



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
MC 61-53
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

TO: Interested Parties / Applicant
DATE: January 14, 2008
RE: Tecumseh Power Company / 175-16035-00009
FROM: Matthew Stuckey, Deputy Branch Chief
Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER.dot12/03/07



Mitchell E. Daniels, Jr.
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100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(317) 232-8603
(800) 451-6027
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New Source Review and Minor Source Operating Permit OFFICE OF AIR QUALITY

**TecumsehPower Company
1555 South Jackson Street
Salem, Indiana 47167**

(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 to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

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 MSOP under 326 IAC 2-6.1.

Operation Permit No.: M175-16035-00009	
Issued by:	Issuance Date: January 14, 2008
Original signed by: Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Expiration Date: January 14, 2013

TABLE OF CONTENTS

A. SOURCE SUMMARY.....	4
A.1 General Information [326 IAC 2-5.1-3(c)][326 IAC 2-6.1-4(a)]	
A.2 Emission Units and Pollution Control Equipment Summary	
B. GENERAL CONDITIONS	7
B.1 Definitions [326 IAC 2-1.1-1]	
B.2 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]	
B.3 Term of Conditions [326 IAC 2-1.1-9.5]	
B.4 Enforceability	
B.5 Severability	
B.6 Property Rights or Exclusive Privilege	
B.7 Duty to Provide Information	
B.8 Certification	
B.9 Annual Notification [326 IAC 2-6.1-5(a)(5)]	
B.10 Preventive Maintenance Plan [326 IAC 1-6-3]	
B.11 Prior Permits Superseded [326 IAC 2-1.1-9.5]	
B.12 Termination of Right to Operate [326 IAC 2-6.1-7(a)]	
B.13 Permit Renewal [326 IAC 2-6.1-7]	
B.14 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]	
B.15 Source Modification Requirement	
B.16 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2] [IC 13-17-3-2][IC 13-30-3-1]	
B.17 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]	
B.18 Annual Fee Payment [326 IAC 2-1.1-7]	
B.19 Credible Evidence [326 IAC 1-1-6]	
C. SOURCE OPERATION CONDITIONS	12
Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]	
C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]	
C.2 Permit Revocation [326 IAC 2-1.1-9]	
C.3 Opacity [326 IAC 5-1]	
C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]	
C.6 Fugitive Dust Emissions [326 IAC 6-4]	
C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
Testing Requirements [326 IAC 2-6.1-5(a)(2)]	
C.8 Performance Testing [326 IAC 3-6]	
Compliance Requirements [326 IAC 2-1.1-11]	
C.9 Compliance Requirements [326 IAC 2-1.1-11]	
Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]	
C.10 Compliance Monitoring [326 IAC 2-1.1-11]	
C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]	
C.12 Instrument Specifications [326 IAC 2-1.1-11]	
Corrective Actions and Response Steps	
C.13 Response to Excursions or Exceedances	
C.14 Actions Related to Noncompliance Demonstrated by a Stack Test	

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

- C.15 Malfunctions Report [326 IAC 1-6-2]
- C.16 General Record Keeping Requirements [326 IAC 2-6.1-5]
- C.17 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2]
[IC 13-14-1-13]

D.1. EMISSIONS UNIT OPERATION CONDITIONS..... 18

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

- D.1.1 Particulate [326 IAC 6-3-2]
- D.1.2 Preventative Maintenance Plan [326 IAC 1-6-3]

Compliance Determination Requirements

- D.1.3 Particulate Control

D.2. EMISSIONS UNIT OPERATION CONDITIONS..... 20

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

- D.2.1 Particulate Emissions [326 IAC 6-2-4]

D.3. EMISSIONS UNIT OPERATION CONDITIONS..... 22

Certification Form 24

Annual Notification 25

Malfunction Report 26

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 and A.2 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 2-5.1-3(c)][326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary lawn and garden equipment transmission manufacturing and testing operation.

Source Address:	1555 South Jackson Street, Salem, Indiana 47167
Mailing Address:	1555 South Jackson Street, Salem, Indiana 47167
General Source Phone Number:	(812) 883-3575
SIC Code:	3568
County Location:	Washington
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) Two (2) shotblasters, identified as shot blast machine TC1637 and TC563, with a maximum throughput rate of 0.89 tons per hour total, with particulate matter controlled by a cartridge-type dust collector (TC# 1735), which exhausts to the indoors;
- (b) One (1) shotblaster, identified as shot blast machine TC1651, with a maximum throughput rate of 1.19 tons per hour with particulate matter controlled by a single cartridge-type dust collector (TC#1651), which exhausts to the indoors;
- (c) One (1) metal machining operation, located in Tool Room Building "D," consisting of surface grinding, deburring, and machining using a water-soluble oil coolant, with a maximum throughput rate of 0.0045 tons per hour with particulate matter controlled by a cartridge-type dust collector system (TC#1650), which exhausts to the outdoors;
- (d) One (1) axle polishing operation, located in Building "D," with a maximum throughput rate of 0.51 tons per hour with particulate matter controlled by a cartridge-type dust collector system, which exhausts to the indoors;
- (e) Natural gas-fired combustion sources with heat input equal to or less than 10 MMBtu per hour, including:
 - (1) One (1) boiler unit, located in the Back Mechanical Room in the Assembly Department, with a heat input rate of 0.9 MMBtu/hr, exhausting to vent HWB-1;
 - (2) One (1) HVAC unit, with a heat input rate of 4.7 MMBtu/hr, for the south side of Building "A" , exhausting to vent MAU-1;
 - (3) One (1) HVAC unit, with a heat input rate of 4.7 MMBtu/hr, for the north side of

- Building "A", exhausting to vent MAU-2;
- (4) One (1) HVAC unit, with a heat input rate of 4.225 MMBtu/hr, for Building "B," exhausting to vent MAU-3;
 - (5) One (1) HVAC unit, with a heat input rate of 4.225 MMBtu/hr, for Building "D," exhausting to vent MAU-4;
 - (6) One (1) HVAC unit, with a heat input rate of 4.225 MMBtu/hr, for Building "E," exhausting to vent MAU-5;
 - (7) One (1) HVAC unit, with a heat input rate of 4.225 MMBtu/hr, for Building "D," exhausting to vent MAU-6;
 - (8) One (1) HVAC unit, with a heat input rate of 4.225 MMBtu/hr, for Building "C," exhausting to vent MAU-7;
 - (9) One (1) non-heat treat axle temper draw furnace, located in Building "D," with a heat input rate of 1.475 MMBtu/hr, exhausting to vents GEF-23, GEF-25, and SAF-2;
 - (10) One (1) radiant tube heating system, located in the Assembly Department, with a heat input rate of 1.08 MMBtu/hr, exhausting to vents CVR-1 and CVR-2;
 - (11) One (1) HVAC unit, with a heat input rate of 5.0 MMBtu/hr, for the West side assembly area, exhausting to vent MAU-15;
 - (12) Four (4) water heaters, with a combined heat input rate of 0.29 MMBtu/hr, exhausting to vents 39A (front offices), 21A (abcor room), 7A (sales office), and 28A (front mechanical room);
 - (13) Seven (7) HVAC units, with a combined heat input rate of 3.99 MMBtu/hr, exhausting to vents 18A (Building "C"), RT-1, RT-2, RTMZ-1 (front offices), RT-3 (receiving dock), MAU-8 (assembly), and MAU-RDL (R&D);
 - (14) Eight (8) office furnaces, with a combined heat input rate of 1.32 MMBtu/hr, exhausting to vents 7A, 8A, 9A (sales/training room), 10A, 10B, and 10C (offices near back mechanical room);
 - (15) Ten (10) ceiling duct furnaces, with a combined heat input rate of 3.24 MMBtu/hr, exhausting to vents 29A (steel dock - Building "E"), 34A (assembly), 32A (maintenance shop - Building "C"), 30A (tool room - Building "D"), 35A (Building "B"), 5A (blast room - Building "A"), 6A (receiving dock), and GUH-1 (back mechanical room); and
 - (16) One (1) draw furnace, heat input 0.55 MM BTU/hr, exhausting to vent 33A.
- (f) One (1) twenty-five (25) horsepower (hp), electric powered, dyno room engine test stand, identified as dyno room #1 test stand, with unleaded gasoline as a back-up fuel and a maximum capacity of seven (7) pounds per hour of unleaded gasoline, exhausting to stack ETS-2;
- (g) One (1) twenty-five (25) horsepower (hp), electric powered, dyno room engine test stand, identified as dyno room #2 test stand, exhausting to stack ETS-1;

