



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

September 2, 2004

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

TO: Interested Parties / Applicant
RE: Valeo, Inc / 031-19333-00014
FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this approval is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice.** The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER-MOD.dot 9/16/03



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Joseph E. Kernan
Governor

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September 2, 2004

Mr. T. A. Cosgrove
Valeo, Inc.
Engine Cooling Automotive Division
1100 East Barachel Lane
Greensburg, Indiana 47240-1200

Re: **031-19333-00014**
Minor Source Modification to:
Part 70 Operating Permit No.: **T 031-7017-00014**

Dear Mr. Cosgrove:

Valeo, Inc. Engine Cooling Automotive Division was issued Part 70 Operating Permit T 031-7017-00014 on March 28, 2000 for a fabrication plant producing automobile condensers, radiators, and cooling modules. Applications to modify the source were received on May 20, 2002 and July 2, 2004. Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for construction at the source:

- (h) (1) one (1) core assembly process, equipped with one (1) fin mill, one (1) tube mill, and one (1) turbulator that does not use evaporative oil, each constructed in 2004,
- (i) Two (2) Mitsubishi fin mill machines which can be used at any one (1) NOCOLOK Line, capacity: 0.200 gallons of evaporative oil per hour each.

The following construction conditions are applicable to the proposed project:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval 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.
3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval 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.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.
6. Pursuant to 326 IAC 2-7-10.5(l) the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

The source may begin construction and operation when the minor source modification has been issued. Operating conditions shall be incorporated into the Part 70 Operating Permit as a minor permit modification in accordance with 326 IAC 2-7-10.5(l)(2) and 326 IAC 2-7-12.

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 contact Michael S. Schaffer, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, at 631-691-3395, ext. 23 or in Indiana at 1-800-451-6027 (ext 631-691-3395).

Sincerely,
Original signed by

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments - TSD and Minor Source Modification
MSS/MES

cc: File - Decatur County
Decatur County Health Department
Air Compliance Section Inspector - Jennifer Dorn
Compliance Branch
Administrative and Development Section
Technical Support and Modeling - Michele Boner



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PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Valeo, Inc. Engine Cooling Automotive Division
1100 E. Barachel Lane
Greensburg, Indiana 47240-1200**

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 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.

<p>First Minor Source Modification No: MSM 031-19333-00014</p>	<p>Conditions Affected: A.2, A.3, B.26, and D.2.1, D.2.3, and D.3.1</p> <p>Conditions Added: B.27</p> <p>Sections Affected: B, C, D.2 and D.3</p>
<p>Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality</p>	<p>Issuance Date: September 2, 2004</p>

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Emergency/Deviation Occurrence Report
Semiannual Compliance Monitoring Report

- (e) NOCOLOK Line #4, with a throughput of 80 aluminum cores (700 pounds) per hour consisting of:
 - (1) one (1) fin mill, with a capacity of 0.49 gal/hr/mill.
 - (2) one (1) core assembly process which includes the application of 1.5 pounds of evaporating oil per hour,
 - (3) one (1) natural gas core conditioning oven, EU-N4CO, with a capacity of 2.0 MM Btu/hr, exhausting to stack PE-53,
 - (4) one (1) conditioning cool down station, exhausting to stack PE-54.

- (f) NOCOLOK Line #5, with a throughput of 80 aluminum cores (700 pounds) per hour, consisting of:
 - (1) one (1) core assembly process which includes the application of 1.5 pounds of evaporating oil per hour,
 - (2) one (1) natural gas core conditioning oven, EU-N5CO, with a capacity of 2.0 MMBtu/hr, and, exhausting to stack PE-59,
 - (3) one (1) cool down station, exhausting to stack PE-60.

