



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

July 27, 2004

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P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
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TO: Interested Parties / Applicant

RE: Tompkins Industries, Dexter Axle Division / 113-19295-00008

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision – Approval

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 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires 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 from 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-AM.dot 9/16/03

July 27, 2004

Mr. Larry Parks
Tomkins Industries - Dexter Axle Division
P. O. Box 108
Albion, Indiana 46701

Re: 113-19295-00008
Second Administrative Amendment to
FESOP 113-17172-00008

Dear Mr. Parks:

Tomkins Industries - Dexter Axle Division, located at 500 South Seventh Street, Albion, Indiana 46701 was issued a FESOP on March 23, 2004 for a stationary motor vehicle parts and accessories manufacturing source. A letter requesting the following changes was received on June 22, 2004:

Dexter Axle Company has submitted a request to move 6 surface coating guns from booth EU-11 to booth EU-12, resulting in a total of 10 guns in booth EU-12 and 5 guns in booth EU-11.

The coatings applied, maximum amount of each coating applied to each part, and maximum number of parts coated, are the same for both booths.

In addition, moving the surface coating guns will not generate an increase in production or emissions from any other existing source emission units, there are no new applicable requirements, and there are no changes to any existing conditions that are required.

Based on this information, it is determined that the proposed changes shall be incorporated into the existing source FESOP via an Administrative Amendment pursuant to 326 IAC 2-8-10(a)(6) which states that changes which revise descriptive information where the revision will not trigger a new applicable requirement or violate a permit term can be incorporated into an existing source FESOP via an Administrative Amendment.

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

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Scott Fulton at (800) 451-6027, press 0 and ask for extension (3-5691), or dial (317) 233-5691.

Sincerely,

Original Signed by

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

SDF

cc: File - Noble County
U.S. EPA, Region V
Noble County Health Department
Northern Regional Office
Air Compliance Section Inspector - Doyle Houser
Compliance Data Section
Administrative and Development

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) OFFICE OF AIR QUALITY

**Tomkins Industries - Dexter Axle Division
500 South Seventh Street
Albion, Indiana 46701**

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F 113-17172-00008	Date Issued: March 23, 2004 Expiration Date: March 23, 2009
Issued by: Paul Dubenetzky, Branch Chief, Office of Air Quality	

First Administrative Amendment No.: 113-19334-00008 Date Issued: June 25, 2004
First Minor Permit Revision No.: 113-19132-00008 Date Issued: June 30, 2004

Second Administrative Amendment No.: 113-19295-00008	Affected Pages: 5 and 23
Issued by: Original Signed by Paul Dubenetzky, Branch Chief, Office of Air Quality	Issued Date: July 27, 2004

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 through A.3 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 2-8-3(b)]

The Permittee owns and operates a stationary motor vehicle parts and accessories manufacturing source.

Authorized Individual:	Facility Manager
Source Address:	500 South Seventh Street, Albion, Indiana 46701
Mailing Address:	P.O. Box 108, Albion, Indiana 46701
General Source Phone:	260-636-2195
SIC Code:	3714
Source Location Status:	Noble County
Source Status:	Attainment for all criteria pollutants Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

- (a) One (1) shoe dip tank constructed in 1974, identified as EU-06, exhausting to Stack 6, capacity: 2,034 brake shoes per hour.
- (b) One (1) metal backing plate dip tank, identified as EU-07, constructed in 2000, exhausting to Stack 7, capacity: 923 metal backing plates per hour.
- (c) One (1) spray paint booth constructed in 1969, identified as EU-11, equipped with five (5) high volume low pressure (HVL) spray guns and dry filters to control particulate overspray, exhausting to Stack 11, capacity: 429 metal brake parts per hour.
- (d) One (1) spray paint booth constructed in 1973, identified as EU-12, equipped with ten (10) high volume low pressure (HVL) spray guns and dry filters to control particulate overspray, exhausting to Stack 12, capacity: 429 metal brake parts per hour.
- (e) One (1) spray paint booth, identified as EU-15, equipped with eleven (11) high volume low pressure (HVL) spray guns and dry filters to control particulate overspray, exhausting to Stack 15, capacity: 429 metal brake parts per hour.
- (f) One (1) grinding system constructed in 1975, identified as EU-14, equipped with six (6) grinders and a HEPA filtration system, identified as CE-14, for particulate control, exhausting to Stack 14, capacity: 1,800 pounds of friction material per hour.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Surface Coating Operations

