Mr. William J. Schubert Honeywell International, Inc. 1850 Riverfork Dr. West Huntington, IN 46750

Re: 069-15053

First Administrative Amendment to

FESOP 069-12492-00034

Dear Mr. Schubert:

Honeywell International Inc. was issued a permit on October 12, 2001 for a stationary truck brake systems component manufacturing operation. A letter requesting an administrative amendment to delete some emission units from FESOP No. 069-12492-00034 was received on October 12, 2001. According to 326 IAC 2-8-10(a)(6), an administrative amendment may be used if the modification "revises descriptive information where the revision will not trigger a new applicable requirement or violate a permit term". Since the changes requested will not increase the facility's potential-to-emit, and therefore, will not trigger any new applicable requirements or violate permit terms, the permit is hereby administratively amended as follows (strike-out to show deletions and bold to show additions):

- (1) The description of emission units in Section A.2 is amended as follows:
 - 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:

- (1) one (1) paint spray booth (ID No. I-T-C1) utilizing a low pressure air atomization application system, coating a maximum of 35 steel compressors per hour, with a water wash curtain for overspray control, and exhausting at two (2) stacks;
- one (1) paint spray booth (ID No. I-T-C2) utilizing a low pressure air atomization application system, coating a maximum of 140 aluminum valves per hour, with a water wash curtain for overspray control, and exhausting at two (2) stacks;
- (3) two (2) shot blasters (ID Nos. I-T-19 and I-T-20), each with a maximum cast steel shot blast rate of 7,650 lb/hr and 15,300 lb/hr, respectively, and each equipped with a baghouse for control of particulate emissions; **and**
- one (1) cold cleaner degreasing operation with a maximum solvent consumption of 4.5 gallons per day. ; and
- (5) one (1) solvent distillation device (ID No. I-T-33) with a maximum used solvent consumption of 15 gallons per day.
- (2) The description of insignificant activities in Section A.3 is amended as follows:
 - 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:
 - (a) two (2) one (1) natural gas fired typhoon washers (ID Nos. I-T-C3 and I-T-C4) each rated at 0.4 million (MM) Btu/hr;
 - (b) two (2) natural gas fired pyrolysis furnaces (ID Nos. I-T-C5 and I-T-C6) each

Honeywell International Inc. Huntington, Indiana

Permit Reviewer: Madhurima D. Moulik

Page 2 of 3 069-15053-00034

- (c) one (1) natural gas fired water boiler (ID No. I-T-C7) rated at 0.72 MMBtu/hr;
- (d) two (2) natural gas fired space heaters (ID Nos. I-T-C8 and I-T-C9) each rated at 2.2 MMBtu/hr;
- (e) two (2) natural gas fired space heaters (ID Nos. I-T-10 and I-T-11) each rated at 1.5 MMBtu/hr;
- (e -f) one (1) natural gas fired liquid evaporator (ID No. I-T-13) rated at 0.395 MMBtu/hr;
- (f g) one (1) natural gas fired water heater (ID No. I-T-14) rated at 0.156 MMBtu/hr;
- (g h) two (2) natural gas fired high pressure washers (ID Nos. I-T-17 and I-T-18) each rated at 2.0 MMBtu/hr;
- (h-i) thirteen (13) natural gas fired space heaters (ID Nos. I-T-21, I-T-22, HT-23, HT-24, HT-25, HT-26, HT-27, HT-28, HT-29, HT-30, HT-31A, HT-31B, and HT-32) each rated at 0.15 MMBtu/hr:
- (i j-) one (1) Acme Fab Parts Washer utilizing a non-VOC containing aqueous wash solution with a burner rated at 1.5 million Btu/hour.
- (b) one (1) Metal Inert Gas (MIG) welding station utilizing ESAB Spollare 295 High Density plus copper wire with a maximum consumption rate of 0.275 lbs/hour.
- (c) one (1) Metal Inert Gas (MIG) welding station utilizing Lincolnweld Fiber Spool E70S-6 wire with a maximum consumption rate of 0.367 lbs/hour.
- (d) one (1) Metal Inert Gas (MIG) welding station utilizing Lincolnweld L-50 ER70S-3 wire with a maximum consumption rate of 0.0625 lbs/hour.
- (e) one (1) Tungsten Inert Gas (TIG) welding station with a maximum consumption rate of 0.0625 lbs/hour.
- (3) The facility description in Section D.1 is amended as follows:

SECTION D.1 FACILITY OPERATION CONDITIONS

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

- (a) one (1) paint spray booth (ID No. I-T-C1) utilizing a low pressure air atomization application system, coating a maximum of 35 steel compressors per hour, with a water wash curtain for overspray control, and exhausting at two (2) stacks;
- (b) one (1) paint spray booth (ID No. I-T-C2) utilizing a low pressure air atomization application system, coating a maximum of 140 aluminum valves per hour, with a water wash curtain for overspray control, and exhausting at two (2) stacks;
- (c) two (2) shot blasters (ID Nos. I-T-19 and I-T-20), each with a maximum cast steel shot blast rate of 7,650 lb/hr and 15,300 lb/hr, respectively, and each equipped with a baghouse for control of particulate emissions; **and**
- (d) one (1) cold cleaner degreasing operation with a maximum solvent consumption of 4.5 gallons per day. ; and
- (e) one (1) solvent distillation device (ID No. I-T-33) with a maximum used solvent consumption of 15 gallons per day.
- (4) The facility description in Section D.2 is amended as follows:

SECTION D.2 FACILITY OPERATION CONDITIONS

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

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

per hour

(a) two (2) one (1) natural gas fired typhoon washers (ID Nos. I-T-C3 and I-T-C4) each rated at 0.4 million (MM) Btu/hr;

Honeywell International Inc. Huntington, Indiana

Permit Reviewer: Madhurima D. Moulik

Page 3 of 3 069-15053-00034

- (b) two (2) natural gas fired pyrolysis furnaces (ID Nos. I-T-C5 and I-T-C6) each rated at 0.3 MMBtu/hr;
- (c) one (1) natural gas fired water boiler (ID No. I-T-C7) rated at 0.72 MMBtu/hr;
- (d) two (2) natural gas fired space heaters (ID Nos. I-T-C8 and I-T-C9) each rated at 2.2 MMBtu/hr:
- (e) two (2) natural gas fired space heaters (ID Nos. I-T-10 and I-T-11) each rated at 1.5 MMBtu/hr;
- (f e) one (1) natural gas fired liquid evaporator (ID No. I-T-13) rated at 0.395 MMBtu/hr;
- (g f) one (1) natural gas fired water heater (ID No. I-T-14) rated at 0.156 MMBtu/hr;
- (h g) two (2) natural gas fired high pressure washers (ID Nos. I-T-17 and I-T-18) each rated at 2.0 MMBtu/hr;
- († h) thirteen (13) natural gas fired space heaters (ID Nos. I-T-21, I-T-22, HT-23, HT-24, HT-25, HT-26, HT-27, HT-28, HT-29, HT-30, HT-31A, HT-31B, and HT-32) each rated at 0.15 MMBtu/hr:
- († i) one (1) Acme Fab Parts Washer utilizing a non-VOC containing aqueous wash solution with a burner rated at 1.5 million Btu/hour.
- one (1) Metal Inert Gas (MIG) welding station utilizing ESAB Spollare 295 High Density (b) plus copper wire with a maximum consumption rate of 0.275 lbs/hour.
- one (1) Metal Inert Gas (MIG) welding station utilizing Lincolnweld Fiber Spool E70S-6 wire (c) with a maximum consumption rate of 0.367 lbs/hour.
- (d) one (1) Metal Inert Gas (MIG) welding station utilizing Lincolnweld L-50 ER70S-3 wire with a maximum consumption rate of 0.0625 lbs/hour.
- (e) one (1) Tungsten Inert Gas (TIG) welding station with a maximum consumption rate of 0.0625 lbs/hour.
- (3) Additionally, references to the Office of Air Management (OAM) have been changed to Office of Air Quality (OAQ).

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

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Madhurima Moulik, at (800) 451-6027, press 0 and ask for Madhurima Moulik or extension 3-0868, or dial (317) 233-0868.

Sincerely,

Paul Dubenetzky, Chief Permits Branch Office of Air Quality

Attachments

mm

File - Huntington County cc:

U.S. EPA, Region V

Huntington County Health Department Air Compliance Section Inspector - Ryan Hillman Compliance Data Section - Karen Nowak Administrative and Development - Janet Mobley Technical Support and Modeling - Michele Boner

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

Honeywell International, Inc. 1850 Riverfork Drive West Huntington, Indiana 46750

(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.: F069-12492-00034	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: 11-16-2000
First Administrative Amendment No.: 069-15053	Pages Modified: 4, 5, 23, 28

Honeywell International, Inc. Huntington, Indiana Permit Reviewer: Gurinder Saini First Administrative Amendment No. 069-15053 Modified by: Madhurima D. Moulik Page 4 of 32 OP No. F069-12492-00034

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 truck brake systems component manufacturing plant.