- (g) NOCOLOK Line # 6, with a capacity of 400 lbs/hr, consisting of:
 - (1) one (1) core assembly process,
 - (2) one (1) natural gas core conditioning oven, with a capacity of 4.0 MMBTU/hr, exhausting to stack PE-600A, B ,
 - (3) one (1) spray fluxer with capacity of 11 lb/hr of Aluminum Flouride Flux, exhausting to stack PE-601,
 - (4) one (1) natural gas flux dry off oven, with a capacity of 1.5 MMBTU/hr, exhausting to stack PE-602,
 - (5) one (1) nitrogen electric braze oven, exhausting to stack PE-603A, B,
 - (6) one (1) mass spec test with helium lubricating oil, exhausting to stack PE-604,
 - (7) one (1) natural gas paint dryoff oven, with a capacity of 0.4 MMBTU/hr, exhausting to stack PE-605.

- (h) NOCOLOK Line # 7, with a capacity of 300 lbs/hr, consisting of:
 - (1) one (1) core assembly process, equipped with one (1) fin mill, one (1) tube mill, and one (1) turbulator, each constructed in 2004,
 - (2) one (1) natural gas core conditioning oven, with a capacity of 2.0 MMBTU/hr, exhausting to stack PE-700A, B,
 - (3) one (1) spray fluxer with capacity of 11 lb/hr of Aluminum Flouride Flux, exhausting to stack PE-701,

- (4) one (1) natural gas flux dry off oven, with a capacity of 1.5 MMBTU/hr, exhausting to stack PE-702,
- (5) one (1) nitrogen electric braze oven, exhausting to stack PE-703A, B,
- (6) one (1) mass spec test with helium lubricating oil, exhausting to stack PE-704,
- (i) Two (2) Mitsubishi fin mill machines which can be used at any one (1) NOCOLOK Line, capacity: 0.200 gallons of evaporative oil per hour each.
- (j) Mechanical Radiator, EU-53, utilizing no control, and not exhausting to a stack, consists of three (3) fin press lines, P0, P1, and P2 which includes the application of 4.4 pounds per hour of evaporating oil for each press.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1 (21) that have applicable requirements.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

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

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

- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) 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.

B.27 Credible Evidence [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [62 FR 8314]

Notwithstanding the conditions of this permit that state specific methods that may be used to demonstrate compliance with, or a violation of, applicable requirements, any person (including the Permittee) may also use other credible evidence to demonstrate compliance with, or a violation of, any term or condition of this permit.

- (4) The process has already returned to operating within “normal” parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

**C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]**

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAQ shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAQ within thirty (30) days of receipt of the notice of deficiency. IDEM, OAQ reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

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

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

- (a) Pursuant to 326 IAC 2-6-3(b)(3), starting in 2006 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
 - (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
 - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) (“Regulated pollutant, which is used only for purposes of Section 19 of this rule”) from the source, for purpose of fee assessment.

The statement must be submitted to:

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

The emission statement does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (b) The emission statement 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.18 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- (a) With the exception of performance tests conducted in accordance with Section C- Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information 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 kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAQ, representative. 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 written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and