- (a) One (1) shoe dip tank constructed in 1974, identified as EU-06, exhausting to Stack 6, capacity: 2,034 brake shoes per hour.
- (b) One (1) metal backing plate dip tank, identified as EU-07, constructed in 2000, exhausting to Stack 7, capacity: 923 metal backing plates per hour.
- (c) One (1) spray paint booth constructed in 1969, identified as EU-11, equipped with five (5) high volume low pressure (HVLP) spray guns and dry filters to control particulate overspray, exhausting to Stack 11, capacity: 429 metal brake parts per hour.
- (d) One (1) spray paint booth constructed in 1973, identified as EU-12, equipped with ten (10) high volume low pressure (HVLP) spray guns and dry filters to control particulate over-spray, exhausting to Stack 12, capacity: 429 metal brake parts per hour.
- (e) One (1) spray paint booth, identified as EU-15, equipped with eleven (11) high volume low pressure (HVLP) spray guns and dry filters to control particulate overspray, exhausting to Stack 15, capacity: 429 metal brake parts 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 [326 IAC 2-8-4(1)]

D.1.1 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4] [40 CFR 63, Subpart M]

- (a) The use of any individual HAP, including coatings, dilution solvents, and cleaning solvents from the five (5) surface coating operations, identified as EU-06, EU-07, EU-11, EU-12, and EU-15 shall not exceed a total of 9.70 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This usage limit is required to limit the potential to emit of any single HAP from the entire source to less than ten (10) tons per year. Compliance with this limitation shall render the requirements of 326 IAC 2-7 and 40 CFR 63, Subpart M not applicable.
- (b) The use of any combination of HAPs, including coatings, dilution solvents, and cleaning solvents from the five (5) surface coating operations, identified as EU-06, EU-07, EU-11, EU-12, and EU-15 shall not exceed a total of 24.6 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This usage limit is required to limit the potential to emit of any combination of HAPs from the entire source to less than ten (25) tons per year. Compliance with this limitation shall render the requirements of 326 IAC 2-7 and 40 CFR 63, Subpart M not applicable.
- (c) Any change or modification that increases the potential to emit from EU-06, EU-07, EU-11, EU-12, and EU-15 to greater than a total of 99.0 tons of VOC per year may render the requirements of 326 IAC 2-7 applicable and shall require prior IDEM, OAQ approval.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9, the owner or operator shall not allow the discharge into the atmosphere VOC from the one (1) metal backing plate dip tank, identified as EU-07 and one (1) spray paint booth, identified as EU-15 in excess of, three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water delivered to the applicator for air dried or forced warm air dried coatings.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for an Administrative Amendment to a Federally Enforceable State Operating Permit (FESOP)

Source Background and Description

Source Name:	Dexter Axle Company
Source Location:	500 South Seventh Street, Albion, Indiana 46701
County:	Noble
SIC Code:	3714
Operation Permit No.:	F 113-17172-00008
Date Issued:	March 23, 2004
Administrative Amendment No.:	113-19295-00008
Permit Reviewer:	SDF

The Office of Air Quality (OAQ) has reviewed an application from Dexter Axle Company relating to the operation of their stationary motor vehicle parts and accessories manufacturing operation.

Request

Specifically, on June 22, 2004, Dexter Axle Company submitted a request to move 6 surface coating guns from booth EU-11 to booth EU-12, resulting in a total of 10 guns in booth EU-12 and 5 guns in booth EU-11.

The coatings applied, maximum amount of each coating applied to each part, and maximum number of parts coated, are the same for both booths.

In addition, moving the surface coating guns will not generate an increase in production or emissions from any other existing source emission units, there are no new applicable requirements, and there are no changes to any existing conditions that are required.

Based on this information, it is determined that the proposed changes shall be incorporated into the existing source FESOP via an Administrative Amendment pursuant to 326 IAC 2-8-10(a)(6) which states that changes which revise descriptive information where the revision will not trigger a new applicable requirement or violate a permit term can be incorporated into an existing source FESOP via an Administrative Amendment.

Existing Approvals

The source has been operating under FESOP 113-17172-00008, issued on March 23, 2004, First Administrative Amendment 113-19334-00008, issued on June 25, 2004, and First Minor Permit Revision 113-19132-00008, issued on June 30, 2004.

Recommendation

The staff recommends to the Commissioner that the Administrative Amendment 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.

An administratively complete application for the purposes of this review was received on June 22, 2004.

Emission Calculations

Since the coatings applied at both booths are the same, the maximum amount of coating applied to each part is the same for both booths, the maximum number of parts coated is the same for both booths, and there will still be the same number of guns, it is determined that there will be no increases in emissions. Therefore, no calculations are necessary.

Potential To Emit Due to Proposed Changes

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

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

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

Note: For the purpose of determining Title V applicability for particulates, PM₁₀, not PM, is the regulated pollutant in consideration.

HAPs	Potential To Emit (tons/year)
Worst Case Single HAP	-
Combined HAPs	-

The coatings applied, maximum amount of each coating applied to each part, and maximum number of parts coated, are the same for both booths.

In addition, moving the surface coating guns will not generate an increase in production or emissions from any other existing source emission units, there are no new applicable requirements, and there are no changes to any existing conditions that are required.

Based on this information, it is determined that the proposed changes shall be incorporated into the existing source FESOP via an Administrative Amendment pursuant to 326 IAC 2-8-10(a)(6) which states that changes which revise descriptive information where the revision will no trigger a new applicable requirement or violate a permit term can be incorporated into an existing source FESOP via an Administrative Amendment.

