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**FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP) RENEWAL
OFFICE OF AIR QUALITY**

**ITT Aerospace Communications Division
7310 Innovation Blvd
Fort Wayne, Indiana 46801**

(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.: F003-13873-00185	
Issued by:Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date:May 8, 2003 Expiration Date:May 8, 2008

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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 Quality (OAQ). 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)]

The Permittee owns and operates a stationary printed circuit board manufacturing plant.

Authorized individual:	Manager, Environmental Health & Safety
Source Address:	7310 Innovation Blvd., Fort Wayne, Indiana 46801
Mailing Address:	7310 Innovation Blvd., Fort Wayne, Indiana 46801
General Source Phone:	(260) 451-5032
SIC Code:	3663
Source Location Status:	Allen
Source Status:	Attainment for all criteria pollutants Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD 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)]

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

- (a) Conformal Coater #2, identified as Unit 3, installed in 1993, using air atomization applicators, coating a maximum of 240 plastic parts per hour, utilizing a fully enclosed chamber with absorbent material on floor surface and dry filters for particulate matter overspray control and exhausting through one (1) stack, identified as stack S-3;
- (b) Three (3) cold cleaners performing organic solvent degreasing operations:
 - (1) Conformax AU Dip Tank, identified as Unit 1, installed in 1993, with a maximum capacity of 10 gallons, exhausting at stack S-1;
 - (2) EMC Stencil Cleaner Machine, identified as Unit 9, installed in 1993, used for cold cleaning operations, with a maximum capacity of 45 pounds per hour, exhausting at stack S-9 and
 - (3) EMC Resolute 100 IPA Cleaner, identified as Unit 10, installed in 1995, with a maximum capacity of 240 pieces per hour, exhausting at stack S-10.

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

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:

- (1) Three (3) natural gas fired boilers, identified as Units 13, 14, and 15 each rated at 2.5 million (MM)Btu per hour, all installed in 1993, exhausting at stack S-16a, S-16b and S-16c, respectively.
- (b) Two (2) routers, identified as Units 11 and 12, with a capacity of 115 pieces per hour each, with a common baghouse for particulate control, identified as S-15.
- (c) Activities emitting less than one (1) ton per year of a single HAP and less than fifteen (15) pounds per day of VOC:
 - (1) SRT Rework Stations that are currently out of service;
 - (2) Spot Cleaning in Demasking area;
 - (3) Chipbonder application;
 - (4) Loctite Application;
 - (5) Glue Removal;
 - (6) Epoxy Application;
 - (7) Hand Solvent Cleaning Activities;
 - (8) Hand Isopropyl Alcohol Cleaning Activities;
 - (9) Solder paste application;
 - (10) The Room Temperature Vulcanization (RVT) application process done using Loctite 5084 UV Cure RVT, containing less then 5% VOC by weight.
- (d) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 including:
 - (1) Two (2) Baron Blakeslee degreasers using en-solv solvent;
 - (2) SMD Area Branson B950R Degreaser using Ionox I3950 solvent.
- (e) Activities with particulate matter emissions equal to or less than 5 pounds per hour or 25 pounds per day:
 - (1) Hand-held Machine Shop Activities - including cutoff saws, and spot and portable welding;
 - (2) Model Shop Grinding Area utilizing hand-held equipments - including pedestal grinders, sanders, and sand blaster equipment with internal filter system;
 - (3) Hand soldering;
 - (4) Soltec Wave Solder Machine.
- (f) Other activities or categories with emissions equal to or less than the insignificant thresholds specified in 326 IAC 2-7-1(21) including:
 - (1) Paint hoods;
 - (2) Chemical mixing and dispensing room;
 - (3) Hand application tinning stations;
 - (4) Hand acrylic conformal application;
 - (5) Heat guns;
 - (6) Solder mask operation;
 - (7) Bench cleaning/Flux Removal;

- (8) ESD mat cleaning;
- (9) Heatsink Compound Applications;
- (10) Abrasive Removal of Conformal Coat/Swam Blaster;
- (11) Urethane Conformal Coat;
- (12) Glyptal Application;
- (13) Iridite Hand Application;
- (14) Solder Machine clean-up;
- (15) Conformal coat oven cleaning;
- (16) LSI Repair/TACFLUX 001;
- (17) Fusion UV Cure Oven;
- (18) Heller I/R Oven;
- (19) Soltec I/R Ovens;
- (20) Two (2) RD2 Machines - vapor phase reflow machines use to repair defective parts on a completed circuit board using Fluorinert (FC-5312) chemical;
- (21) Alpha Lab Hood;
- (22) Sealed Air Versa Packer Machine;
- (23) UV Curing Chamber;
- (24) Smart Sonic Stencil Silk Screening;
- (25) Stencil Rubber Stamping;
- (26) Ultrasonic Cleaners;
- (27) Lab Fume Hoods;
- (28) Wet Cutting;
- (29) Multi-Solder Vaporette;
- (30) Electric Drying Ovens;
- (31) Chemical Lab Pack Activities.

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

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 Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deletedby this permit.
- (b) All previous registrations and permits are superseded by this permit.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

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

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.3 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.4 Enforceability [326 IAC 2-8-6]

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

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.6 Severability [326 IAC 2-8-4(4)]

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

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

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

(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 Quality
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, OAQ within a reasonable time, any information that IDEM, OAQ 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). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

- (c) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ 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.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit 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.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (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 an 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, using the attached Certification Form, with each submittal requiring certification.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (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. All certifications 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 Branch, Office of Air Quality
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, OAQ, 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, OAQ 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.13 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 maintain and implement Preventive Maintenance Plans (PMPs), 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.
- (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, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ 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).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. 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.14 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 2-8-12.

