



Mitchell E. Daniels, Jr.  
Governor

Thomas W. Easterly  
Commissioner

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

TO: Interested Parties / Applicant  
DATE: February 3, 2005  
RE: Webb Wheel Products, Inc. / MSOP 123-19210-00024  
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 1/10/05



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**NEW SOURCE CONSTRUCTION  
and MINOR SOURCE OPERATING PERMIT  
OFFICE OF AIR QUALITY**

**Webb Wheel Products, Inc.  
9860 W SR 66  
Tell City, Indiana 47586**

(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 2-1.1, 326 IAC 2-5.1 if new source, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 123-19210-00024	
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: February 3, 2005  Expiration Date: February 3, 2010

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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)]

---

The Permittee owns and operates a stationary truck hub, brake drum, and rotor painting and machining source.

Authorized Individual:	Facilities Engineering Manager
Source Address:	9860 W SR 66, Tell City, IN 47586
Mailing Address:	P.O. Box 102, Tell City, IN 47586
General Source Phone:	256-572-1933
SIC Code:	3714
County Location:	Perry
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Minor Source, under PSD and Nonattainment NSR Rules

### 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) Hub High Volume Inline, identified as Complete Machining Center, equipped with a mist collection system for particulate control, constructed in 2004, with a capacity of: 51.2 wheel parts per hour, total, and 250 gallons per month of coolant solvent, consisting of a total of two (2) lines with the following equipment:
  - (1) Hub High Volume Line 1, with the total capacity of 25.6 Hub parts per hour, with each part weighing a total of 62.0 pounds, consisting of:
    - (A) One Vertical lathe identified as Operation 10, exhausting inside the building, with a capacity of: 25.6 Hub parts per hour.
    - (B) One Vertical lathe identified as Operation 20, exhausting inside the building, with a capacity of: 25.6 Hub parts per hour.
    - (C) One (1) drilling operation, identified as Operation 30, exhausting inside the building, with a capacity of: 25.6 Hub parts per hour.
    - (D) One (1) grinding operation, identified as Operation 40, exhausting inside the building, with a capacity of: 25.6 Hub parts per hour.
  - (2) Hub High Volume Line 2, with the total capacity of 25.6 Hub parts per hour, with each part weighing a total of 62.0 pounds, consisting of:
    - (A) One Vertical lathe identified as Operation 10, exhausting inside the building, with a capacity of: 25.6 Hub parts per hour.
    - (B) One Vertical lathe identified as Operation 20, exhausting inside the building, with a capacity of: 25.6 Hub parts per hour.

- (C) One (1) drilling operation, identified as Operation 30, exhausting inside the building, with a capacity of: 25.6 Hub parts per hour.
- (D) One (1) grinding operation, identified as Operation 40, exhausting inside the building, with a capacity of: 25.6 Hub parts per hour.
- (3) One Hub parts washer, identified as HS13, equipped with a natural gas-fired burner, identified as HS12, rated at 0.50 million British thermal units per hour, with a capacity of: 180 gallons of rust inhibitor solvent. The rust inhibitor is captured and re-used, and only 2 gallons per hour will be used.
- (b) One (1) Drum/Rotor Machining Line, identified as Drum/Rotor Machining Center, equipped with a cartridge dust collection system for particulate control, constructed in 2004, with a capacity of: 100 Drum wheel parts per hour, total, consisting of a total of two (2) lines with the following equipment:
  - (1) Drum/Rotor Machining Line 1, with a total capacity of 50.0 Hub wheel parts per hour, with each part weighing 110 pounds, consisting of:
    - (A) One (1) machining operation, identified as Operation 10, exhausting inside the building, with a capacity of: 50 Hub wheel parts per hour.
    - (B) One (1) drilling operation, identified as Operation 20, exhausting inside the building, with a capacity of: 50 Hub wheel parts per hour.
    - (C) One (1) drilling operation, identified as Operation 30, exhausting inside the building, with a capacity of: 50 Hub wheel parts per hour.
  - (2) Drum/Rotor Machining Line 2, with a total capacity of 50.0 Hub wheel parts per hour, with each part weighing 110 pounds, consisting of:
    - (A) One (1) machining operation, identified as Operation 10, exhausting inside the building, with a capacity of: 50 Hub wheel parts per hour.
    - (B) One (1) drilling operation, identified as Operation 20, exhausting inside the building, with a capacity of: 50 Hub wheel parts per hour.
    - (C) One (1) drilling operation, identified as Operation 30, exhausting inside the building, with a capacity of: 50 Hub wheel parts per hour.
  - (3) One Drum parts washer, identified as HS15, equipped with a natural gas-fired burner, identified as HS14, rated at 0.50 million British thermal units per hour, with a capacity of 180 gallons of rust inhibitor solvent. The rust inhibitor is captured and re-used, and only 2 gallons per hour will be used.
- (c) One (1) Drum Painting Area, identified as Drum Painting, with a capacity of: 100 wheel parts per hour, total, consisting of:
  - (1) One (1) automatic spray paint system, identified as DS11, equipped with a dry filter overspray recovery system for particulate control, exhausting to stack DS11, with a capacity of: 100 wheel parts per hour.
  - (2) One (1) natural gas-fired dry off oven, identified as HS10, rated: 0.500 million British thermal units per hour.