County Attainment Status

The source is located in Noble County.

Pollutant	Status
PM ₁₀	Attainment
SO ₂	Attainment
NO ₂	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Noble County has been designated as attainment or unclassifiable for ozone.
- (b) Noble County has been classified as attainment or unclassifiable for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Existing Source Potential To Emit

Source emissions (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited), as obtained from the Technical Support Document (TSD) of First Minor Permit Revision 113-19132-00008, issued on June 30, 2004:

Unit	PM (tons/yr)	PM10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Worst Case Single HAP (tons/yr)	Comb. HAPs (tons/yr)
Source	108.0	91.0	0.09	15.2	99.8	12.7	<10	<25
PSD Major Levels	250	250	250	250	250	250	-	-
Part 70 Major Levels	-	100	100	100	100	100	10	10/25

- (a) The existing source is not a major PSD stationary source because the source criteria pollutant emissions are, after all applicable limits and standards, less than or equal to the respective major source levels of 250 tons per year.
- (b) The existing source is not a Title V major stationary source because no criteria pollutant emissions exceed the applicable level of 100 tons per year, and the single and combined HAP emissions do not exceed their respective applicable levels of 10 and 25 tons per year.

Potential to Emit After Issuance

Source emissions after the proposed changes (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Unit	PM (tons/yr)	PM10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Worst Case Single HAP (tons/yr)	Comb. HAPs (tons/yr)
Source	108.0	91.0	0.09	15.2	99.8	12.7	<10	<25
Changes	-	-	-	-	-	-	-	-
Total	108.0	91.0	0.09	15.2	99.8	12.7	<10	<25

PSD Major Levels	250	250	250	250	250	250	-	-
Part 70 Major Levels	-	100	100	100	100	100	10	10/25

- (a) The source after the proposed changes is still not a major PSD stationary source because the source criteria pollutant emissions are, after all applicable limits and standards, still less than or equal to the respective major source levels of 250 tons per year.
- (b) The source after the proposed changes is still not a Title V major stationary source because no criteria pollutant emissions exceed the applicable level of 100 tons per year, and the single and combined HAP emissions do not exceed their respective applicable levels of 10 and 25 tons per year.

Federal Rule Applicability

The proposed changes do not trigger any new applicable federal rules and do not affect any of the existing applicable federal requirements.

State Rule Applicability - Entire Source

The proposed changes do not trigger any new state rules and do not affect any of the existing state rules.

State Rule Applicability - Individual Facilities

The proposed changes do not trigger any new state rules and do not affect any of the existing state rules.

Changes to the Permit

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

(a) Condition A.2:

Condition A.2 shall be changed as follows to reflect the gun reconfiguration for booths EU-11 and EU-12.

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

- (a) One (1) shoe dip tank constructed in 1974, identified as EU-06, exhausting to Stack 6, capacity: 2,034 brake shoes per hour.

- (b) One (1) metal backing plate dip tank, identified as EU-07, constructed in 2000, exhausting to Stack 7, capacity: 923 metal backing plates per hour.
- (c) One (1) spray paint booth constructed in 1969, identified as EU-11, equipped with ~~eleven~~ **five (415)** high volume low pressure (HVLP) spray guns and dry filters to control particulate overspray, exhausting to Stack 11, capacity: 429 metal brake parts per hour.
- (d) One (1) spray paint booth constructed in 1973, identified as EU-12, equipped with ~~four ten~~ **(410)** high volume low pressure (HVLP) spray guns and dry filters to control particulate over-spray, exhausting to Stack 12, capacity: 429 metal brake parts per hour.

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(b) Unit Description of Section D.1:

The unit description of Section D.1 shall be changed as follows to reflect the gun reconfiguration for booths EU-11 and EU-12.

Facility Description [326 IAC 2-8-4(10)]: Surface Coating Operations

- (a) One (1) shoe dip tank constructed in 1974, identified as EU-06, exhausting to Stack 6, capacity: 2,034 brake shoes per hour.
- (b) One (1) metal backing plate dip tank, identified as EU-07, constructed in 2000, exhausting to Stack 7, capacity: 923 metal backing plates per hour.
- (c) One (1) spray paint booth constructed in 1969, identified as EU-11, equipped with ~~eleven~~ **five (415)** high volume low pressure (HVLP) spray guns and dry filters to control particulate overspray, exhausting to Stack 11, capacity: 429 metal brake parts per hour.
- (d) One (1) spray paint booth constructed in 1973, identified as EU-12, equipped with ~~four ten~~ **(410)** high volume low pressure (HVLP) spray guns and dry filters to control particulate over-spray, exhausting to Stack 12, capacity: 429 metal brake parts per hour.

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Conclusion

The owner or operator shall operate the equipment of booths EU-11 and EU-12 according to the requirements of Administrative Amendment 113-19295-00008 and all other active operating approvals.