



Joseph E. Kernan  
Governor

Lori F. Kaplan  
Commissioner

October 26, 2004

100 North Senate Avenue  
P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
(317) 232-8603  
(800) 451-6027  
www.in.gov/idem

TO: Interested Parties / Applicant

RE: Vibration Control Technologies, LLC / MSOP 113-16637-00080

FROM: Paul Dubenetzky  
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, Room 1049, 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.dot 9/16/03



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## MINOR SOURCE OPERATING PERMIT OFFICE OF AIR QUALITY

**Vibration Control Technologies, LLC**  
**1496 Gerber Street**  
**Ligonier, Indiana 46767**

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

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-5.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 113-16637-00080	
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: October 26, 2004 Expiration Date: October 26, 2009

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## SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 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)]

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The Permittee owns and operates automobile parts production plant for machining and surface coating of auto parts.

Authorized Individual: Plant Manager  
Source Address: 1496 Gerber Street, Ligonier, IN 46767  
Mailing Address: same as above  
General Source Phone: (260) 894-7199  
SIC Code: 3499  
County Location: Noble  
Source Location Status: Attainment for all criteria pollutants  
Source Status: Minor Source Operating Permit  
Minor Source, under PSD Rules;  
Minor Source, Section 112 of the Clean Air Act

### A.2 Emissions Units and Pollution Control Equipment Summary

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This stationary source is approved to construct and operate the following emissions units and pollution control devices:

- (a) One (1) Ford 6.8 Assembly Cell line, consisting of:
  - (1) One (1) adhesive roll coater, with a maximum capacity of 105 machined metal parts per hour, and exhausting to stack S-9.
  - (2) One (1) NMP washer, with a maximum capacity of 105 machined metal parts per hour, exhausting to general ventilation.
  - (3) One (1) spray booth, identified as P-1, with a maximum capacity of 105 machined metal parts per hour, using dry filters as particulate matter control, and exhausting to stack S-10.
- (b) One (1) Ford 5.4 line, consisting of:
  - (1) One (1) adhesive roll coater, with a maximum capacity of 105 machined metal parts per hour, and exhausting to general ventilation.
  - (2) One (1) NMP washer, with a maximum capacity of 105 machined metal parts per hour, and exhausting to stack S-7.
  - (3) One (1) spray booth, identified as P-2, with a maximum capacity of 105 machined metal parts per hour, using dry filters as control, and exhausting to stack S-8.

- (c) One (1) Honda Civic Assembly line:
  - (1) One (1) spray booth, with a maximum capacity of 100 units per hour, using dry filters as particulate matter control, and exhausting to the stack S-15.
  - (2) One (1) spray booth, with a maximum capacity of 100 units per hour, using dry filters as particulate matter control, and exhausting to the stack S-14.
  - (3) One (1) brush coater or timing mark station, with a maximum capacity of 100 units per hour, and exhausting to the atmosphere.
- (d) One (1) Honda BPX Line #1 Assembly Cell:
  - (1) One (1) spray shadow booth, with a maximum capacity of 92 units per hour, and exhausting to the stack S-17.
  - (2) One (1) spray final booth, with a maximum capacity of 92 units per hour, using dry filters as particulate matter control, and exhausting to the stack S-18.
  - (3) One (1) brush coater or timing mark station, with a maximum capacity of 92 units per hour, and exhausting to the atmosphere.
- (e) One (1) Honda Compact Assembly Cell:
  - (1) One (1) spray shadow booth, with a maximum capacity of 92 units per hour, and exhausting to the stack S-19.
  - (2) One (1) spray final booth, with a maximum capacity of 92 units per hour, using dry filters as particulate matter control, and exhausting to the stack S-20.
  - (3) One (1) brush coater or timing mark station, with a maximum capacity of 92 units per hour, and exhausting to the atmosphere.
- (f) One (1) Ford 2.5 Duratec/DMD line, consisting of:
  - (1) One (1) adhesive roll coater, with a maximum capacity of 85 machined metal parts per hour, and exhausting to general ventilation.
  - (2) One (1) NMP washer, with a maximum capacity of 85 machined metal parts per hour, and exhausting to stack S-2.
  - (3) One (1) dip tank, with a maximum capacity of 85 machined metal parts per hour, using dry filters as particulate matter control, and exhausting to stack S-1.
- (g) One mechanical shot blaster, with a maximum capacity of 80 lb/hr of parts, and exhausting to the atmosphere.
- (h) One (1) Ford 4.0 Redesign Line:
  - (1) One (1) adhesive spray booth, with a maximum capacity of 225 units per hour, using dry filters as particulate matter control, and exhausting to the stack S-4.
  - (2) One (1) spray booth, with a maximum capacity of 225 units per hour, using dry filters as particulate matter control, and exhausting to the stack S-6.

- (3) Four (4) rubber molding presses, with a maximum capacity of 81 lb/hr each, exhausting to stack S-5.
- (i) One (1) Ford I4 Assembly line:
  - (1) One (1) spray booth, with a maximum capacity of 105 machined metal parts per hour, and exhausting to the stack S-11.
- (j) Three (3) natural gas-fired heaters, rated at 0.32 million British thermal units (MMBTU) per hour each.
- (k) Two (2) natural gas-fired heaters, rated at 0.2 million British thermal units (MMBTU) per hour each.
- (l) One (1) natural gas-fired heaters, rated at 0.1 million British thermal units (MMBTU) per hour each.
- (m) Four (4) natural gas-fired sealer tank heaters, rated at 0.3 million British thermal units (MMBTU) per hour each.
- (n) Four (4) natural gas-fired wash tank heaters, rated at 0.4 million British thermal units (MMBTU) per hour each.
- (o) One (1) Nissan Assembly Cell:
  - (1) One (1) spray booth, with a maximum capacity of 60 units per hour, and exhausting to the stack S-16.
  - (2) One (1) brush coater or timing mark station, with a maximum capacity of 60 units per hour, and exhausting to the atmosphere.
- (p) One (1) D219 Assembly Cell:
  - (1) One (1) spray booth, with a maximum capacity of 225 units per hour, using dry filters as particulate matter control, and exhausting to the stack S-12.
  - (2) Two (2) rubber molding presses, with a maximum capacity of 58.5 lb/hr each, exhausting to stack S-13.
- (q) One (1) Ford 3.0 Vulcan Cell:
  - (1) One (1) dip tank, with a maximum capacity of 85 units per hour, and exhausting to stack S-3.

## **SECTION B GENERAL CONDITIONS**

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

### **B.1 Permit No Defense [IC 13]**

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This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

### **B.2 Definitions**

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Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

### **B.3 Effective Date of the Permit [IC13-15-5-3]**

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Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

### **B.4 Revocation of Permits [326 IAC 2-1.1-9(5)]**

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Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

### **B.5 Permit Term and Renewal [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5]**

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

The Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date. If a timely and sufficient permit application for a renewal has been made, this permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

### **B.6 Modification to Permit [326 IAC 2]**

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Notwithstanding the Section B condition entitled "Minor Source Operating Permit", all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

### **B.7 Annual Notification [326 IAC 2-6.1-5(a)(5)]**

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- (a) Annual notification shall be submitted 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) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.
- (c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

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

- (d) 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.8 Preventive Maintenance Plan [326 IAC 1-6-3]**

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- (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 (this time frame is determined on a case by case basis but no more than ninety (90) days) after issuance of this permit, including the following information on each emissions unit:
- (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, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

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

- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMP's 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 PMP whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) 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.9 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]**

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- (a) Permit revisions are governed by the requirements of 326 IAC 2-6.1-6.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

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

- (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)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a non-road engine, as defined in 40 CFR 89.2.

**B.10 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] [IC13-17-3-2][IC 13-30-3-1]**

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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 this title or the conditions of this permit or any operating permit revisions;
- (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 processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
- (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.11 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]**

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Pursuant to [326 IAC 2-6.1-6(d)(3)]:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, within thirty (30) days of the change.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) IDEM, OAQ, shall issue a revised permit.

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

**B.12 Annual Fee Payment [326 IAC 2-1.1-7]**

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- (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.

## SECTION C

## SOURCE OPERATION CONDITIONS

Entire Source

**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 construct and 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 non-overlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**C.4 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.5 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-7-1(34).

- (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

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

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- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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

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

no later than thirty-five (35) days prior to the intended test date.

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ (and local agency) not later than forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, (and local agency), 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.7 Compliance Requirements [326 IAC 2-1.1-11]

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The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements 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

### C.8 Compliance Monitoring [326 IAC 2-1.1-11]

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

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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.

## Record Keeping and Reporting Requirements

### C.10 Malfunctions Report [326 IAC 1-6-2]

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

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- (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 when operation begins.

### C.12 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

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- (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, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (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, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do not 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

## FACILITY OPERATION CONDITIONS

### Emissions Unit Description:

One (1) Ford 6.8 line, consisting of:

- (a) One (1) adhesive roll coater, with a maximum capacity of 105 machined metal parts per hour, and exhausting to stack S-9.
- (b) One (1) NMP washer, with a maximum capacity of 105 machined metal parts per hour, exhausting to general ventilation.
- (c) One (1) spray booth, identified as P-1, with a maximum capacity of 105 machined metal parts per hour, using dry filters as particulate matter control, and exhausting to stack S-10.

One (1) Ford 5.4 line, consisting of:

- (d) One (1) adhesive roll coater, with a maximum capacity of 105 machined metal parts per hour, using no control, and exhausting to stack S-12.
- (e) One (1) NMP washer, with a maximum capacity of 105 machined metal parts per hour, using no control, and exhausting to stack S-7.
- (f) One (1) spray booth, identified as P-2, with a maximum capacity of 105 machined metal parts per hour, using dry filters as control, and exhausting to stack S-8.