Authorized individual: William J.Schubert

Source Address: 1850 Riverfork Drive West, Huntington, Indiana 46750 Mailing Address: 1850 Riverfork Drive West, Huntington, Indiana 46750

Phone Number: (219) 358-4456 SIC Code: 3714 Source Location Status: Huntington

County Status: Attainment for all criteria pollutants

Source Status: Federally Enforceable State Operating Permit (FESOP)

Minor Source, under PSD;

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) one (1) paint spray booth (ID No. I-T-C1) utilizing a low pressure air atomization application system, coating a maximum of 35 steel compressors per hour, with a water wash curtain for overspray control, and exhausting at two (2) stacks;
- (b) one (1) paint spray booth (ID No. I-T-C2) utilizing a low pressure air atomization application system, coating a maximum of 140 aluminum valves per hour, with a water wash curtain for overspray control, and exhausting at two (2) stacks;
- (c) two (2) shot blasters (ID Nos. I-T-19 and I-T-20), each with a maximum cast steel shot blast rate of 7,650 lb/hr and 15,300 lb/hr, respectively, and each equipped with a baghouse for control of particulate emissions; and
- (d) one (1) cold cleaner degreasing operation with a maximum solvent consumption of 4.5 gallons per day.

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:
 - one (1) natural gas fired typhoon washer (ID No. I-T-C3) rated at 0.4 million (MM) Btu/hr;

- (b) two (2) natural gas fired pyrolysis furnaces (ID Nos. I-T-C5 and I-T-C6) each rated at 0.3 MMBtu/hr:
- (c) one (1) natural gas fired water boiler (ID No. I-T-C7) rated at 0.72 MMBtu/hr;
- (d) two (2) natural gas fired space heaters (ID Nos. I-T-C8 and I-T-C9) each rated at 2.2 MMBtu/hr;

Honeywell International, Inc. Huntington, Indiana

First Administrative Amendment No. 069-15053 Modified by: Madhurima D. Moulik Page 5 of 32 OP No. F069-12492-00034

Permit Reviewer: Gurinder Saini

- (e) one (1) natural gas fired liquid evaporator (ID No. I-T-13) rated at 0.395 MMBtu/hr;
- (f) one (1) natural gas fired water heater (ID No. I-T-14) rated at 0.156 MMBtu/hr;
- (g) two (2) natural gas fired high pressure washers (ID Nos. I-T-17 and I-T-18) each rated at 2.0 MMBtu/hr;
- (h) thirteen (13) natural gas fired space heaters (ID Nos. I-T-21, I-T-22, HT-23, HT-24, HT-25, HT-26, HT-27, HT-28, HT-29, HT-30, HT-31A, HT-31B, and HT-32) each rated at 0.15 MMBtu/hr;
- (i) one (1) Acme Fab Parts Washer utilizing a non-VOC containing aqueous wash solution with a burner rated at 1.5 million Btu/hour.
- (b) one (1) Metal Inert Gas (MIG) welding station utilizing ESAB Spollare 295 High Density plus copper wire with a maximum consumption rate of 0.275 lbs/hour.
- (c) one (1) Metal Inert Gas (MIG) welding station utilizing Lincolnweld Fiber Spool E70S-6 wire with a maximum consumption rate of 0.367 lbs/hour.
- (d) one (1) Metal Inert Gas (MIG) welding station utilizing Lincolnweld L-50 ER70S-3 wire with a maximum consumption rate of 0.0625 lbs/hour.
- (e) one (1) Tungsten Inert Gas (TIG) welding station with a maximum consumption rate of 0.0625 lbs/hour.

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) for a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permit Conditions

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

Honeywell International, Inc. Huntington, Indiana Permit Reviewer: Gurinder Saini First Administrative Amendment No. 069-15053 Modified by: Madhurima D. Moulik Page 23 of 32 OP No. F069-12492-00034

SECTION D.1

FACILITY OPERATION CONDITIONS

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

- (a) one (1) paint spray booth (ID No. I-T-C1) utilizing a low pressure air atomization application system, coating a maximum of 35 steel compressors per hour, with a water wash curtain for overspray control, and exhausting at two (2) stacks;
- (b) one (1) paint spray booth (ID No. I-T-C2) utilizing a low pressure air atomization application system, coating a maximum of 140 aluminum valves per hour, with a water wash curtain for overspray control, and exhausting at two (2) stacks;
- (c) two (2) shot blasters (ID Nos. I-T-19 and I-T-20), each with a maximum cast steel shot blast rate of 7,650 lb/hr and 15,300 lb/hr, respectively, and each equipped with a baghouse for control of particulate emissions; and
- (d) one (1) cold cleaner degreasing operation with a maximum solvent consumption of 4.5 gallons per day.