- (d) One (1) Hub painting area, identified as Hub Painting, with a capacity of: 100 wheel parts per hour, total, consisting of:
  - (1) One (1) powdercoat paint system, identified as Norson powder booth white and Norson powder booth black, equipped with a dry filter overspray recovery system for particulate control, exhausting inside the building, with a capacity of: 100 wheel parts per hour.
  - (2) One (1) five stage parts washer, with a capacity of: 3.00 gallons of solvent per hour, total, including the following:
    - (A) Stage 1 washer, identified as HS2, equipped with a 0.50 million British thermal unit per hour natural gas-fired burner, with a capacity of: 3.00 gallons of alkaline rinse per hour.
    - (B) Stage 2 washer, identified as Stage 2 washer, with a capacity of: 3.00 gallons of water per hour.
    - (C) Stage 3 washer, identified as HS3, equipped with a 0.50 million British thermal unit per hour natural gas-fired burner, with a capacity of: 3.00 gallons of iron phosphate solvent per hour.
    - (D) Stage 4 washer, identified as Stage 4 washer, with a capacity of: 3.00 gallons of water per hour.
    - (E) Stage 5 washer, identified as Stage 5 washer, with a capacity of: 3.00 gallons of sealing solvent per hour.
- (e) One (1) natural gas-fired dry off oven, identified as HS5, constructed in 2004, rated: 0.500 million British thermal units per hour.
- (f) One (1) natural gas-fired IR gel oven, identified as HS6, constructed in 2004, rated: 1.44 million British thermal units per hour.
- (g) One (1) natural gas-fired convection cure oven, identified as HS7, constructed in 2004, rated: 0.800 million British thermal units per hour.
- (h) Two (2) office heaters, identified as HST18 and HST19, constructed in 2004, rated: 0.100 million British thermal units per hour, each.
- (i) Two (2) office heaters, identified as HST20 and HST21, constructed in 2004, rated: 0.180 million British thermal units per hour, each.
- (j) One (1) office heater, identified as HST22, constructed in 2004, rated: 0.160 million British thermal units per hour.
- (k) One (1) preheat oven, identified as DS10, constructed in 2004, rated: 0.500 million British thermal units per hour.
- (l) One (1) air make up unit, identified as HS16, constructed in 2004, rated: 3.207 million British thermal units per hour.
- (m) One (1) air make up unit, identified as HS17, constructed in 2004, rated: 3.207 million British thermal units per hour.

**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]**

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**

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]**

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)]**

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]**

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]**

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 Minor Source Operating Permit [326 IAC 2-6.1]**

This document shall also become a minor source operating permit pursuant to 326 IAC 2-6.1 when, prior to start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), Permit Administration & Development Section.
  - (1) If the Affidavit of Construction verifies that the facilities covered in this Construction Permit were constructed as proposed in the application, then the facilities may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.
  - (2) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2-6.1-6 and 326 IAC 2-2 and an Operation Permit Validation Letter is issued.

- (b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
- (c) Upon receipt of the Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section, the Permittee shall attach it to this document.
- (d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-1.1-7(Fees).

B.8 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (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.9 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days (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.10 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

- (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.11 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]

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.12 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.13 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 one hundred (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 Stack Height [326 IAC 1-7]**

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted by using good engineering practices (GEP) pursuant to 326 IAC 1-7-3.

C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue, 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.7 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 not later than forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

### Compliance Requirements [326 IAC 2-1.1-11]

#### C.8 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.9 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.10 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.

C.11 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11]

- (a) Whenever a condition in this permit requires the measurement of total static pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( 2%) of full scale reading.
- (b) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

C.12 Compliance Response Plan - Preparation and Implementation

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ, upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
  - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
  - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
  - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
  - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
  - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.
  - (4) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:

- (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
  - (3) An automatic measurement was taken when the process was not operating.
  - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

### **Record Keeping and Reporting Requirements**

#### **C.13 Malfunctions Report [326 IAC 1-6-2]**

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

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

#### **C.14 General Record Keeping Requirements [326 IAC 2-6.1-5]**

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented when operation begins.

C.15 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) Reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, 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**