- (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 describes 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, OAQ 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 No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 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 Quality
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 2-8-4(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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ 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, OAQ 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.
- (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 material of substantial economic value.
- Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.15 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 Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

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

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists

independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.16 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, OAQ 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, OAQ 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, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]
[326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ 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 Quality
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, OAQ on or before the date it is due.
- (2) If IDEM, OAQ 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, OAQ 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, OAQ, any additional information identified as needed to process the application.

B.18 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 Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015
- Any such application shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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.19 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

- (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 Quality
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, OAQ, in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

(b) 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).

(c) 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, OAQ or U.S. EPA is required.

B.20 Permit Revision Requirement [326 IAC 2-8-11.1]

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

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]

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, OAQ and 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.

B.22 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 Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application 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).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ 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 317-233-4320 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P][326 IAC 6-3-2]

- (a) Pursuant to 40 CFR 52 Subpart P, the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), the allowable particulate emissions rate from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 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 any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also satisfy the requirements of 326 IAC 2-3 (Emission Offset);
 - (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) The potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.
- (c) 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 the source's potential to emit does not exceed the above specified limits.
- (d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 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.4 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.

C.5 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.

C.6 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).

C.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or 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.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. 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 14-10-1 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.9 Performance Testing [326 IAC 3-6]

- (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, OAQ.

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 Quality
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, OAQ 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, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM,

OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. 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.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

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

C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

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; 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).

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

-
- (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 response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, 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 response 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, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do 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.15 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required data, reports 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) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.16 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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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 Quality
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, OAQ on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.17 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) Conformal Coater #2, identified as Unit 3, installed in 1993, using air atomization applicators, coating a maximum of 240 plastic parts per hour, utilizing a fully enclosed chamber with absorbent material on floor surface and dry filters for particulate matter overspray control and exhausting through one (1) stack, identified as stack S-3;

(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 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 (General Reduction Requirements), the VOC content delivered to the applicator of Conformal Coater #2 shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply.

D.1.2 HAP Limit [326 IAC 2-8-4]

The coating operation shall limit HAP usages to less than 9.99 tons and 22.35 tons of any single HAP and any combination of HAPs, respectively, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period, with compliance determined at the end of each month. These usage limits are required to limit the source's potential to emit of any single HAP and any combination of HAPs to less than 10 and 25 tons, respectively, per 12 consecutive month period. Compliance with these limits make 326 IAC 2-7 not applicable.

D.1.3 Particulate-Matter (PM) [40 CFR 52 Subpart P]

Pursuant to 40 CFR 52 Subpart P, the PM from Conformal Coater #2 shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation 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:

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

D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.1.5 Volatile Organic Compounds (VOC) and HAPs [326 IAC 8-1-2][326 IAC 8-1-4]

Compliance with the VOC and HAP usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC and HAP data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Compliance Monitoring Requirements

D.1.6 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating booth shall be controlled by the dry particulate filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.1.7 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack while the booth is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

D.1.8 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly 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.1.1 and D.1.2.
 - (1) The amount of coating material and solvent less water used on a monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (2) The cleanup solvent usage for each month;
 - (3) The total VOC and HAP usage for each month; and
 - (4) The weight of VOCs and HAPs emitted for each compliance period.

- (b) To document compliance with Condition D.1.7, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

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

D.1.9 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.2 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 require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 FACILITY OPERATION CONDITIONS

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

- (b) Three (3) cold cleaners performing organic solvent degreasing operations:
- (1) Conformax AU Dip Tank, identified as Unit 1, installed in 1993, with a maximum capacity of 10 gallons, exhausting at stack S-1;
 - (2) EMC Stencil Cleaner Machine, identified as Unit 9, installed in 1993, used for cold cleaning operations, with a maximum capacity of 45 pounds per hour, exhausting at stack S-9 and
 - (3) EMC Resolute 100 IPA Cleaner, identified as Unit 10, installed in 1995, with a maximum capacity of 240 pieces per hour, exhausting at stack S-10.

(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.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.2.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:

- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), for cold cleaning facility construction of which commenced after July 1, 1990, the Permittee shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

SECTION D.3 FACILITY OPERATION CONDITIONS

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

Insignificant Activities:

- (a) Three (3) natural gas fired boilers, identified as Units 13, 14, and 15 each rated at 2.5 million (MM)Btu per hour, all installed in 1993, exhausting at stack S-16a, S-16b and S-16c, respectively.
- (b) Two (2) routers, identified as Units 11 and 12, with a capacity of 115 pieces per hour each, with a common baghouse for particulate control, identified as S-15.
- (e) Activities with particulate matter emissions equal to or less than 5 pounds per hour or 25 pounds per day:
 - (1) Hand-held Machine Shop Activities - including cutoff saws, and spot and portable welding;
 - (2) Model Shop Grinding Area utilizing hand-held equipments - including pedestal grinders, sanders, and sand blaster equipment with internal filter system;
 - (3) Hand soldering;
 - (4) Soltec Wave Solder Machine.

(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.3.1 Particulate [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4(a) (Particulate Emission Limitations for Sources of Indirect Heating) the particulate emissions from the three (3) 2.5 MMBtu per hour heat input boiler shall each be limited to 0.6 pounds per MMBtu heat input.

D.3.2 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), allowable particulate emissions from the two (2) routers, the Machine Shop Activities, Model Shop Grinding Area, Hand soldering and Soltec Wave Solder Machine shall not exceed 0.551 pounds per hour.

SECTION D.4 FACILITY OPERATION CONDITIONS

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

Insignificant Activities

- (a) two (2) Baron Blakeslee degreasers; and
- (b) one (1) Branson degreaser.