- (h) Storage Tanks, including:
 - (1) One (1) 270 gallon gasoline storage tank;
 - (2) One (1) 6,000 gallon used oil storage tank;
 - (3) One (1) 8,000 gallon gear oil storage tank;
 - (4) One (1) 4,000 gallon hydraulic oil storage tank;
 - (5) One (1) 5,000 gallon hydraulic oil storage tank;
 - (6) One (1) 5,000 gallon gearbox grease storage tank;
 - (7) One (1) 3,000 gallon gearbox grease storage tank;
 - (8) One (1) 12,000 gallon wastewater storage tank;
 - (9) One (1) 6,500 gallon filtration tank;
 - (10) One (1) 1,500 gallon recycled cutting oil storage tank; and
 - (11) One (1) 6,000 gallon cutting oil storage tank.
- (i) One (1) natural gas-fired, three stage steel parts washer, located in Building "B," with a heat input capacity of 4.0 MMBtu/hr, exhausting to vent IEF-17. This washer uses non-VOC and non-HAP solvents;
- (j) One (1) natural gas-fired, iron phosphate parts washer, located in Building "B," with a heat input capacity of 2.5 MMBtu/hr, exhausting to vents IEF-26 and IEF-27. This washer uses non-VOC and non-HAP solvents;
- (k) One (1) natural gas-fired, two stage axle parts washer, located in Building "D," with a heat input capacity of 1.6 MMBtu/hr, exhausting to vents 23C and 23D. This washer uses non-VOC and non-HAP solvents;
- (l) One (1) arc welding booth, consisting of shielded metal arc, gas metal arc, and fluxed cored arc welding, uncontrolled and exhausting to vent GEF-40;
- (m) One (1) metal cutting booth, consisting of plasma and oxyacetylene metal cutting, with a maximum metal cutting rate of 10 feet per hour each, uncontrolled and exhausting to vent GEF-40;
- (n) One (1) de-rust dip tank. This dip tank uses non-VOC and non-HAP solvents; and
- (o) One (1) rust inhibitor dip tank. This dip tank uses non-VOC and non-HAP solvents.

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-1.1-1]

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 2-1.1-1) shall prevail.

B.2 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

- (a) This permit, M175-16035-00009, 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 of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal 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.

B.3 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability

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 Severability

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

B.6 Property Rights or Exclusive Privilege

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

B.7 Duty to Provide Information

- (a) 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 an "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.
- (b) 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.8 Certification

- (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. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.9 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, IN 46204-2251
- (c) The notification 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.

B.10 Preventive Maintenance Plan [326 IAC 1-6-3]

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

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

- (b) 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 is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to M175-16035-00009 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.12 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

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 ninety (90) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

B.13 Permit Renewal [326 IAC 2-6.1-7]

- (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 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require the certification by an "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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
 - (1) Submitted at least ninety (90) days prior to the date of the expiration of this permit; and
 - (2) 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) 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 2-6.1 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 being needed to process the application.

B.14 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.15 Source Modification Requirement

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

B.16 Inspection and Entry

[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.17 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The application which shall be submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

B.18 Annual Fee Payment [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.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.19 Credible Evidence [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions 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 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

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]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 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 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
MC 61-52 IGCN 1003
Indianapolis, Indiana 46204-2251

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 an "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) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **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 to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-6.1-5(a)(2)]

C.8 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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by an "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 an "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 Permittee 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.9 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 2-6.1-5(a)(2)]

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

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing 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.

C.12 Instrument Specifications [326 IAC 2-1.1-11]

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps

C.13 Response to Excursions or Exceedances

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; and/or

- (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
 - (1) monitoring data;
 - (2) monitor performance data, if applicable; and
 - (3) corrective actions taken.

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test

- (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 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 response action documents submitted pursuant to this condition do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

C.15 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).

- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.16 General Record Keeping Requirements [326 IAC 2-6.1-5]

- (a) Records of all required monitoring data, reports and support information required by this permit 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 physically present or electronically accessible 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.17 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) 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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (b) 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.
- (c) 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) Two (2) shotblasters, identified as shot blast machine TC1637 and TC563, with a maximum throughput rate of 0.89 tons per hour total, with particulate matter controlled by a cartridge-type dust collector (TC# 1735), which exhausts to the indoors;
- (b) One (1) shotblaster, identified as shot blast machine TC1651, with a maximum throughput rate of 1.19 tons per hour with particulate matter controlled by a cartridge-type dust collector (TC#1651), which exhausts to the indoors;
- (c) One (1) metal machining operation, located in Tool Room Building "D," consisting of surface grinding, deburring, and machining using a water-soluble oil coolant, with a maximum throughput rate of 0.0045 tons per hour with particulate matter controlled by a cartridge-type dust collector system (TC#1650), which exhausts to the outdoors;
- (d) One (1) axle polishing operation, located in Building "D," with a maximum throughput rate of 0.51 tons per hour with particulate matter controlled by a cartridge-type dust collector system, which exhausts to the indoors;

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

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

D.1.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emission rate from the following emission units and control devices shall not exceed the pounds per hour limitation when operating at the stated process weight rates calculated using the following equations:

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:

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

Emission Unit (dust collector)	Process weight rate (tons per hour)	Allowable particulate emission rate (pounds per hour)
Shot Blast Machines TC1637 and TC563 (TC#1735)	0.89 total	3.79 total
Shot Blast Machine TC1651 (TC#1651)	1.19	4.61
Metal Machining (TC#1650)	0.0045	0.551
Axle Polishing	0.51	2.61