**EMISSIONS UNITS OPERATION CONDITIONS**

**Emissions Unit Description:**

- (a) One (1) Hub High Volume Inline, identified as Complete Machining Center, equipped with a mist collection system for particulate control, constructed in 2004, with a capacity of: 51.2 wheel parts per hour, total, and 250 gallons per month of coolant solvent, consisting of a total of two (2) lines with following equipment:
  - (1) Hub High Volume Line 1, with the total capacity of 25.6 Hub parts per hour, with each part weighing a total of 62.0 pounds, consisting of:
    - (A) One Vertical lathe identified as Operation 10, exhausting inside the building, with a capacity of: 25.6 Hub parts per hour.
    - (B) One Vertical lathe identified as Operation 20, exhausting inside the building, with a capacity of: 25.6 Hub parts per hour.
    - (C) One (1) drilling operation, identified as Operation 30, exhausting inside the building, with a capacity of: 25.6 Hub parts per hour.
    - (D) One (1) grinding operation, identified as Operation 40, exhausting inside the building, with a capacity of: 25.6 Hub parts per hour.
  - (2) Hub High Volume Line 2, with the total capacity of 25.6 Hub parts per hour, with each part weighing a total of 62.0 pounds, consisting of:
    - (A) One Vertical lathe identified as Operation 10, exhausting inside the building, with a capacity of: 25.6 Hub parts per hour.
    - (B) One Vertical lathe identified as Operation 20, exhausting inside the building, with a capacity of: 25.6 Hub parts per hour.
    - (C) One (1) drilling operation, identified as Operation 30, exhausting inside the building, with a capacity of: 25.6 Hub parts per hour.
    - (D) One (1) grinding operation, identified as Operation 40, exhausting inside the building, with a capacity of : 25.6 Hub parts per hour.
  - (3) One Hub parts washer, identified as HS13, equipped with a natural gas-fired burner, identified as HS12, rated at 0.50 million British thermal units per hour, with a capacity of: 180 gallons of rust inhibitor solvent. The rust inhibitor is captured and re-used, and only 2 gallons per hour will be used.
- (b) One (1) Drum/Rotor Machining Line, identified as Drum/Rotor Machining Center, equipped with a cartridge dust collection system for particulate control, constructed in 2004, with a capacity of: 100 Drum wheel parts per hour, total, consisting of a total of two (2) lines with the following equipment:
  - (1) Drum/Rotor Machining Line 1, with a total capacity of 50.0 Hub wheel parts per hour, with each part weighing 110 pounds, consisting of:
    - (A) One (1) machining operation, identified as Operation 10, exhausting inside the building, with a capacity of: 50 Hub wheel parts per hour.
    - (B) One (1) drilling operation, identified as Operation 20, exhausting inside the building, with a capacity of: 50 Hub wheel parts per hour.
    - (C) One (1) drilling operation, identified as Operation 30, exhausting inside the building, with a capacity of: 50 Hub wheel parts per hour.
  - (2) Drum/Rotor Machining Line 2, with a total capacity of 50.0 Hub wheel parts per hour, with each part weighing 110 pounds, consisting of:
    - (A) One (1) machining operation, identified as Operation 10, exhausting inside the building, with a capacity of: 50 Hub wheel parts per hour.

**Emissions Unit Description: (continued)**

- (B) One (1) drilling operation, identified as Operation 20, exhausting inside the building, with a capacity of: 50 Hub wheel parts per hour.
  - (C) One (1) drilling operation, identified as Operation 30, exhausting inside the building, with a capacity of: 50 Hub wheel parts per hour.
  - (D) One Drum parts washer, identified as HS15, equipped with a natural gas-fired burner, identified as HS14, rated at 0.50 million British thermal units per hour, with a capacity of 180 gallons of rust inhibitor solvent. The rust inhibitor is captured and re-used, and only 2 gallons per hour will be used.
- (c) One (1) Drum Painting Area, identified as Drum Painting, with a capacity of: 100 wheel parts per hour, total, consisting of:
- (1) One (1) automatic spray paint system, identified as DS11, equipped with a dry filter overspray recovery system for particulate control, exhausting to stack DS11, with a capacity of: 100 wheel parts per hour.
  - (2) One (1) natural gas-fired dry off oven, identified as HS10, rated: 0.500 million British thermal units per hour.
- (d) One (1) Hub painting area, identified as Hub Painting, with a capacity of: 100 wheel parts per hour, total, consisting of:
- (1) One (1) powdercoat paint system, identified as Norson powder booth white and Norson powder booth black, equipped with a dry filter overspray recovery system for particulate control, exhausting inside the building, with a capacity of: 100 wheel parts per hour.
  - (2) One (1) five stage parts washer, with a capacity of 3.00 gallons of solvent per hour, total, including the following:
    - (A) Stage 1 washer, identified as HS2, equipped with a 0.50 million British thermal unit per hour natural gas-fired burner, with a capacity of: 3.00 gallons of alkaline rinse per hour.
    - (B) Stage 2 washer, identified as Stage 2 washer, with a capacity of: 3.00 gallons of water per hour.
    - (C) Stage 3 washer, identified as HS3, equipped with a 0.50 million British thermal unit per hour natural gas-fired burner, with a capacity of: 3.00 gallons of iron phosphate solvent per hour.
    - (D) Stage 4 washer, identified as Stage 4 washer, with a capacity of: 3.00 gallons of water per hour.
    - (E) Stage 5 washer, identified as Stage 5 washer, with a capacity of with a capacity of: 3.00 gallons of sealing solvent per hour.
- (e) One (1) natural gas-fired dry off oven, identified as HS5, constructed in 2004, rated: 0.500 million British thermal units per hour.
- (f) One (1) natural gas-fired IR gel oven, identified as HS6, constructed in 2004, rated: 1.44 million British thermal units per hour.
- (g) One (1) natural gas-fired convection cure oven, identified as HS7, constructed in 2004, rated: 0.800 million British thermal units per hour.
- (h) Two (2) office heaters, identified as HST18 and HST19, constructed in 2004, rated: 0.100 million British thermal units per hour, each.
- (i) Two (2) office heaters, identified as HST20 and HST21, constructed in 2004, rated: 0.180 million British thermal units per hour, each.

**Emissions Unit Description: (continued)**

- (j) One (1) office heater, identified as HST22, constructed in 2004, rated: 0.160 million British thermal units per hour.
- (k) One (1) preheat oven, identified as DS10, constructed in 2004, rated: 0.500 million British thermal units per hour.
- (l) One (1) air make up unit, identified as HS16, constructed in 2004, rated: 3.207 million British thermal units per hour.
- (m) One (1) air make up unit, identified as HS17, constructed in 2004, rated: 3.207 million British thermal units per hour.