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

- (b) NOCOLOK Line #1, with a capacity of 150 aluminum cores per hour, consisting of:
 - (1) one (1) natural gas core conditioning oven, EU-20, with a capacity of 2.4 million British thermal units per hour (MM Btu/hr), exhausting to stack PE-20,
 - (2) one (1) cool down station, EU-19, exhausting to stack PE-19,
 - (3) one (1) core assembly process which includes the application of 4.3 pounds of evaporating oil per hour.
- (c) NOCOLOK Line #2, with a capacity of 150 aluminum cores per hour, consisting of:
 - (1) one (1) natural gas core conditioning oven, EU-31, with a capacity of 4.0 MM Btu/hr, exhausting to stack PE-31,
 - (2) one (1) cool down station, EU-32, exhausting to stack PE-32,
 - (3) one (1) core assembly process which includes the application of 4.3 pounds of evaporating oil per hour.
- (d) NOCOLOK Line #3, with a capacity of 150 aluminum cores per hour, consisting of:
 - (1) three (3) fin mills, with a capacity of 0.49 gal/hr/mill,
 - (2) one (1) natural gas core conditioning oven, EU-44, with a capacity of 4.0 MM Btu/hr, exhausting to stack PE-44,
 - (3) one (1) cool down station, EU-45, exhausting to stack PE-45,
 - (4) one (1) core assembly process which includes the application of 4.3 pounds of evaporating oil per hour.
- (e) NOCOLOK Line #4, with a throughput of 80 aluminum cores (700 pounds) per hour consisting of:
 - (1) one (1) fin mill, with a capacity of 0.49 gal/hr/mill.
 - (2) one (1) core assembly process which includes the application of 1.5 pounds of evaporating oil per hour,
 - (3) one (1) natural gas core conditioning oven, EU-N4CO, with a capacity of 2.0 MM Btu/hr, exhausting to stack PE-53,
 - (4) one (1) conditioning cool down station, exhausting to stack PE-54.
- (f) NOCOLOK Line #5, with a throughput of 80 aluminum cores (700 pounds) per hour, consisting of:
 - (1) one (1) core assembly process which includes the application of 1.5 pounds of evaporating oil per hour,
 - (2) one (1) natural gas core conditioning oven, EU-N5CO, with a capacity of 2.0 MMBtu/hr, and, exhausting to stack PE-59,
 - (3) one (1) cool down station, exhausting to stack PE-60.

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

- (g) NOCOLOK Line # 6, with a capacity of 400 lbs/hr, consisting of:
- (1) one (1) core assembly process,
 - (2) one (1) natural gas core conditioning oven, with a capacity of 4.0 MMBTU/hr, exhausting to stack PE-600A, B ,
 - (3) one (1) spray fluxer with capacity of 11 lb/hr of Aluminum Flouride Flux, exhausting to stack PE-601,
 - (4) one (1) natural gas flux dry off oven, with a capacity of 1.5 MMBTU/hr, exhausting to stack PE-602,
 - (5) one (1) nitrogen electric braze oven, exhausting to stack PE-603A, B,
 - (6) one (1) mass spec test with helium lubricating oil, exhausting to stack PE-604,
 - (7) one (1) natural gas paint dryoff oven, with a capacity of 0.4 MMBTU/hr, exhausting to stack PE-605.
- (h) NOCOLOK Line # 7, with a capacity of 300 lbs/hr, consisting of:
- (1) one (1) core assembly process, equipped with one (1) fin mill, one (1) tube mill, and one (1) turbulator, each constructed in 2004,
 - (2) one (1) natural gas core conditioning oven, with a capacity of 2.0 MMBTU/hr, exhausting to stack PE-700A, B,
 - (3) one (1) spray fluxer with capacity of 11 lb/hr of Aluminum Flouride Flux, exhausting to stack PE-701,
 - (4) one (1) natural gas flux dry off oven, with a capacity of 1.5 MMBTU/hr, exhausting to stack PE-702,
 - (5) one (1) nitrogen electric braze oven, exhausting to stack PE-703A, B,
 - (6) one (1) mass spec test with helium lubricating oil, exhausting to stack PE-704.
- (i) Two (2) Mitsubishi fin mill machines which can be used at any one (1) NOCOLOK Line, capacity: 0.200 gallons of evaporative oil per hour each.

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

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Any change or modification that increases the potential to emit from any one (1) of the NOCOLOK Lines (NOCOLOK Lines #1 - #7) in combination with the two (2) Mitsubishi fin mills to greater than or equal to twenty-five (25) tons per year, may render the requirements of 326 IAC 8-1-6 applicable to that NOCOLOK line, and shall require prior IDEM, OAQ approval.

Compliance Determination Requirements

D.2.2 Testing Requirements [326 IAC 2-7-6(1)]

Testing of these facilities is not specifically required by this permit. However, if testing is required, compliance with the particulate matter limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not

preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.

Recordkeeping Requirements

D.2.3 Record Keeping Requirements

- (a) To document compliance with Condition D.2.1, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limits established in Condition D.2.1.
- (1) records of amount of evaporating oil usage at each NOCOLOK line,
 - (2) percent VOC of evaporating oil, and
 - (3) VOC emissions per month at each NOCOLOK line.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3 FACILITY OPERATION CONDITIONS

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

- (i) Mechanical Radiator, EU-53, utilizing no control, and not exhausting to a stack, consisting of three (3) fin press lines, P0, P1, and P2, which include the application of 4.4 pounds per hour of evaporating oil for each press.

Emissions Limitations and Standards

D.3.1 Volatile Organic Compounds (VOC)

- (a) The VOC input from the evaporating oil usage on each of the Presses P0, P1, and P2, shall be less than twenty-five (25) tons per twelve (12) month consecutive period. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply.
- (b) Any change or modification which may increase the potential VOC emissions from the equipment covered above must be approved by the Office of Air Quality (OAQ) before such change may occur.

Compliance Determination Requirements

D.3.2 Testing Requirements [326 IAC 2-7-6(1)]

Testing of these facilities is not specifically required by this permit. However, if testing is required, compliance shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.

Recordkeeping Requirements

D.3.3 Record Keeping Requirements

- (a) To document compliance with Condition D.3.1, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limits established in Condition D.3.1.
 - (1) records of amount of evaporating oil usage,
 - (2) percent VOC of evaporating oil, and
 - (3) VOC emissions per month.
- (b) 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

Technical Support Document (TSD) for Part 70 Minor Source and Minor Permit Modifications

Source Background and Description

Source Name:	Valeo, Inc. Engine Cooling Automotive Division
Source Location:	1100 E. Brachel Lane, Greensburg, Indiana 47240-1200
County:	Decatur
SIC Code:	3714
Operation Permit No.:	T 031-7017-00014
Operation Permit Issuance Date:	March 28, 2000
Minor Source Modification No.:	MSM 031-19333-00014
Minor Permit Modification No.:	MPM 031-19521-00014
Permit Reviewer:	Michael S. Schaffer

The Office of Air Quality (OAQ) has reviewed modification applications from Valeo, Inc. Engine Cooling Automotive Division relating to the construction of the following emission units and pollution control devices:

- (h) (1) One (1) core assembly process, equipped with one (1) fin mill, one (1) tube mill, and one (1) turbulator that does not use evaporative oil, each constructed in 2004,
- (i) Two (2) Mitsubishi fin mill machines which can be used at any one (1) NOCOLOK Line, capacity: 0.200 gallons of evaporative oil per hour each.

Emission Units and Pollution Control Equipment Removed

The following facilities have been removed from service and thus, will be deleted as part of this modification:

- (1) One (1) manifold press, identified as P3; and
- (2) One (1) natural gas-fired paint dry off oven, with a capacity of 1.5 MMBTU/hr, exhausting to stack PE-705.

History

Valeo, Inc. Engine Cooling Automotive Division was issued a Part 70 permit on March 28, 2000. A First Administrative Amendment (031-14621-00014) was issued on September 20, 2001 to remove a fine press with a potential to emit of 17.5 tons of VOC per year and to add a manifold press with a potential to emit of 4.1 tons per year. A First Reopening (031-13178-00014) was issued on January 15, 2002 to revise permit language from Condition B.11(c)(3) of the Part 70 Operating Permit.

