



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: June 16, 2005
RE: Dexter Axle Company / SPR 113-20098-00008
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



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

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Governor

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Mr. Dwight Busche, Sr.
Dexter Axle Company
P.O. Box 108
Albion, IN 46701

June 16, 2005

Re: **113-20098**
First Significant Revision to
FESOP 113-17172-00008

Dear Mr. Busche, Sr.:

Dexter Axle Company was issued FESOP 113-17172-00008 on March 23, 2004 for a stationary motor vehicle parts and accessories manufacturing source. A letter requesting changes to this permit was received on September 23, 2004. Pursuant to the provisions of 326 IAC 2-8-11.1 a Significant Permit Revision to this permit is hereby approved as described in the attached Technical Support Document.

The revision consists of:

- (1) Language updates to Conditions B.10, B.18, C.9, and C.19 as well the addition of Condition B.23;
- (2) An update to the telephone numbers in Condition B.22;
- (3) The addition of the word "nominal" in each paragraph within the equipment lists in Conditions A.2 and A.3;
- (4) Revisions to Section D.1 of the permit due to the delisting of EGBE as a HAP by the USEPA on November 18, 2004; and
- (5) Changes to the description of the one (1) grinding system, identified as EU-14, as well as significant changes to the existing compliance determination and compliance monitoring requirements in Section D.2 of the permit.

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the significant permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. For your convenience, the entire revised FESOP, with all revisions and amendments made to it, is being provided.

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 Michael S. Schaffer, c/o OAQ, 100 North Senate Avenue, Indianapolis, Indiana, 46204, 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
MSS/MES

cc: File - Noble County
U.S. EPA, Region V
Noble County Health Department
Air Compliance Section Inspector - Doyle Houser
Compliance Branch
Administrative and Development Section
Technical Support and Modeling - Michele Boner



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

**Dexter Axle Company
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	
Original signed by Paul Dubenetzky Issued by: Paul Dubenetzky, Chief Permits Branch Office of Air Quality	Issuance Date: March 23, 2004 Expiration Date: March 23, 2009.

First Administrative Amendment 113-19334-00008, issued on June 25, 2004
First Minor Permit Revision 113-19132-00008, issued on June 30, 2004
Second Administrative Amendment 113-19295-00008, issued on July 27, 2004

First Significant Permit Revision 113-20098-00008	
Issued by: Original signed by Paul Dubenetzky, Chief Permits Branch Office of Air Quality	Issuance Date: June 16, 2005

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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 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
Attainment for all criteria pollutants
Source Status: 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, nominal 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, nominal 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, nominal 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 overspray, exhausting to Stack 12, nominal 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, nominal 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 dry filters for particulate control, exhausting inside, nominal capacity: 1,800 pounds of friction material per hour.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

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

- (a) Source-wide natural gas-fired combustion, nominally rated at 34.62 million British thermal units per hour total, consisting of the following:
 - (1) Three (3) air makeup units, nominal heat input capacity: 5.00 million British thermal units per hour each;
 - (2) Eight (8) heaters/air conditioners, nominal heat input capacity: 0.475 million British thermal units per hour each;
 - (3) Twenty-five (25) natural gas-fired space heaters, nominal heat input capacity: 0.150 million British thermal units per hour each;
 - (4) Three (3) bonders, nominal heat input capacity: 0.800 million British thermal units per hour each;
 - (5) Three (3) parts washers, nominal heat input capacity: 0.650 million British thermal units per hour each;
 - (6) One (1) parts washer, nominal heat input capacity: 0.880 million British thermal units per hour;
 - (7) One (1) parts washer, nominal heat input capacity: 1.80 million British thermal units per hour;
 - (8) One (1) parts washer, nominal heat input capacity: 4.80 million British thermal units per hour; and
 - (9) Three (3) office furnaces, nominal heat input capacity: 0.080 million British thermal units per hour each.
- (b) Three (3) metal inert gas (MIG) welding stations, using L50 welding wire, nominal capacity: 6.00 pounds of welding wire per hour each.
- (c) Paved and unpaved roads and parking lots with public access.
- (d) Grinding and machining operation controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, consisting of the following:

One (1) bullard system, consisting of eight (8) bullard machines, equipped with dry filters for particulate control, nominal capacity: 85 parts (3,443 pounds) per hour.
- (e) One (1) natural gas-fired Building 1 parts washer, with a nominal heat input capacity of 0.8 million British thermal units per hour. This washer uses a non-VOC and a non-HAP spray cleaner.
- (f) One (1) natural gas-fired Building 2 parts washer, with a nominal heat input capacity of 1.8 million British thermal units per hour. This washer uses a non-VOC and a non-HAP spray cleaner.