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

**Emission Limitations and Standards**

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

- (a) Particulate from the surface coating shall be controlled by a dry particulate filter, 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.1.2 Particulate [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the Hub High Volume Line 1, and the Hub High Volume Line 2 shall not exceed 3.51 pounds per hour, each, when operating at a process weight rate of 1,587 pounds per hour, each.
- (b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the Drum/Rotor Machining Line 1, and the Drum/Rotor Machining Line 2 shall not exceed 8.07 pounds per hour, each, when operating at a process weight rate of 5,500 pounds per hour, each.

The pounds per hour limitations were 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:

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

D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

Any change or modification that increases the actual emissions of VOC to greater than fifteen (15) pounds per day or more shall require prior IDEM, OAQ approval.

D.1.4 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 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.1.5 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), for cold cleaning facility construction of which commenced after July 1, 1990, the Permittee 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.1.6 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 these facilities and their control devices.

### **Compliance Determination Requirements**

#### D.1.7 Particulate Matter

- 
- (a) In order to comply with Condition D.1.2(a) the mist collection system for PM control shall be functional and control emissions from the Hub High Volume Line 1, and the Hub High Volume Line 2, at all times that these units are in operation.
  - (b) In order to comply with Condition D.1.2(b), the cartridge dust collection system for PM control shall be functional and control emissions from the Drum/Rotor Machining Line 1, and the Drum/Rotor Machining Line 2, at all times that these units are in operation.

### **Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]**

#### D.1.8 Monitoring

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- (a) Monthly inspections shall be performed to verify the placement, integrity and particle loading of the mist collection system filters for the Complete Machining Center. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C – Compliance Monitoring Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

- (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.1.9 Record Keeping Requirements**

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- (a) To document compliance with Condition D.1.8, the Permittee shall maintain records of the results of the inspections required under Condition D.1.8.
- (b) To document compliance with Condition D.1.6, the Permittee shall maintain of records of any additional inspections 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>Webb Wheel Products, Inc.</b>
<b>Address:</b>	<b>9860 W SR 66</b>
<b>City:</b>	<b>Tell City, IN 47586</b>
<b>Phone #:</b>	<b>256-572-1933</b>
<b>MSOP #:</b>	<b>123-19210-00024</b>

I hereby certify that Webb Wheel Products, Inc. is

- still in operation.
- no longer in operation.

I hereby certify that Webb Wheel Products, Inc. is

- in compliance with the requirements of MSOP **123-19210-00024**.
- not in compliance with the requirements of MSOP **123-19210-00024**.

<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 a New Source Construction and Minor Source  
Operating Permit

**Source Background and Description**

<b>Source Name:</b>	<b>Webb Wheel Products, Inc.</b>
<b>Source Location:</b>	<b>9860 W SR 66, Tell City, IN 47586</b>
<b>County:</b>	<b>Perry</b>
<b>SIC Code:</b>	<b>3714</b>
<b>Operation Permit No.:</b>	<b>123-19210-00024</b>
<b>Permit Reviewer:</b>	<b>Craig J. Friederich</b>

The Office of Air Quality (OAQ) has reviewed an application from Webb Wheel Products, Inc. relating to the construction and operation of a truck hub, brake drum, and rotor painting and machining source.

**New Emission Units and Pollution Control Equipment**

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

- (a) One (1) Hub High Volume Inline, identified as Complete Machining Center, equipped with a mist collection system for particulate control, constructed in 2004, with a capacity of: 51.2 wheel parts per hour, total, and 250 gallons per month of coolant solvent, consisting of a total of two (2) lines with the following equipment:
  - (1) Hub High Volume Line 1, with the total capacity of 25.6 Hub parts per hour, with each part weighing a total of 62.0 pounds, consisting of:
    - (A) One Vertical lathe identified as Operation 10, exhausting inside the building, with a capacity of: 25.6 Hub parts per hour.
    - (B) One Vertical lathe identified as Operation 20, exhausting inside the building, with a capacity of: 25.6 Hub parts per hour.
    - (C) One (1) drilling operation, identified as Operation 30, exhausting inside the building, with a capacity of: 25.6 Hub parts per hour.
    - (D) One (1) grinding operation, identified as Operation 40, exhausting inside the building, with a capacity of: 25.6 Hub parts per hour.
  - (2) Hub High Volume Line 2, with the total capacity of 25.6 Hub parts per hour, with each part weighing a total of 62.0 pounds, consisting of:
    - (A) One Vertical lathe identified as Operation 10, exhausting inside the building, with a capacity of: 25.6 Hub parts per hour.
    - (B) One Vertical lathe identified as Operation 20, exhausting inside the building, with a capacity of: 25.6 Hub parts per hour.
    - (C) One (1) drilling operation, identified as Operation 30, exhausting inside the building, with a capacity of: 25.6 Hub parts per hour.