On May 20, 2002, Valeo, Inc. Engine Cooling Automotive Division submitted an application to the OAQ requesting to add two (2) Mitsubishi fin mills with a potential to emit of 5.20 tons of VOC per year. At that time, the two (2) Mitsubishi fin mills were exempt from construction permit requirements because pursuant to 326 IAC 2-1.1-3(e)(1)(D) the potential to emit of both fin mills are less than ten

(10) tons per year total and both fin mills are not subject to any of the requirements of 326 IAC 8. This application 031-15646-00014, has been combined into the processing of these minor source and permit modifications

On July 2, 2004, Valeo, Inc. Engine Cooling Automotive Division submitted an application to IDEM, OAQ requesting the following:

- (1) To revise Condition C.17 to incorporate the revisions to 326 IAC 2-6 that became effective March 27, 2004 and published in the Indiana Register on April 1, 2004;
- (2) To delete manifold press P3 from Section D.3 because it is an insignificant activity with a potential to emit less than twenty-five (25) tons of VOC per year, it is not part of EU-53, and it is no longer in service;
- (3) To delete the natural gas-fired paint dryoff oven rated at 1.5 million British thermal unit per hour that is listed in Condition A.2(h)(7) and paragraph (h)(7) in the equipment description box for Section D.2; and
- (4) To replace the three (3) existing fin mills that are located in the one (1) core assembly process for NOCOLOK Line #7 with one (1) fin mill, one (1) tube mill, and one (1) turbulator, which are all exempt from construction permit requirements pursuant to 326 IAC 2-1.1-3(e)(1)(D).

Since the source has indicated that they will replace the three (3) existing fin mills that are located in the one (1) core assembly process for NOCOLOK Line #7 with one (1) fin mill, one (1) tube mill, and one (1) turbulator, the potential to emit of the existing (3) existing fin mills versus one (1) fin mill, one (1) tube mill, and one (1) tubulator is as follows:

Potential to Emit VOC from replaced equipment (tons/yr) = 3 (fin mills) x 0.21 (gal/hr/fin mill) x 2.4 (lbs/gal) x 8,760 (hrs/yr) x (1 ton/2,000 lbs) = 9.63 (tons/yr)

Potential to Emit VOC from new equipment (tons/yr) = (1 fin mill x 0.20 (gal/hr/fin mill) x 2.4 (lbs/gal) x 8,760 (hrs/yr) x (1 ton/2,000 lbs)) + (1 tube mill x 0.50 (gal/hr/tube mill) x 2.4 (lbs/gal) x 8,760 (hrs/yr) x (1 ton/2,000 lbs)) + (1 turbulator mill x 0.20 (gal/hr/turbulator mill) x 2.4 (lbs/gal) x 8,760 (hrs/yr)) = 2.10 (tons/yr) + 5.25 (tons/yr) + 2.10 = 9.46 tons per year.

Based on the calculation above, the one (1) fin mill, one (1) tube mill, and one (1) turbulator are also exempt from construction permit requirements because pursuant to 326 IAC 2-1.1-3(e)(1)(D) the potential to emit of the one (1) fin mill, one (1) tube mill, and one (1) turbulator is less than ten (10) tons per year total and each facility is not subject to the requirements of 326 IAC 8.

However, since the combined potential to emit between the two (2) Mitsubishi fin mills as well as the one (1) fin mill, one (1) tube mill, and one (1) turbulator, is greater than a total of ten (10) tons of VOC per year and each emission unit has not been included in any approval, IDEM, OAQ has elected to process these modifications as one (1) Minor Source Modification and one (1) Minor Permit Modification pursuant to 326 IAC 2-7-10.5(d)(4)(B) and 326 IAC 2-7-12(b)(1). See the Justification for Modification Section of this document for further details.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

No stacks will be added to this source as a result of this modification

Recommendation

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

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

Applications for the purposes of this review were received on May 20, 2002 and July 2, 2004.

Emission Calculations

Potential to Emit VOC from two (2) Mitsubishi fin mills (tons/yr) = (2 fin mills x 0.200 (gal/hr/fin mill) x 2.4 (lbs/gal) x 8,760 (hrs/yr) x (1 ton/2,000 lbs)) = 4.20 tons per year

Note that the potential to emit from the two (2) Mitsubishi fin mills has been changed from 5.30 tons of VOC to 4.20 tons of VOC per year since the source submitted the May 20, 2002 application to IDEM, OAQ. This is because the capacity of the two (2) Mitsubishi fin mills has been reduced from 0.250 gallons of evaporative oil per hour to 0.200 gallons of evaporative oil per hour since that application was submitted.