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

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

Compliance Determination Requirements

D.1.3 Particulate Control

In order to comply with Condition D.1.1, the dust collectors shall be in operation at all times, when the shot blast machines (TC1637 and TC563), metal machining, and axle polishing are in operation.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (e) Natural gas-fired combustion sources with heat input equal to or less than 10 MMBtu per hour, including:
- (1) One (1) boiler unit, located in the Back Mechanical Room in the Assembly Department, with a heat input rate of 0.9 MMBtu/hr, exhausting to vent HWB-1;
 - (2) One (1) HVAC unit, with a heat input rate of 4.7 MMBtu/hr, for the south side of Building "A", exhausting to vent MAU-1;
 - (3) One (1) HVAC unit, with a heat input rate of 4.7 MMBtu/hr, for the north side of Building "A", exhausting to vent MAU-2;
 - (4) One (1) HVAC unit, with a heat input rate of 4.225 MMBtu/hr, for Building "B," exhausting to vent MAU-3;
 - (5) One (1) HVAC unit, with a heat input rate of 4.225 MMBtu/hr, for Building "D," exhausting to vent MAU-4;
 - (6) One (1) HVAC unit, with a heat input rate of 4.225 MMBtu/hr, for Building "E," exhausting to vent MAU-5;
 - (7) One (1) HVAC unit, with a heat input rate of 4.225 MMBtu/hr, for Building "D," exhausting to vent MAU-6;
 - (8) One (1) HVAC unit, with a heat input rate of 4.225 MMBtu/hr, for Building "C," exhausting to vent MAU-7;
 - (9) One (1) non-heat treat axle temper draw furnace, located in Building "D," with a heat input rate of 1.475 MMBtu/hr, exhausting to vents GEF-23, GEF-25, and SAF-2;
 - (10) One (1) radiant tube heating system, located in the Assembly Department, with a heat input rate of 1.08 MMBtu/hr, exhausting to vents CVR-1 and CVR-2;
 - (11) One (1) HVAC unit, with a heat input rate of 5.0 MMBtu/hr, for the West side assembly area, exhausting to vent MAU-15;
 - (12) Four (4) water heaters, with a combined heat input rate of 0.29 MMBtu/hr, exhausting to vents 39A (front offices), 21A (abcor room), 7A (sales office), and 28A (front mechanical room);
 - (13) Seven (7) HVAC units, with a combined heat input rate of 3.99 MMBtu/hr, exhausting to vents 18A (Building "C"), RT-1, RT-2, RTMZ-1 (front offices), RT-3 (receiving dock), MAU-8 (assembly), and MAU-RDL (R&D);
 - (14) Eight (8) office furnaces, with a combined heat input rate of 1.32 MMBtu/hr, exhausting to vents 7A, 8A, 9A (sales/training room), 10A, 10B, and 10C (offices near back mechanical room);
 - (15) Ten (10) ceiling duct furnaces, with a combined heat input rate of 3.24 MMBtu/hr, exhausting to vents 29A (steel dock - Building "E"), 34A (assembly), 32A (maintenance

shop - Building "C"), 30A (tool room - Building "D"), 35A (Building "B"), 5A (blast room - Building "A"), 6A (receiving dock), and GUH-1 (back mechanical room); and

- (16) One (1) draw furnace, heat input 0.55 MM BTU/hr, exhausting to vent 33A.

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

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

D.2.1 Particulate Emissions [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), particulate emissions from the 0.9 MMBtu/hr boiler shall be limited to 1.12 pounds per MMBtu heat input.

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (f) One (1) twenty-five (25) horsepower (hp), electric powered, dyno room engine test stand, identified as dyno room #1 test stand, with unleaded gasoline as a back-up fuel and a maximum capacity of seven (7) pounds per hour of unleaded gasoline, exhausting to stack ETS-2;
- (g) One (1) twenty-five (25) horsepower (hp), electric powered, dyno room engine test stand, identified as dyno room #2 test stand, exhausting to stack ETS-1;
- (h) Storage Tanks, including:
 - (1) One (1) 270 gallon gasoline storage tank;
 - (2) One (1) 6,000 gallon used oil storage tank;
 - (3) One (1) 8,000 gallon gear oil storage tank;
 - (4) One (1) 4,000 gallon hydraulic oil storage tank;
 - (5) One (1) 5,000 gallon hydraulic oil storage tank;
 - (6) One (1) 5,000 gallon gearbox grease storage tank;
 - (7) One (1) 3,000 gallon gearbox grease storage tank;
 - (8) One (1) 12,000 gallon wastewater storage tank;
 - (9) One (1) 6,500 gallon filtration tank;
 - (10) One (1) 1,500 gallon recycled cutting oil storage tank; and
 - (11) One (1) 6,000 gallon cutting oil storage tank.
- (i) One (1) natural gas-fired, three stage steel parts washer, located in Building "B," with a heat input capacity of 4.0 MMBtu/hr, exhausting to vent IEF-17. This washer uses non-VOC and non-HAP solvents;
- (j) One (1) natural gas-fired, iron phosphate parts washer, located in Building "B," with a heat input capacity of 2.5 MMBtu/hr, exhausting to vents IEF-26 and IEF-27. This washer uses non-VOC and non-HAP solvents;
- (k) One (1) natural gas-fired, two stage axle parts washer, located in Building "D," with a heat input capacity of 1.6 MMBtu/hr, exhausting to vents 23C and 23D. This washer uses non-VOC and non-HAP solvents;
- (l) One (1) arc welding booth, consisting of shielded metal arc, gas metal arc, and fluxed cored arc welding, uncontrolled and exhausting to vent GEF-40;
- (m) One (1) metal cutting booth, consisting of plasma and oxyacetylene metal cutting, with a maximum metal cutting rate of 10 feet per hour each, uncontrolled and exhausting to vent GEF-40;

(n) One (1) de-rust dip tank. This dip tank uses non-VOC and non-HAP solvents; and

(o) One (1) rust inhibitor dip tank. This dip tank uses non-VOC and non-HAP solvents.

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

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

There are no additional specific applicable requirements for these emission units.

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

**MINOR SOURCE OPERATING PERMIT (MSOP)
CERTIFICATION**

Source Name: TecumsehPower Company
Source Address: 1555 South Jackson Street, Salem, Indiana 47167
Mailing Address: 1555 South Jackson Street, Salem, Indiana 47167
MSOP Permit No.: M175-16035-00009

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:

- Annual Compliance Notification
- Test Result (specify) _____
- Report (specify) _____
- Notification (specify) _____
- Affidavit (specify) _____
- 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**

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	TecumsehPower Company
Address:	1555 South Jackson Street
City:	Salem, Indiana 47167
Phone #:	(812) 883-3575
MSOP #:	M175-16035-00009

I hereby certify that Tecumseh Power Company at Salem, Indiana is : still in operation.

no longer in operation.

I hereby certify that Tecumseh Power Company at Salem, Indiana is : in compliance with the requirements of MSOP M175-16035-00009.

not in compliance with the requirements of MSOP M175-16035-00009.