- (D) One (1) grinding operation, identified as Operation 40, exhausting inside the building, with a capacity of: 25.6 Hub parts per hour.
- (3) One Hub parts washer, identified as HS13, equipped with a natural gas fired burner, identified as HS12, rated at 0.50 million British thermal units per hour, capacity: 180 gallons of rust inhibitor solvent. The rust inhibitor is captured and re-used, and only 2 gallons per hour will be used.
- (b) One (1) Drum/Rotor Machining Line, identified as Drum/Rotor Machining Center, equipped with a cartridge dust collection system for particulate control, constructed in 2004, with a capacity of: 100 Drum wheel parts per hour, total, consisting of a total of two (2) lines with the following equipment:
  - (1) Drum/Rotor Machining Line 1, with a total capacity of 50.0 Hub wheel parts per hour, with each part weighing 110 pounds, consisting of:
    - (A) One (1) machining operation, identified as Operation 10, exhausting inside the building, with a capacity of: 50 Hub wheel parts per hour.
    - (B) One (1) drilling operation, identified as Operation 20, exhausting inside the building, with a capacity of: 50 Hub wheel parts per hour.
    - (C) One (1) drilling operation, identified as Operation 30, exhausting inside the building, with a capacity of: 50 Hub wheel parts per hour.
  - (2) Drum/Rotor Machining Line 2, with a total capacity of 50.0 Hub wheel parts per hour, with each part weighing 110 pounds, consisting of:
    - (A) One (1) machining operation, identified as Operation 10, exhausting inside the building, with a capacity of: 50 Hub wheel parts per hour.
    - (B) One (1) drilling operation, identified as Operation 20, exhausting inside the building, with a capacity of: 50 Hub wheel parts per hour.
    - (C) One (1) drilling operation, identified as Operation 30, exhausting inside the building, with a capacity of: 50 Hub wheel parts per hour.
  - (3) One Drum parts washer, identified as HS15, equipped with a natural gas-fired burner, identified as HS14, rated at 0.50 million British thermal units per hour, with a capacity of 180 gallons of rust inhibitor solvent. The rust inhibitor is captured and re-used, and only 2 gallons per hour will be used.
- (c) One (1) Drum Painting Area, identified as Drum Painting, with a capacity of: 100 wheel parts per hour, total, consisting of:
  - (1) One (1) automatic spray paint system, identified as DS11, equipped with a dry filter overspray recovery system for particulate control, exhausting to stack DS11, with a capacity of: 100 wheel parts per hour.
  - (2) One (1) natural gas-fired dry off oven, identified as HS10, rated: 0.500 million British thermal units per hour.
- (d) One (1) Hub painting area, identified as Hub Painting, with a capacity of: 100 wheel parts per hour, total, consisting of:

- (1) One (1) powdercoat paint system, identified as Norson powder booth white and Norson powder booth black, equipped with a dry filter overspray recovery system for particulate control, exhausting inside the building, with a capacity of: 100 wheel parts per hour.
- (2) One (1) five stage parts washer, with a capacity of: 3.00 gallons of solvent per hour, total, including the following:
  - (A) Stage 1 washer, identified as HS2, equipped with a 0.50 million British thermal unit per hour natural gas fired burner, with a capacity of: 3.00 gallons of alkaline rinse per hour.
  - (B) Stage 2 washer, identified as Stage 2 washer, with a capacity of: 3.00 gallons of water per hour.
  - (C) Stage 3 washer, identified as HS3, equipped with a 0.50 million British thermal unit per hour natural gas fired burner, with a capacity of: 3.00 gallons of iron phosphate solvent per hour.
  - (D) Stage 4 washer, identified as Stage 4 washer, with a capacity of: 3.00 gallons of water per hour.
  - (E) Stage 5 washer, identified as Stage 5 washer, with a capacity of: 3.00 gallons of sealing solvent per hour.
- (e) One (1) natural gas fired dry off oven, identified as HS5, constructed in 2004, rated: 0.500 million British thermal units per hour.
- (f) One (1) natural gas fired IR gel oven, identified as HS6, constructed in 2004, rated: 1.44 million British thermal units per hour.
- (g) One (1) natural gas fired convection cure oven, identified as HS7, constructed in 2004, rated: 0.800 million British thermal units per hour.
- (h) Two (2) office heaters, identified as HST18 and HST19, constructed in 2004, rated: 0.100 million British thermal units per hour, each.
- (i) Two (2) office heaters, identified as HST20 and HST21, constructed in 2004, rated: 0.180 million British thermal units per hour, each.
- (j) One (1) office heater, identified as HST22, constructed in 2004, rated: 0.160 million British thermal units per hour.
- (k) One (1) preheat oven, identified as DS10, constructed in 2004, rated: 0.500 million British thermal units per hour.
- (l) One (1) air make up unit, identified as HS16, constructed in 2004, rated: 3.207 million British thermal units per hour.
- (m) One (1) air make up unit, identified as HS17, constructed in 2004, rated: 3.207 million British thermal units per hour.

### Existing Approvals

This is the first air approval for this source.

### Enforcement Issue

There are no enforcement actions pending.

### Recommendation

The staff recommends to the Commissioner that the construction and operation be approved. This recommendation is based on the following facts and conditions:

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

An administratively complete permit application for the purposes of this review was received on May 20, 2004. Additional information was received on August 19, 2004.

### Emission Calculations

See pages 1 through 6 of 6 of Appendix A of this document for detailed emission calculations. Please note the PM and PM<sub>10</sub> emissions from the hub high volume lines 1 and 2, and the drum/rotor machining lines 1 and 2 are negligible.