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

### Emission Limitations and Standards

#### D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9, the owner or operator shall not allow the discharge into the atmosphere VOC in excess of, for air dried or forced warm air dried coatings, three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the applicators at the Ford 6.8 and 5.4 line spray booths and adhesive roll coaters.

#### D.1.2 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment of P-1 and P-2 during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

#### D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee of NMP washer cold cleaning facilities on the Ford 6.8 and Ford 5.4 Lines shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;

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

#### D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

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- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:
  - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
    - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
    - (B) The solvent is agitated; or
    - (C) The solvent is heated.
  - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
  - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
  - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
  - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
    - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
    - (B) A water cover when solvent is used is insoluble in, and heavier than, water.

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

#### D.1.5 Particulate [326 IAC 6-3-2(d)]

- (a) Particulate from the surface coating manufacturing processes shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:
  - (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
  - (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

#### D.1.6 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.1.7 Volatile Organic Compounds (VOC)[326 IAC 8-1-2] [326 IAC 8-1-4]

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

#### D.1.8 Particulate Matter (PM)

In order to comply with condition D.1.5, the dry filters for PM control shall be in operation and control emissions from the spray booths P-1 and P-2 at all times that the spray booths are in operation.

#### D.1.9 Training Requirements

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- (a) In order to comply with condition D.1.5 the Permittee shall implement an operator-training program.
  - (1) All spray booth operators or employees that perform maintenance at the surface coating facilities shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within 60 days of the date of permit issuance. All new operators shall be trained upon hiring or transfer.
  - (2) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within 1 hour for inspection by IDEM.
  - (3) All operators shall be given refresher training annually.
- (b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

#### **Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]**

##### D.1.10 Record Keeping Requirements

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- (a) In order to comply with condition D.1.1, the Permittee shall maintain records in accordance with (1) and (2) below. Records maintained for (1) and (2) shall be maintained on a monthly basis and shall be complete and sufficient to establish compliance with the VOC usage limit established in condition D.1.1.
  - (1) The VOC content of each coating material and solvent used less water; and
  - (2) The coatings and solvents applied during each month, purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the coating or solvent type.
- (b) In order to comply with Condition D.1.9, the Permittee shall maintain a copy of the operator-training program, all training records including the list of trained operators, and the additional measures prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.2

## FACILITY OPERATION CONDITIONS

### Emissions Unit Description:

One (1) Honda Civic line, consisting of:

- (a) One (1) spray booth, with a maximum capacity of 100 units per hour, using dry filters as particulate matter control, and exhausting to the stack S-15.
- (b) One (1) spray booth, with a maximum capacity of 100 units per hour, using dry filters as particulate matter control, and exhausting to the stack S-14.
- (c) One (1) brush coater or timing mark station, with a maximum capacity of 100 units per hour, and exhausting to the atmosphere.

One (1) Honda BPX Line #1 Assembly Cell:

- (d) One (1) spray shadow booth, with a maximum capacity of 92 units per hour, and exhausting to the stack S-17.
- (e) One (1) spray final booth, with a maximum capacity of 92 units per hour, using dry filters as particulate matter control, and exhausting to the stack S-18.
- (f) One (1) brush coater or timing mark station, with a maximum capacity of 92 units per hour, and exhausting to the atmosphere.

One (1) Honda Compact Assembly Cell:

- (g) One (1) spray shadow booth, with a maximum capacity of 92 units per hour, and exhausting to the stack S-19.
- (h) One (1) spray final booth, with a maximum capacity of 92 units per hour, using dry filters as particulate matter control, and exhausting to the stack S-20.
- (i) One (1) brush coater or timing mark station, with a maximum capacity of 92 units per hour, and exhausting to the atmosphere.

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

### Emission Limitations and Standards

#### D.2.1 Particulate [326 IAC 6-3-2(d)]

- (a) Particulate from the surface coating manufacturing processes shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:
  - (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

- (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

#### D.2.2 Preventive Maintenance Plan [326 IAC 1-6-3]

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

### Compliance Determination Requirements

#### D.2.3 Particulate Matter (PM)

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In order to comply with condition D.2.1, the dry filters for PM control shall be in operation and control emissions from the spray booths at all times that the spray booths are in operation.

#### D.2.4 Training Requirements

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- (a) In order to comply with condition D.2.1 the Permittee shall implement an operator-training program.
  - (1) All spray booth operators or employees that perform maintenance at the surface coating facilities shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within 60 days of the date of permit issuance. All new operators shall be trained upon hiring or transfer.
  - (2) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within 1 hour for inspection by IDEM.
  - (3) All operators shall be given refresher training annually.
- (b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

### Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

#### D.2.5 Record Keeping Requirements

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- (a) In order to comply with Condition D.2.4, the Permittee shall maintain a copy of the operator-training program, all training records including the list of trained operators, and the additional measures prescribed by the Preventive Maintenance Plan.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.3

## FACILITY OPERATION CONDITIONS

### Emissions Unit Description:

One (1) Ford 2.5 Duratec/DMD line, consisting of:

- (a) One (1) adhesive roll coater, with a maximum capacity of 85 machined metal parts per hour, and exhausting to general ventilation.
- (b) One (1) NMP washer, with a maximum capacity of 85 machined metal parts per hour, and exhausting to stack S-2.
- (c) One (1) dip tank, with a maximum capacity of 85 machined metal parts per hour, using dry filters as particulate matter control, and exhausting to stack S-1.

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

### Emission Limitations and Standards

#### D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee of NMP washer cold cleaning facilities on the Ford 2.5 Duratec/DMD line shall:

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

#### D.3.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:
  - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
    - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
    - (B) The solvent is agitated; or

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

#### D.3.3 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.

## SECTION D.4

## FACILITY OPERATION CONDITIONS

### Emissions Unit Description:

- (a) One enclosed mechanical shot blaster, with a maximum capacity of 80 lb/hr of parts, using baghouse as control, and exhausting to the atmosphere.

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

### Emission Limitations and Standards

#### D.4.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2]

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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.

### Compliance Determination Requirement

#### D.4.2 Particulate Control

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In order to comply with D.4.1, the baghouse for particulate control shall be in operation and control emissions from the mechanical shot blasting operation at all times that the machine is in operation.

## SECTION D.5

## FACILITY OPERATION CONDITIONS

### Emissions Unit Description:

One (1) Ford 4.0 Redesign Line:

- (a) One (1) adhesive spray booth, with a maximum capacity of 225 units per hour, using dry filters as particulate matter control, and exhausting to the stack S-4.
- (b) One (1) spray booth, with a maximum capacity of 225 units per hour, using dry filters as particulate matter control, and exhausting to the stack S-6.
- (c) Four (4) rubber molding presses, with a maximum capacity of 81 lb/hr each, exhausting to stack S-5.

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

### Emission Limitations and Standards

#### D.5.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9, the owner or operator shall not allow the discharge into the atmosphere VOC in excess of, for air dried or forced warm air dried coatings, three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the applicators at the Ford 4.0 Redesign line spray booths.

#### D.5.2 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment of the two (2) spray booths during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

#### D.5.3 Particulate [326 IAC 6-3-2(d)]

- (a) Particulate from the surface coating manufacturing processes shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:
  - (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
  - (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

**D.5.4 Preventive Maintenance Plan [326 IAC 1-6-3]**

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

**Compliance Determination Requirements**

**D.5.5 Volatile Organic Compounds (VOC)[326 IAC 8-1-2] [326 IAC 8-1-4]**

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Compliance with the VOC content contained in condition D.5.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

**D.5.6 Particulate Matter (PM)**

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In order to comply with condition D.5.3, the dry filters for PM control shall be in operation and control emissions from the two (2) spray booths at all times that the spray booths are in operation.

**D.5.7 Training Requirements**

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- (a) In order to comply with condition D.5.3 the Permittee shall implement an operator-training program.
- (1) All spray booth operators or employees that perform maintenance at the surface coating facilities shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within 60 days of the date of permit issuance. All new operators shall be trained upon hiring or transfer.
  - (2) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within 1 hour for inspection by IDEM.
  - (3) All operators shall be given refresher training annually.
- (b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

**Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]**

**D.5.8 Record Keeping Requirements**

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- (a) In order to comply with condition D.5.1, the Permittee shall maintain records in accordance with (1) and (2) below. Records maintained for (1) and (2) shall be maintained on a monthly basis and shall be complete and sufficient to establish compliance with the VOC usage limit established in condition D.5.1.
- (1) The VOC content of each coating material and solvent used less water; and
  - (2) The coatings and solvents applied during each month, purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the coating or solvent type.

- (b) In order to comply with Condition D.5.7, the Permittee shall maintain a copy of the operator-training program, all training records including the list of trained operators, and the additional measures prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**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).

<b>Company Name:</b>	<b>Vibration Control Technologies, LLC (VCT)</b>
<b>Address:</b>	<b>1496 Gerber Street</b>
<b>City:</b>	<b>Ligonier, IN 46767</b>
<b>Phone #:</b>	<b>(260) 894-7199</b>
<b>MSOP #:</b>	<b>113-16637-00080</b>

I hereby certify that VCT is  still in operation.  
 no longer in operation.

I hereby certify that VCT is  in compliance with the requirements of MSOP 113-16637-00080.  
 not in compliance with the requirements of MSOP 113-16637-00080.

<b>Authorized Individual (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Date:</b>

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.

<b>Noncompliance:</b>



**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:

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

Technical Support Document (TSD) for Minor Source Operating Permit

**Source Background and Description**

<b>Source Name:</b>	<b>Vibration Control Technologies, LLC</b>
<b>Source Location:</b>	<b>1496 Gerber Street</b>
<b>County:</b>	<b>Noble</b>
<b>SIC Code:</b>	<b>3499</b>
<b>Operation Permit No.:</b>	<b>113-16637-00080</b>
<b>Operation Permit Issuance Date:</b>	<b>October 26, 2004</b>
<b>Permit Reviewer:</b>	<b>Gaurav Shil/EVP</b>

The Office of Air Quality (OAQ) has reviewed an application from Vibration Control Technologies, LLC relating to the operation of automobile parts production plant for machining and surface coating of auto parts.

**History**

Prior to January 1, 2002, Freudenburg-NOK company owned the following two (2) plants:

- (a) Plant 1 is located at 1497 Gerber Street, Ligonier, Indiana 46767; and
- (b) Plant 2 is located at 1496 Gerber Street, Ligonier, Indiana 46767.

Plant 1 and 2 were located on contiguous properties. Vibration Control Technologies, LLC (VCT) bought Plant #2 from Freudenburg-NOK, Ligonier (F-NOK) effective January 1, 2002. The two plants handle different processes and have different SIC codes. Plant 1, under the control of Freudenburg-NOK Company, manufactures automotive brake and steering components, oil parts, CVJ boots, electrical connectors and various other engineered rubber parts. Plant 2 performs machining and surface coating of auto parts. Also, the two plants do not exchange products. Hence, these two plants, now with different ownership, are considered different sources. All facilities taken over by VCT are separated from the current Title V Permit No. T113-7644-00023 and are covered by this operating permit.

**Permitted Emission Units and Pollution Control Equipment**

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

- (a) One (1) Ford 6.8 Assembly Cell line, consisting of:
  - (1) One (1) adhesive roll coater, with a maximum capacity of 105 machined metal parts per hour, and exhausting to stack S-9.
  - (2) One (1) NMP washer, with a maximum capacity of 105 machined metal parts per hour, exhausting to general ventilation.
  - (3) One (1) spray booth, identified as P-1, with a maximum capacity of 105 machined metal parts per hour, using dry filters as particulate matter control, and exhausting to stack S-10.

- (b) One (1) Ford 5.4 line, consisting of:
  - (1) One (1) adhesive roll coater, with a maximum capacity of 105 machined metal parts per hour, and exhausting to general ventilation.
  - (2) One (1) NMP washer, with a maximum capacity of 105 machined metal parts per hour, and exhausting to stack S-7.
  - (3) One (1) spray booth, identified as P-2, with a maximum capacity of 105 machined metal parts per hour, using dry filters as control, and exhausting to stack S-8.
- (c) One (1) Honda Civic Assembly line:
  - (1) One (1) spray booth, with a maximum capacity of 100 units per hour, using dry filters as particulate matter control, and exhausting to the stack S-15.
  - (2) One (1) spray booth, with a maximum capacity of 100 units per hour, using dry filters as particulate matter control, and exhausting to the stack S-14.
  - (3) One (1) brush coater or timing mark station, with a maximum capacity of 100 units per hour, and exhausting to the atmosphere.
- (d) One (1) Ford 2.5 Duratec/DMD line, consisting of:
  - (1) One (1) adhesive roll coater, with a maximum capacity of 85 machined metal parts per hour, and exhausting to general ventilation.
  - (2) One (1) NMP washer, with a maximum capacity of 85 machined metal parts per hour, and exhausting to stack S-2.
  - (3) One (1) dip tank, with a maximum capacity of 85 machined metal parts per hour, using dry filters as particulate matter control, and exhausting to stack S-1.
- (e) One mechanical shot blaster, with a maximum capacity of 80 lb/hr of parts, and exhausting to the atmosphere.
- (f) One (1) Ford I4 Assembly line:
  - (1) One (1) spray booth, with a maximum capacity of 105 machined metal parts per hour, and exhausting to the stack S-11.
- (g) Three (3) natural gas-fired heaters, rated at 0.32 million British thermal units (MMBTU) per hour each.
- (h) Two (2) natural gas-fired heaters, rated at 0.2 million British thermal units (MMBTU) per hour each.
- (i) One (1) natural gas-fired heaters, rated at 0.1 million British thermal units (MMBTU) per hour each.
- (j) Four (4) natural gas-fired sealer tank heaters, rated at 0.3 million British thermal units (MMBTU) per hour each.
- (k) Four (4) natural gas-fired wash tank heaters, rated at 0.4 million British thermal units (MMBTU) per hour each.

- (l) One (1) Nissan Assembly Cell:
  - (1) One (1) spray booth, with a maximum capacity of 60 units per hour, and exhausting to the stack S-16.
  - (2) One (1) brush coater or timing mark station, with a maximum capacity of 60 units per hour, and exhausting to the atmosphere.
- (m) One (1) D219 Assembly Cell:
  - (1) One (1) spray booth, with a maximum capacity of 225 units per hour, using dry filters as particulate matter control, and exhausting to the stack S-12.
  - (2) Two (2) rubber molding presses, with a maximum capacity of 58.5 lb/hr each, exhausting to stack S-13.
- (n) One (1) Ford 3.0 Vulcan Cell:
  - (1) One (1) dip tank, with a maximum capacity of 113 units per hour, and exhausting to stack S-3.

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

The source also consists of the following unpermitted emission units:

- (a) One (1) Honda BPX Line #1 Assembly Cell:
  - (1) One (1) spray shadow booth, with a maximum capacity of 92 units per hour, and exhausting to the stack S-17.
  - (2) One (1) spray final booth, with a maximum capacity of 92 units per hour, using dry filters as particulate matter control, and exhausting to the stack S-18.
  - (3) One (1) brush coater or timing mark station, with a maximum capacity of 92 units per hour, and exhausting to the atmosphere.
- (b) One (1) Honda Compact Assembly Cell:
  - (1) One (1) spray shadow booth, with a maximum capacity of 92 units per hour, and exhausting to the stack S-19.
  - (2) One (1) spray final booth, with a maximum capacity of 92 units per hour, using dry filters as particulate matter control, and exhausting to the stack S-20.
  - (3) One (1) brush coater or timing mark station, with a maximum capacity of 92 units per hour, and exhausting to the atmosphere.
- (c) One (1) Ford 4.0 Redesign Line:
  - (1) One (1) adhesive spray booth, with a maximum capacity of 225 units per hour, using dry filters as particulate matter control, and exhausting to the stack S-4.
  - (2) One (1) spray booth, with a maximum capacity of 225 units per hour, using dry filters as particulate matter control, and exhausting to the stack S-6.
  - (3) Four (4) rubber molding presses, with a maximum capacity of 81 lb/hr each, exhausting to stack S-5.

## Existing Approvals

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

- (a) T113-7644-00023 issued on June 30, 2000; and
- (b) SSM 113-12104-00023 issued on July 11, 2000.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised, or deleted by this permit.

The following conditions from Part 70 Permit No. 113-7644-00023, issued on June 30, 2000, and revised in First Significant Source Modification No. 113-12104-00023, issued on July 11, 2000 have been determined no longer applicable; therefore, was not incorporated into this Part 70 permit:

- (a) Condition D.2.2

### D.2.2 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from P-1 shall be limited by the following:

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

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

*Reason not incorporated:* The Ford 6.8 line is not subject to the requirements of this rule because pursuant to 326 IAC 6-3-2 (a), any manufacturing process listed in subsections (b) through (d) of 326 IAC 6-3-2 shall follow the work practices and control technologies contained therein. Surface coating manufacturing processes are listed in 326 IAC 6-3-2 (d) and shall follow the work practices and control technologies listed therein.

- (b) Condition D.3.3

### D.3.3 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from P-2 shall be limited by the following:

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

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

*Reason not incorporated:* The Ford 5.4 line is not subject to the requirements of this rule because pursuant to 326 IAC 6-3-2 (a), any manufacturing process listed in subsections (b) through (d) of 326 IAC 6-3-2 shall follow the work practices and control technologies contained therein. Surface coating manufacturing processes are listed in 326 IAC 6-3-2 (d) and shall follow the work practices and control technologies listed therein.

(c) Condition D.2.5

D.2.5 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC and PM limit specified in Condition D.2.1 and D.2.2, respectively, shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

*Reason not incorporated:* The condition D.2.5 is repetition of condition C.9 included in the Source Operation Conditions of the current MSOP template. This condition is included as C.7 in permit no. 113-16637-00080. Hence, it is deleted from section D.2.

(d) Condition D.3.5

D.3.5 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC and PM limit specified in Condition D.3.1 and D.3.2, respectively, shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

*Reason not incorporated:* The condition D.3.5 is repetition of condition C.9 included in the Source Operation Conditions of the current MSOP template. This condition is included as C.7 in permit no. 113-16637-00080. Hence, it is deleted from section D.3.

**Enforcement Issue**

- (a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled "Unpermitted Emission Units and Pollution Control Equipment".
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

**Stack Summary**

Stack ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temperature (°F)
S-1	Ford 2.5 dip tank	24	0.5	3450	Ambient
S-2	Ford 2.5 NMP washer	26	1.33	3450	Ambient
S-3	Ford 3.0 vulcan	24	0.63	3450	Ambient
S-4	Ford 4.0 redesign spray booth	24	0.5	1200	Ambient
S-5	Ford 4.0 molding presses	23	1.5	3450	Ambient
S-6	Ford 4.0 spray booth	23	1	2877	Ambient
S-7	Ford 5.4 NMP washer	26	1.33	3450	Ambient
S-8	Ford 5.4 spray booth	26	1	2877	Ambient
S-9	Ford 6.8 roll coater	26	1.33	3450	Ambient

Stack ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temperature (°F)
S-10	Ford 6.8 spray booths	26	1	2877	Ambient
S-11	I4 spray booth	24	1	3450	Ambient
S-12	D219 spray booth	25	0.5	1200	Ambient
S-13	D219 molding presses	25	1.5	3450	Ambient
S-14	Honda Civic spray booth	24	1.5	3450	Ambient
S-15	Honda Civic spray booth	25	1	3450	Ambient
S-16	Nissan assembly spray booth	24	1	3450	Ambient
S-17	Honda BPX #1 shadow booth	25	1	3450	Ambient
S-18	Honda BPX #1 final booth	25	1	3450	Ambient
S-19	Honda Compact Assembly shadow booth	25	1	3450	Ambient
S-20	Honda Compact Assembly final booth	25	1	3450	Ambient

**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.

A complete application for the purposes of this review was received on October 4, 2002, with additional information received on May 19, 2004 and May 28, 2004.

**Emission Calculations**

See Appendix A of this document for detailed emission calculations (Pages 1 to 12).

**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	67.18
PM-10	67.35
SO <sub>2</sub>	0.02
VOC	23.69
CO	2.58
NO <sub>x</sub>	3.07

HAPs	Potential to Emit (tons/yr)
Methylene diphenyl diisocyanate	2.93
Ethylene Glycol	4.08
Acetphenone	0.85
Other	0.17
Total	8.05

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM-10 and VOC is less than 100 tons per year and greater than 25 tons per year. Therefore the source, previously operating under Part 70 Permit T113-7644-00023, is now subject to the provisions of 326 IAC 2-6.1. An MSOP will be issued.
- (b) Fugitive Emissions  
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

**County Attainment Status**

The source is located in Noble County.

Pollutant	Status
PM-10	Attainment
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment
1-hr Ozone	Attainment
8-hr Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) 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 emissions and NOx are considered when evaluating the rule applicability relating to ozone. Noble County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NOx 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.
- (b) Noble County has been classified as attainment for all criteria pollutants. 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.
- (c) Fugitive Emissions  
 Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 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 applicability.

## Source Status

Existing Source PSD, Part 70, or FESOP 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	14.68
PM-10	14.68
SO <sub>2</sub>	0.00
VOC	19.75
CO	0.00
NO <sub>x</sub>	0.00
Single HAP	negligible
Combination HAPs	negligible

- (a) This existing source is not a major stationary source because no attainment regulated 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.

## Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source is 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) This source is not subject to the requirements of the New Source Performance Standard, 326 IAC 12 (40 CFR 60.310 Subpart EE), because the provisions of this subpart apply to each metal furniture surface coating operation in which organic coatings are applied and the source does not contain any metal furniture surface coating operation.
- (b) This source is not subject to the requirements of the New Source Performance Standard, 326 IAC 12 (40 CFR 60.450, Subpart SS), since Standards of Performance for Industrial Surface Coating: Large Appliances apply to each surface coating operation in a large appliance surface coating line and spray booth lines at the source do not fit the definition of large appliance surface coating line.
- (c) This source is not subject to the requirements of the New Source Performance Standard, 326 IAC 12 (40 CFR 60.460, Subpart TT), since the source does not contain any organic surface coating operation that applies coating to the surface of any continuous metal strip with thickness of 0.15 millimeter (mm) (0.006 in.) or more that is packaged in a roll or coil.
- (d) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart NNNN since it is not a major HAP source as defined in 40 CFR 63, subpart A.
- (e) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart RRRR since it is not a major HAP source as defined in 40 CFR 63, subpart A.

- (f) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart SSSS since it is not a major source as defined in 40 CFR 63, subpart A.
- (g) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart T because the provisions of this subpart apply to each individual batch vapor, in-line vapor, in-line cold, and batch cold solvent cleaning machine that uses any solvent containing methylene chloride (CAS No. 75-09-2), perchloroethylene (CAS No. 127-18-4), trichloroethylene (CAS No. 79-01-6), 1,1,1-trichloroethane (CAS No. 71-55-6), carbon tetrachloride (CAS No. 56-23-5) or chloroform (CAS No. 67-66-3), or any combination of these halogenated HAP solvents, in a total concentration greater than 5 percent by weight, as a cleaning and/or drying agent and the source does not have any washer/degreaser that uses any solvent mentioned in 40 CFR 63.460 (a).

### **State Rule Applicability – Entire Source**

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

The auto parts surface coating operation will emit less than 10 tons per year of a single HAP or 25 tons per year of a combination of HAPs. Since the source is not a major source of hazardous air pollutants (HAP), as defined in 40 CFR 63.41, 326 IAC 2-4.1 does not apply.

#### 326 IAC 2-6 (Emission Reporting)

This source is located in Noble County and the potential to emit of all criteria pollutants is less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

#### 326 IAC 5-1 (Visible Emissions 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 8-6-1 (Organic Solvent Emission Limitations)

326 IAC 8-6-1 is not applicable to this source since the source is located in Noble County, and was constructed after January 1, 1980. Moreover, the source-wide VOC emissions are less than one hundred (100) tons per year.

### **State Rule Applicability – Individual Facilities**

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

Particulate from the surface coating operations at the following assembly lines shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications:

- (a) Ford 6.8 line
- (b) Ford 5.4 line
- (c) Honda Civic line
- (d) Honda BPX Line #1
- (e) Honda Compact Assembly Cell
- (f) Ford 4.0 Redesign Line

If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:

Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

Pursuant to 326 IAC 6-3-2 (d) (4), surface coating manufacturing processes at the following assembly lines shall be exempted from the requirements of 326 IAC 6-3 since each of them uses less than five (5) gallons of coating per day:

- (a) Ford 2.5 Duratec/DMD Line
- (b) Ford 3.0 Vulcan Line
- (c) Ford I4 Assembly Cell
- (d) Nissan Assembly Cell

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

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.

The mechanical shot blaster has a maximum process weight rate of 80 pounds per and the methods in 326 IAC 6-3-2 (b) through (d) do not apply. Therefore the allowable emissions for this facility will be 0.551 pounds per hour.

$$\text{Limited emissions from the shot blaster} = \frac{(0.01 \text{ lb PM})(80 \text{ lb})(1-.999)}{(\text{lb abrasive})(\text{hr})} = 0.0008 \text{ lb/hr}$$

The controlled emission of 0.0008 lb/hr is less than the allowable emission of 0.551 lb/hr, therefore this facility complies with this limit. The baghouse shall be in operation at all times the mechanical shot blaster is in operation, in order to comply with this limit.

326 IAC 8-1-6 (New Facilities; general reduction requirements)

326 IAC 8-1-6 (BACT) does not apply to any facility at this source since each facility has VOC emissions less than twenty-five (25) tons per year.

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

(1) The following facilities shall be subject to the requirements of 326 IAC 8-2-9:

- (a) Ford 6.8 line spray booth P-1 and the roll coater
- (b) Ford 5.4 line spray booth P-2 and the roll coater
- (c) Ford 4.0 Redesign line spray booths

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of extreme duty and/or air dried coatings delivered to the applicator at the above facilities shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.

Based on the MSDS submitted by the source and calculations made, the facilities are in compliance with this requirement.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

- (2) Pursuant to Permit No. T113-7644-00023, the spray booth and adhesive roll coater on the Ford 5.4 Line were determined to be subject to the requirements of 326 IAC 8-2-9. However, the VOC emissions in pounds per day from the spray booth and roll coater are each less than fifteen (15) pounds per day. Hence, pursuant to 326 IAC 8-2-1 (a)(4) both the facilities are not subject to the requirements of 326 IAC 8-2-9.

Pursuant to 326 IAC 8-2-9 (a) (4), the following facilities are not subject to the requirements of 326 IAC 8-2-9 since each of them have PTE of VOC less than fifteen (15) pounds per day:

- (a) Honda Civic Line
- (b) Honda BPX Line #1
- (c) Honda Compact Assembly Cell
- (d) Ford 2.5 Duratec/DMD Line

#### 326 IAC 8-3-2 (Cold Cleaner Operations)

Pursuant to 326 IAC 8-3-2, the owner or operator of the NMP washers cold cleaning facilities on the Ford 2.5 Duratec/DMD Line, Ford 5.4 Assembly Cell and Ford 6.8 Assembly Cell shall:

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

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

- (a) The requirements of 326 IAC 8-3-5 apply to any new cold cleaner degreaser located in any county in Indiana and not equipped with remote solvent reservoirs. The NMP washers, cold cleaner degreaser facilities on the Ford 2.5 Duratec/DMD Line, Ford 5.4 Assembly Cell and Ford 6.8 Assembly Cell are not equipped with remote solvent reservoirs and therefore the requirements of 326 IAC 8-3-5 shall apply.

Pursuant to 326 IAC 8-3-5(a), the owner or operator of the NMP washers, cold cleaner degreaser facilities on the Ford 2.5 Duratec/DMD Line, Ford 5.4 Assembly Cell and Ford 6.8 Assembly Cell shall:

- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
  - (A) the solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));

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

326 IAC 20-6-1 (Halogenated solvent cleaning)

326 IAC 20-6-1 is not applicable to the NMP washers, cold cleaners and degreaser facilities because these facilities do not use any solvent containing the halogenated compounds listed in 326 IAC 20-6-1 (a).

## **Conclusion**

The construction and operation of this automobile parts production plant for machining and surface coating of auto parts shall be subject to the conditions of the New Source Construction and Minor Source Operating Permit 113-16637-00080.

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

**Addendum to the Technical Support Document (TSD) for a  
Minor Source Operating Permit**

**Source Background and Description**

<b>Source Name:</b>	<b>Vibration Control Technologies, LLC</b>
<b>Source Location:</b>	<b>1496 Gerber Street</b>
<b>County:</b>	<b>Noble</b>
<b>SIC Code:</b>	<b>3499</b>
<b>Operation Permit No.:</b>	<b>113-16637-00080</b>
<b>Operation Permit Issuance Date:</b>	<b>October 26, 2004</b>
<b>Permit Reviewer:</b>	<b>Gaurav Shil/EVP</b>

On July 23, 2004, the Office of Air Quality (OAQ) had a notice published in the News-Sun, Kendallville, Indiana, stating that Vibration Control Technologies, LLC had applied for a Minor Source Operating Permit (MSOP) to operate an automobile parts production plant for machining and surface coating of auto parts. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On August 22, 2004, OAQ received comments from Vibration Control Technologies on the proposed MSOP. The summary of the comments and corresponding responses is shown below. Changes made to the permit as a result of the comments are shown in bold and deleted permit language is shown with a line through it. Any permit changes affecting the permit's Table of Contents are also revised without replication herein.

**Comment 1:**

Conditions D.1.9 (a), D.2.4 (a), D.5.7 (a) Record Keeping Requirements

The paragraph states "In order to comply with condition D.1.1, the Permittee shall maintain records in accordance with (1) through (4) below." However, it has already been proven that no extreme performance coatings exceed the 3.5 lb/gal threshold as documented on page 10 of 13 of the TSD, 326 IAC 8-2-9 (Miscellaneous Metal Coating), (1) 3<sup>rd</sup> Paragraph. It reads, "Based on the MSDS submitted by the source and calculations made, the facilities are in compliance with this requirement." As VCT has fulfilled this requirement, VCT requests that IDEM remove this sub-section of this condition in its entirety.

**Response to Comment 1:**

IDEM agrees that the VOC usage record keeping requirements in Conditions D.1.9 (a) and D.5.7 (a) are not needed to demonstrate compliance with Conditions D.1.1 and D.5.1, respectively. Presently, the requirements of 326 IAC 8-2-9 apply to Ford 6.8, Ford 5.4, and Ford 4.0 Redesign lines. For surface coating operations, the coatings used at the source are 326 IAC 8-2-9 compliant i.e. discharge of VOC from the surface coating of miscellaneous metal parts and products is less than 3.5 pounds of VOC per gallon of coating. The Permittee shall not use any extreme performance coating that exceeds the 3.5 lb/gal threshold. The Permittee shall maintain records of the coatings applied during each month, VOC content of each coating material as applied, purchase orders, invoices, and material safety data sheets necessary to verify the coating type. Condition reference numbers are also changed to incorporate changes from other comments. The permit is revised as follows as a result of this comment:

#### D.1.10 Record Keeping Requirements

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- (a) In order to comply with condition D.1.1, the Permittee shall maintain records in accordance with (1) ~~through~~ **and (4) (2)** below. Records maintained for (1) ~~through~~ **and (4) (2)** shall be ~~taken as stated below~~ **maintained on a monthly basis** and shall be complete and sufficient to establish compliance with the VOC usage limit established in condition D.1.1.
- (1) The VOC content of each coating material and solvent used less water-; **and**
  - (2) ~~The amount of coating material and solvent used on monthly basis.~~
    - (A) ~~Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.~~
    - (B) ~~Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;~~  
**The coatings and solvents applied during each month, purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the coating or solvent type**
  - (3) ~~The monthly cleanup solvent usage; and~~
  - (4) ~~The total VOC usage for each month.~~

#### D.5.8 Record Keeping Requirements

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- (a) In order to comply with condition D.5.1, the Permittee shall maintain records in accordance with (1) ~~through~~ **and (4) (2)** below. Records maintained for (1) ~~through~~ **and (4) (2)** shall be ~~taken as stated below~~ **maintained on a monthly basis** and shall be complete and sufficient to establish compliance with the VOC usage limit established in condition D.1.1.
- (1) The VOC content of each coating material and solvent used less water-; **and**
  - (2) ~~The amount of coating material and solvent used on monthly basis.~~
    - (A) ~~Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.~~
    - (B) ~~Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;~~  
**The coatings and solvents applied during each month, purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the coating or solvent type**
  - (3) ~~The monthly cleanup solvent usage; and~~
  - (4) ~~The total VOC usage for each month.~~

#### Comment 2:

Conditions D.1.9 (b), D.2.4 (a), D.5.7 (b) Record Keeping Requirements

This sub-section reads, "In order to comply with Condition D.1.5, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventative Maintenance Plan." In a similar operation at another Freudenberg location in Morristown, permit # 16637, there are training requirements that satisfy this particular requirement.

VCT would like to request that these requirements (listed below) be included in this permit, while eliminating the need for the above-listed sub-section of the condition.

### **Response to Comment 2:**

The record keeping requirements in Conditions D.1.9 (b), D.2.4 (a) and D.5.7 (b) ensure that the waterwash and dry filters must operate properly to ensure compliance with 326 IAC 6-3-2 (d). The following operator-training programs and related recordkeeping requirements shall be sufficient to ensure the proper operation of control equipment associated with surface coating booths. Hence the record keeping requirements in Conditions D.1.9 (b), D.2.4 (a) and D.5.7 (b) are deleted from the permit and the operator training program requirements are included as Compliance Determination in Sections D.1, D.2 and D.5.

Conditions D.1.9 (b), D.2.4 (a) and D.5.7 (b) are removed from the permit and replaced with requirements for operator-training programs and related recordkeeping requirements:

~~(b) In order to comply with Condition D.5.3, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.~~

### **Compliance Determination Requirements**

#### **D.1.9 Training Requirements**

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- (a) In order to comply with Condition D.1.5 the Permittee shall implement an operator-training program.
  - (1) All spray booth operators or employees that perform maintenance at the surface coating facilities shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within 60 days of the date of permit issuance. All new operators shall be trained upon hiring or transfer.
  - (2) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within 1 hour for inspection by IDEM.
  - (3) All operators shall be given refresher training annually.
- (b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

#### **D.1.10 Record Keeping Requirements**

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- (b) In order to comply with Condition D.1.9, the Permittee shall maintain a copy of the operator-training program, all training records including the list of trained operators, and the additional measures prescribed by the Preventive Maintenance Plan.

**Comment 3:**

TSD Page 2 of 12, Appendix A – Emissions Calculations, VOC and Particulates

The Ford 5.4L & 6.8L Assembly Cells have Rubinate M listed in their calculations. The weight percentage of volatile organic compounds is listed as 45 %. This is incorrect. This coating is polymer-based and uses MDI. MDI is completely reactive and contains no remaining VOCs after its reaction. IDEM has accepted this chemical as a non-VOC in its calculations in multiple instances. If you need particular permit numbers or additional documentation, DECA can provide such data.

This also relates to Comment 1. The referenced page 10 of 13 of the TSD states for 326 IAC 8-2-9 (Miscellaneous Metal Coatings) that all coatings are in compliance. VCT requests that the VOC % of Rubinate M read, "0".

**Response to Comment 3:**

Rubinate M contains Diphenylmethane Dilsocyanate (MDI) and polymeric MDI (PMDI). PMDI completely polymerizes, forms into the product, and is not emitted. Hence the emission calculations (Pages 1 to 3) are revised to show that VOC % of Rubinate M is 0. The following minor changes are also made to the Technical Support Document with this addendum. However IDEM prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the Technical Support Document that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that all comments and responses are documented and part of the records regarding this permit decision.

IDEM agrees that TSD should have read as follows:

**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	52.9
PM-10	53.07
SO <sub>2</sub>	0.02
VOC	<del>23.69</del> 17.70
CO	2.58
NO <sub>x</sub>	3.07

**Comment 4:**

Appendix A: Emissions Calculations VOC and Particulate

The Permittee submitted revised MSDS sheets for Kalcor 094-91110 and revised PI-19 forms for Ford 4 L Redesign final paint booth, Ford 5.4 L paint booth and Ford 6.8 L paint booth. The Permittee requested to revise the emission calculations.

The MSDS clearly indicates that Kalcor 094-91110 has a solids content of 36.1%. This number should be used for calculating potential particulate instead of the weight % volatiles since it is more precise. VCT requests this change be made for each process that uses the Kalcor 094-91110.

Since this change will reduce the potential particulate emissions, the Ford 4.0L Redesign facility cannot be considered an unpermitted facility due to its insignificant nature. Since a permit has not been issued to the source, we believe the units are still permitted under the Freudenberg Title V permit. We would also include the lengthy review period for this application and that the time-frame, submitted on 10/4/02, would have been more than sufficient to have these facilities properly permitted prior to beginning construction if the application would have been reviewed and issued in a timely fashion. VCT requests that this issue not be referred to enforcement due to the aforementioned reasons.

**Response to Comment 4:**

The potential particulate emissions are calculated for Ford 4.0L Redesign Line spray booth using volume % non-volatiles (solids) of 36.1% for Kalcor 094-91110. This number is taken from the revised MSDS sheets submitted on October 1, 2004. This number is not used to calculate weight % volatiles. The weight % volatiles is taken from Form PI: 19 for surface coating operations. The weight % volatiles for Kalcor 094-91110 is 52.7%. The potential particulate emissions for each facility that uses Kalcor 094-91110 are revised based on the change in technical data of the coating. The particulate potential emissions from the Ford 4.0 L Redesign line spray booth based on the revised technical data sheets are 6.34 tons per year. Since the emissions are greater than the modification threshold of five (5) tons per year Ford 4.0 L Redesign facility is considered as an unpermitted facility due to its significant nature.

Appendix A, Pages 1, 2 and 3 of 12 are revised to include the data in revised material safety data sheets for Kalcor 094-91110. The following changes are also made to the Technical Support Document with this addendum. However IDEM prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the Technical Support Document that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that all comments and responses are documented and part of the records regarding this permit decision.

