Quarterly Report**

Source Name: Allomatic Products Company  
Source Address: 609 East Chaney Street, Sullivan, Indiana 47882  
Mailing Address: 609 East Chaney Street, P. O. Box 267, Sullivan, Indiana 47882  
NSR/FESOP No.: 153-12504-00015  
Limit: The single HAP input usage (before the catalytic oxidizer) from all the emission points, including insignificant activities shall be limited to 43 tons per twelve month period, rolled on a monthly basis.

YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	Single HAP input Usage This Month	Single HAP input Usage Previous 11 Months	Single HAP input Usage 12 Month Total
Month 1			
Month 2			
Month 3			

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

## **Indiana Department of Environmental Management Office of Air Management**

### **Technical Support Document (TSD) for a Federally Enforceable State Operating Permit (FESOP) and New Source Review (NSR)**

#### **Source Background and Description**

Source Name: Allomatic Products Company  
Source Location: 609 East Chaney Street, Sullivan, Indiana 47882  
County: Sullivan  
SIC Code: 3714  
NSR/FESOP No.: 153-12504-00015

Permit Reviewer: Aida De Guzman

The Office of Air Management (OAM) has reviewed a FESOP application from Allomatic Products Company relating to the operation of an automotive clutch plates and transmission parts manufacturing plant.

#### **Source Definition**

This automotive clutch plate and transmission parts manufacturing company consists of two (2) plants:

- (a) Allomatic Products Company is located at 609 East Chaney Street, Sullivan, Indiana 47882; and
- (b) RayMan Company, LLC is located at 312 South Street, Sullivan, Indiana 47882.

Since the two (2) plants are located on contiguous properties, have the same SIC codes and are owned by one (1) company, they will be considered one (1) source. The source has requested that for permit tracking purposes, the name Allomatic Products Company will be used for the whole source.

#### **New Emission Units and Pollution Control Equipment Receiving Advanced Source Modification Approval**

The application includes information relating to the prior approval for the construction and operation of the following equipment pursuant to 326 IAC 2-8-4(11):

- (a) Proposed New Construction:

- (1) One (1) adhesive coating line, to be identified as RM2002, which is capable of coating 300 torque rings per hour. The adhesive will be applied through a curtain coater. The VOC and HAP emissions will be controlled by a new 1.0 million British Thermal per hour (mmBtu/hr) catalytic oxidizer (S/V- ID S10).

### **Permitted Emission Units and Pollution Control Equipment**

- (b) The source consists of the following permitted emission units and pollution control devices:
  - (1) Various natural gas-fired space heater, ID5 with a maximum total heat input capacity of 16 million British Thermal Units per hour (mmBtu/hr);
  - (2) Two (2) etching lines M2002 and M2027, which are capable of etching a total of 10,200 steel plates per hour, and have a maximum usage of 4 pounds of acid per hour. The particulate matter emissions from these facilities are controlled by a packed tower scrubber (S/V -ID S1);
  - (3) Two (2) adhesive coating lines identified as M2003 and M2028, which are capable of coating a total of 10,200 steel friction cores per hour. The adhesive is applied through roll coaters. The volatile organic compounds (VOC) and hazardous air pollutant (HAP) emissions are controlled by a 1.5 mmBtu/hr catalytic oxidizer (S/V -ID S2);
  - (4) Two (2) OD sanders, identified as M2010.1 and M2010.2 capable of grinding a total of 11,400 bonded assemblies per hour. The particulate matter emissions from these sanders are controlled by baghouse (S/V - ID S6); and
  - (5) Two (2) opposed disk grinders, identified as RM1012 and RM1013 capable of grinding a total of 19,000 friction assemblies per hour. The PM emission is controlled by baghouse (SV- ID S14).

### **Insignificant Activities**

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Various natural gas-fired heaters, burners/ovens, including the incinerators with a total heat input capacity of 6.5 mmBtu/hr.
- (b) Combustion source flame safety purging on startup.
- (c) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (d) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughput less than 12,000 gallons.
- (e) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (f) Machining where an aqueous cutting coolant continuously floods the machining interface.

- (g) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (h) Cleaners and solvents characterized as follows:
  - (1) Having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38 degrees C (100°F) or;
  - (2) Having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20 degrees C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (i) The following equipment related to manufacturing activities not resulting in the emissions of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (j) Closed loop heating and cooling systems.
- (k) Activities associated with the treatment of wastewater streams with an oil and greases content less than or equal to 1% by volume.
- (l) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.
- (m) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other filtration equipment.
- (n) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as bag filter or cyclone.
- (o) Paved and unpaved roads and parking lots with public access.
- (p) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks and fluid handling equipment.
- (q) On-site fire and emergency response training approved by the department.
- (r) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying and woodworking operations.
- (s) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees C).
- (t) A laboratory defined in 326 IAC 2-7-1(20)(C).
- (u) Other Categories not previously identified:
  - (1) Three (3) induction bonders, M2033, M2045, and M2046 with a total rate of 1,800 pounds of clutch per hour, venting to Stack S/V- ID S3.
  - (2) Two (2) rotary bonders, identified as M2008, with a rate of 270 pounds per hour and M2009 with a rate of 230 pounds per hour, venting to stack S/V- ID S4 and S/V- ID S5 respectively.

- (2) S-11 Bonding oven.
- (3) S-7 Electric batch oven.
- (4) One (1) degreaser, identified as RM6012 with two (2) compartments, one compartment has a capacity of 336 gallons of liquid was and the other compartment has capacity of 336 gallons of liquid rinse. The degreaser has a 1.8 mmBtu/hr liquid heater and 0.8 mmBtu/hr dryer.
- (5) Fugitive - steel blanking (die lubricant, rust prevention application).
- (6) Two (2) paper blanking facilities, identified as M5001 and M5002 with a total capacity of 290 friction paper per hour, and 11,000 paper rings per hour. The particulate matter emissions from facilities are controlled by a cyclone (S/V- ID S9).

### Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) MSOP 153-12089-00015, issued on July 19, 2000
- (b) Registration 153-11039-00015, issued on September 21, 1999
- (c) CP153-10144-00015, issued on February 10, 1999,
- (d) Exemption 153-8762-00015, issued on August 27, 1997,
- (e) Exemption 153-5013-00015, issued on February 5, 1996.

All conditions from previous approvals were incorporated into this FESOP.

### Recommendation

The staff recommends to the Commissioner that the FESOP be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP application for the purposes of this review was received on July 21, 2000, and August 24, 2000.

### Emission Calculations

- (a) Proposed New Adhesive Coating Line RM2002: See Page 1 of 2 TSD Appendix A for detailed calculations.
- (b) Two Existing Adhesive Coating Lines M2003 and M2028: See Page 1 of 2 TSD Appendix A for detailed calculations.
- (c) Natural Gas Combustion: See Page 2 of 2 TSD Appendix A for detailed calculations.
- (d) Two Etching Lines: Controlled by a packed tower scrubber, with a control efficiency of 96% and a 100% capture system.

Assume the worst case that all the hydrochloric acid (HCL) used is 100% flashed off.

$$\begin{aligned} \text{Uncontrolled HCL/PM/PM10 Emissions} &= 4.0 \text{ lb/hr} * 35.2\% \text{ by wt.} * 8760 \text{ hrs/yr} * \\ &\text{ton/2000 lbs} \\ &= 6.2 \text{ tons/yr} \end{aligned}$$

$$\begin{aligned} \text{Controlled HCL/PM/PM10 Emissions} &= 6.2 \text{ tons/yr} (1-0.96) \\ &= 0.248 \text{ ton/yr} \end{aligned}$$

(e) Opposed Disk Grinding/Sanding Wheels, M2010.1 and M2010.2:

(1) Maximum Production Rate: 9,500 pc/hr per grinder \* 2 grinders = 19,000 pc/hr

(a) Part Specification:

(1)	5.6 in OD	
(2)	4.6 in ID	
(3)	Core Mass	= 0.077 lbs
(4)	Wafer Mass	= 0.008 lb/wafer * 2 = 0.017 lb
(5)	Assembly Mass	= 0.094 lbs

(2)	0.016 in. material removed	= 0.008 in/side * 2
(3)	Paper Density	= 0.022 lb/in <sup>3</sup>
(4)	Dust Density	= 0.008 lb/in <sup>3</sup>
(5)	Ventilation Per Grinder	= 1700 acfm * 2 = 3400 acfm
(6)	Dust Collection Efficiency	= 95%

Calculations:

(1) Volume of Material Removed:  

$$V = \frac{B(5.6^2 - 4.6^2)}{4} * 0.016 \text{ in.} = 0.128 \text{ in}^3$$

(2) Mass Removed Per Part:  

$$m = \text{paper density, } 0.022 \text{ lb/in}^3 * V, 0.128 \text{ in}^3$$

$$= 2.816 \times 10^{-3} \text{ lb/pc}$$

$$\begin{aligned} m &= 19,000 \text{ pcs/hr} * 2.816 \times 10^{-3} \\ &= 53.5 \text{ lb/hr} \end{aligned}$$

(3) PM/PM10 uncontrolled emissions =  $E_{in}$  : Assuming 100% Capture and 95% Removal

$$\begin{aligned} E_{in} &= 53.5 \text{ lb/hr} \\ &= 234 \text{ tons/yr} \end{aligned}$$

PM/PM10 controlled emissions =  $E_{out}$

$$\begin{aligned} E_{out} &= 53.5 \text{ lb/hr} (1-0.95) \\ &= 2.7 \text{ lb/hr} \\ &= 11.8 \text{ tons/yr} \end{aligned}$$

$$\begin{aligned} \text{Grain Loading} &= 54.1 \text{ lb/hr} * \text{hr/60 min} * \text{min/10,000 acf} * 7000 \text{ gr/lb} \\ &= 0.63 \text{ gr/ft}^3 \end{aligned}$$

(4) Part Throughput = 19,200 pc/hr \* 0.094 lb/pc  
 = 1802 lb/hr

(f) Outside Diameter (OD) Sanders RM1012 and RM1013:

- (1) Maximum Production Rate: 5,700 pcs/hr \* 2 sanders = 11,400 pcs/hr
- (2) Depth of material removed per side = 0.010 inch (in.)
- (3) Dust collector efficiency, n = 95%
- (4) Capture System = 100%
- (5) Air flow rate, Q = 10,000 ft<sup>3</sup>/min
- (6) Core thickness, t<sub>core</sub> = 0.036 in.
- (7) Wafer thickness, t<sub>wafer</sub> = 0.036 in.
- (8) Outside diameter, OD = 5.6 in.
- (9) Inside diameter, ID = 4.6 in.
- (10) Paper density, P<sub>paper</sub> = 0.022 lb/in<sup>3</sup>
- (11) Steel density, P<sub>steel</sub> = 0.281 lb/in<sup>3</sup>
- (12)

Calculations:

- (1) P<sub>PM</sub>, Mass weight density of the plate assembly:

$$P_{PM} = \frac{t_{core}}{t_{core} + 2 t_{wafer}} (P_{steel}) + \frac{t_{wafer}}{t_{core} + 2 t_{wafer}} (P_{paper})$$

$$= 0.101 \text{ lb/in}^3$$

- (2) V, Volume of part being removed:

$$V = 2 * (\pi * OD * (t_{core} + 2 * t_{wafer}) * \text{Depth})$$

$$= 0.038 \text{ in}^3/\text{part}$$

$$\begin{aligned} \text{Uncontrolled PM/PM10 emission} &= V * P_{PM} \\ &= 0.038 \text{ in}^3/\text{part} * 0.101 \text{ lb/in}^3 \\ &= 0.0038 \text{ lb PM/pc} \\ &= 0.0038 \text{ lb PM/pc} * 11,400 \text{ pcs/hr} * \text{ton}/2000 \text{ lb} * 8760 \text{ hrs/yr} \\ &= 189.7 \text{ tons/yr} \end{aligned}$$

$$\begin{aligned} \text{Controlled PM/PM10 Emissions} &= 189.7 (1-0.95) \\ &= 9.5 \text{ tons/yr} \end{aligned}$$

SUMMARY OF EMISSIONS (TONS/YEAR)													
Pollutant	Adhesive Coating				Natural Gas Combustion	Etching Lines Uncontrolled Emissions	Etching Lines Controlled Emissions	Opposed Disk Grinding Uncontrolled Emissions	Opposed Disk Grinding Controlled Emissions	OD Sanders Uncontrolled Emissions	OD Sanders Controlled Emissions	Total Uncontrolled Emissions	Total Controlled Emissions
	New Coater Uncontrolled Emissions	New Coater Controlled Emissions	Existing Coater Uncontrolled Emissions	Existing Coaters Controlled Emissions									
PM	0.0	0.0	0.0	0.0	0.2	6.2	0.25	234.0	11.8	189.7	9.5	430.0	21.75
PM10	0.0	0.0	0.0	0.0	0.7	6.2	0.25	234.0	11.8	189.7	9.5	430.6	22.3
VOC	25.0	1.25	49.86	2.5	0.6	0.0	0.0	0.0	0.0	0.0	0.0	75.46	4.35
NOx	0.0	0.0	0.0	0.0	9.8	0.0	0.0	0.0	0.0	0.0	0.0	9.8	9.8
SO2	0.0	0.0	0.0	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.1
CO	0.0	0.0	0.0	0.0	8.3	0.0	0.0	0.0	0.0	0.0	0.0	8.3	8.3
HAP	14.28	0.71	3.03	0.15	0.0	6.2	0.25	0.0	0.0	0.0	0.0	23.51	1.11

**Potential To Emit for the Source**

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	430.0
PM-10	430.6
SO <sub>2</sub>	0.1
VOC	75.46
CO	8.3
NO <sub>x</sub>	9.8

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Methyl Ethyl Ketone	14.28
Methanol	2.8
Formaldehyde	0.23
Hydrochloric Acid	6.2
<b>TOTAL</b>	<b>23.51</b>

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of Particulate Matter Less than Ten Microns (PM10) are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7. The source however, chose to operated under the Federally Enforceable State Operating Permit (FESOP) Program.

**Potential to Emit After Issuance**

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Federally Enforceable State Operating Permit.

Process/facility	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Natural Gas	1.0	0.1	0.5	8.3	9.9	0.0
Adhesive Coating	0.0	0.0	3.75	0.0	0.0	0.86
Etching Lines	2.0	0.0	0.0	0.0	0.0	0.25
Opposed Disk Grinders	52.0	0.0	0.0	0.0	0.0	0.0
OD Sanders	41.0	0.0	0.0	0.0	0.0	0.0
Insignificant Activities	3.0	0.0	0.0	0.0	0.0	0.0
<b>Total Emissions</b>	<b>99.0</b>	<b>0.1</b>	<b>4.25</b>	<b>8.3</b>	<b>9.9</b>	<b>1.11</b>

Methodology:  
 Facility PM10 Limit =  $\frac{\text{Facility Emission}}{\text{Sourcewide Emissions}} * \text{PM10 Limit, 95 tons/yr}$

**County Attainment Status**

The source is located in Sullivan County.

Pollutant	Status (attainment, maintenance attainment or unclassifiable; severe, moderate, marginal, or nonattainment)
PM-10	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	attainment
CO	attainment
Lead	not determined

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO<sub>x</sub>) are precursors for the formation of ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Sullivan County has been designated as attainment or unclassifiable for ozone.

**Federal Rule Applicability**

- (a) New Source Performance Standards (NSPS)  
 There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
  - (1) 40 CFR Part 60.110, Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984. The affected facility to which this subpart applies is each storage vessel with a capacity greater than or equal to 40 cubic meters (10,567 gallons)  
  
 This rule is not applicable to the storage tanks listed under the insignificant activities, because their capacities are each less than 10,567 gallons.
- (b) National Emission Standards for Hazardous Air Pollutants (NESHAPs)
  - (1) 40 CFR Part 63.460, Subpart T - Halogenated Emission Standards for Halogenated Solvent Cleaning. One (1) degreaser, identified as RM6012, an insignificant activity is not subject to this NESHAP, because no halogenated solvent is used in the cleaning process.
  - (2) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

**State Rule Applicability - Entire Source**

- (a) 326 IAC 5-1 (Visible Opacity Limitations)  
 Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
  - (1) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
  - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**State Rule Applicability - Individual Facilities**

- (a) 326 IAC 2-8 (FESOP):
  - (1) The PM10 emissions from the following facilities are limited to less than 100 tons/year in order that 326 IAC 2-7 (Part 70) will not apply:

Process/facility	PM10 Emissions (ton/year)	PM10 Emissions (lbs/hr)

Natural Gas	* 1.0	-
Adhesive Coating	0.0	-
Etching Lines	2.0	0.45
Opposed Disk Grinders	52.0	11.8
OD Sanders	41.0	9.4
Insignificant Activities	* 3.0	-
<b>Total Emissions</b>	<b>99.0</b>	<b>21.7</b>

\*since these values are insignificant no hourly limit will be set for them, but they will be deducted from the limit of 99 tons/yr.

- (2) The single HAP (MEK) is emitted at 14.28 tons/yr, which is greater than 10 tons/yr. Therefore, the source wide single HAP input usage is limited to 43 tons/yr before the oxidizers and using 79% overall control efficiency. This limit and the operation of the oxidizers shall result to a single HAP emissions after control of less than 10 tons/yr.

(b) 326 IAC 8-2-9 (Miscellaneous Metal Coating)

- (1) The proposed new adhesive coating line, to be identified as RM2002, is subject to this rule, because it has potential VOC emissions of equal to 25 tons per year. This rule mandates a limit of 3.0 pounds per gallon less water, delivered to the coating applicator for all other types of coatings.

The adhesive coating to be used in the proposed coating line emits 5.39 pounds of VOC per gallon less water, which is greater than the limit of 3.0 pounds per gallon less water. The source is proposing to use one of the compliance methods in 326 IAC 8-1-2 by installing a new catalytic oxidizer to comply with the limit.

The equivalent emission limit in pounds per gallon of coating solids, using one of the compliance methods in 326 IAC 8-1-2(a) is determined by the following equation:

$$\begin{aligned}
 E &= \frac{L}{1 - L/D} \\
 &= \frac{3.0 \text{ lb/gal}}{1 - 3.0 / 6.8} \\
 &= 5.36 \text{ pounds per gallon solids}
 \end{aligned}$$

Where:

- E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.  
 L = Applicable emission limit from this article in pounds per gallon of coating  
 D = Density of VOC in coating in pounds per gallon of VOC  
 = Density of coating, lb/gal \* wt % organic \* (1/volume % organic)  
 = 7.7 lb/gal \* 70% \* (1 / 78.8%)

The equivalent overall efficiency of the capture system and control device as a percentage needed in order to meet the emission limitation is determined by the following equation:

$$O = \frac{V - E}{V} * 100$$

$$\begin{aligned} &= \frac{V}{25.42} * 100 \\ &= \frac{25.42 - 5.36}{25.42} * 100 \\ &= 79\% \end{aligned}$$

The new system will have an overall control efficiency of 95% (95% destruction efficiency and 100% capture) and therefore, meets the rule.

Where:

V = The actual VOC content of the coating in pounds per gallon of coating solids as applied.  
= 25.42 lb/gal

E = Equivalent emission limit in pounds of VOC per gallon of coating solid as applied

O = Equivalent overall efficiency of the capture system and control device as percentage.