### 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	48.4
PM <sub>10</sub>	48.7
SO <sub>2</sub>	0.034
VOC	10.8
CO	4.74
NO <sub>x</sub>	5.64

HAPs	Potential to Emit (tons/yr)
Single HAP	0.101
Total HAPs	0.107

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all criteria pollutants is less than one hundred (100) tons per year. Therefore, the source is 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 Perry County.

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

- (a) Volatile organic compounds (VOC) and nitrogen oxides (NO<sub>x</sub>) 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<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. Perry County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> 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.
- (b) Perry County has been classified as attainment or unclassifiable in Indiana for all remaining 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 PSD and Emission Offset applicability.

### Source Status

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

Pollutant	Emissions (tons/yr)
PM	17.0
PM <sub>10</sub>	17.3
SO <sub>2</sub>	0.034
VOC	10.8
CO	4.74
NO <sub>x</sub>	5.64
Single HAP	Less than 10
Combination HAPs	Less than 25

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

### Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This new 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) the combination of HAPs is less than 25 tons per year.

This is the first air approval issued to this source.

### Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) The parts washers are not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), Subpart T because these activities do not use any of the halogenated solvents listed in this subpart. Any change or modification to these degreasing activities that will require the use of halogenated solvents shall obtain prior approval from IDEM, OAQ.

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

#### 326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

The potential to emit of all criteria pollutants is less than two-hundred fifty (250) tons per year. Therefore, the requirements of 326 IAC 2-2 are not applicable.

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

This source is not located in Lake or Porter County with the potential to emit greater than twenty-five (25) tons per year of NO<sub>x</sub>, does not emit five (5) tons per year or more of lead and does not require a Part 70 Operating Permit. Therefore, the requirements of 326 IAC 2-6 do not apply.

#### 326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity limitations), except as provided in 326 IAC 5-1-3 (Temporary alternative opacity limitations), opacity shall meet the following, unless otherwise stated in the permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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

Particulate from the surface coating shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

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:

- (a) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (b) 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.

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

- (a) The particulate from the Hub High Volume Line 1, and the Hub High Volume Line 2, shall be limited to 3.51 pounds per hour, each, when operating at a process weight rate of 1,587 pounds per hour, each, based on the following equation:

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:

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

The mist collection system shall be in operation at all times these facilities are in operation, in order to comply with this limit.

- (b) The particulate from the Drum/Rotor Machining Line 1, and the Drum/Rotor Machining Line 2, shall be limited to 8.07 pounds per hour, each, when operating at a process weight rate of 5,500 pounds per hour, each, based on the following equation:

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:

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

The cartridge dust collection system shall be in operation at all times these facilities are in operation, in order to comply with this limit.

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

The potential to emit VOC from the surface coating operations is less than fifteen (15) pounds per day. Therefore, the requirements of 326 IAC 8-2-9 are not applicable.

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

The one (1) Hub parts washer, identified as HS13, the one (1) drum parts washer, identified as HS15, and the five stage parts washer associated with the Hub painting area, are subject to the provisions of 326 IAC 8-3-2 (Organic solvent degreasing operations: cold cleaner operations) because they were constructed after the rule applicability date of January 1, 1980, and each uses a spray for the purpose of cleaning the article. The owner or operator of each cold cleaning facility 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 operating 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 (Organic Solvent Degreasing Operations)

The one (1) Hub parts washer, identified as HS13, the one (1) drum parts washer, and the five stage parts washer associated with the Hub painting area, are subject to the provisions of 326

IAC 8-3-5 (Organic solvent degreasing operations: cold cleaner degreaser operation and control) because they do not have a remote solvent reservoir. Pursuant to 326 IAC 8-3-5, the owner or operator of a cold cleaner degreaser operation shall:

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser shall ensure that the following 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<sup>EC</sup>) (one hundred degrees Fahrenheit (100<sup>EF</sup>));
    - (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<sup>EC</sup>) (one hundred degrees Fahrenheit (100<sup>EF</sup>)), 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<sup>EC</sup>) (one hundred degrees Fahrenheit (100<sup>EF</sup>)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9<sup>EC</sup>) (one hundred twenty degrees Fahrenheit (120<sup>EF</sup>)):
    - (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.

**Conclusion**

The construction and operation of this truck hub, brake drum, and rotor painting and machining source shall be subject to the conditions of the New Source Construction and Minor Source Operating Permit 123-19210-00024.

## Indiana Department of Environmental Management Office of Air Quality

### Addendum to the Technical Support Document for New Construction and a Minor Source Operating Permit

<b>Source Name:</b>	<b>Webb Wheel Products, Inc.</b>
<b>Source Location:</b>	<b>9860 W SR 66, Tell City, IN 47586</b>
<b>County:</b>	<b>Perry</b>
<b>Construction Permit No.:</b>	<b>MSOP 123-19210-00024</b>
<b>SIC Code:</b>	<b>3714</b>
<b>Permit Reviewer:</b>	<b>Craig J. Friederich</b>

On December 16, the Office of Air Quality (OAQ) had a notice published in the Perry County News, 537 Main Street, Tell City, Indiana, 47586, stating that Webb Wheel Products, Inc. had applied for a construction operating permit to construct and operate a truck hub, brake drum, and rotor painting and machining source with a mist collection system, a cartridge dust collection system, and dry filters for particulate control. The notice also stated that OAQ proposed to issue a permit for this installation 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.

Upon further review, the OAQ has decided to make the following changes to the construction permit: The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded**):

#### **Change 1:**

Condition D.1.7 has been revised as follows to clarify which section of Condition D.1.2 is being referenced.

#### D.1.7 Particulate Matter

- (a) In order to comply with Condition D.1.2**(a)**, the mist collection system for PM control shall be functional and control emissions from the Hub High Volume Line 1, and the Hub High Volume Line 2, at all times that these units are in operation.
- (b) In order to comply with Condition D.1.2**(b)**, the cartridge dust collection system for PM control shall be functional and control emissions from the Drum/Rotor Machining Line 1, and the Drum/Rotor Machining Line 2, at all times that these units are in operation.

#### **Change 2:**

Conditions D.1.1(b) and D.1.1(c) satisfy the compliance monitoring requirements for the dry filters located at the spray paint system, identified as DS11. Therefore, Conditions D.1.8(b) and D.1.8(c) are not required and have been deleted as follows:

#### D.1.8 Monitoring

- (a) Monthly inspections shall be performed to verify the placement, integrity and particle loading of the mist collection system filters for the Complete Machining Center. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C – Compliance Monitoring Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

- (b) ~~Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters located at the one (1) automatic spray paint system, identified as DS11, and the one (1) powdercoat paint system, identified as Norson powder coat white and Norson powder coat black. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack DS11 while the booth is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C—Compliance Response Plan—Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.~~
- (c) ~~Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C—Compliance Response Plan—Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.~~
- (db) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

### Change 3:

The allowable particulate emissions from the Drum/Rotor Machining Center are less than ten (10) pounds per hour, and the control device does not have to be in operation at all times the Drum/Rotor Machining Center is in operation to comply with any applicable emission limits. Therefore, the monitoring requirements have been removed as follows, with all subsequent conditions being re-numbered accordingly:

#### D.1.9 Parametric Monitoring

~~The Permittee shall record the total static pressure drop across the cartridge dust collection system used in conjunction with the Drum/Rotor Machining Center, at least once per shift when the Drum/Rotor Machining Center is in operation when venting directly to the atmosphere. When for any one reading, the pressure drop across the filter is outside the normal range of 1.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C—Compliance Response Plan—Preparation, Implementation, Records and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C—Compliance Response Plan—Preparation, Implementation, Records and Reports shall be considered a deviation from this permit.~~

~~The instrument used for determining the pressure shall comply with Section C—Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ and shall be calibrated at least once every six (6) months.~~

#### D.1.10 Cartridge Inspections

~~An inspection shall be performed each calendar quarter of all cartridges controlling the Drum/ Rotor Machining Center, when venting directly to the atmosphere. An inspection shall be performed within three (3) months of redirecting vents directly to the atmosphere and every three (3) months thereafter. Inspections are optional when venting to the indoors. Inspections required by this condition shall not be performed in consecutive months. All defective cartridges shall be replaced.~~

#### D.1.11 Broken or Failed Cartridge Detection

~~In the event that Cartridge 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. 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 Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after cartridge failure is observed and it will be ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.~~
- ~~(b) For single compartment units, if failure is indicated by a significant drop in the cartridge's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if cartridge failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired 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).~~

#### Change 4:

Condition D.1.9 (formerly D.1.12) has been revised as follows to remove the reference to Conditions D.1.9 and D.1.10, which have been removed, as shown above. The changes are as follows:

#### D.1.129 Record Keeping Requirements

- ~~(a) To document compliance with Condition D.1.8, the Permittee shall maintain records of the results of the inspections required under Condition D.1.8.~~
- ~~(b) To document compliance with Condition D.1.9, the Permittee shall maintain records once per shift of the total static pressure drop during normal operation when venting directly to the atmosphere.~~
- ~~(c) To document compliance with Condition D.1.10, the Permittee shall maintain records of the results of the inspections required under Condition D.1.10.~~
- ~~(db) To document compliance with Condition D.1.6, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.~~
- ~~(ec) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.~~

**Appendix A: Emissions Calculations  
VOC and Particulate  
From Surface Coating Operations**

**Company Name: Webb Wheel Products, Inc.  
Address City IN Zip: 9860 W SR 66, Tell City, IN 47586  
MSOP: 123-19210  
Plt ID: 123-00024  
Reviewer: Craig J. Friederich  
Application Date: May 20, 2004**

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
DAB 4060 EX	9.4	66.000%	66.0%	0.2000%	75.0%	25.00%	0.02000	100.000	0.075	0.02	0.04	0.90	0.16	14.00	0.08	50%
Powdercoat White	13.1	0.000%	0.0%	0.0%	0.0%	100.00%	0.06000	100.000	0.00	0.00	0.00	0.00	0.00	17.17	0.00	95%
Powdercoat Black	13.1	0.000%	0.0%	0.0%	0.0%	100.00%	0.06000	100.000	0.00	0.00	0.00	0.00	0.00	17.17	0.00	95%

PM Control Efficiency:

65.00%				
<b>Uncontrolled</b>	<b>0.04</b>	<b>0.90</b>	<b>0.16</b>	<b>48.3</b>
<b>Controlled</b>	<b>0.04</b>	<b>0.90</b>	<b>0.16</b>	<b>16.9</b>

**State Potential Emissions Add worst case coating to all solvents**

**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 hr/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)
- Total = Worst Coating + Sum of all solvents used