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

MALFUNCTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY FAX NUMBER - 317 233-6865

This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?____, 25 TONS/YEAR SULFUR DIOXIDE ?____, 25 TONS/YEAR NITROGEN OXIDES?____, 25 TONS/YEAR VOC ?____, 25 TONS/YEAR HYDROGEN SULFIDE ?____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?____, 25 TONS/YEAR FLUORIDES ?____, 100 TONS/YEAR CARBON MONOXIDE ?____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF "MALFUNCTION" AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: _____ PHONE NO. () _____
LOCATION: (CITY AND COUNTY) _____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: ____/____/20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/20____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

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

Addendum to the Technical Support Document (TSD) for a
New Source Review and Minor Source Operating Permit

Source Background and Description

Source Name:	TecumsehPower Company
Source Location:	1555 South Jackson Street, Salem, Indiana 47167
County:	Washington
SIC Code:	3568
Operation Permit No.:	175-16035-00009
Permit Reviewer:	Brian Williams

On December 6, 2007, the Office of Air Quality (OAQ) had a notice published in the Salem Leader newspaper in Washington County, Indiana, stating that TecumsehPower Company had applied for a New Source Review and Minor Source Operating Permit (MSOP) to operate an existing lawn and garden equipment transmission manufacturing and testing operation located at 1555 South Jackson Street, Salem, Indiana 47167. The notice also stated that the OAQ proposed to issue a New Source Review and MSOP for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Comments and Responses

On December 14, 2007, the TecumsehPower Company submitted comments to IDEM, OAQ on the draft New Source Construction and Minor Source Operating Permit (MSOP).

The Technical Support Document (TSD) is used by IDEM, OAQ for historical purposes. IDEM, OAQ does not make any changes to the original TSD, but the Permit will have the updated changes. The comments and revised permit language are provided below with deleted language as ~~strikeouts~~ and new language **bolded**.

Comment 1:

As of December 14, 2007, the source has pumped out the 1,000 gallon anhydrous ammonia tank and will not use it in the future. Please remove all references to the ammonia tank in the draft permit and technical support document.

Response to Comment 1:

IDEM, OAQ agrees with the recommended changes to the permit. The permit has been revised as follows:

...

A.2 Emission Units and Pollution Control Equipment Summary

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

...

- (h) Storage Tanks, including:
 - (1) One (1) 270 gallon gasoline storage tank;
 - (2) One (1) 6,000 gallon used oil storage tank;

- ~~(3)~~ One (1) 1,000 gallon anhydrous ammonia storage tank;
- (43) One (1) 8,000 gallon gear oil storage tank;
- ~~(54)~~ One (1) 4,000 gallon hydraulic oil storage tank;
- ~~(65)~~ One (1) 5,000 gallon hydraulic oil storage tank;
- ~~(76)~~ One (1) 5,000 gallon gearbox grease storage tank;
- ~~(87)~~ One (1) 3,000 gallon gearbox grease storage tank;
- ~~(98)~~ One (1) 12,000 gallon wastewater storage tank;
- ~~(409)~~ One (1) 6,500 gallon filtration tank;
- ~~(4110)~~ One (1) 1,500 gallon recycled cutting oil storage tank; and
- ~~(4211)~~ One (1) 6,000 gallon cutting oil storage tank.

...
SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- ...
- (h) Storage Tanks, including:
 - (1) One (1) 270 gallon gasoline storage tank;
 - (2) One (1) 6,000 gallon used oil storage tank;
 - ~~(3)~~ One (1) 1,000 gallon anhydrous ammonia storage tank;
 - (43) One (1) 8,000 gallon gear oil storage tank;
 - ~~(54)~~ One (1) 4,000 gallon hydraulic oil storage tank;
 - ~~(65)~~ One (1) 5,000 gallon hydraulic oil storage tank;
 - ~~(76)~~ One (1) 5,000 gallon gearbox grease storage tank;
 - ~~(87)~~ One (1) 3,000 gallon gearbox grease storage tank;
 - ~~(98)~~ One (1) 12,000 gallon wastewater storage tank;
 - ~~(409)~~ One (1) 6,500 gallon filtration tank;
 - ~~(4110)~~ One (1) 1,500 gallon recycled cutting oil storage tank; and
 - ~~(4211)~~ One (1) 6,000 gallon cutting oil storage tank.
- ...

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

Technical Support Document (TSD) for a New Source Review and Minor Source
Operating Permit (MSOP)

Source Background and Description

Source Name:	TecumsehPower Company
Source Location:	1555 South Jackson Street, Salem, Indiana 47167
County:	Washington
SIC Code:	3568
Operation Permit No.:	175-16035-00009
Permit Reviewer:	Brian Williams

The Office of Air Quality (OAQ) has reviewed an application from TecumsehPower Company, formerly known as Tecumseh Products Company, relating to the construction and operation of an existing lawn and garden equipment transmission manufacturing and testing operation.

History

On October 19, 1992, Tecumseh Products Company was issued Registration No. 175-2733-00009. The following registered units were included in the permit:

- (a) Eight (8) furnaces; three (3) with a capacity of 4.5 MMBtu/hr, two (2) with a capacity of 3.5 MMBtu/hr, two (2) with a capacity of 0.7 MMBtu/hr, and one (1) with a capacity of 4 MMBtu/hr;
- (b) One (1) cold dip degreaser;
- (c) Three (3) shotblasters, each having a baghouse;
- (d) Nine (9) oil quench tanks.

On March 20, 2000, Registration No. 175-2733-00009 was modified by a notice-only change (175-11838-00009). The three (3) baghouses associated with the three (3) shotblasters were removed and the three (3) shotblasters were vented to a single cartridge-type dust collector.

On October 25, 1999, Tecumseh Products Company was issued another Registration (Registration No. 175-11343-00009). The following registered units were included in the permit:

- (a) One (1) engine test stand #1, with a maximum capacity of seven (7) pounds per hour of unleaded gasoline, using no control equipment as control, and exhausting to stack ETS-1;
- (b) One (1) dyno room #1 test stand A & B, with a maximum capacity of seven (7) pounds per hour of unleaded gasoline, using no control equipment as control, and exhausting to stack ETS-2;
- (c) One (1) dyno room #2 test stand A & B, with a maximum capacity of seven (7) pounds per hour of unleaded gasoline, using no control equipment as control, and exhausting to stack ETS-3;

- (d) One (1) engine test stand #2, with a maximum capacity of seven (7) pounds per hour of unleaded gasoline, using no control equipment as control, and exhausting to stack ETS-4.

On May 24, 2002, Tecumseh Products Company informed IDEM of the following changes:

The following units have been removed from Tecumseh Products Company's operation:

- (a) Four (4) heat treat furnaces identified as units FCU2, FCU3, FCU4, and FCU8 and their four (4) associated oil quench tanks;
- (b) One (1) cold dip degreaser;
- (c) One (1) shotblaster.

The following units were not constructed as permitted:

- (a) Engine Test Stands #1 and #2 (ETS-1 and ETS-4)

The following units were retired from service but never permitted:

- (a) Two (2) boilers identified as Boiler #1 and #2, with a capacity of 5.23 MMBtu/hr each.

On October 24, 2007, Tecumseh Products Company informed IDEM of the following changes:

The following units have been removed from Tecumseh Products Company's operation:

- (a) Five (5) oil quench tanks.

On October 29, 2007, Tecumseh Products Company informed IDEM of the following changes:

- (a) The source requested that the company name be changed from Tecumseh Products Company to TecumsehPower Company.
- (b) Engine Test Stands #1 and #2 (ETS-1 and ETS-4) were constructed as mobile sources located outside of the facility. As a result, they will not be included in the permit, since IDEM, OAQ does not permit mobile sources.