- (2) The existing two (2) adhesive coating lines identified as M2003 and M2028 are subject to 326 IAC 8-2-9, because each actual emissions are greater than 15 pounds per day. The adhesive coating currently being used emits 5.66 pounds per gallon of coating less water. These lines are currently controlled by an existing catalytic oxidizer (S/V -ID S2), which is required by CP 153-10144-00015, issued on February 10, 1999 to comply with the limit. CP 153-10144-00015 requires this catalytic oxidizer to have an overall control of 42.2%. This percent overall control requirement will change due to change in the data. See below calculations.

The equivalent emission limit in pounds per gallon of coating solids, using one of the compliance methods in 326 IAC 8-1-2(a) is determined by the following equation:

$$\begin{aligned} E &= \frac{L}{1 - L/D} \\ &= \frac{3.0 \text{ lb/gal}}{1 - 3.0 / 7.52} \\ &= 5.0 \text{ pounds per gallon solids} \end{aligned}$$

Where:

E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.

L = Applicable emission limit from this article in pounds per gallon of coating

D = Density of VOC in coating in pounds per gallon of VOC

= Density of coating, lb/gal \* wt % organic \* (1/volume % organic)

= 7.5 lb/gal \* 76% \* (1 / 75.8%)

The equivalent overall efficiency of the capture system and control device as a percentage needed in order to meet the emission limitation is determined by the following equation:

$$\begin{aligned} O &= \frac{V - E}{V} * 100 \\ &= \frac{33.61 - 5.0}{33.61} * 100 \\ &= 85\% \end{aligned}$$

The source is in compliance with the 3.0 pounds per gallon less water limit, for all

other types of coating under 326 IAC 8-2-9, because the existing catalytic oxidizer's actual overall control of 95% (95% destruction efficiency and 100% capture) exceeds the required efficiency of 85%.

Where:

V = The actual VOC content of the coating in pounds per gallon of coating solids as applied.

= 33.61 lb/gal

E = Equivalent emission limit in pounds of VOC per gallon of coating solid as applied

O = Equivalent overall efficiency of the capture system and control device as percentage.

(c) 326 IAC 6-3-2 (Process Operations)

This rule mandates a PM emissions limit using the following equation:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

Facility/Process	Process Weight Rate (tons/hr)	PM Limit (lb/hr)
Acid Etching, M2002 & M2027	0.51	2.6
OD Sanders, M2010.1 & M2010.2	0.57	2.8
Opposed Disk Grinders, RM1012 & RM1013	0.95	3.96

(d) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

(1) The etching operation permitted in CP153-10144-00015, issued on February 10, 1999 was not determined to be subject to this rule, since it does not emit single HAP at 10 tons per year or greater nor emit combined HAPs at 25 tons per year or greater.

(2) The new adhesive coating line, RM2002 is emitting Methyl Ethyl Ketone (MEK) at levels greater than 10 tons per year. Therefore, it is subject to 326 IAC 2-4.1. This line is in compliance with the rule, since it is controlled by a new catalytic oxidizer.

### Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state

and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows

1. The opposed disk grinders baghouse has applicable compliance monitoring conditions as specified below:
  - (a) Daily visible emissions notations of the opposed disk grinders baghouse SV- ID S14 shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.
  - (b) The Permittee shall record the total static pressure drop across the baghouse controlling the opposed disk grinders, at least once daily when **any** of the opposed disk grinder is in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 0.5 to 2.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

These monitoring conditions are necessary to ensure compliance with the PM10 limit under 326 IAC 2-8.

2. The proposed catalytic oxidizer and the existing catalytic oxidizer have applicable compliance monitoring conditions as specified below:

- (a) The new catalytic oxidizer shall operate at a minimum temperature of 350°F, or a minimum temperature, duct velocity or fan amperage established during most recent stack tests that will correspond to the overall control of 79%.
- (b) The existing catalytic oxidizer shall operate at a minimum temperature of 650°F, or a minimum temperature, duct velocity or fan amperage established during most recent stack tests that will correspond to the overall control of 85%.