Potential to Emit VOC from new equipment (tons/yr) = (1 fin mill x 0.20 (gal/hr/fin mill) x 2.4 (lbs/gal) x 8,760 (hrs/yr) x (1 ton/2,000 lbs)) + (1 tube mill x 0.50 (gal/hr/tube mill) x 2.4 (lbs/gal) x 8,760 (hrs/yr) x (1 ton/2,000 lbs)) + (1 turbulator mill x 0.200 (gal/hr/turbulator mill) x 2.4 (lbs/gal) x 8,760 (hrs/yr)) = 2.10 (tons/yr) + 5.25 (tons/yr) + 2.10 = 9.46 tons per year.

Potential To Emit of Modification

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

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

Pollutant	Potential To Emit (tons/year)
PM	-
PM ₁₀	-
SO ₂	-
VOC	13.7
CO	-
NO _x	-

Justification for Modification

The Part 70 Operating Permit is being modified through a Part 70 Minor Source Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5(d)(4)(B)(iii), since the potential to emit VOC from the two (2) Mitsubishi fin mills as well as the proposed fin mill, tube mill, and turbulator is greater than ten (10) tons per year, but less than twenty-five (25) tons per year.

The proposed operating conditions shall be incorporated into the Part 70 Operating Permit as a Minor Permit Modification (MPM 031-19521-00014) in accordance with 326 IAC 2-7-12(b)(1). The Minor Permit Modification will give the source approval to operate the proposed emission unit.

County Attainment Status

The source is located in Decatur County.

Pollutant	Status
PM ₁₀	attainment
SO ₂	attainment
NO ₂	attainment
1-Hour Ozone	attainment
8-Hour Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and nitrogen oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Decatur County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx 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.
- (b) Decatur County has been classified as attainment or unclassifiable in Indiana for PM₁₀, SO₂, NO₂, CO and Lead. 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.

Source Status

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

Pollutant	Emissions (tons/year)
PM	0.29
PM ₁₀	0.39
SO ₂	negligible
VOC	151.24
CO	1.30
NO _x	1.50

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.
- (b) These emissions are based upon the information in the TSD for First Administrative Amendment 031-14621-00014, issued on September 20, 2001.

Potential to Emit of Modification After Issuance

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

Process/facility	Potential to Emit (tons/year)						
	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
Two (2) Mitsubishi Fin Mills	-	-	-	4.20	-	-	-
NOCOLOK Line # 7 - Fin mill, Tube mill, and Turbulator,	-	-	-	9.46	-	-	-
Total Emissions From Proposed Modification	-	-	-	13.7	-	-	-
PSD or Offset Threshold Level	250	250	250	250	250	250	-

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

Federal Rule Applicability

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

State Rule Applicability - Individual Facilities

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

Since this source is currently operating as a minor PSD source and the unrestricted potential to emit of this modification is less than two hundred fifty (250) tons of VOC per year, the requirements of 326 IAC 2-2 do not apply.

326 IAC 8-1-6 (New facilities; General Reduction Requirements)

Based on the analyses performed in the TSDs for T 031-031-7017-00014, issued on March 28, 2000 and AAT 031-14621-00014, issued on September 20, 2001, the potential VOC emissions from NOCOLOK Lines #1 - #7 are each less than twenty-five (25) tons per year. In addition, the NOCOLOK process is not subject to any of the requirements from 326 IAC 8. Therefore, any change or modification that increased the potential to emit VOC from any one (1) of the NOCOLOK lines to greater than or equal to twenty-five (25) tons per year prior to this modification may have rendered the requirements of 326 IAC 8-1-6 applicable and should have required prior IDEM, OAQ approval.