On November 13, 2007, TecumsehPower Company informed IDEM of the following changes:

- (a) Dyno room #2 test stand will no longer have the ability to burn gasoline. The source will remove the gasoline and exhaust system from this unit. Dyno room #2 test stand will now be powered by an electric motor.

Permitted and Unpermitted Emission Units and Pollution Control Equipment

Taking into account all the above-mentioned changes. The source consists of the following permitted and unpermitted emission units and pollution control devices:

- (a) Two (2) shotblasters, identified as shot blast machine TC1637 and TC563, with a maximum throughput rate of 0.89 tons per hour total, with particulate matter controlled by a cartridge-type dust collector (TC# 1735), which exhausts to the indoors;

- (b) One (1) shotblaster, identified as shot blast machine TC1651, with a maximum throughput rate of 1.19 tons per hour with particulate matter controlled by a cartridge-type dust collector (TC#1651), which exhausts to the indoors;
- (c) One (1) metal machining operation, located in Tool Room Building "D," consisting of surface grinding, deburring, and machining using a water-soluble oil coolant, with a maximum throughput rate of 0.0045 tons per hour with particulate matter controlled by a cartridge-type dust collector system (TC#1650), which exhausts to the outdoors;
- (d) One (1) axle polishing operation, located in Building "D," with a maximum throughput rate of 0.51 tons per hour with particulate matter controlled by a cartridge-type dust collector system, which exhausts to the indoors;
- (e) Natural gas-fired combustion sources with heat input equal to or less than 10 MMBtu per hour, including:
 - (1) One (1) boiler unit, located in the Back Mechanical Room in the Assembly Department, with a heat input rate of 0.9 MMBtu/hr, exhausting to vent HWB-1;
 - (2) One (1) HVAC unit, with a heat input rate of 4.7 MMBtu/hr, for the south side of Building "A", exhausting to vent MAU-1;
 - (3) One (1) HVAC unit, with a heat input rate of 4.7 MMBtu/hr, for the north side of building "A", exhausting to vent MAU-2;
 - (4) One (1) HVAC unit, with a heat input rate of 4.225 MMBtu/hr, for Building "B," exhausting to vent MAU-3;
 - (5) One (1) HVAC unit, with a heat input rate of 4.225 MMBtu/hr, for Building "D," exhausting to vent MAU-4;
 - (6) One (1) HVAC unit, with a heat input rate of 4.225 MMBtu/hr, for Building "E," exhausting to vent MAU-5;
 - (7) One (1) HVAC unit, with a heat input rate of 4.225 MMBtu/hr, for Building "D," exhausting to vent MAU-6;
 - (8) One (1) HVAC unit, with a heat input rate of 4.225 MMBtu/hr, for Building "C," exhausting to vent MAU-7;
 - (9) One (1) non-heat treat axle temper draw furnace, located in Building "D," with a heat input rate of 1.475 MMBtu/hr, exhausting to vents GEF-23, GEF-25, and SAF-2;
 - (10) One (1) radiant tube heating system, located in the Assembly Department, with a heat input rate of 1.08 MMBtu/hr, exhausting to vents CVR-1 and CVR-2;
 - (11) One (1) HVAC unit, with a heat input rate of 5.0 MMBtu/hr, for the West side assembly area, exhausting to vent MAU-15;
 - (12) Four (4) water heaters, with a combined heat input rate of 0.29 MMBtu/hr, exhausting to vents 39A (front offices), 21A (abcor room), 7A (sales office), and 28A (front mechanical room);

- (13) Seven (7) HVAC units, with a combined heat input rate of 3.99 MMBtu/hr, exhausting to vents 18A (Building "C"), RT-1, RT-2, RTMZ-1 (front offices), RT-3 (receiving dock), MAU-8 (assembly), and MAU-RDL (R&D);
 - (14) Eight (8) office furnaces, with a combined heat input rate of 1.32 MMBtu/hr, exhausting to vents 7A, 8A, 9A (sales/training room), 10A, 10B, and 10C (offices near back mechanical room);
 - (15) Ten (10) ceiling duct furnaces, with a combined heat input rate of 3.24 MMBtu/hr, exhausting to vents 29A (steel dock - Building "E"), 34A (assembly), 32A (maintenance shop - Building "C"), 30A (tool room - Building "D"), 35A (Building "B"), 5A (blast room - Building "A"), 6A (receiving dock), and GUH-1 (back mechanical room); and
 - (16) One (1) draw furnace, heat input 0.55 MM BTU/hr, exhausting to vent 33A.
- (f) One (1) twenty-five (25) horsepower (hp), electric powered, dyno room engine test stand, identified as dyno room #1 test stand, with unleaded gasoline as a back-up fuel and a maximum capacity of seven (7) pounds per hour of unleaded gasoline, exhausting to stack ETS-2A;
- (g) One (1) twenty-five (25) horsepower (hp) electric powered, dyno room engine test stand, identified as dyno room #2 test stand, exhausting to stack ETS-1;
- (h) Storage Tanks, including:
- (1) One (1) 270 gallon gasoline storage tank;
 - (2) One (1) 6,000 gallon used oil storage tank;
 - (3) One (1) 1,000 gallon anhydrous ammonia storage tank;
 - (4) One (1) 8,000 gallon gear oil storage tank;
 - (5) One (1) 4,000 gallon hydraulic oil storage tank;
 - (6) One (1) 5,000 gallon hydraulic oil storage tank;
 - (7) One (1) 5,000 gallon gearbox grease storage tank;
 - (8) One (1) 3,000 gallon gearbox grease storage tank;
 - (9) One (1) 12,000 gallon wastewater storage tank;
 - (10) One (1) 6,500 gallon filtration tank;
 - (11) One (1) 1,500 gallon recycled cutting oil storage tank; and
 - (12) One (1) 6,000 gallon cutting oil storage tank.
- (i) One (1) natural gas-fired, three stage steel parts washer, located in Building "B," with a heat input capacity of 4.0 MMBtu/hr, exhausting to vent IEF-17. This washer uses non-VOC and non-HAP solvents;

- (j) One (1) natural gas-fired, iron phosphate parts washer, located in Building "B," with a heat input capacity of 2.5 MMBtu/hr, exhausting to vents IEF-26 and IEF-27. This washer uses non-VOC and non-HAP solvents;
- (k) One (1) natural gas-fired, two stage axle parts washer, located in Building "D," with a heat input capacity of 1.6 MMBtu/hr, exhausting to vents 23C and 23D. This washer uses non-VOC and non-HAP solvents;
- (l) One (1) arc welding booth, consisting of shielded metal arc, gas metal arc, and fluxed cored arc welding, uncontrolled and exhausting to vent GEF-40;
- (m) One (1) metal cutting booth, consisting of plasma and oxyacetylene metal cutting, with a maximum metal cutting rate of 10 feet per hour each, uncontrolled and exhausting to vent GEF-40;
- (n) One (1) de-rust dip tank. This dip tank uses non-VOC and non-HAP solvents; and
- (o) One (1) rust inhibitor dip tank. This dip tank uses non-VOC and non-HAP solvents.