- (g) Eight (8) natural gas-fired Building 2 heating and air conditioning units, each are nominally rated at 0.175 million British thermal units per hour for a nominal total of 1.4 million British thermal units per hour.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deletedby this permit.
- (b) All previous registrations and permits are superseded by this permit.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

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 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)] [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, modifications, or amendments of this permit do not affect the expiration date.

B.4 Enforceability [326 IAC 2-8-6]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U.S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(a)(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, or its equivalent, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal. The certification may be included in the text of the submittal.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the sources compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204
- (b) The annual compliance certification report 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) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

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(1).

B.12 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (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 after issuance of this permit, including the following information on each facility:
- (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
Indianapolis, Indiana 46204

The PMP extension notification does not require the certification by the "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 PMPs 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 PMPs 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 the "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.13 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;

- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ Northern Regional Office, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,

Telephone No.: 317-233-5674 (ask for Compliance Section)

Facsimile No.: 317-233-5967

Northern Regional Office: 574-245-4870, facsimile 574-245-4877

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:

- (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

- (h) Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.16 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, IN 46204

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
- (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) 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.
 - (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the dead-

line specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

B.17 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (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
Indianapolis, Indiana 46204
- Any such application shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.18 Operational Flexibility [326 IAC 2-8-15] [326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:
- Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204
- and
- United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

- (b) **Emission Trades [326 IAC 2-8-15(c)]**
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) **Alternative Operating Scenarios [326 IAC 2-8-15(d)]**
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.19 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2] [IC 13-30-3-1] [IC 13-17-3-2]

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 FESOP 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 the conditions of this permit;
- (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 facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (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.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

- (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.23 Credible Evidence [326 IAC 2-8-4(3)] [326 IAC 2-8-5] [62 FR 8314] [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [40 CFR 52 Subpart P] [326 IAC 6-3-2]

- (a) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than one hundred (100) pounds per hour shall not exceed 0.551 pounds per hour.
- (b) 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 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:
 - (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also satisfy the requirements of 326 IAC 2-3 (Emission Offset);
 - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
 - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.
- (c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.
- (d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

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 nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

C.6 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.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.8 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.

C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

The Permittee shall comply with the applicable requirements of 326 IAC 14-10, 326 IAC 18, and 40 CFR 61.140.

Testing Requirements [326 IAC 2-8-4(3)]

C.10 Performance Testing [326 IAC 3-6]

- (a) 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
Indianapolis, Indiana 46204

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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 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.11 Compliance Requirements [326 IAC 2-1.1-11]

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 [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.12 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

in writing, prior to the end of the initial ninety (90) day compliance schedule with full justification of the reasons for inability to meet this date.

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(1).

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.13 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

within ninety (90) days from the date of issuance of this permit.

C.15 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.16 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]

- (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 is 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 time frame 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 and the Permittee documents such response in accordance with subsection (e) below, 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 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 status of the applicable compliance monitoring parameter with respect to normal, and the results of the 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 an administrative amendment 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) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) 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.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

- (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 response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (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.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.18 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (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 within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

- (c) 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.

- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) The first report covered the period commencing on the date of issuance of the original FESOP and ended on the last day of the reporting period. All subsequent reporting periods shall be based on calendar years, unless otherwise specified by this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156

- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

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, nominal 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, nominal 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, nominal 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 overspray, exhausting to Stack 12, nominal 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, nominal 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) [326 IAC 2-8-4]

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.

D.1.3 Volatile Organic Compounds (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment of EU-07 and EU-15 during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

D.1.4 Particulate Matter (PM) and Particulate Matter Less Than Ten Microns (PM₁₀) [326 IAC 2-8-11.1(d)(5)(E)]

Pursuant to 326 IAC 2-8-11.1(d)(5)(E), the input of solids to proposed spray paint booth (EU-15) shall not exceed 99.6 tons per twelve (12) consecutive month period with compliance determined at the end of each month, equivalent to 24.9 tons of PM and PM₁₀ per year each, based on a minimum transfer efficiency and minimum control efficiency of fifty percent (50%) each.

D.1.5 Particulate Matter (PM) [40 CFR 52, Subpart P]

Pursuant to 40 CFR 52 Subpart P, the PM from the three (3) spray paint booths (EU-11, EU-12, and EU-15) shall not exceed the pound per hour emission rate established as E in the following formula:

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:

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

or

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

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.1.6 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the three (3) spray paint booths (EU-11, EU-12, and EU-15) shall be controlled by dry filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.1.7 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for EU-11, EU-12, and EU-15 as well as any control devices.