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

Degreasing Operations

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

D.4.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-3]

Pursuant to 326 IAC 8-3-3 (Open Top Vapor Degreaser Operations), the Permittee shall operate the degreasers by complying with the following requirements:

- (a) Equip the vapor degreaser with a cover that can be opened and closed easily without disturbing the vapor zone;
- (b) Keep the cover closed at all times except when processing work loads through the degreaser;
- (c) Minimize solvent carryout by
 - (1) Racking parts to allow complete drainage;
 - (2) Moving parts in and out of the degreaser at less than 3.3 meters per minute (eleven (11) feet per minute);
 - (3) Degreasing the workload in the vapor zone at least thirty (30) seconds or until condensation ceases;
 - (4) Tipping out any pools of solvent on the cleaned parts before removal; and
 - (5) Allowing parts to dry within the degreaser for at least fifteen (15) seconds or until visually dry;

- (d) Not degrease porous or absorbent materials, such as cloth, leather, wood or rope;
- (e) Not occupy more than half of the degreaser's open top area with the workload;
- (f) Not load the degreaser such that the vapor level drops more than fifty percent (50%) of the vapor depth when the workload is removed;
- (g) Never spray above the vapor level;
- (h) Repair solvent leaks immediately, or shut down the degreaser;
- (i) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, such that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere;
- (j) Not use workplace fans near the degreaser opening;
- (k) Not allow visually detectable water in the solvent exiting the water separator; and
- (l) Provide a permanent, conspicuous label summarizing the operating requirements.

D.4.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-6]

- (a) Pursuant to 326 IAC 8-3-6(a) (Open Top Vapor Degreaser Operation and Control), the owner or operator of an open top vapor degreaser shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover than can be opened and closed easily without disturbing the vapor zone.
 - (2) Equip the degreaser with the following switches:
 - (A) A condenser flow switch and thermostat which shuts off sump heat if condenser coolant stops circulating or becomes too warm.
 - (B) A spray safety switch which shuts off spray pump if the vapor level drops more than ten (10) centimeters (four (4) inches).
 - (C) Equip the degreaser with a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (D) Equip the degreaser with one (1) of the following control devices:
 - (i) A freeboard ratio of seventy-five hundredths (0.75) or greater and a powered cover if the degreaser opening is greater than one (1) square meter (ten and eight-tenths (10.8) square feet).
 - (ii) A refrigerated chiller.
 - (iii) An enclosed design in which the cover opens only when the article is actually entering or exiting the degreaser.
 - (iv) A carbon adsorption system with ventilation which, with the cover open, achieves a ventilation rate of greater than or equal to fifteen (15) cubic meters per minute per square meter (fifty (50) cubic feet

per minute per square foot) of air to vapor interface area and an average of less than twenty-five (25) parts per million of solvent is exhausted over one (1) complete adsorption cycle.

- (v) Other systems of demonstrated equivalent or better control as those outlined in clauses (i) through (iv). Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-6(b) (Open Top Vapor Degreaser Operation and Control Requirements), the owner or operator of a cold cleaning emissions unit shall ensure that the following operating requirements are met:
- (1) Keep the cover closed at all times except when processing workloads through the degreaser.
 - (2) Minimize solvent carryout emissions by:
 - (A) Racking articles to allow complete drainage;
 - (B) Moving articles in and out of the degreaser at less than three and three-tenths (3.3) meters per minute (eleven (11) feet per minute);
 - (C) Degreasing the workload in the vapor zone at least thirty (30) seconds or until condensation ceases;
 - (D) Tipping out any pools of solvent on the cleaned articles before removal; and
 - (E) Allowing articles to dry within the degreaser for at least fifteen (15) seconds or until visually dry.
 - (3) Prohibit the entrance into the degreaser of porous or absorbent materials such as, but not limited to, cloth, leather, wood, or rope.
 - (4) Prohibit occupation of more than one-half ($\frac{1}{2}$) of the degreaser's open top area with the workload.
 - (5) Prohibit the loading of the degreaser to the point where the vapor level would drop more than ten (10) centimeters (four (4) inches) when the workload is removed.
 - (6) Prohibit solvent spraying above the vapor level.
 - (7) Repair solvent leaks immediately or shut down the degreaser if leaks cannot be repaired immediately.
 - (8) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.
 - (9) Prohibit the exhaust ventilation rate from exceeding twenty (20) cubic meters per minute per square meter (sixty-five (65) cubic feet per minute per square foot) of degreaser open area unless a greater ventilation rate is necessary to meet Occupational Safety and Health Administration requirements.

- (10) Prohibit the use of workplace fans near the degreaser opening.
- (11) Prohibit visually detectable water in the solvent exiting the water separator.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY**

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

Source Name: ITT Aerospace Communications Division
Source Address: 7310 Innovation Blvd., Fort Wayne IN 46801
Mailing Address: 7310 Innovation Blvd., Fort Wayne IN 46801
FESOP No.: F003-13873-00185

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 QUALITY
COMPLIANCE BRANCH
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: ITT Aerospace Communications Division
Source Address: 7310 Innovation Blvd., Fort Wayne IN 46801
Mailing Address: 7310 Innovation Blvd., Fort Wayne IN 46801
FESOP No.: F003-13873-00185

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 Quality (OAQ), 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) working 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 ₂ , VOC, NO _x , 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 QUALITY
COMPLIANCE DATA SECTION**

FESOP Quarterly Report

Source Name: ITT Aerospace Communications Division
Source Address: 7310 Innovation Blvd., Fort Wayne IN 46801
Mailing Address: 7310 Innovation Blvd., Fort Wayne IN 46801
FESOP No.: F003-13873-00185
Facility: Conformal Coater #2
Parameter: VOC
Limit: VOC usage of less than 25 tons per 12 consecutive month period, with compliance determined at the end of each month.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Usage This Month	VOC Usage Previous 11 Months	VOC 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 QUALITY
 COMPLIANCE DATA SECTION**

FESOP Quarterly Report

Source Name: ITT Aerospace Communications Division
 Source Address: 7310 Innovation Blvd., Fort Wayne IN 46801
 Mailing Address: 7310 Innovation Blvd., Fort Wayne IN 46801
 FESOP No.: F003-13873-00185
 Facility: Conformal Coater #2
 Parameter: HAPs
 Limit: HAPs usage of less than 9.99 tons and 22.35 tons of any single HAP and any combination of HAPs, respectively, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period, with compliance determined at the end of each month.