(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 PSD Minor Status [326 IAC 2-2] [40 CFR 52.21]

- (a) The total source potential to emit any criteria pollutant is less than 250 tons per year.

 Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.
- (b) Any change or modification in the equipment covered in this permit which may increase the potential to emit to 250 tons per year, shall require a PSD permit pursuant to 326 IAC 2-2 and 40 CFR 52.21, before such change may occur.

D.1.2 FESOP Permit Content [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4, the Abrasive Shot Blasters (ID Nos. I-T-19 and I-T-20) should be operated only when Baghouses are in operation with control efficiency of 99.5%. This will ensure limiting the PM_{10} emissions from the entire source to below one hundred (100) tons per 12 month period the Part 70 Operating Permit level.

The Particulate Matter less than 10 micron size (PM_{10}) emissions from Shot Blaster 1 and Shot Blaster 2 shall be limited to less than 0.26 and 0.52 pounds per hour respectively. PM_{10} emissions from both Shot Blasters shall not exceed 0.068 lbs per ton of cast steel shot blasted.

D.1.3 Particulate Emission Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) emissions from the Abrasive Shot Blasting operation shall be limited to 10.1 pounds per hour for Shot Blaster 1 and to 16.0 pounds per hour for Shot Blaster 2.

D.1.4 New Facilities, General Reduction Requirements [326 IAC 8-1-6]

Potential VOC emissions from each facility at this source are less than 25 tons per year, therefore, the requirements of 326 IAC 8-1-6 will not apply in this case.

Any change or modification in the equipment covered in this permit which may increase the potential to emit to 25 tons VOC per year, shall require the approval of a Best Available Control Technology (BACT) plan, pursuant to 326 IAC 8-1-6, before such change may occur.

Honeywell International, Inc. Huntington, Indiana

Permit Reviewer: Gurinder Saini

First Administrative Amendment No. 069-15053 Modified by: Madhurima D. Moulik Page 28 of 32 OP No. F069-12492-00034

SECTION D.2

FACILITY OPERATION CONDITIONS

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
 - (a) one (1) natural gas fired typhoon washer (ID Nos. I-T-C3) rated at 0.4 million (MM) Btu/hr;
 - (b) two (2) natural gas fired pyrolysis furnaces (ID Nos. I-T-C5 and I-T-C6) each rated at 0.3 MMBtu/hr;
 - (c) one (1) natural gas fired water boiler (ID No. I-T-C7) rated at 0.72 MMBtu/hr;
 - (d) two (2) natural gas fired space heaters (ID Nos. I-T-C8 and I-T-C9) each rated at 2.2 MMBtu/hr;
 - (e) one (1) natural gas fired liquid evaporator (ID No. I-T-13) rated at 0.395 MMBtu/hr;
 - (f) one (1) natural gas fired water heater (ID No. I-T-14) rated at 0.156 MMBtu/hr;
 - (g) two (2) natural gas fired high pressure washers (ID Nos. I-T-17 and I-T-18) each rated at 2.0 MMBtu/hr:
 - (h) thirteen (13) natural gas fired space heaters (ID Nos. I-T-21, I-T-22, HT-23, HT-24, HT-25, HT-26, HT-27, HT-28, HT-29, HT-30, HT-31A, HT-31B, and HT-32) each rated at 0.15 MMBtu/hr;
 - (i) one (1) Acme Fab Parts Washer utilizing a non-VOC containing aqueous wash solution with a burner rated at 1.5 million Btu/hour.
- (b) one (1) Metal Inert Gas (MIG) welding station utilizing ESAB Spollare 295 High Density plus copper wire with a maximum consumption rate of 0.275 lbs/hour.
- (c) one (1) Metal Inert Gas (MIG) welding station utilizing Lincolnweld Fiber Spool E70S-6 wire with a maximum consumption rate of 0.367 lbs/hour.
- (d) one (1) Metal Inert Gas (MIG) welding station utilizing Lincolnweld L-50 ER70S-3 wire with a maximum consumption rate of 0.0625 lbs/hour.
- (e) one (1) Tungsten Inert Gas (TIG) welding station with a maximum consumption rate of 0.0625 lbs/hour.

(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 Particulate Emission Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) emissions from the four welding units shall be limited to 0.02 pounds per hour based on process weight rate of 0.767 lbs/ hour, as determined by the following:

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

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