Compliance Determination Requirements

D.1.8 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]

(a) Compliance with the VOC requirements for all surface coating operations as well as the content limitation for EU-07 contained in Conditions D.1.1(c) and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(b) Compliance with the VOC content limit for EU-15 contained in Condition D.1.2 shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis. This volume weighted average shall be determined by the following equation:

$$A = [3 C \times U] / 3 U$$

Where: A = The volume weighted average in pounds VOC per gallon less water as applied;

C = VOC content of the coating in pounds VOC per gallon less water as applied; and

U = The usage rate of the coating in gallons per day.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.9 Monitoring

-
- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (Stacks 11, 12, and 15) while one or more of the booths are 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.
 - (b) 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.
 - (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.10 Record Keeping Requirements

-
- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC requirement and content limits established in Conditions D.1.1 and D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) The VOC content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (3) The volume weighted average VOC content of the coatings used for each day at EU-15;
 - (4) The cleanup solvent usage for each month;
 - (5) The total VOC usage for each month; and
 - (6) The weight of VOC emitted for each compliance period.
 - (b) To document compliance with Condition D.1.4, the Permittee shall maintain records of the input of solids to EU-15 each month.

- (c) To document compliance with Condition D.1.9, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.11 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.4 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Grinding System

- (f) One (1) grinding system, constructed in 1975, identified as EU-14, equipped with six (6) grinders and dry filters for particulate control, exhausting inside, nominal capacity: 1,800 pounds of friction material 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.2.1 Particulate Matter (PM) and Particulate Matter Less Than Ten Microns (PM₁₀) [326 IAC 2-8-4] [326 IAC 2-2]

The PM and PM₁₀ emission rates from the one (1) grinding system, identified as EU-14, shall not exceed 12.0 pounds per hour each, equivalent to 52.6 tons of PM and PM₁₀ per year. These limits shall limit the potential to emit PM from the entire source to less than two hundred fifty (250) tons per year and the potential to emit PM₁₀ from the entire source to less than one hundred (100) tons per year. Compliance with these limits shall render the requirements of 326 IAC 2-2 and 326 IAC 2-7 not applicable.

D.2.2 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate from the one (1) grinding system, identified as EU-14, shall not exceed 3.82 pounds per hour when operating at a process weight rate of 0.900 tons per hour.

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

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

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

D.2.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for one (1) grinding system, identified as EU-14 and its control device.

Compliance Determination Requirements

D.2.4 Particulate Control

In order to comply with Conditions D.2.1 and D.2.2, the dry filters for particulate control shall be in operation and control emissions from the one (1) grinding system, identified as EU-14, at all times that the one (1) grinding system, identified as EU-14, is in operation.

D.2.5 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

For any change or modification that causes the exhaust from the one (1) grinding system, identified as EU-14 to vent to the outside atmosphere, within one hundred eighty (180) days after the change or modification, to demonstrate compliance with Condition D.2.1, the Permittee shall perform PM and PM₁₀ testing on the exhaust for EU-14, utilizing methods as approved by the Commissioner. When venting to the outside atmosphere, the test shall be repeated at least once every five (5) years from the date of the valid compliance demonstration. Testing when venting to the outside atmosphere, shall be conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.2.6 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the dry filters. To monitor the performance of the dry filters, weekly observations shall be made of the visible emissions from the one (1) grinding system, identified as EU-14, when exhausting to the outside atmosphere. 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.
- (b) The Permittee shall implement an operator-training program.
 - (1) All operators that perform grinding operations using grinding equipment shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained upon issuance of SPR 113-20098-00008 if training was not completed within the last twelve (12) months. All new operators shall be trained within thirty (30) days of hiring or transfer.
 - (2) Training shall include proper filter alignment, filter inspection on a daily basis, maintenance, and trouble shooting practices. The training program shall be written and include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within one (1) hour for inspection by IDEM, OAQ.
 - (3) All operators shall be given refresher training annually.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.7 Record Keeping Requirements

- (a) To document compliance with Condition D.2.6(a), the Permittee shall maintain records of the results of the inspections required under Condition D.2.6(a).
- (b) To document compliance with Condition D.2.6(c), the Permittee shall maintain 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.

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Insignificant Activities

- (a) Source-wide natural gas-fired combustion, nominally rated at 34.62 million British thermal units per hour total, consisting of the following:
- (1) Three (3) air makeup units, nominal heat input capacity: 5.00 million British thermal units per hour each;
 - (2) Eight (8) heaters/air conditioners, nominal heat input capacity: 0.475 million British thermal units per hour each;
 - (3) Twenty-five (25) natural gas-fired space heaters, nominal heat input capacity: 0.150 million British thermal units per hour each;
 - (4) Three (3) bonders, nominal heat input capacity: 0.800 million British thermal units per hour each;
 - (5) Three (3) parts washers, nominal heat input capacity: 0.650 million British thermal units per hour each;
 - (6) One (1) parts washer, nominal heat input capacity: 0.880 million British thermal units per hour;
 - (7) One (1) parts washer, nominal heat input capacity: 1.80 million British thermal units per hour;
 - (8) One (1) parts washer, nominal heat input capacity: 4.80 million British thermal units per hour; and
 - (9) Three (3) office furnaces, nominal heat input capacity: 0.080 million British thermal units per hour each.
- (b) