



Joseph E. Kernan  
Governor

Lori F. Kaplan  
Commissioner

December 29, 2003

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: GenCorp, Inc. dba GDx Automotive / 169-17370-00004  
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 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, 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 4-21.5-3-7 and IC 13-15-7-3 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 Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) 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.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency  
401 M Street  
Washington, D.C. 20406

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.

December 29, 2003

Mr. Mike Hough  
GenCorp, Inc., dba GDx Automotive  
P.O. Box 507  
Wabash, IN 46992

Re: **169-17370-00004**  
First Significant Permit Modification to  
**Part 70 169-5650-00004**

Dear Mr. Hough:

GenCorp, Inc., dba GDx Automotive, was issued a permit on April 15, 2002 for a stationary rubber product manufacturing operation. A letter requesting a change was received on June 4, 2003. Pursuant to the provisions of 2-7-12, the permit is hereby modified as follows:

GenCorp, Inc., dba GDx Automotive, has submitted an application to remove Part (b)(1)(B) of Condition D.1.8 which requires record keeping of the cleaning cycle operation of the source baghouses.

The Office of Air Quality has recently determined that this requirement is no longer necessary because the cleaning operation is a normal baghouse function that is regulated under the Preventive Maintenance Plan (PMP) under 326 IAC 2-7-5(13), and that demonstrating compliance with the requirements of the PMP is sufficient to demonstrate that the baghouses are being cleaned as designed, in lieu of the requirements of Condition D.1.8(b)(1)(B).

Therefore, the record keeping requirement of Condition D.1.8(b)(1)(B) shall be removed.

The proposed change is considered a significant change to the existing monitoring requirements. The proposed change does not affect the emissions or production from any of the source emission units, there are no changes to any existing conditions that are required, and there are no new applicable requirements that are triggered.

Therefore, the proposed change shall be incorporated into the existing Part 70 Permit via a Significant Permit Modification pursuant to 326 IAC 2-7-12(d)(1) which states that any significant changes to existing Part 70 permit monitoring conditions or terms shall be considered significant.

To incorporate the proposed change into the permit, the following changes shall be made. All additional information is indicated in bold type. All deleted information is struck-out.

**Condition D.1.8:**

Part (b)(1)(B) shall be removed from Condition D.1.8 as follows because record keeping of the baghouse cleaning cycle operations is no longer required

**D.1.8 Record Keeping Requirements**

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- (a) To document compliance with Condition D.1.4, the Permittee shall maintain records of visible emission notations of the Banbury Mills, stacks (BH02, BH03, BH04, BH05) and Compound handling, stacks (BH06, BH07, BH08, BH10) exhaust once per shift.
- (b) To document compliance with Condition D.1.5, the Permittee shall maintain ~~the following~~:
- (1) Once per shift records of the ~~following operational parameters~~ **total static pressure drop** during normal operation when venting to the atmosphere; **and**
    - ~~(A) Inlet and outlet differential static pressure; and~~
    - ~~(B) Cleaning cycle operation.~~
  - (2) Documentation of the dates vents are redirected.

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

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Scott Fulton, at (800) 451-6027, and ask for Scott Fulton or extension (3-5691), or dial (317) 233-5691.

Sincerely,

Original Signed by Paul Dubenetzky  
Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

**Attachments**

SDF

cc: File - Wabash County  
U.S. EPA, Region V  
Wabash County Health Department  
Air Compliance Section Inspector - Ryan Hillman  
Compliance Data Section - Karen Nowak  
Administrative and Development  
Technical Support and Modeling - Michele Boner

# **PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY**

**GenCorp, Inc., dba GDx Automotive  
One General Street  
Wabash, Indiana 46992**

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T169-5650-00004	Date Issued: April 15, 2002 Expiration Date: April 15, 2007
Issued by: Janet McCabe Assistant Commissioner Office of Air Quality	
First Administrative Amendment No.: 169-16057-00004	Date Issued: June 10, 2002
Second Administrative Amendment No.: 169-17150-00004	Date Issued: May 8, 2003
First Significant permit Modification No.: 169-17370-00004	Affected Page: 29

Issued by: Original Signed by Paul Dubenetzky  
Paul Dubenetzky, Branch Chief,  
Office of Air Quality

Issued: December 29, 2003

GenCorp, Inc., dba GDX Automotive  
Wabash, Indiana  
Permit Reviewer: PR/EVP

First Significant Permit Modification No.: 169-17370-00004  
Amended By: SDF

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#### D.1.7 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

### Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

#### D.1.8 Record Keeping Requirements

- (a) To document compliance with Condition D.1.4, the Permittee shall maintain records of visible emission notations of the Banbury Mills, stacks (BH02, BH03, BH04, BH05) and Compound handling, stacks (BH06, BH07, BH08, BH10) exhaust once per shift.
- (b) To document compliance with Condition D.1.5, the Permittee shall maintain:
  - (1) once per shift records of the total static pressure drop during normal operation when venting to the atmosphere; and
  - (2) Documentation of the dates vents are redirected.
- (c) To document compliance with Condition D.1.6, the Permittee shall maintain records of the results of the inspections required under Condition D.1.6 and the dates the vents are redirected.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping

Requirements, of this permit.