IDEM agrees that the TSD should have read as follows:

**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	<del>67.18</del> <b>52.90</b>
PM-10	<del>67.35</del> <b>53.07</b>
SO <sub>2</sub>	0.02
VOC	<del>23.69</del> <b>17.70</b>
CO	2.58
NO <sub>x</sub>	3.07

IDEM, OAQ also has decided to make the following change to the permit:

1. A clarification of the term "Calendar Year" has been added to section (d) of C.12 General Reporting Requirements.
  - (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.**

**Appendix A: Emission Calculations**

**Company Name:** Vibration Control Technologies, LLC  
**Address City IN Zip:** 1496 Gerber Street, Ligonier, IN 46767  
**MSOP:** 113-16637-00080  
**Plt ID:** 113-00080  
**Reviewer:** Gaurav Shil/EVP  
**SIC Code:** 3499

<b>Uncontrolled Potential Emissions (tons/year)</b>					
Emissions Generating Activity					
Pollutant	Natural Gas Combustion	Surface Coating	Rubber Presses	Abrasive Blasting	TOTAL
PM	0.06	49.44	0.00	3.40	52.90
PM10	0.23	49.44	0.00	3.40	53.07
SO2	0.02	0.00	0.00	0.00	0.02
NOx	3.07	0.00	0.00	0.00	3.07
VOC	0.17	14.15	3.38	0.00	17.70
CO	2.58	0.00	0.00	0.00	2.58
total HAPs	0.06	7.01	0.98	0.00	8.05
worst case single HAP	0.05	4.08	0.85	0.00	
	Hexane	Ethylene Glycol	Acetophenone		
Total emissions based on rated capacity at 8,760 hours/year.					
<b>Controlled Potential Emissions (tons/year)</b>					
Emissions Generating Activity					
Pollutant	Natural Gas Combustion	Surface Coating	Rubber Presses	Abrasive Blasting	TOTAL
PM	0.06	6.77	0.00	0.00340	6.83
PM10	0.23	6.77	0.00	0.00340	7.00
SO2	0.02	0.00	0.00	0.00	0.02
NOx	3.07	0.00	0.00	0.00	3.07
VOC	0.17	14.15	3.38	0.00	17.70
CO	2.58	0.00	0.00	0.00	2.58
total HAPs	0.06	7.01	0.98	0.00	8.05
worst case single HAP	0.05	4.08	0.85	0.00	
	Hexane	Ethylene Glycol	Acetophenone		
Total emissions based on rated capacity at 8,760 hours/year, after control.					

**Appendix A: Emissions Calculations**  
**VOC and Particulate**

**Company Name:** Vibration Control Technologies, LLC  
**Address City IN Zip:** 1496 Gerber Street, Ligonier, IN 46767  
**MSOP:** 113-16637-00080  
**Pit ID:** 113-00080  
**Reviewer:** Gaurav Shil/EVP  
**SIC Code:** 3499

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency*
<b>Ford 2.5L Duratec/DMD Assembly Cell</b>																
Roll Coater																
Rubinate M	10.33	0.00%	0.0%	0.0%	0.0%	90.00%	0.00072	85.000	0.00	0.00	0.00	0.00	0.00	0.00	n/a	100%
Dip Tank																
Trim RP-06	6.91	77.00%	0.0%	77.0%	0.0%	0.00%	0.00067	85.000	5.32	5.32	0.30	7.27	1.33	0.00	n/a	n/a
NMP Washer																
SP-708	8.54	100.00%	0.0%	100.0%	0.0%	0.00%	0.00056	85.000	8.54	8.54	0.41	9.76	1.78	0.00	n/a	n/a
LS-605	8.50	8.00%	0.0%	8.0%	0.0%	0.00%	0.00047	85.000	0.68	0.68	0.03	0.65	0.12	1.37	n/a	n/a
<b>Ford 3.0 L Vulcan</b>																
Dip Tank																
Trim RP-06	6.91	77.00%	0.0%	77.0%	0.0%	0.00%	0.00067	85.000	5.32	5.32	0.30	7.27	1.33	0.00	n/a	100%
<b>Ford 4.0L Redesign</b>																
Adhesive Spray Booth																
Chemlock 8560 S	10.00	59.80%	59.8%	0.0%	0.0%	0.00%	0.00041	225.000	0.00	0.00	0.00	0.00	0.00	0.57	n/a	65%
Spray Booth																
Kalcor 094-91110	10.80	52.70%	49.5%	3.2%	62.5%	36.10%	0.00360	225.000	0.92	0.35	0.28	6.72	1.23	6.34	0.96	65%
<b>Ford 5.4L Assembly Cell</b>																
Roll Coater																
Rubinate M	10.33	0.00%	0.0%	0.0%	0.0%	90.00%	0.00037	105.000	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%
NMP Washer																
SP-708	8.54	100.00%	0.0%	100.0%	0.0%	0.00%	0.00056	105.000	8.54	8.54	0.50	12.05	2.20	0.00	n/a	n/a
LS-605	8.50	8.00%	0.0%	8.0%	0.0%	0.00%	0.00047	105.000	0.68	0.68	0.03	0.81	0.15	1.69	n/a	n/a
Spray Booth																
Kalcor 094-91110	10.80	52.70%	49.5%	3.2%	62.5%	36.10%	0.00360	105.000	0.92	0.35	0.13	3.14	0.57	2.96	0.96	65%
<b>Ford 6.8L Assembly Cell</b>																
Roll Coater																
Rubinate M	10.33	0.00%	0.0%	0.0%	0.0%	90.00%	0.00042	105.000	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%
NMP Washer																
SP-708	8.54	100.00%	0.0%	100.0%	0.0%	0.00%	0.00056	105.000	8.54	8.54	0.50	12.05	2.20	0.00	n/a	n/a
LS-605	8.50	8.00%	0.0%	8.0%	0.0%	0.00%	0.00047	105.000	0.68	0.68	0.03	0.81	0.15	1.69	n/a	n/a
Spray Booth																
Kalcor 094-91110	10.80	52.70%	49.5%	3.2%	62.5%	36.10%	0.00360	105.000	0.92	0.35	0.13	3.14	0.57	4.23	0.96	50%
<b>Ford I4 Assembly Cell</b>																
Spray Booth																
Kalcor 094-91110	10.80	52.70%	49.5%	3.2%	62.5%	36.10%	0.00150	105.000	0.92	0.35	0.05	1.31	0.24	1.23	0.96	65%
<b>Ford D219 Assembly Cell</b>																
Adhesive Spray																
Chemlok 8560 S	10.00	59.80%	59.8%	0.0%	0.0%	0.00%	0.00041	225.000	0.00	0.00	0.00	0.00	0.00	0.57	n/a	65%

**Appendix A: Emissions Calculations**  
**VOC and Particulate - continued**

Company Name: **Vibration Control Technologies, LLC**  
 Address City IN Zip: **1496 Gerber Street, Ligonier, IN 46767**  
 MSOP: **113-16637-00080**  
 Pit ID: **113-00080**  
 Reviewer: **Gaurav Shil/EVP**  
 SIC Code: **3499**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency*
<b>Honda Civic Assembly Cell</b>																
Spray Booth																
Kalcor 094-9218FR	10.28	4.70%	0.0%	4.7%	0.0%	55.50%	0.00355	100.000	0.48	0.48	0.17	4.12	0.75	13.71	0.87	10%
Spray Booth																
Struktol SCA 1100	7.91	0.00%	0.0%	0.0%	0.0%	0.00%	0.00355	100.000	0.00	0.00	0.00	0.00	0.00	0.00	n/a	10%
Timing Mark																
Ace Royal Hi-Gloss Latex Enamel	1.26	14.40%	0.0%	14.4%	0.0%	50.00%	0.00021	100.000	0.18	0.18	0.00	0.09	0.02	0.00	0.36	100%
<b>Honda BPX 1</b>																
Shadow Booth																
Kalcor 094-9218FR	10.28	4.70%	0.0%	4.7%	0.0%	55.50%	0.00120	92.000	0.48	0.48	0.05	1.28	0.23	2.37	0.87	50%
Final Booth																
Kalcor 094-9218FR	10.28	4.70%	0.0%	4.7%	0.0%	55.50%	0.00240	92.000	0.48	0.48	0.11	2.56	0.47	4.74	0.87	50%
Timing Mark																
Ace Royal Hi-Gloss Latex Enamel	1.26	14.40%	0.0%	14.4%	0.0%	50.00%	0.00021	92.000	0.18	0.18	0.00	0.08	0.02	0.00	0.36	100%
<b>Honda Compact Assembly Cell</b>																
Shadow Booth																
Kalcor 094-9218FR	10.28	4.70%	0.0%	4.7%	0.0%	55.50%	0.00120	92.000	0.48	0.48	0.05	1.28	0.23	2.37	0.87	50%
Final Booth																
Kalcor 094-9218FR	10.28	4.70%	0.0%	4.7%	0.0%	55.50%	0.00240	92.000	0.48	0.48	0.11	2.56	0.47	4.74	0.87	50%
Timing Mark																
Ace Royal Hi-Gloss Latex Enamel	1.26	14.40%	0.0%	14.4%	0.0%	50.00%	0.00021	92.000	0.18	0.18	0.00	0.08	0.02	0.00	0.36	100%
<b>Nissan Assembly Cell</b>																
Spray Coater																
Kalcor 094-9218FR	10.28	4.70%	0.0%	4.7%	0.0%	55.50%	0.00067	60.000	0.48	0.48	0.02	0.47	0.09	0.86	0.87	50%
Time Mark																
Ace Royal Hi-Gloss Latex Enamel	1.26	14.40%	0.0%	14.4%	0.0%	50.00%	0.00021	60.000	0.18	0.18	0.00	0.05	0.01	0.00	0.36	100%
<b>3.23</b>												<b>77.54</b>	<b>14.15</b>	<b>49.44</b>		

**Controlled Potential Emissions**

Control Efficiency:		Controlled VOC lbs per Hour	Controlled VOC lbs per Day	Controlled VOC tons per Year	Controlled PM tons/yr
VOC	PM				
0.00%	80.00%	3.23	77.54	14.15	6.77

<b>Total Controlled Potential Emissions:</b>		
Total Emissions	VOC	PM/PM10
<b>Uncontrolled (tons/yr)</b>	<b>14.15</b>	<b>49.44</b>
<b>Controlled (tons/yr)</b>	<b>14.15</b>	<b>6.77</b>

**METHODOLOGY**

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water)  
 Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % Organics)  
 Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)  
 Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)  
 Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hrs/yr) \* (1 ton/2000 lbs)  
 Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1- Weight % Volatiles) \* (1-Transfer efficiency) \*(8760 hrs/yr) \*(1 ton/2000 lbs)  
 Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids)  
 Note: Trim RP-06 contains no solids per chemist.

