



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

June 25, 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: Tomkins Industries-Dexter Axle Division / MPM 039-19038-00455

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 approval 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) 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-MOD.dot 9/16/03



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

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June 25, 2004

Mr. Adam Dexter
Tomkins Industries - Dexter Axle Division
2900 Industrial Parkway East
P.O. Box 250
Elkhart, IN 46515

Re: **039-19038-00455**
First Minor Permit Modification to
Part 70 No.: T 039-17508-00455

Dear Mr. Dexter:

Tomkins Industries - Dexter Axle Division was issued a Part 70 Operating Permit on February 16, 2004 for an axle, rim, and wheel manufacturing source. A letter requesting changes to this permit was received on May 3, 2004. Pursuant to the provisions of 326 IAC 2-7-12 a minor permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of the addition of the Torflex axle manufacturing line, consisting of five (5) insignificant MIG welding stations. The welding stations are subject to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes).

The changes in the Part 70 Operating Permit are documented in the Technical Support Document. All other conditions of the permit shall remain unchanged and in effect. For your convenience, the entire revised Title V Operating Permit, with all modifications and amendments made to it, will be provided upon approval.

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 CarrieAnn Paukowits, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, at 631-691-3395 ext. 18, or in Indiana at 1-800-451-6027 (ext. 631-691-3395).

Sincerely,

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

CAP/MES
Attachments

cc: File - Elkhart County
U.S. EPA, Region V
Elkhart County Health Department
Northern Regional Office
Air Compliance Section Inspector - Tony Pelath
Compliance Branch
Administrative and Development Section
Technical Support and Modeling - Michele Boner



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PART 70 OPERATING PERMIT RENEWAL OFFICE OF AIR QUALITY

**Tomkins Industries - Dexter Axle Division
222, 400, and 500 Collins Road,
Elkhart, IN 46575**

(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.

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

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. **This permit also addresses certain new source review requirements for new equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-7-10.5, applicable to those conditions.**

Operation Permit No.: T039-17508-00455	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: February 16, 2004 Expiration Date: February 16, 2009
First Minor Permit Modification No.: 039-19038-00455	Pages Affected: 5 and 7; 29a is added
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: June 25, 2004

D.3 FACILITY OPERATION CONDITIONS - Insignificant Activities 29a

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Matter [326 IAC 6-3-2]

Certification 30
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Quarterly Deviation and Compliance Monitoring Report 33

- (4) Three (3) pad welders, each installed in 1980, located in Plant 11, identified as 222W-1, 222W-2, and 222W-3, each with maximum capacity of 75 parts per hour, with material input of 2600 lb/hr, each exhausting to one (1) stack (222W-1, 222W-2, and 222W-3);

A.4 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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

- (1) One (1) robot welder, installed in 1980, located in Plant 11, identified as 222R-4, with maximum capacity of 14 pounds of wire per hour, exhausting to one (1) stack (222R-4), [326 IAC 6-3-2(c) covered under C.1];
- (2) Three (3) manual welders, installed in 1980, located in Plant 11, identified as 222M-5, 222M-6, and 222M-7, each with maximum capacity of 14 pounds of wire per hour, each exhausting to one (1) stack (222M-5, 222M-6, and 222M-7), [326 IAC 6-3-2(c) covered under C.1];
- (3) One (1) welder unit, installed in 1995, located in Plant 14, identified as 400EC-1, with maximum capacity of 512 parts per hour, exhausting to one (1) stack (400EC-1), [326 IAC 6-3-2(c), [326 IAC 6-3-2(c) covered under C.1];
- (4) One (1) robotic metal inert gas (MIG) welder, identified as RWS-1, located in Plant 11, constructed in 1996, which consumes 1.5 pounds of carbon weld wire per hour and has production capacity of 450 pounds of steel spindles per hour, [326 IAC 6-3-2(c) covered under C.1];
- (5) Four (4) welding stations, identified as TFW-01, located in Plant 11, constructed in 1998, using MIG carbon steel welding wire, with maximum welding wire consumption rate of 3 pounds per hour for each station, exhausting to one (1) stack (TRW-01), [326 IAC 6-3-2(c) covered under C.1];
- (6) One (1) burnoff oven, installed on August 30, 1988, located in Plant 14, identified as 400BO-1, with maximum heat input capacity of 0.9 million British thermal units per hour (mmBtu/hr), exhausting to one (1) stack (400BO-1); [326 IAC 4.2]
- (7) One (1) Torflex axle manufacturing line, constructed in 2004, with a capacity of 60 parts (4,830 pounds) per hour, consisting of:
 - (a) Four (4) MIG welding stations, identified as BRKT-TACK, BRKT-W1, BRKT-W2, and IB/SPND-W1, equipped with Torit filters and exhausting inside, capacity: 20.88 pounds of weld wire per hour, per station. [326 IAC 6-3]
 - (b) One (1) MIG welding station, identified as RB/SPND-W1, equipped with a Torit filter and exhausting inside, capacity: 32.6 pounds of weld wire per hour. [326 IAC 6-3]