YEAR: _____

Month	Single HAP Emission This Month (tons)	Single HAP Emission Previous 11 Months (tons)	Single HAP Emission 12 Month Total (tons)
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 QUALITY
 COMPLIANCE DATA SECTION**

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

Source Name: ITT Aerospace Communications Division
 Source Address: 7310 Innovation Blvd., Fort Wayne IN 46801
 Mailing Address: 7310 Innovation Blvd., Fort Wayne IN 46801
 FESOP No.: F003-13873-00185

Months: _____ **to** _____ **Year:** _____

<p>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>9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.</p>	
<p>9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD</p>	
<p>Permit Requirement (specify permit condition #)</p>	
<p>Date of Deviation:</p>	<p>Duration of Deviation:</p>
<p>Number of Deviations:</p>	
<p>Probable Cause of Deviation:</p>	
<p>Response Steps Taken:</p>	
<p>Permit Requirement (specify permit condition #)</p>	
<p>Date of Deviation:</p>	<p>Duration of Deviation:</p>
<p>Number of Deviations:</p>	
<p>Probable Cause of Deviation:</p>	
<p>Response Steps Taken:</p>	

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

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document (TSD) for a Federally Enforceable State Operating Permit (FESOP) Renewal

Source Name:	ITT Aerospace Communications Division
Source Location:	7310 Innovation Blvd., Fort Wayne, Indiana 46801
SIC Code:	3663
County:	Allen
Operation Permit No.:	F003-13873-00185
Permit Reviewer:	Alic Bent /EVP

On March 21, 2003, the Office of Air Quality (OAQ) had a notice published in the News Sentinel, Fort Wayne, Indiana, stating that ITT Aerospace Communications Division had applied for a Federally Enforceable State Operating Permit (FESOP) Renewal for the operation of a stationary printed circuit board manufacturing plant. The notice also stated that OAQ proposed to issue a Federally Enforceable State Operating Permit Renewal for this operation and provided information on how the public could review the proposed FESOP Renewal 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 FESOP Renewal should be issued as proposed.

Upon further review, the OAQ has decided to make the following changes to the FESOP Renewal. Bolded language has been added and the language with a line through it has been deleted.

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

Condition C.2(b) has been revised to clarify that the less than 250 ton per year limit is not "Pursuant to 326 IAC 2-2".

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

- (b) ~~Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD));~~ **The potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.**

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Federally Enforceable State Operating Permit (FESOP) Renewal

Source Background and Description

Source Name: ITT Aerospace Communications Divisions
Source Location: 7310 Innovation Blvd., Fort Wayne, IN 46801
County: Allen
SIC Code: 3663
Operation Permit No.: F003-13873-00185
Permit Reviewer: Alic Bent/EVP

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from ITT Aerospace Communications Divisions relating to the operation of a stationary printed circuit board manufacturing plant. ITT Aerospace Communications Divisions was issued FESOP 003-5066-00185 on December 10, 1996.

Permitted Emission Units and Pollution Control Equipment

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

- (a) Conformal Coater #2, identified as Unit 3, installed in 1993, using air atomization applicators, coating a maximum of 240 plastic parts per hour, utilizing a fully enclosed chamber with absorbent material on floor surface and dry filters for particulate matter overspray control and exhausting through one (1) stack, identified as stack S-3;
- (b) Three (3) cold cleaners performing organic solvent degreasing operations:
 - (1) Conformax AU Dip Tank, identified as Unit 1, installed in 1993, with a maximum capacity of 10 gallons, exhausting at stack S-1;
 - (2) EMC Stencil Cleaner Machine, identified as Unit 9, installed in 1993, used for cold cleaning operations, with a maximum capacity of 45 pounds per hour, exhausting at stack S-9 and
 - (3) EMC Resolute 100 IPA Cleaner, identified as Unit 10, installed in 1995, with a maximum capacity of 240 pieces per hour, exhausting at stack S-10.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Insignificant Activities

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
 - (1) Three (3) natural gas fired boilers, identified as Units 13, 14, and 15 each rated at 2.5 million (MM)Btu per hour, all installed in 1993, exhausting at stack S-16a, S-16b and S-16c, respectively.
- (b) Two (2) routers, identified as Units 11 and 12, with a capacity of 115 pieces per hour each, with a common baghouse for particulate control, identified as S-15.
- (c) Activities emitting less than one (1) ton per year of a single HAP and less than fifteen (15) pounds per day of VOC:
 - (1) SRT Rework Stations that are currently out of service;
 - (2) Spot Cleaning in Demasking area;
 - (3) Chipbonder application;
 - (4) Loctite Application;
 - (5) Glue Removal;
 - (6) Epoxy Application;
 - (7) Hand Solvent Cleaning Activities;
 - (8) Hand Isopropyl Alcohol Cleaning Activities;
 - (9) Solder paste application;
 - (10) The Room Temperature Vulcanization (RVT) application process done using Loctite 5084 UV Cure RVT, containing less then 5% VOC by weight.
- (d) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 including:
 - (1) Two (2) Baron Blakeslee degreasers using en-solv solvent;
 - (2) SMD Area Branson B950R Degreaser using Ionox I3950 solvent.
- (e) Activities with particulate matter emissions equal to or less than 5 pounds per hour or 25 pounds per day:
 - (1) Hand-held Machine Shop Activities - including cutoff saws, and spot and portable welding;
 - (2) Model Shop Grinding Area utilizing hand-held equipments - including pedestal grinders, sanders, and sand blaster equipment with internal filter system;
 - (3) Hand soldering;
 - (4) Soltec Wave Solder Machine.
- (f) Other activities or categories with emissions less than the insignificant thresholds specified in 326 IAC 2-7-1(21) including:
 - (1) Paint hoods;
 - (2) Chemical mixing and dispensing room;
 - (3) Hand application tinning stations;
 - (4) Hand acrylic conformal application;
 - (5) Heat guns;