**Appendix A: Emissions Calculations  
VOC Potential Emissions**

**Parts Washers and Complete Machining Center  
Company Name: Webb Wheel Products, Inc.  
Address City IN Zip: 9860 W SR 66, Tell City, IN 47586  
MSOP: 123-19210  
Pit ID: 123-00024  
Reviewer: Craig J. Friederich  
Date: May 20, 2004**

Material	Density (lbs/gal)	Usage Rate (gal/hr)	Usage Rate (lb/hr)	Weight Percent Volatile	Maximum Potential Emissions (tons/yr)
<b>Complete Machining Center</b>					
Syntilo 9926B	9.00	0.1735	1.56	20%	<b>1.37</b>
Syntilo 9926B	9.00	0.1735	1.56	20%	<b>1.37</b>
<b>Total:</b>					<b>2.74</b>

Material	Density (lbs/gal)	Usage Rate (gal/hr)	Usage Rate (lb/hr)	Weight Percent Volatile	Maximum Potential Emissions (tons/yr)
<b>Washers HS13 and HS15</b>					
Rust Inhibitor	8.30	4.00	33.2	4.00%	<b>5.82</b>

Material	VOC Content (lbs/gal)	Usage Rate (gal/hr)	Emission Rate (lb/hr)	Maximum Potential Emissions (tons/yr)
<b>Five Stage Parts Washer</b>				
Rust Inhibitor	0.13	3.00	0.39	<b>1.71</b>

**Methodology**

VOC Emission Rate (lbs/hr)=Maximum Rate (units/hr) \* Emission Factor (lb/units)  
 Recycled By Solvent System(tons/yr)=Emission Rate (lbs/hr) \* 8760 hours per year / 2000 pounds per ton  
 Maximum Potential Emissions(tons/yr)=Recycled By Solvent System (tons/yr) x (1-Percent Solvent Recycled)  
 \*Note: Estimated Solvent Loss Rate From Inventory

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only  
MM BTU/HR <100  
Small Industrial Boiler**

**All Significant Combustion**

**Company Name:** Webb Wheel Products, Inc.  
**Address City IN Zip:** 9860 W SR 66, Tell City, IN 47586  
**MSOP:** 123-19210  
**Plt ID:** 123-00024  
**Reviewer:** Craig J. Friederich  
**Application Date:** May 20, 2004

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

5.24

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Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.90	7.60	0.600	100	5.50	84.0
				**see below		
Potential Emission in tons/yr	0.044	0.174	0.014	2.295	0.126	1.928

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

\*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 5 for HAPs emissions calculations.

**Appendix A: Emissions Calculations  
 Natural Gas Combustion Only  
 MM BTU/HR <100  
 Small Industrial Boiler  
 HAPs Emissions**

All Significant Combustion

**Company Name:** Webb Wheel Products, Inc.  
**Address City IN Zip:** 9860 W SR 66, Tell City, IN 47586  
**MSOP:** 123-19210  
**Pit ID:** 123-00024  
**Reviewer:** Craig J. Friederich  
**Application Date:** May 20, 2004

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 0.00210	Dichlorobenzene 0.00120	Formaldehyde 0.07500	Hexane 1.80000	Toluene 0.00340
Potential Emission in tons/yr	0.000048	0.000028	0.001721	0.041312	0.000078

HAPs - Metals						
Emission Factor in lb/MMcf	Lead 0.0005	Cadmium 0.0011	Chromium 0.0014	Manganese 0.0004	Nickel 0.0021	<b>Total</b>
Potential Emission in tons/yr	0.00001	0.00003	0.00003	0.00001	0.00005	<b>0.043</b>

Methodology is the same as page 4.

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

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only  
MM BTU/HR <100  
Small Industrial Boiler**

**Insignificant Combustion**

**Company Name:** Webb Wheel Products, Inc.  
**Address City IN Zip:** 9860 W SR 66, Tell City, IN 47586  
**MSOP:** 123-19210  
**Pit ID:** 123-00024  
**Reviewer:** Craig J. Friederich  
**Application Date:** May 20, 2004

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

7.63

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Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.90	7.60	0.600	100	5.50	84.0
				**see below		
Potential Emission in tons/yr	0.064	0.254	0.020	3.344	0.184	2.809

\*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 7 for HAPs emissions calculations.

**Appendix A: Emissions Calculations  
 Natural Gas Combustion Only  
 MM BTU/HR <100  
 Small Industrial Boiler  
 HAPs Emissions**

**Insignificant Combustion**

**Company Name: Webb Wheel Products, Inc.  
 Address City IN Zip: 9860 W SR 66, Tell City, IN 47586  
 MSOP: 123-19210  
 Pit ID: 123-00024  
 Reviewer: Craig J. Friederich  
 Application Date: May 20, 2004**

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 0.00210	Dichlorobenzene 0.00120	Formaldehyde 0.07500	Hexane 1.80000	Toluene 0.00340
Potential Emission in tons/yr	0.000070	0.000040	0.002508	0.060186	0.000114

HAPs - Metals						
Emission Factor in lb/MMcf	Lead 0.0005	Cadmium 0.0011	Chromium 0.0014	Manganese 0.0004	Nickel 0.0021	<b>Total</b>
Potential Emission in tons/yr	0.00002	0.00004	0.00005	0.00001	0.00007	<b>0.063</b>

Methodology is the same as page 6.

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