The addition of the capability to use the two (2) Mitsubishi fin mills at any NOCOLOK line could have caused the potential to emit from any one (1) NOCOLOK line in combination with the use of the two (2) Mitsubishi fin mills at that same NOCOLOK line to be greater than twenty-five (25) tons of VOC per year. As a result, the potential to emit from the two (2) Mitsubishi fin mills must be counted as part of the "worst case" potential to emit of each NOCOLOK line.

IDEM, OAQ has determined that the potential to emit from each NOCOLOK line including the potential emissions from the two (2) Mitsubishi fin mills is and will continue to be less than twenty-five (25) tons per year. However, in order to insure that the potential VOC emissions from each NOCOLOK line do not ever exceed twenty-five (25) tons per year, the language in Condition D.2.1 of the Part 70 Operating Permit will be revised to the following:

"Any change or modification that increases the potential to emit from any one (1) of the NOCOLOK Lines (NOCOLOK Lines #1 - #7) in combination with the two (2) Mitsubishi fin mills to greater than or equal to twenty-five (25) tons per year, may render the requirements of 326 IAC 8-1-6 applicable to that NOCOLOK line, and shall require prior IDEM, OAQ approval."

Compliance Requirements

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

Monitoring Requirements.

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

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

Proposed Changes

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

Change 1:

The OAQ, Technical Support and Modeling Section listed in Condition B.26(c) should now be the OAQ, Billing, Licensing, and Training Section. Therefore, Condition B.26(c) will be revised as follows:

B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-~~0425~~ **4230** (ask for OAQ, ~~Technical Support and Modeling Section~~ **Billing, Licensing, and Training Section**), to determine the appropriate permit fee.

Change 2:

In accordance with the credible evidence rule (62 Fed. Reg. 8314, Feb 24, 1997); Section 113(a) of the Clean Air Act, 42 U.S.C. Section 7413 (a); and a letter from the United States Environmental Protection Agency (US EPA) to IDEM, OAQ dated May, 18 2004, all permits must address the use of credible evidence; otherwise, US EPA will object to the permits. The following language will be incorporated into the permit to address credible evidence:

B.27 Credible Evidence [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [62 FR 8314]

Notwithstanding the conditions of this permit that state specific methods that may be used to demonstrate compliance with, or a violation of, applicable requirements, any person (including the Permittee) may also use other credible evidence to demonstrate compliance with, or a violation of, any term or condition of this permit.

Change 3:

The following revisions were made to the Condition C.17 to incorporate the revisions to 326 IAC 2-6 that became effective March 27, 2004. The revised rule was published in the April 1, 2004 Indiana Register.

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

- (a) ~~The Permittee shall submit an annual emission statement certified pursuant to the require-~~

ments of 326 IAC 2-6, that must be received by July 1st of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements: Pursuant to 326 IAC 2-6-3(b)(3), starting in 2006 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

- (1) Indicate **estimated** actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting) **all pollutants listed in 326 IAC 2-6-4(a)**;
- (2) Indicate **estimated** actual emissions of other regulated pollutants **as defined by 326 IAC 2-7-1(32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule")** from the source, for purposes of Part 70 fee assessment.

~~(b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:~~

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

The emission statement does require the certification by the "responsible official as defined by 326 IAC 2-7-1(34)

~~(c)~~ **(b)** The annual emission statement 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, ~~ΘAM~~ **OAQ**, on or before the date it is due.

Change 4:

As part of their July 2, 2004 application, the source has made the following changes to their operation.

- (a) Manifold press P3 was never part of EU-53 and this insignificant activity has been removed from service;
- (b) The one (1) natural gas-fired paint dryoff oven rated at 1.5 million British thermal unit per hour that is located in NOCOLOK Line #7 has been removed from service; and
- (c) The three (3) existing fin mills that are located in the one (1) core assembly process for NOCOLOK Line #7 will be replaced with one (1) fin mill, one (1) tube mill, and one (1) turbulator.