A.5 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Insignificant Activities

- (7) One (1) Torflex axle manufacturing line, constructed in 2004, with a capacity of 60 parts (4,830 pounds) per hour, consisting of:
- (a) Four (4) MIG welding stations, identified as BRKT-TACK, BRKT-W1, BRKT-W2, and IB/SPND-W1, equipped with Torit filters and exhausting inside, capacity: 20.88 pounds of weld wire per hour, per station. [326 IAC 6-3]
 - (b) One (1) MIG welding station, identified as RB/SPND-W1, equipped with a Torit filter and exhausting inside, capacity: 32.6 pounds of weld wire per hour. [326 IAC 6-3]

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

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Matter [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the five (5) MIG welding stations at the Torflex axle manufacturing line shall not exceed 7.40 pounds per hour, total, when operating at a process weight rate of 4,830 pounds per hour, total.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour;
and P = process weight rate in tons per hour

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

**Technical Support Document (TSD) for a Part 70
Minor Permit Modification**

Source Background and Description

Source Name:	Tomkins Industries - Dexter Axle Division
Source Location:	222, 400 and 500 Collins Road, Elkhart, IN 46515
County:	Elkhart
SIC Code:	3714
Operation Permit No.:	T 039-17508-00455
Operation Permit Issuance Date:	February 16, 2004
Minor Permit Modification No.:	039-19038-00455
Permit Reviewer:	CarrieAnn Paukowits

The Office of Air Quality (OAQ) has reviewed a modification application from Tomkins Industries - Dexter Axle Division relating to the construction and operation of the following emission units and pollution control devices:

One (1) MIG welding station, identified as RB/SPND-W1, at the Torflex axle manufacturing line, equipped with a Torit filter and exhausting inside, capacity: 32.6 pounds of weld wire per hour.

On April 15, 2004, the Tomkins Industries - Dexter Axle Division, had submitted a review request for the construction and operation of the following new equipment:

Four (4) MIG welding stations, identified as BRKT-TACK, BRKT-W1, BRKT-W2, and IB/SPND-W1, at the Torflex axle manufacturing line, equipped with Torit filters and exhausting inside, capacity: 60 parts (4,830 pounds) per hour, total, and 20.88 pounds of weld wire per hour, per station.

The addition of those four (4) MIG welding stations did not require a source or permit modification. However, the welding stations were also for the Torflex axle manufacturing line and all five (5) welders will be constructed at approximately the same time. Therefore, the five (5) MIG welding stations are considered part of the same facility and modification, and this Minor Permit Modification is for the operation of the following:

One (1) Torflex axle manufacturing line, constructed in 2004, with a capacity of 60 parts (4,830 pounds) per hour, consisting of:

- (a) Four (4) MIG welding stations, identified as BRKT-TACK, BRKT-W1, BRKT-W2, and IB/SPND-W1, equipped with Torit filters and exhausting inside, capacity: 20.88 pounds of weld wire per hour, per station.
- (b) One (1) MIG welding station, identified as RB/SPND-W1, equipped with a Torit filter and exhausting inside, capacity: 32.6 pounds of weld wire per hour.

History

On April 15, 2004, Tomkins Industries - Dexter Axle Division, submitted an application to add a Torflex axle manufacturing line, consisting of four (4) MIG welders to their existing source. On May 3, 2004, Tomkins Industries - Dexter Axle Division submitted an application to the OAQ requesting to add one (1) additional MIG welder to the Torflex axle manufacturing line. Tomkins Industries - Dexter Axle Division was issued a Part 70 permit renewal on February 16, 2004.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

There are no stacks associated with the new emissions units.

Recommendation

The staff recommends to the Commissioner that the Part 70 Minor Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on May 3, 2004.

Emission Calculations

See page 1 of 1 of Appendix A of this document for detailed emissions calculations.

Potential To Emit of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source 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."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	2.80
PM ₁₀	2.80
SO ₂	0.00
VOC	0.00
CO	0.00
NO _x	0.00

HAP's	Potential To Emit (tons/year)
Manganese	0.255
TOTAL	0.255

Justification for Modification

- (a) These new welding stations are insignificant because the potential to emit PM and PM₁₀ is less than five (5) pounds per hour and twenty-five (25) pounds per day, the potential to emit any individual HAP is less than five (5) pounds per day, and the potential to emit any combination of HAPs is less than twelve and a half (12.5) pounds per day and two and a half (2.5) tons per year. A source modification is not required because the potential to emit PM and PM₁₀ is less than five (5) tons per year, total.
- (b) The Part 70 Operating permit is being modified through a Part 70 Minor Permit Modification. This modification is being performed pursuant to 326 IAC 2-7-12(b)(1), for permit modifications that do not violate any applicable requirement; do not involve significant changes to existing monitoring, reporting, or record keeping requirements in the Part 70 permit; do not require or change a case-by-case determination of an emission limit or other standard, source specific determination for temporary sources of ambient impacts, or visibility or increment analysis; do not seek to establish or change a Part 70 permit term or condition for which there is no corresponding underlying applicable requirement; are not modifications under any provision of Title I of the CAA; and are not required by the Part 70 program to be processed as a significant modification. This modification is subject to 326 IAC 6-3-2. However, IDEM, OAQ, has determined that the applicability of 326 IAC 6-3-2 does not cause a case-by-case determination of an emission limitation or standard. Therefore, a significant permit modification is not required.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM ₁₀	attainment
SO ₂	attainment
NO ₂	attainment
1-hour Ozone	maintenance attainment
8-hour Ozone	basic nonattainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NO_x

emissions were reviewed pursuant to the requirements for nonattainment new source review.

- (b) Elkhart County has been classified as attainment or unclassifiable for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Source Status

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

Pollutant	Emissions (tons/year)
PM	less than 100
PM ₁₀	less than 100
SO ₂	less than 100
VOC	greater than 100; less than 250
CO	less than 100
NO _x	less than 100

- (a) This existing source is a major stationary source because a nonattainment regulated pollutant is emitted at a rate of 100 tons per year or more.
- (b) These emissions are based upon the Technical Support Document to T 039-17508-00455 issued on February 16, 2004.

Potential to Emit of Modification After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.

Process/facility	Potential to Emit (tons/year)						
	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
Welding	2.80	2.80	-	-	-	-	0.255

This proposed modification to an existing minor stationary source is not major because the emission increase is less than the PSD and Emission Offset significant levels. Therefore, pursuant to 326 IAC 2-2 and 326 IAC 2-3, the PSD and Emission Offset requirements do not apply.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this modification.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14, 326 IAC 20, 40 CFR 61 and 40 CFR Part 63) applicable to this modification.

State Rule Applicability - Individual Facilities

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

The unrestricted potential PM emissions from the five (5) MIG welding stations, all on the Torflex axle manufacturing line, are greater than 0.551 pounds per hour, total. In addition, the five (5) MIG welding stations consume more than six hundred and twenty-five (625) pounds of weld wire per day. Therefore, the requirements of 326 IAC 6-3-2 are applicable.

Pursuant to 326 IAC 6-3-2, the particulate from the five (5) MIG welding stations shall not exceed 7.40 pounds per hour, total, when operating at a process weight rate of 4,830 pounds per hour, total. Since the unrestricted potential particulate emissions from the five (5) MIG welding stations is 0.639 pounds per hour, the five (5) MIG welding stations will comply with this rule. This limitation is based upon the following:

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

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

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

There are no specific compliance monitoring requirements applicable to this modification.

Changes

The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language appears in bold):