Existing Approvals

The source has been operating under previous approvals including, but no limited to, the following:

- (a) R175-2733-00009, issued on October 19, 1992; and
- (b) R175-11343-00009 issued on October 25, 1999; and
- (c) R175-11838-00009 issued on March 20, 2000.

All conditions from previous approvals were incorporated into this permit except the following:

- (a) R175-2733-00009, issued on October 19, 1992

Condition 8-3-2(Cold Cleaner Operation): Permittee shall comply with 8-3-2

Reason not incorporated: Cold Cleaner Operation removed from service.

Enforcement Issue

Pursuant to 326 IAC 2-5.5-2(b) any existing source that is not a chrome electroplating source that had a valid air registration shall apply for approval under this rule no later than twenty-four (24) months from the effective date of this rule or in the case of TecumsehPower Company, December 25, 2000. TecumsehPower Company submitted an application on May 24, 2002. As a result, IDEM is aware that the source did not apply for the proper operating permit in a timely manner. IDEM is reviewing this matter and will take appropriate action.

Stack Summary

Stack ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temperature (°F)
ETS-2	Engine Test Stand	8'11"	10" x 10"	1049	75
ETS-1	Engine Test Stand	8'11"	10" x 10"	1049	75

Recommendation

The staff recommends to the Commissioner that the operation 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 application for the purposes of this review was received on May 24, 2002, with additional information received on August 21, 2002, October 25, 2007, October 29, 2007, November 5, 2007, and November 13, 2007.

Emission Calculations

- (a) See Appendix A of this TSD for detailed emissions calculations (Appendix A, pages 1 through 7).
- (b) (EPA) TANKS Version 4.09b program, it was determined that use and storage of anhydrous ammonia, lubricating oils, hydraulic oils, machining oils, wastewater, and/or machining fluids (including coolants) at this source would have negligible potential emissions of volatile organic compounds (VOCs).
- (c) The potential to emit (PTE) calculations for the bulk gasoline storage tank were provided by the source in the permit application. The source calculated the PTE using the Environmental Protection Agency's (EPA) TANKS Version 4.0 program. The calculations were verified by IDEM, OAQ using the EPA's TANKS Version 4.09b program.

Potential to Emit of the Source Before Controls

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

Pollutant	Potential to Emit (tons/yr)
PM	94.64
PM-10	96.05
SO ₂	0.21
VOC	3.15
CO	68.85
NO _x	25.94

HAPs	Potential to Emit (tons/yr)
Benzene	6.62E-02
Ethylbenzene	8.21E-02
Hexane	5.27E-01
Toluene	3.62E-01
Xylene	1.64E-01
MTBE	2.46E-01
Dichlorobenzene	2.97E-04

HAPs	Potential to Emit (tons/yr)
Formaldehyde	1.86E-02
Lead	1.24E-04
Cadmium	2.72E-04
Chromium	3.46E-04
Manganese	9.40E-05
Nickel	5.19E-04
Total	1.56

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM, PM-10, SO₂, VOC, CO, and NO_x are less than 100 tons per year and the potential to emit PM, PM-10, NO_x, and CO is greater than 25 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. An MSOP will be issued.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-1.1-1(16)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is not subject to 326 IAC 2-7 (Part 70 Permits).

County Attainment Status

The source is located in Washington County.

Pollutant	Status
PM-10	attainment
PM2.5	attainment
SO ₂	attainment
NO _x	attainment
8-hour Ozone	attainment
CO	attainment
Lead	attainment

- (a) Washington County has been classified as unclassifiable or attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM 2.5 emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions. See the State Rule Applicability for the source section.
- (b) Volatile organic compounds (VOC) emissions and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Washington County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) Washington County has been classified as attainment or unclassifiable in Indiana for PM, PM-10, SO₂, NO₂, CO, and lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

- (d) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule amendment to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.
- (e) Fugitive Emissions
Since this type of operation is not one of the 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 particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD applicability.

Source Status

Existing Source PSD Definition (emissions after controls, based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/yr)
PM	1.53*
PM-10	2.94*
SO ₂	0.21
VOC	3.15
CO	68.85
NO _x	25.94
Single HAP	5.27E-01
Combination HAPs	1.56

*Potential to Emit after controls

- (a) This existing source is not a major stationary source because no attainment pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from this permit 175-16035-00009, is still not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons per year.

This status is based on all the air approvals issued to the source. This status has been verified by the OAQ inspector assigned to the source.

Federal Rule Applicability

- (a) The requirements of New Source Performance Standard 40 CFR 60, Subpart Db - Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units (326 IAC 12) are not included in this permit for the one (1) boiler unit (0.9 MMBtu/hr), located in the Back Mechanical Room in the Assembly Department. The boiler unit was constructed after the applicability date, but has a maximum heat input capacity that is less than 100 MMBtu per hour.
- (b) The requirements of the New Source Performance Standard (NSPS), 40 CFR 60.110, Subpart Kb (Volatile Organic Liquid Storage Vessels) are not included in the permit, because this source does not have storage tanks with a capacity greater than or equal to 75 cubic meters (19,813 gallons).

- (c) The requirements of the New Source Performance Standard (NSPS), 40 CFR 60.4200, Subpart IIII (Standards of Performance for Stationary Compression Ignition Internal Combustion Engines) are not included in this permit because the two dyno room engine test stands were constructed before July 11, 2005 and the two dyno room engine test stands are not compression ignition internal combustion engines.
- (d) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit for this source.
- (e) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) included in this permit.

State Rule Applicability – Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

This source is a minor source under PSD rules because the potential to emit of any regulated pollutant is less than two hundred fifty (250) tons per year.

326 IAC 2-4.1 (New Source Toxics Control)

The operation of the lawn and garden equipment transmission manufacturing and testing operation will emit less than 10 tons per year of a single HAP and less than 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

This source is located in Washington, is not required to operate under a Part 70 permit, and emits less than five (5) tons per year of lead. Therefore, pursuant to 326 IAC 2-6-1(b), the source is only subject to additional information requests as provided in 326 IAC 2-6-5.

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 the 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.

326 IAC 6-4 (Fugitive Dust Emissions)

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.

State Rule Applicability – Shotblasting, Machine Room, and Tool Room

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

The metal machining operation has a maximum process weight rate less than 100 pounds per hour. Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions 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 shall not exceed 0.551 pounds per hour.

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emission rate from the following emission units and control devices shall not exceed

the pounds per hour limitation when operating at the stated process weight rates calculated using the following equations:

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:

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

Emission Unit (dust collector)	Process weight rate (tons per hour)	Allowable particulate emission rate (pounds per hour)	Unrestricted potential emissions (pounds per hour)
Shot Blast Machines TC1637 and TC563 (TC#1735)	0.89 total	3.79 total	10.3 total
Shot Blast Machine TC1651 (TC#1651)	1.19	4.61	1.9
Metal Machining (TC#1650)	0.0045	0.551	6.2
Axle Polishing	0.51	2.61	3.1

In order to comply with this limit, the dust collectors shall be in operation at all times, when the shot blast machines (TC1637 and TC563), metal machining, and axle polishing are in operation.

Based on calculations, the dust collector is not needed to comply with this limit for shot blast machine TC1651.