Therefore, Conditions A.2 and A.3 as well as the equipment description boxes for Sections D.2 and D.3 Condition A.3, the equipment description box for Section D.3, and Condition D.3.1 will be revised in the modification as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
[326 IAC 2-7-5(15)]

- (h) NOCOLOK Line # 7, with a capacity of 300 lbs/hr, consisting of:
 - (1) one (1) core assembly process, **equipped with one (1) fin mill, one (1) tube mill, and one (1) turbulator, each constructed in 2004,**
 - ~~(7) one (1) natural gas paint dryoff oven, with a capacity of 1.5 MMBTU/hr, exhausting to stack PE-705.~~
- (i) **Two (2) Mitsubishi fin mill machines which can be used at any one (1) NOCOLOK Line, capacity: 0.200 gallons of evaporative oil per hour each.**
- ~~(j)~~ (j) Mechanical Radiator, EU-53, utilizing no control, and not exhausting to a stack, consists of three (3) fin press lines which includes the application of 4.4 pounds per hour of evaporating oil for each press.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]
(h) NOCOLOK Line # 7, with a capacity of 300 lbs/hr, consisting of: <ul style="list-style-type: none">(1) one (1) core assembly process, equipped with one (1) fin mill, one (1) tube mill, and one (1) turbulator, each constructed in 2004,(7) one (1) natural gas paint dryoff oven, with a capacity of 1.5 MMBTU/hr, exhausting to stack PE-705.
(i) Two (2) Mitsubishi fin mill machines which can be used at any one (1) NOCOLOK Line, capacity: 0.200 gallons of evaporative oil per hour each.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

One (1) manifold press, identified as P3, with a maximum design evaporative oil usage rate of 0.27 gallons per hour. **This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1 (21) that have applicable requirements.**

SECTION D.3 FACILITY OPERATION CONDITIONS

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

- (j) Mechanical Radiator, EU-53, utilizing no control, and not exhausting to a stack, consisting of three (3) fin press lines, P0, P1, and P2, and ~~one (1) manifold press, P3~~, which include the application of 4.4 pounds per hour of evaporating oil for each press.

Change 5:

As a result of Change 4, Conditions D.2.1 and D.3.1 as well as the record keeping requirements in Condition D.2.3 have been revised as follows:

Emissions Limitations and Standards

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

~~Any change or modification which may increase the potential VOC emissions to 25 tons per year or more from each of the NOCOLOK lines #1 - #5, must be approved by the Office of Air Quality (OAQ) before such change may occur. The input VOC to each NOCOLOK lines #1 through #5 is less than 25 tons per year, therefore, 326 IAC 8-1-6 (BACT) does not apply.~~ **Any change or modification that increases the potential to emit from any one (1) of the NOCOLOK Lines (NOCOLOK Lines #1 - #7) in combination with the two (2) Mitsubishi fin mills to greater than or equal to twenty-five (25) tons per year, may render the requirements of 326 IAC 8-1-6 applicable to that NOCOLOK line, and shall require prior IDEM, OAQ approval.**

Recordkeeping Requirements

D.2.3 Record Keeping Requirements

- (a) To document compliance with Condition D.2.1, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limits established in Condition D.2.1.
- (1) records of amount of evaporating oil usage **at each NOCOLOK line**,
 - (2) percent VOC of evaporating oil, and
 - (3) VOC emissions per month **at each NOCOLOK line**.

Emissions Limitations and Standards

D.3.1 Volatile Organic Compounds (VOC)

- (a) The VOC input from the evaporating oil usage on each of the Presses P0, P1, and P2, and ~~manifold press P3~~, shall be less than twenty-five (25) tons per twelve (12) month consecutive period. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply.
- (b) Any change or modification which may increase the potential VOC emissions from the equipment covered above must be approved by the Office of Air Quality (OAQ) before such change may occur.

Conclusion

The construction and operation of this proposed modification shall be subject to the conditions of the attached Part 70 Minor Source Modification No. 031-19333-00014 and proposed Part 70 Minor Permit Modification No. 031-19521-00014.