\* Transfer Efficiency for HVLP and flat coated surface is 65%.  
 Transfer Efficiency for HVLP and table leg coated surface is 10%.  
 Transfer Efficiency for air atomization spray and flat coated surface is 50%.

**Appendix A: Emission Calculations  
HAP Emission Calculations**

**Company Name: Vibration Control Technologies, LLC  
Address City IN Zip: 1496 Gerber Street, Ligonier, IN 46767  
MSOP: 113-16637-00080  
Pit ID: 113-00080  
Reviewer: Gaurav Shil/EVP  
SIC Code: 3499**

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Diphenylmethane Diliscyanate	Weight % Ethylene Glycol	MDI Emissions (ton/yr)	Ethylene Glycol Emissions (ton/yr)
Rubinate M	10.33	0.00072	85.000	45.00%	0.00%	1.25	0.00
Kalcor 094-91110	10.8	0.00360	225.000	0.00%	5.00%	0.00	1.92
Rubinate M	10.33	0.00037	105.000	45.00%	0.00%	0.79	0.00
Kalcor 094-91110	10.8	0.00360	105.000	0.00%	5.00%	0.00	0.89
Rubinate M	10.33	0.00042	105.000	45.00%	0.00%	0.90	0.00
Kalcor 094-91110	10.8	0.00360	105.000	0.00%	5.00%	0.00	0.89
Kalcor 094-91110	10.8	0.00150	105.000	0.00%	5.00%	0.00	0.37

**Total State Potential Emissions**

**2.93**

**4.08**

**METHODOLOGY**

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

## VOC Emissions from Molding (Single Press) Ford 4L Redesign Line

Company Name: Vibration Control Technologies, LLC

Address City IN Zip: 1496 Gerber Street, Ligonier, IN 46767

MSOP: 113-16637-00080

Plt ID: 113-00080

Reviewer: Gaurav Shi/EVP

SIC Code: 3499

Rubber Processing Capacity (lb/hr)

81

Single Press

Pollutant	Emission Factor (lb/lb)	Emission Rate (Lb/hr) (lb/hr)	Total Emissions (tons/year)
VOC	0.00175	0.14175	0.620865
1,1,1-Trichloroethane	0.0000042	0.0003402	0.001490076
1,2,4-Trichlorobenzene	0	0	0
1,3-Butadiene	7.53E-06	0.00060993	0.002671493
1,4-Dichlorobenzene	0	0	0
Methyl Ethyl Ketone	3.02E-06	0.00024462	0.001071436
2,4 Toluenediamine	0	0	0
MIBK	0	0	0
Acetaldehyde	7.64E-06	0.00061884	0.002710519
Acetonitrile	0	0	0
Acetophenone	0.00044	0.03564	0.1561032
Acrylonitrile	0	0	0
Aniline	0	0	0
Benzene	0	0	0
Methylene Chloride	1.84E-06	0.00014904	0.000652795
Biphenyl	0	0	0
Bis (2-ethylhexyl) phthalate	0.0000026	0.0002106	0.000922428
Carbondisulfide	0.0000042	0.0003402	0.001490076
Carbonyl sulfide	0	0	0
Chloromethane	0	0	0
Cumene	2.76E-06	0.00022356	0.000979193
Dibutylphthalate	7.16E-06	0.00057996	0.002540225
Dibenzofuran	6.72E-08	5.4432E-06	2.38412E-05
Dimethylphthalate	0	0	0
Ethylbenzene	0	0	0
Hexachlorobutadiene	3.93E-07	0.000031833	0.000139429
Napthalene	4.04E-06	0.00032724	0.001433311
Hexane	1.64E-05	0.0013284	0.005818392
o-Toludine	0	0	0
o-Xylene	0	0	0
Phenol	1.28E-06	0.00010368	0.000454118
Propylene Oxide	0	0	0
Tetrachloroethylene	0	0	0
Toluene	2.72E-06	0.00022032	0.000965002
<b>Total HAPs (tons/year)</b>			<b>0.18</b>

The worst case press has a potential of 0.62 tpy VOC. Therefore, each facility is less than 25 tpy potential emissions and 326 IAC 8-1-6 does not apply.

## Methodology:

Emissions factors are obtained from Volume 4: Emission Factors Application Manual for the Rubber Manufacturer's Association (RMA), May 1996.

Emissions factors are provided from the applicant.

Potential Emissions in tons per year = Max. production rate (lbs/hr) \* e.f. (lb/lb) \* 4.38

## VOC Emissions from Molding (Three Presses) Ford 4L Redesign Line

Company Name: Vibration Control Technologies, LLC  
 Address City IN Zip: 1496 Gerber Street, Ligonier, IN 46767  
 MSOP: 113-16637-00080  
 Plt ID: 113-00080  
 Reviewer: Gaurav Shil/EVP  
 SIC Code: 3499

Rubber Processing Capacity (lb/hr)

324

Four Presses

Pollutant	Emission Factor (lb/lb)	Emission Rate (Lb/hr) (lb/hr)	Total Emissions (tons/year)
VOC	0.00175	0.567	2.48346
1,1,1-Trichloroethane	0.0000042	0.0013608	0.005960304
1,2,4-Trichlorobenzene	0	0	0
1,3-Butadiene	7.53E-06	0.00243972	0.010685974
1,4-Dichlorobenzene	0	0	0
Methyl Ethyl Ketone	3.02E-06	0.00097848	0.004285742
2,4 Toluenediamine	0	0	0
MIBK	0	0	0
Acetaldehyde	7.64E-06	0.00247536	0.010842077
Acetonitrile	0	0	0
Acetophenone	0.00044	0.14256	0.6244128
Acrylonitrile	0	0	0
Aniline	0	0	0
Benzene	0	0	0
Methylene Chloride	1.84E-06	0.00059616	0.002611181
Biphenyl	0	0	0
Bis (2-ethylhexyl) phthalate	0.0000026	0.0008424	0.003689712
Carbondisulfide	0.0000042	0.0013608	0.005960304
Carbonyl sulfide	0	0	0
Chloromethane	0	0	0
Cumene	2.76E-06	0.00089424	0.003916771
Dibutylphthalate	7.16E-06	0.00231984	0.010160899
Dibenzofuran	6.72E-08	2.17728E-05	9.53649E-05
Dimethylphthalate	0	0	0
Ethylbenzene	0	0	0
Hexachlorobutadiene	3.93E-07	0.000127332	0.000557714
Napthalene	4.04E-06	0.00130896	0.005733245
Hexane	1.64E-05	0.0053136	0.023273568
o-Toludine	0	0	0
o-Xylene	0	0	0
Phenol	1.28E-06	0.00041472	0.001816474
Propylene Oxide	0	0	0
Tetrachloroethylene	0	0	0
Toluene	2.72E-06	0.00088128	0.003860006
<b>Total HAPs (tons/year)</b>			<b>0.72</b>

## Methodology:

Emissions factors are obtained from Volume 4: Emission Factors Application Manual for the Rubber Manufacturer's Association (RMA), May 1996.

Emissions factors are provided from the applicant.

Potential Emissions in tons per year = Max. production rate (lbs/hr) \* e.f. (lb/lb) \* 4.38

## VOC Emissions from Molding (Single Press) Ford D219 Assembly Line

Company Name: Vibration Control Technologies, LLC  
 Address City IN Zip: 1496 Gerber Street, Ligonier, IN 46767  
 MSOP: 113-16637-00080  
 Pit ID: 113-00080  
 Reviewer: Gaurav Shil/EVP  
 SIC Code: 3499

Rubber Processing Capacity (lb/hr)

58.5

Single Press

Pollutant	Emission Factor (lb/lb)	Emission Rate (Lb/hr) (lb/hr)	Total Emissions (tons/year)
VOC	0.00175	0.102375	0.4484025
1,1,1-Trichloroethane	0.0000042	0.0002457	0.001076166
1,2,4-Trichlorobenzene	0	0	0
1,3-Butadiene	7.53E-06	0.000440505	0.001929412
1,4-Dichlorobenzene	0	0	0
Methyl Ethyl Ketone	3.02E-06	0.00017667	0.000773815
2,4 Toluenediamine	0	0	0
MIBK	0	0	0
Acetaldehyde	7.64E-06	0.00044694	0.001957597
Acetonitrile	0	0	0
Acetophenone	0.00044	0.02574	0.1127412
Acrylonitrile	0	0	0
Aniline	0	0	0
Benzene	0	0	0
Methylene Chloride	1.84E-06	0.00010764	0.000471463
Biphenyl	0	0	0
Bis (2-ethylhexyl) phthalate	0.0000026	0.0001521	0.000666198
Carbondisulfide	0.0000042	0.0002457	0.001076166
Carbonyl sulfide	0	0	0
Chloromethane	0	0	0
Cumene	2.76E-06	0.00016146	0.000707195
Dibutylphthalate	7.16E-06	0.00041886	0.001834607
Dibenzofuran	6.72E-08	3.9312E-06	1.72187E-05
Dimethylphthalate	0	0	0
Ethylbenzene	0	0	0
Hexachlorobutadiene	3.93E-07	2.29905E-05	0.000100698
Napthalene	4.04E-06	0.00023634	0.001035169
Hexane	1.64E-05	0.0009594	0.004202172
o-Toludine	0	0	0
o-Xylene	0	0	0
Phenol	1.28E-06	0.00007488	0.000327974
Propylene Oxide	0	0	0
Tetrachloroethylene	0	0	0
Toluene	2.72E-06	0.00015912	0.000696946
<b>Total HAPs (tons/year)</b>			<b>0.13</b>

The worst case press has a potential of 0.45 tpy VOC. Therefore, each facility is less than 25 tpy potential emissions and 326 IAC 8-1-6 does not apply.