- (6) Solder mask operation;
- (7) Bench cleaning/Flux Removal;
- (8) ESD mat cleaning;
- (9) Heatsink Compound Applications;
- (10) Abrasive Removal of Conformal Coat/Swam Blaster;
- (11) Urethane Conformal Coat;
- (12) Glyptal Application;
- (13) Iridite Hand Application;
- (14) Solder Machine clean-up;
- (15) Conformal coat oven cleaning;
- (16) LSI Repair/TACFLUX 001;
- (17) Fusion UV Cure Oven;
- (18) Heller I/R Oven;
- (19) Soltec I/R Ovens;
- (20) Two (2) RD2 Machines - vapor phase reflow machines use to repair defective parts on a completed circuit board using Fluorinert (FC-5312) chemical;
- (21) Alpha Lab Hood;
- (22) Sealed Air Versa Packer Machine;
- (23) UV Curing Chamber;
- (24) Smart Sonic Stencil Silk Screening;
- (25) Stencil Rubber Stamping;
- (26) Ultrasonic Cleaners;
- (27) Lab Fume Hoods;
- (28) Wet Cutting;
- (29) Multi-Solder Vaporette;
- (30) Electric Drying Ovens;
- (31) Chemical Lab Pack Activities.

Permitted Emission Units and Pollution Control Equipment Removed from the Source

The following permitted emission units and pollution control devices have been removed from the source:

- (a) Corpane Cleaner #1;
- (b) Corpane Cleaner #2;
- (c) Corpane Cleaner #3, exhausting at stack S-3;
- (d) Conformal Coat #1;
- (e) Flow Solder #1;
- (f) Flow Solder #2;
- (g) GDP Pretin Workcell (listed as insignificant activity #5 in Section A.3 in the original FESOP; and
- (h) Electrovert Oven (listed as insignificant activity #31 in Section A.3 in the original FESOP).

Existing Approvals

(a) FESOP 003-5066-00185, issued on December 10, 1996.

All conditions from previous approvals were incorporated into this FESOP.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the FESOP Renewal 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 Renewal application for the purposes of this review was received on February 5, 2001.

There was no notice of completeness letter mailed to the source.

Emission Calculations

See Appendix A: pages 1 through 4 of this document for detailed Conformal Coater #2 emissions calculations. The calculations that follows for the other emission units are based on that done for original FESOP 003-5066-00185, issued on December 10, 1996.

VOC Potential Emissions

Unit ID	Process	Emission rate (lb/hr)	Potential VOC Emissions (ton/yr)
1	Conformax AU Dip Tank	1.65	7.23
3	Conformal Coater #2	8.55	37.45
9	EMC Stencil Cleaner	3.30	14.45
10	IPA Cleaner	0.55	2.41
VT53	Barons Blakeslee Degreaser	0.03	0.11
MRL-120	Barons Blakeslee Degreaser	0.17	0.727
B-950R	Branson	0.15	0.65
		TOTAL	63.03

HAP Potential Emissions

Unit ID	Process	Toluene	Xylene	MEK	Ethylbenzene
1	Conformax AU Dip Tank	-	-	-	-
3	Conformal Coater #2	10.58	19.82	6.07	1.01
9	EMC Stencil Cleaner	-	-	-	-
10	IPA Cleaner	-	-	-	-
VT53	Barons Blakeslee Degreaser	-	-	-	-
MRL-120	Barons Blakeslee Degreaser	-	-	-	-
B-950R	Branson	-	-	-	-
	TOTAL (ton/yr)	10.58	19.82	6.07	1.01

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous FESOP.

Pollutant	Unrestricted Potential Emissions (tons/yr)
PM	less than 100
PM-10	less than 100
SO ₂	less than 100
VOC	less than 100
CO	less than 100
NO _x	less than 100

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

HAP's	Unrestricted Potential Emissions (tons/yr)
Toluene	greater than 10
Xylene	greater than 10

MEK	less than 10
Ethylbenzene	less than 10
TOTAL	less than 25

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of a single HAP is equal to or greater than ten (10) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Potential to Emit After Issuance

The source, issued a FESOP on December 10, 1996, has opted to remain a FESOP source, rather than apply for a Part 70 Operating Permit. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of this Federally Enforceable State Operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit. Since the source has not constructed any new emission units, the source's potential to emit is based on the emission units included in the original FESOP. F003-5066-00185; issued on December 10, 1996.