### **Conclusion**

The operation of this clutch plates and transmission parts manufacturing plant shall be subject to the conditions of the attached proposed **New Source Review/Federally Enforceable State Operating Permit (NSR/FESOP No.: 153-12504-00015)**.

# Indiana Department of Environmental Management Office of Air Management

## Addendum to the Technical Support Document for a Federally Enforceable State Operating Permit (FESOP) and New Source Review (NSR)

Source Name: Allomatic Products Company  
Source Location: 609 East Chaney Street, Sullivan, Indiana 47882  
County: Sullivan  
SIC Code: 7389  
NSR/FESOP No.: 153-12504-00015  
Permit Reviewer: Aida De Guzman

On September 30, 2000, the Office of Air Management (OAM) had a notice published in the Sullivan Daily Times, Sullivan, Indiana, stating that Allomatic Products Company had applied for a Federally Enforceable State Operating Permit for the operation of an automotive clutch plates and transmission parts manufacturing plant, and a New Source Review for the construction of a new adhesive coating line, and few insignificant activities. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review, the OAM has decided to make the following revisions to the permit (changes are bolded and deletions are struck-through for emphasis):

- (a) Condition B.1 Permit No Defense in the proposed permit was deleted in the final permit. Subsequent conditions were re-numbered accordingly.
- (b) Condition B.14, Emergency Provisions, now B.13 was revised as follows:

### B.1-4 3 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Management, Compliance Section), or  
Telephone Number: 317-233-5674 (ask for Compliance Section)  
Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted ~~notice~~ **the attached Emergency Occurrence Report Form or its equivalent**, either ~~in writing by mail~~ or facsimile, ~~of the emergency~~ to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;  
(B) Any steps taken to mitigate the emissions; and  
(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3-(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in ~~compliance~~ **accordance** with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules. 326 IAC 2-8-12 (f)

- (g) Operations may continue during an emergency only if the following conditions are met:
- (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

**B.15 14 Deviations from Permit Requirements and Conditions [326 IAC 2-8-5(4)(3)(C)(ii)]**

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

~~within ten (10) calendar days from the date of the discovery of the deviation.~~ **using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.**

**The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
  - ~~(2) An emergency as defined in 326 IAC 2-7-1(12); or~~
  - ~~(3) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.~~
  - ~~(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.~~

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) ~~Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

**Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.**

- (d) ~~Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.~~

- (d) Condition C.17 General Reporting Requirements was revised as follows:

C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) ~~To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Semi-Annual Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.~~  
**The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period.**

The **Quarterly Deviation and Compliance Monitoring Report** shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) ~~All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

- ~~(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.~~

- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. **Reporting periods are based on calendar years.**



**Appendix A: Emissions Calculations  
Natural Gas Combustion Only  
MM BTU/HR <100  
Small Industrial Boiler**

1 @ 16 mmBtu/hr space heater  
 Insignificant Activity:  
 6.5 mmBut/hr various heaters,  
 including the 'incinerators

**Company Name** Allomatic Products Company  
**Address City** 609 East Chaney St., Sullivan, IN 47882  
**FESOP/NSR I** 153-12504-00015  
**Reviewer:** Aida De Guzman  
**Date Applicat** July 21, 2000

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
16.0	140.2
6.5	56.0

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission, tons/yr (16 mmBtu/hr)	0.1	0.5	0.0	7.0	0.4	5.9
Potential Emission, tons/yr (6.5 mmBtu/hr)	0.1	0.2	0.0	2.8	0.2	2.4
<b>TOTAL (tons/yr)</b>	<b>0.2</b>	<b>0.7</b>	<b>0.0</b>	<b>9.8</b>	<b>0.6</b>	<b>8.3</b>

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

\*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton  
 above  
 emission