State Rule Applicability – Dyno Room Engine Test Stands

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

Dyno room #1 test stand is exempt from the requirements of 326 IAC 6-3, because, pursuant to 326 IAC 1-2-59, liquid and gaseous fuels and combustion air are not considered as part of the process weight. In addition, the potential particulate emissions are less than five hundred fifty one thousandths (0.551) pound per hour.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

Dyno room #1 test stand is not subject to 326 IAC 8-1-6 (New Facilities; General Reduction Requirements), because it has the potential to emit less than twenty-five (25) tons per year of VOC.

326 IAC 9-1-1 (Carbon Monoxide Emission Limits)

Dyno room #1 test stand is not subject to 326 IAC 9-1-1 (Carbon Monoxide Emission Limits) because there are no applicable emission limits for the source under 326 IAC 9-1-2.

326 IAC 10-1-1 (Nitrogen Oxides Control)

Dyno room #1 test stand is not subject to 326 IAC 10-1-1 (Nitrogen Oxides Control) because the source is not located in Clark or Floyd counties.

326 IAC 10-5-1 (Nitrogen Oxide Reduction Program for Internal Combustion Engines (ICE))

Dyno room #1 test stand is not subject to 326 IAC 10-5-1 (Nitrogen Oxide Reduction Program for Internal Combustion Engines (ICE)) because it is not a large NOx SIP Call engine.

State Rule Applicability – Natural Gas Combustion

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

The natural gas-fired combustion units (HVAC, water heaters, office furnaces, ceiling duct furnaces, radiant tube heating system, draw furnaces) are not subject to 326 IAC 6-2 as they are not sources of indirect heating. However, the natural gas-fired boiler unit is subject to 326 IAC 6-2-4 because it was constructed after September 21, 1983. Pursuant to 326 IAC 6-2-4 (a) (Particulate emission limitations for sources of indirect heating: emission limitations for facilities specified in 326 IAC 6-2-1(d)), particulate emissions from this boiler must be calculated using the following equation:

$$P_t = \frac{1.09}{Q^{0.26}}$$

Where:

P_t = pounds of particulate matter emitted per million Btu heat input (lb/MMBtu).

Q = total source operating capacity (0.9 MMBtu/hr).

$$P_t = \frac{1.09}{0.9^{0.26}}$$

$$P_t = 1.12 \text{ lb/MMBtu}$$

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

The natural gas-fired combustion units (HVAC, water heaters, office furnaces, ceiling duct furnaces, radiant tube heating system) are exempt from the requirements of 326 IAC 6-3, because, pursuant to 326 IAC 1-2-59, liquid and gaseous fuels and combustion air are not considered as part of the process weight.

326 IAC 9-1-1 (Carbon Monoxide Emission Limits)

The natural gas-fired combustion units (HVAC, water heaters, office furnaces, ceiling duct furnaces, radiant tube heating system), are not subject to 326 IAC 9-1-1 (Carbon Monoxide Emission Limits) because there are no applicable emission limits for the source under 326 IAC 9-1-2.

326 IAC 10-1-1 (Nitrogen Oxides Control)

The natural gas-fired combustion units (HVAC, water heaters, office furnaces, ceiling duct furnaces, radiant tube heating system), are not subject to 326 IAC 10-1-1 (Nitrogen Oxides Control) because the source is not located in Clark or Floyd counties.

State Rule Applicability – Part Washers

326 IAC 8-3-1 (Organic Solvent Degreasing Operations)

The natural gas-fired, three stage steel parts washer, iron phosphate parts washer, and the two stage axle parts washer, are each not subject to 326 IAC 8-3-1 (Organic Solvent Degreasing Operations), because these units use non-VOC based solvents.

State Rule Applicability – Storage Tanks

326 IAC 8-4-3 (Petroleum Liquid Storage Facilities)

The gasoline and petroleum liquid storage tanks are not subject to 326 IAC 8-4-3, because they each have a capacity less than 39,000 gallons.

State Rule Applicability - Welding Operations and Torch Cutting Equipment

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

Pursuant to 326 IAC 6-3-1(b)(9), the arc welding operation is exempt from the requirements of 326 IAC 6-3 because it consumes less than 625 pounds of rod or wire per day. Pursuant to 326 IAC 6-3-1(b)(10), torch cutting equipment is exempt from the requirements of 326 IAC 6-3, because less than 3,400 inches per hour of stock one (1) inch thickness or less is cut.

Compliance Requirements

There are no compliance monitoring requirements included in this permit.

Conclusion

The construction and operation of this lawn and garden equipment transmission manufacturing and testing operation shall be subject to the conditions of the MSOP No. 175-16035-00009.

**Appendix A: Emission Calculations
Dyno Room Test Stand Emissions**

**Company Name: TecumsehPower Company
Address City IN Zip: 1555 South Jackson Street, Salem, Indiana 47167
Permit Number: 175-16035-00009
Reviewer: Brian Williams**

Maximum Horsepower	25 hp										
Density of Gasoline	6.13 lb/gal										
Gasoline Heating Value	20300 Btu/lb										
Brake-specific Fuel Consumption	7000 Btu/hp-hr										
	Emission Factor (lb/hp-hr)										
	Unlimited Potential to Emit (tons/yr)										
Test Stand Area	Fuel Type	CO	VOC	Nox	SO₂	PM/PM10	CO	VOC	NOx	SO₂	PM/PM10
Dyno Room Test Stand #1	Unleaded	0.439	0.015	0.011	5.91E-04	7.21E-04	48.07	1.64	1.20	0.06	0.08
Unlimited Total							48.07	1.64	1.20	0.06	0.08

Source: Emission factor based on AP-42 Table 3.3-1, Emission Factors for Uncontrolled Gasoline Industrial Engines October 1996

Methodology

Unlimited PTE (tons/yr): Maximum Horsepower (hp) x Emission Factor (lb/hp-hr) x 8760/1 (hr/yr) x 1/2000 (ton/lb)

HAP Content of Gasoline (from Vendor Specifications)

HAP	Percent by Weight
Benzene	4.00%
Ethylbenzene	2.00%
Hexane	5.00%
Toluene	22.00%
Xylene	10.00%
MTBE	15.00%

			Total VOC Emission Factor (lb/hp-hr)	HAPs Potential to Emit (tons/yr)						
Test Stand Area	Fuel Type			Benzene	Ethylbenzene	Hexane	Toluene	Xylene	MTBE	Total HAPs
Dyno Room Test Stand #1	Unleaded		0.015	6.57E-02	8.21E-02	8.21E-02	3.61E-01	1.64E-01	2.46E-01	1.00
Unlimited Total				6.57E-02	8.21E-02	8.21E-02	3.61E-01	1.64E-01	2.46E-01	1.00

Source: Emission factor based on AP-42 Table 3.3-1, Emission Factors for Uncontrolled Gasoline Industrial Engines October 1996

Methodology

Unlimited PTE (tons/yr): Maximum Horsepower (hp) x Emission Factor (lb/hp-hr) x HAP % Weight x 8760/1 (hr/yr) x 1/2000 (ton/lb)