Process/emission unit	Potential to Emit After Issuance (tons/year)							
	PM	PM-10	SO ₂	VOC	CO	NO _x	Single HAPs	Total HAPs
Conformal Coater #2 ⁽¹⁾	0.01	0.01	-	18.88	-	-	9.99	22.35
Conformax AU Dip Tank	-	-	-	7.23	-	-	-	-
EMC Stencil Cleaner	-	-	-	14.45	-	-	-	-
IPA Cleaner	-	-	-	2.41	-	-	-	-
Insignificant Activities	0.1	0.2	neg.	1.69	2.8	3.3	neg.	neg.
Total PTE After Issuance	0.11	0.21	neg.	44.66	2.3	2.8	9.99	22.35

Insignificant Activities include two (2) Barons Blakeslee degreasers, Branson degreaser, two (2) routers, identified as Units 11 and 12, Machine Shop Activities, Model Shop Grinding, Hand soldering Area, Soltec Wave Solder Machine, Chipbonder application, Spot Cleaning in Demasking area, Loctite Application, Glue Removal, Hand Solvent Cleaning Activities, Hand Isopropyl Alcohol Cleaning Activities, Solder paste application, RVT application process, Epoxy Application and three (3) boilers.

(1) Based on material usage limitation to make 326 IAC 8-1-6 and 326 IAC 2-7 (Part 70) not applicable.

County Attainment Status

The source is located in Allen County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Allen County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

- (a) Provisions of the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.40c, Subpart Dc) "Standards of Performance for Small Industrial Commercial Institutional Steam Generating Units" apply to boilers for which Construction, Reconstruction, or Modification commenced after June 9, 1989 and have a maximum design heat input capacity of 100 MMBtu per hour or less, but greater than or equal to 10 MMBtu per hour. Boilers #1, #2 and #3 were constructed in 1993, but are not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c, Subpart Dc) because the design capacity for each boiler is less than 10 MMBtu per hour.
- (b) The degreasers are not subject to National Emissions Standard for Hazardous Air Pollutants (NESHAP), 40 CFR 63.460, Subpart T. The degreasing operations at the source do not use any halogenated solvent cleaners.

State Rule Applicability - Entire Source

There are no new state rules applicable to the source during this FESOP review process. The applicability determination that follows is based on that conducted for original FESOP 003-5066-00185, issued on December 10, 1996.

326 IAC 2-2 and 40 CFR 52.21 (Prevention of Significant Deterioration, PSD)

This source, constructed in 1993, after the applicability date of August 7, 1980, is not considered a major source because it is not one of the 28 listed source categories and the uncontrolled potential to emit of PM, PM-10, VOC, SO₂ and NO_x are less than 250 tons per year. Therefore, the requirements of 326 IAC 2-2 and 40 CFR 52.21 (PSD) do not apply.

326 IAC 2-4.1-1 (Major Sources of Hazardous Air Pollutants (HAP))

The coating operation shall limit single HAP and combination of HAPs to less than 10 and 25 tons per year, respectively. Therefore, 326 IAC 2-4.1 and 326 IAC 2-7 do not apply.

326 IAC 2-6 (Emission Reporting)

This source is located in Allen County which is not one of the specifically listed counties, nor does this FESOP source have the potential to emit CO, VOC, NO_x, PM-10 (including fugitive emissions), or SO₂ in amounts at or exceeding one-hundred (100) tons per year. Therefore, the requirements of 326 IAC 2-6 do not apply to the source.

326 IAC 2-8 (FESOP)

Pursuant to 326 IAC 2-8-4 the coating operation shall limit HAP usages to less than 9.99 tons and 22.35 tons of any single HAP and any combination of HAPs, respectively, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period, with compliance determined at the end of each month. These usage limits are required to limit the source's potential to emit of any single HAP and any combination of HAPs to less than 10 and 25 tons, respectively, per 12 consecutive month period. Compliance with these limits make 326 IAC 2-7 not applicable.

326 IAC 5-1 (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:

- (a) 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.
- (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.

State Rule Applicability - Individual Facilities

There are no new state rules applicable to the source during this FESOP review process. The applicability determination that follows is based on that conducted for original FESOP 003-5066-00185, issued on December 10, 1996.

326 IAC 6-2 (Particulate Emission Limitations for Source of Indirect Heating)

Pursuant to 326 IAC 6-2-4(a), based on a total source indirect heating capacity of 7.5 MMBtu/hr, the PM emissions from each of the boilers #1, #2 and #3 (all constructed in 1993), shall be limited in accordance with the following, but not exceed 0.6 lb PM/MMBtu heat input, each.

$$Pt = \frac{1.09}{Q^{0.26}} = \frac{1.09}{7.5^{0.26}} = 0.65 \text{ lb PM/MMBtu}$$

where: Pt = pounds of PM emitted per million Btu heat input, (0.65 lb/MMBtu)
Q = total source maximum operating capacity (7.5 MMBtu/hr)

Therefore, the PM emissions for each of the boilers #1, #2 and #3 are each limited at 0.6 lb PM/MMBtu.

The estimated PM emissions from boilers #1, #2 and #3 are as follows:
0.021 ton PM/yr *2000 lb/ton*(1/8760) yr/hr*(1/2.5) hr/MMBtu = 0.002 lb PM/MMBtu

The estimated PM emissions from each of the three (3) boilers is 0.002 lb PM/MMBtu which is less than the limit of 0.6 lb/MMBtu. Therefore, the three (3) boilers are in compliance with this rule.

326 IAC 6-3-2 (Process Operations)

Pursuant to 40 CFR 52 Subpart P the particulate matter (PM) from Conformal Coater #2 shall be limited by the following:

Interpolation 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

Particulate from Conformal Coater #2 shall be controlled by dry filters and the Permittee shall operate the control device in accordance with manufacturer's specifications.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

- (a) The two (2) routers, identified as Units 11 and 12 each handles less than 100 pounds of material per hour. Pursuant to 326 IAC 6-3-2(e)(2), allowable particulate emissions from each of these units shall not exceed 0.551 pounds per hour. The use of a common baghouse with the two (2) routers ensure compliance with this limit.
- (b) The Machine Shop Activities, Model Shop Grinding Area, Hand soldering and Soltec Wave Solder Machine each handles less than 100 pounds of material per hour. Pursuant to 326 IAC 6-3-2(e)(2), allowable particulate emissions from each of these units shall not exceed 0.551 pounds per hour.