## Methodology:

Emissions factors are obtained from Volume 4: Emission Factors Application Manual for the Rubber Manufacturer's Association (RMA), May 1996.

Emissions factors are provided from the applicant.

Potential Emissions in tons per year = Max. production rate (lbs/hr) \* e.f. (lb/lb) \* 4.38

## VOC Emissions from Molding (Two Presses) Ford D219 Assembly Line

Company Name: Vibration Control Technologies, LLC  
 Address City IN Zip: 1496 Gerber Street, Ligonier, IN 46767  
 MSOP: 113-16637-00080  
 Plt ID: 113-00080  
 Reviewer: Gaurav Shil/EVP  
 SIC Code: 3499

Rubber Processing Capacity (lb/hr)

117

Two Presses

Pollutant	Emission Factor (lb/lb)	Emission Rate (Lb/hr) (lb/hr)	Total Emissions (tons/year)
VOC	0.00175	0.20475	0.896805
1,1,1-Trichloroethane	0.0000042	0.0004914	0.002152332
1,2,4-Trichlorobenzene	0	0	0
1,3-Butadiene	7.53E-06	0.00088101	0.003858824
1,4-Dichlorobenzene	0	0	0
Methyl Ethyl Ketone	3.02E-06	0.00035334	0.001547629
2,4 Toluenediamine	0	0	0
MIBK	0	0	0
Acetaldehyde	7.64E-06	0.00089388	0.003915194
Acetonitrile	0	0	0
Acetophenone	0.00044	0.05148	0.2254824
Acrylonitrile	0	0	0
Aniline	0	0	0
Benzene	0	0	0
Methylene Chloride	1.84E-06	0.00021528	0.000942926
Biphenyl	0	0	0
Bis (2-ethylhexyl) phthalate	0.0000026	0.0003042	0.001332396
Carbondisulfide	0.0000042	0.0004914	0.002152332
Carbonyl sulfide	0	0	0
Chloromethane	0	0	0
Cumene	2.76E-06	0.00032292	0.00141439
Dibutylphthalate	7.16E-06	0.00083772	0.003669214
Dibenzofuran	6.72E-08	7.8624E-06	3.44373E-05
Dimethylphthalate	0	0	0
Ethylbenzene	0	0	0
Hexachlorobutadiene	3.93E-07	0.000045981	0.000201397
Napthalene	4.04E-06	0.00047268	0.002070338
Hexane	1.64E-05	0.0019188	0.008404344
o-Toludine	0	0	0
o-Xylene	0	0	0
Phenol	1.28E-06	0.00014976	0.000655949
Propylene Oxide	0	0	0
Tetrachloroethylene	0	0	0
Toluene	2.72E-06	0.00031824	0.001393891
<b>Total HAPs (tons/year)</b>			<b>0.26</b>

## Methodology:

Emissions factors are obtained from Volume 4: Emission Factors Application Manual for the Rubber Manufacturer's Association (RMA), May 1996.

Emissions factors are provided from the applicant.

Potential Emissions in tons per year = Max. production rate (lbs/hr) \* e.f. (lb/lb) \* 4.38

**Appendix A: Emissions Calculations**  
**Natural Gas Fired Heating Units - MMBtu/hr < 100**  
**Company Name: Vibration Control Technologies, LLC**  
**Address City IN Zip: 1496 Gerber Street, Ligonier, IN 46767**  
**MSOP: 113-16637-00080**  
**Plt ID: 113-00080**  
**Reviewer: Gaurav Shil/EVP**  
**SIC Code: 3499**

Heat Input Capacity

MMBtu/hr
0.960
0.400
0.100
2.400
0.255
0.100
1.600
1.200
<b>Total</b>

Potential Throughput

MMCF/yr	
8.41	Three (3) Space Heaters, each rated @ 0.32 MMBtu/hr
3.50	Two (2) Space Heaters, each rated @ 0.20 MMBtu/hr
0.88	One (1) Space Heater rated @ 0.10 MMBtu/hr
21.02	Two (2) HVAC Units, each rated @ 1.2 MMBtu/hr
2.23	One (1) Furnace, rated @ 0.255 MMBtu/hr
0.88	One (1) Furnace rated @ 0.10 MMBtu/hr
14.02	Four (4) Wash Tank Heaters, each rated @ 0.40 MMBtu/hr
10.51	Four (4) Sealer Tank Heaters, each rated @ 0.30 MMBtu/hr
<b>61.45</b>	

Pollutant

	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.06	0.23	0.02	3.07	0.17	2.58

\*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 10 for HAPs emissions calculations.

**Appendix A: Emissions Calculations  
Natural Gas Fired Heating Units - MMBtu/hr < 100**

**HAP Emissions**

**Company Name:** Vibration Control Technologies, LLC  
**Address City IN Zip:** 1496 Gerber Street, Ligonier, IN 46767  
**MSOP:** 113-16637-00080  
**Plt ID:** 113-00080  
**Reviewer:** Gaurav Shil/EVP  
**SIC Code:** 3499

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	6.452E-05	3.687E-05	2.304E-03	5.531E-02	1.045E-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	1.536E-05	3.380E-05	4.302E-05	1.168E-05	6.452E-05

Methodology is the same as page 2.

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

Abrasive Blasting - Confined

Company Name: Vibration Control Technologies, LLC  
 Address City IN Zip: 1496 Gerber Street, Ligonier, IN 46767  
 MSOP: 113-16637-00080  
 Plt ID: 113-00080  
 Reviewer: Gaurav Shil/EVP  
 SIC Code: 3499

Table 1 - Emission Factors for Abrasives

Abrasive	Emission Factor	
	lb PM / lb abrasive	lb PM10 / lb PM
Sand	0.041	0.70
Grit	0.010	0.70
Steel Shot	0.004	0.86
Other	0.010	1.00

Table 2 - Density of Abrasives (lb/ft3)

Abrasive	Density (lb/ft3)
Al oxides	160
Sand	99
Plastic	12.51

Table 3 - Sand Flow Rate (FR1) Through Nozzle (lb/hr)

Flow rate of Sand Through a Blasting Nozzle as a Function of Nozzle pressure and Internal Diameter

Internal diameter, in	Nozzle Pressure (psig)							
	30	40	50	60	70	80	90	100
1/8	28	35	42	49	55	63	70	77
3/16	65	80	94	107	122	135	149	165
1/4	109	138	168	195	221	255	280	309
5/16	205	247	292	354	377	420	462	507
3/8	285	355	417	477	540	600	657	720
7/16	385	472	560	645	755	820	905	940
1/2	503	615	725	835	945	1050	1160	1265
5/8	820	990	1170	1336	1510	1680	1850	2030
3/4	1140	1420	1670	1915	2160	2400	2630	2880
1	2030	2460	2900	3340	3780	4200	4640	5060

Calculations

Adjusting Flow Rates for Different Abrasives and Nozzle Diameters

Flow Rate (FR) = Abrasive flow rate (lb/hr) with internal nozzle diameter (ID)  
 FR1 = Sand flow rate (lb/hr) with internal nozzle diameter (ID1) From Table 3 =  
 D = Density of abrasive (lb/ft3) From Table 2 =  
 D1 = Density of sand (lb/ft3) =  
 ID = Actual nozzle internal diameter (in) =  
 ID1 = Nozzle internal diameter (in) from Table 3 =

615
12.51
99
0.5
0.5

Flow Rate (FR) (lb/hr) = 77.714 per nozzle

Uncontrolled Emissions (E, lb/hr)

EF = emission factor (lb PM/ lb abrasive) From Table 1 =  
 FR = Flow Rate (lb/hr) =  
 w = fraction of time of wet blasting =  
 N = number of nozzles =

0.010
77.714
0
1

Uncontrolled Emissions =	0.78 lb/hr
	3.40 ton/yr
Controlled Emissions =	0.0034 ton/yr

METHODOLOGY

Emission Factors from STAPPA/ALAPCO "Air Quality Permits", Vol. I, Section 3 "Abrasive Blasting" (1991 edition)  
 Ton/yr = lb/hr X 8760 hr/yr X ton/2000 lbs  
 Flow Rate (FR) (lb/hr) = FR1 x (ID/ID1)2 x (D/D1)  
 E = EF x FR x (1-w/200) x N  
 PM and PM10 emissions are controlled by a baghouse with a 99.9% control efficiency.

**Appendix A: Emission Calculations**

**Abrasive Blasting - Confined**

**Company Name:** Vibration Control Technologies, LLC  
**Address City IN Zip:** 1496 Gerber Street, Ligonier, IN 46767  
**MSOP:** 113-16637-00080  
**Plt ID:** 113-00080  
**Reviewer:** Gaurav Shil/EVP  
**SIC Code:** 3499

Compliance with 326 IAC 6-3-2

Pursuant to 326 IAC 6-3-2 (e) (2), allowable Particulate Emissions = 0.551 lb/hr

Controlled emissions= 0.000777136 <<< 0.551 hence this process complies with 326 IAC 6-3-2.