**Appendix A: Emission Calculations
Shotblasting**

Company Name: TecumsehPower Company
Address City IN Zip: 1555 South Jackson Street, Salem, Indiana 47167
Permit Number: 175-16035-00009
Reviewer: Brian Williams

Unit ID	Control Efficiency (%)	Grain Loading per Actual Cubic foot of Outlet Air (grains/cub. ft.)	Gas or Air Flow Rate (acfm.)	PM/PM10 Emission Rate before Controls (lb/hr)	PM/PM10 Emission Rate before Controls (tons/yr)	PM/PM10 Emission Rate after Controls (lb/hr)	PM/PM10 Emission Rate after Controls (tons/yr)
Shotblasters (TC1637 and TC563)	99.0%	0.0015	8000	10.3	45.1	0.103	0.45
Shotblaster (TC1651)	99.0%	0.0015	1500	1.9	8.4	0.019	0.08
Tool Grinding	99.0%	0.0040	1800	6.2	27.0	0.062	0.27
Axle polishing	99.0%	0.0040	900	3.1	13.5	0.031	0.14
Total					94.0		0.94

Methodology

Emission Rate in lbs/hr (after controls) = (grains/cub. ft.) (cub. ft./min.) (60 min/hr) (lb/7000 grains)

Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

Emission Rate in lbs/hr (before controls) = Emission Rate (after controls): (lbs/hr)/(1-control efficiency)

Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

**Appendix A: Emission Calculations
Bulk Gasoline Storage Tank**

Company Name: TecumsehPower Company
Address City IN Zip: 1555 South Jackson Street, Salem, Indiana 47167
Permit Number: 175-16035-00009
Reviewer: Brian Williams

Tank Contents	Capacity (gal)	Annual Gasoline Usage (gal/yr)	Total VOC Emissions (tons/yr)	Benzene Emissions (tons/yr)	Ethylbenzene Emissions (tons/yr)	Hexane Emissions (tons/yr)	Toluene Emissions (tons/yr)	Xylene Emissions (tons/yr)	MBTE Emissions (tons/yr)
Unleaded Gasoline	270.00	12,000	0.15153	0.0061	0.003	0.0076	0.033	0.015	0.023

Methodology

The source calculated the PTE using the Environmental Protection Agency's (EPA) TANKS Version 4.0 program. The calculations were verified by IDEM, OAQ using the EPA's TANKS Version 4.09b program.

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

Company Name: TecumsehPower Company

Address City IN Zip: 1555 South Jackson Street, Salem, Indiana 47167

Permit Number: 175-16035-00009

Reviewer: Brian Williams

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

56.5

494.7

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.47	1.88	0.15	24.73	1.36	20.78

*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 5 for HAPs emissions calculations.

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

HAPs Emissions

Company Name: TecumsehPower Company

Address City IN Zip: 1555 South Jackson Street, Salem, Indiana 47167

Permit Number: 175-16035-00009

Reviewer: Brian Williams

		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	5.19E-04	2.97E-04	1.86E-02	4.45E-01	8.41E-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	1.24E-04	2.72E-04	3.46E-04	9.40E-05	5.19E-04	

Methodology is the same as page 4.

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emissions Calculations
Welding and Thermal Cutting**

**Company Name: TecumsehPower Company
Address City IN Zip: 1555 South Jackson Street, Salem, Indiana 47167
Permit Number: 175-16035-00009
Reviewer: Brian Williams**

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)		EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
WELDING												
Stick (E6011 electrode)	1	0.003333333		0.0384	0.000998	5.00E-06	5.00E-06	1.28E-04	3.33E-06	1.67E-08	1.67E-08	3.36E-06
Stick (E7018 electrode)	1	0.003333333		0.0184	0.00103	2.00E-06	6.00E-06	6.13E-05	3.43E-06	6.67E-09	2.00E-08	3.46E-06
FLAME CUTTING	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)**				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Oxyacetylene	1	0.5	2	0.1622	0.0005	0.0001	0.0003	9.73E-03	4.87E-06	9.73E-10	1.46E-13	4.87E-06
Plasma**	1	1	2	0.0039				4.68E-04				0.000
EMISSION TOTALS												
Potential Emissions lbs/hr								0.01				1.17E-05
Potential Emissions lbs/day								0.25				2.80E-04
Potential Emissions tons/year								0.05				5.12E-05

METHODOLOGY

*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.

**Emission Factor for plasma cutting from American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted). Therefore, the emission factor for plasma cutting is for 8 mm thick rather than 1 inch, and the maximum metal thickness is not used in calculating the emissions.

Using AWS average values: (0.25 g/min)/(3.6 m/min) x (0.0022 lb/g)/(39.37 in./m) x (1,000 in.) = 0.0039 lb/1,000 in. cut, 8 mm thick

Plasma cutting emissions, lb/hr: (# of stations)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 8 mm thick)

Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)

Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)

Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day

Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.

**Appendix A: Emission Calculations
Summary of Emissions**

Company Name: TecumsehPower Company
Address City IN Zip: 1555 South Jackson Street, Salem, Indiana 47167
Permit Number: 175-16035-00009
Reviewer: Brian Williams

Unlimited Potential to Emit (tons/yr)							
Process	PM	PM10	SO₂	NO_x	VOC	CO	HAPs
Dyno Room Test Stand #1	0.08	0.08	0.06	1.20	1.64	48.07	1.00
Shotblasters (TC1637 and TC563)	45.05	45.05	0.00	0.00	0.00	0.00	0.00
Shotblaster (TC1651)	8.45	8.45	0.00	0.00	0.00	0.00	0.00
Tool Grinding	27.03	27.03	0.00	0.00	0.00	0.00	0.00
Axle polishing	13.52	13.52	0.00	0.00	0.00	0.00	0.00
Natural Gas	0.47	1.88	0.15	24.73	1.36	20.78	0.47
Bulk Gasoline Storage Tank	0.00	0.00	0.00	0.00	0.15	0.00	0.09
Storage Tanks	0.00	0.00	0.00	0.00	Negligible	0.00	Negligible
Welding/Cutting	0.05	0.05	0.00	0.00	0.00	0.00	5.12E-05
Total	94.64	96.05	0.21	25.94	3.15	68.85	1.56

Potential to Emit after Controls (tons/yr)							
Process	PM	PM10	SO₂	NO_x	VOC	CO	HAPs
Dyno Room Test Stand #1	0.08	0.08	0.06	1.20	1.64	48.07	1.00
Shotblasters (TC1637 and TC563)	0.45	0.45	0.00	0.00	0.00	0.00	0.00
Shotblaster (TC1651)	0.08	0.08	0.00	0.00	0.00	0.00	0.00
Tool Grinding	0.27	0.27	0.00	0.00	0.00	0.00	0.00
Axle polishing	0.14	0.14	0.00	0.00	0.00	0.00	0.00
Natural Gas	0.47	1.88	0.15	24.73	1.36	20.78	0.47
Bulk Gasoline Storage Tank	0.00	0.00	0.00	0.00	0.15	0.00	0.09
Storage Tanks	0.00	0.00	0.00	0.00	Negligible	0.00	Negligible
Welding/Cutting	0.05	0.05	0.00	0.00	0.00	0.00	5.12E-05
Total	1.53	2.94	0.21	25.94	3.15	68.85	1.56