326 IAC 8-1-6 (General Reduction Requirements)

The Conformal Coater #2, which spray coats the non-metal (plastic) portion of the circuit boards is not subject to this rule. This rule applies to facilities located anywhere in the state that were constructed on or after January 1, 1980, and which have potential volatile organic compound (VOC) emissions of 25 tons per year or more and is not subject to the requirements of any other Article 8 rules. The VOC content delivered to the applicator of Conformal Coater #2 shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply.

326 IAC 8-3-2 (Cold Cleaner Operation)

The Conformax AU Dip Tank, EMC Stencil Cleaner and IPA Cleaner are subject to 326 IAC 8-3-2. This rule applies to new facilities after January 1, 1980, performing organic solvent degreasing operations located anywhere in the state. Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operation), the owner or operator shall:

- (a) equip the cleaner with a cover;
- (a) equip the cleaner with a facility for draining cleaned parts;
- (b) close the degreaser cover whenever parts are not being handled in the cleaner;
- (c) drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (d) provide a permanent, conspicuous label summarizing the operation requirements;

- (e) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)

The Conformax AU Dip Tank, EMC Stencil Cleaner and IPA Cleaner are cold cleaner type degreasing facilities constructed after July 1, 1990 and are subject to the operation and control provisions of 326 IAC 8-3-5.

- (a) Pursuant to 326 IAC 8-3-5(a), the owner or operator of the cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.

- (C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), for cold cleaning facility construction of which commenced after July 1, 1990, the Permittee shall ensure that the following operating requirements are met:
 - (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

326 IAC 8-3-3 (Open Top Vapor Degreaser Operation)

The two (2) Baron Blakeslee degreasers and the one (1) Branson degreaser are subject to 326 IAC 8-3-3. This rule applies to new facilities after January 1, 1980, performing organic solvent degreasing operations located anywhere in the state. Pursuant to 326 IAC 8-3-3 (Open Top Vapor Degreaser Operation), the owner or operator shall:

- (a) Equip the vapor degreaser with a cover that can be opened and closed easily without disturbing the vapor zone;
- (b) Keep the cover closed at all times except when processing work loads through the degreaser;
- (c) Minimize solvent carryout by
 - (1) Racking parts to allow complete drainage;
 - (2) Moving parts in and out of the degreaser at less than 3.3 meters per minute (eleven (11) feet per minute);
 - (3) Degreasing the workload in the vapor zone at least thirty (30) seconds or until condensation ceases;
 - (4) Tipping out any pools of solvent on the cleaned parts before removal; and
 - (5) Allowing parts to dry within the degreaser for at least fifteen (15) seconds or until visually dry;
- (d) Not degrease porous or absorbent materials, such as cloth, leather, wood or rope;
- (e) Not occupy more than half of the degreaser's open top area with the workload;
- (f) Not load the degreaser such that the vapor level drops more than fifty percent (50%) of the vapor depth when the workload is removed;

- (g) Never spray above the vapor level;
- (h) Repair solvent leaks immediately, or shut down the degreaser;
- (i) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, such that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere;
- (j) Not use workplace fans near the degreaser opening;
- (k) Not allow visually detectable water in the solvent exiting the water separator; and
- (l) Provide a permanent, conspicuous label summarizing the operating requirements.

326 IAC 8-3-6 (Open Top Vapor Degreaser Operation and Control Requirements)

The two (2) Baron Blakeslee degreasers and the one (1) Branson degreaser are subject to 326 IAC 8-3-6 because they were constructed after July 1, 1990, and is an open top vapor degreaser with an air to solvent interface of one (1) square meter (ten and eight-tenths (10.8) square feet) or greater, and is located in Allen County.

- (a) Pursuant to 326 IAC 8-3-6(a) (Open Top Vapor Degreaser Operation and Control Requirements), the owner or operator of an open top vapor degreaser emissions unit shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover than can be opened and closed easily without disturbing the vapor zone.
 - (2) Equip the degreaser with the following switches:
 - (A) A condenser flow switch and thermostat which shuts off sump heat if condenser coolant stops circulating or becomes too warm.
 - (B) A spray safety switch which shuts off spray pump if the vapor level drops more than ten (10) centimeters (four (4) inches).
 - (C) Equip the degreaser with a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (D) Equip the degreaser with one (1) of the following control devices:
 - (i) A freeboard ratio of seventy-five hundredths (0.75) or greater and a powered cover if the degreaser opening is greater than one (1) square meter (ten and eight-tenths (10.8) square feet).
 - (ii) A refrigerated chiller.

- (iii) An enclosed design in which the cover opens only when the article is actually entering or exiting the degreaser.
 - (iv) A carbon adsorption system with ventilation which, with the cover open, achieves a ventilation rate of greater than or equal to fifteen (15) cubic meters per minute per square meter (fifty (50) cubic feet per minute per square foot) of air to vapor interface area and an average of less than twenty-five (25) parts per million of solvent is exhausted over one (1) complete adsorption cycle.
 - (v) Other systems of demonstrated equivalent or better control as those outlined in clauses (i) through (iv). Such systems shall be submitted to the U.S. EPA as a SIP revision.