A.4 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

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

- (1) One (1) robot welder, installed in 1980, located in Plant 11, identified as 222R-4, with maximum capacity of 14 pounds of wire per hour, exhausting to one (1) stack (222R-4), [326 IAC 6-3-2(c) covered under C.1];
- (2) Three (3) manual welders, installed in 1980, located in Plant 11, identified as 222M-5, 222M-6, and 222M-7, each with maximum capacity of 14 pounds of wire per hour, each exhausting to one (1) stack (222M-5, 222M-6, and 222M-7), [326 IAC 6-3-2(c) covered under C.1];
- (3) One (1) welder unit, installed in 1995, located in Plant 14, identified as 400EC-1, with maximum capacity of 512 parts per hour, exhausting to one (1) stack (400EC-1), [326 IAC 6-3-2(c), [326 IAC 6-3-2(c) covered under C.1];
- (4) One (1) robotic metal inert gas (MIG) welder, identified as RWS-1, located in Plant 11, constructed in 1996, which consumes 1.5 pounds of carbon weld wire per hour and has production capacity of 450 pounds of steel spindles per hour, [326 IAC 6-3-2(c) covered under C.1];
- (5) Four (4) welding stations, identified as TFW-01, located in Plant 11, constructed in 1998, using MIG ~~stainless~~ **carbon** steel welding wire, with maximum welding wire consumption rate of 3 pounds per hour for each station, exhausting to one (1) stack (TRW-01), [326 IAC 6-3-2(c) covered under C.1];
- (6) One (1) burnoff oven, installed on August 30, 1988, located in Plant 14, identified as 400BO-1, with maximum heat input capacity of 0.9 million British thermal units per hour (mmBtu/hr), exhausting to one (1) stack (400BO-1); [326 IAC 4.2]
- (7) One (1) Torflex axle manufacturing line, constructed in 2004, with a capacity of 60 parts (4,830 pounds) per hour, consisting of:**
 - (a) Four (4) MIG welding stations, identified as BRKT-TACK, BRKT-W1, BRKT-W2, and IB/SPND-W1, equipped with Torit filters and exhausting inside, capacity: 20.88 pounds of weld wire per hour, per station. [326 IAC 6-3]**
 - (b) One (1) MIG welding station, identified as RB/SPND-W1, equipped with a Torit filter and exhausting inside, capacity: 32.6 pounds of weld wire per hour. [326 IAC 6-3]**

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Insignificant Activities

- (7) One (1) Torflex axle manufacturing line, constructed in 2004, with a capacity of 60 parts (4,830 pounds) per hour, consisting of:
- (a) Four (4) MIG welding stations, identified as BRKT-TACK, BRKT-W1, BRKT-W2, and IB/SPND-W1, equipped with Torit filters and exhausting inside, capacity: 20.88 pounds of weld wire per hour, per station. [326 IAC 6-3]
 - (b) One (1) MIG welding station, identified as RB/SPND-W1, equipped with a Torit filter and exhausting inside, capacity: 32.6 pounds of weld wire per hour. [326 IAC 6-3]

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

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Matter [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the five (5) MIG welding stations at the Torflex axle manufacturing line shall not exceed 7.40 pounds per hour, total, when operating at a process weight rate of 4,830 pounds per hour, total.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour;
and P = process weight rate in tons per hour

Conclusion

The operation of this proposed modification shall be subject to the conditions of the attached Part 70 Minor Permit Modification No. 039-19038-00455.

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

Company Name: Tomkins Industries - Dexter Axle Division
Address City IN Zip: 222, 400 and 500 Collins Road, Elkhart, Indiana 465
Approval No.: 039-19038
Plt ID: 039-00455
Reviewer: CarrieAnn Paukowits
Application Date: May 3, 2004

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)					
			PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr						
WELDING																
Submerged Arc	0	0					0.036	0.011			0.000	0.000	0.000	0.000		
Metal Inert Gas (MIG)(carbon steel)	4	20.88					0.0055	0.0005			0.459	0.042	0.000	0.000	0.042	
Metal Inert Gas (MIG)(carbon steel)	1	32.6					0.0055	0.0005			0.179	0.016	0.000	0.000	0.016	
Stick (E7018 electrode)	0	0					0.0211	0.0009			0.000	0.000	0.000	0.000	0.000	
Tungsten Inert Gas (TIG)(carbon steel)	0	0					0.0055	0.0005			0.000	0.000	0.000	0.000	0.000	
Oxyacetylene(carbon steel)	0						0.0055	0.0005			0.000	0.000	0.000	0.000	0.000	
FLAME CUTTING	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)**				EMISSIONS (lbs/hr)				HAPS (lbs/hr)				
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr					
Oxyacetylene	0	2	15					0.1622	0.0005	0.0001	0.0003	0.000	0.000	0.000	0.000	0.000
Oxymethane	0							0.0815	0.0002		0.0002	0.000	0.000	0.000	0.000	0.000
Plasma**	0	0.375	150					0.0039				0.000	0.000	0.000	0.000	0.000
EMISSION TOTALS																
Potential Emissions lbs/hr												0.639				0.058
Potential Emissions lbs/day												15.3				1.40
Potential Emissions tons/year												2.80				0.255

METHODOLOGY

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

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

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

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

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

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

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

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