- (b) Pursuant to 326 IAC 8-3-6(b) (Open Top Vapor Degreaser Operation and Control Requirements), the owner or operator of an open top vapor degreaser shall ensure that the following operating requirements are met:
 - (1) Keep the cover closed at all times except when processing workloads through the degreaser.
 - (2) Minimize solvent carryout emissions by:
 - (A) Racking articles to allow complete drainage;
 - (B) Moving articles in and out of the degreaser at less than three and three-tenths (3.3) meters per minute (eleven (11) feet per minute);
 - (C) Degreasing the workload in the vapor zone at least thirty (30) seconds or until condensation ceases;
 - (D) Tipping out any pools of solvent on the cleaned articles before removal; and
 - (E) Allowing articles to dry within the degreaser for at least fifteen (15) seconds or until visually dry.
 - (3) Prohibit the entrance into the degreaser of porous or absorbent materials such as, but not limited to, cloth, leather, wood, or rope.
 - (4) Prohibit occupation of more than one-half ($\frac{1}{2}$) of the degreaser's open top area with the workload.
 - (5) Prohibit the loading of the degreaser to the point where the vapor level would drop more than ten (10) centimeters (four (4) inches) when the workload is removed.

- (6) Prohibit solvent spraying above the vapor level.
- (7) Repair solvent leaks immediately or shut down the degreaser if leaks cannot be repaired immediately.
- (8) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.
- (9) Prohibit the exhaust ventilation rate from exceeding twenty (20) cubic meters per minute per square meter (sixty-five (65) cubic feet per minute per square foot) of degreaser open area unless a greater ventilation rate is necessary to meet Occupational Safety and Health Administration requirements.
- (10) Prohibit the use of workplace fans near the degreaser opening.
- (11) Prohibit visually detectable water in the solvent exiting the water separator.

326 IAC 8-6 (Organic Solvent Emission Limitations)

Provisions of 326 IAC 8-6 (Organic Solvent Emission Limitations) apply to units commencing operation after October 7, 1974, and prior to January 1, 1980, with potential emissions of 100 tons per year or greater of VOC, and not limited by any other 326 IAC 8 rules. This rule does not apply to any of the units at this source since they were constructed after the applicability date.

Testing Requirements

Testing of this facility is not required by this permit.

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, OAQ, 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 spray booth has applicable compliance monitoring conditions as specified below:
 - (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack while the booth is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
 - (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
 - (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the dry filters must operate properly to ensure compliance with 326 IAC 6-3-2(d) (Particulate Emission Limitations).

Conclusion

The operation of this printed circuit board manufacturing plant shall be subject to the conditions of the attached proposed FESOP Renewal No.: F003-13873-00185.

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations**

Company Name: ITT Aerospace Communications Division
Address City IN Zip: 7310 Innovation Blvd., Fort Wayne, IN 46801
FESOP #: F003-13873-00185
Reviewer: Alic Bent/EVP
Date: November 7, 2002

Process	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Conformal Coater #2																
Hysol PC-20	9.2	87.20%	0.0%	87.2%	0.0%	12.80%	0.00210	240.000	8.00	8.00	4.03	96.72	17.65	1.30	62.47	50%
Xylene	7.3	100.00%	0.0%	100.0%	0.0%	0.00%	0.00260	240.000	7.25	7.25	4.52	108.58	19.82	0.00	N/A	

Uncontrolled Potential Emissions	Add worst case coating to all solvents									Uncontrolled	8.55	205.30	37.47	1.30		
										VOC	Limited/Controlled	4.31	103.47	18.88	0.01	
										Material Usage Limitation						

METHODOLOGY

PM Control Efficiency	98.0%
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Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
 Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
 Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
 Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
 Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
 Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
 Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
 Total = Worst Coating + Sum of all solvents used
 Material usage at the coating booth is limited to 49.6% of potential material usage based on 8,760 hours per year operation in order to limit xylene as a single hazardous air pollutant (HAP) to 9.99 tons per year.
 Controlled emission rate = uncontrolled emission rate * (1 - control efficiency)

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: ITT Aerospace Communications Division
Address City IN Zip: 7310 Innovation Blvd., Fort Wayne, IN 46801
FESOP #: F003-13873-00185
Permit Reviewer: Alic Bent/EVP
Date: November 7, 2002

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Ethylbenzene	Weight % MEK	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Ethylbenzene Emissions (ton/yr)	MEK Emissions (ton/yr)
Conformal Coater #2											
Hysol PC-20	9.17	0.002100	240.00	0.00%	52.25%	5.00%	30.00%	0.00	10.58	1.01	6.07
Xylene	7.25	0.002600	240.00	100.00%	0.00%	0.00%	0.00%	19.82	0.00	0.00	0.00
Potential Emissions								19.82	10.58	1.01	6.07
Limited Emissions								9.99	5.29	1.01	6.07
Total HAPs								22.35			

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

Small Industrial Boiler

Company Name: ITT Aerospace Communications Division
Address City IN Zip: 7310 Innovation Blvd., Fort Wayne 46801
FESOP Renewal #: F003-13873-00185
Reviewer: Alic Bent/EVP
Date: October 30, 2002

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

7.5

65.7

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.1	0.2	0.0	3.3	0.2	2.8

*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

See page 2 for HAPs emissions calculations.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only**

MM BTU/HR <100

Small Industrial Boiler

HAPs Emissions

Company Name: ITT Aerospace Communications Division

Address City IN Zip: 7310 Innovation Blvd., Fort Wayne 46801

FESOP Renewal #: F003-13873-00185

Reviewer: Alic Bent/EVP

Date: October 30, 2002

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	6.899E-05	3.942E-05	2.464E-03	5.913E-02	1.117E-04

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	1.643E-05	3.614E-05	4.599E-05	1.248E-05	6.899E-05

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.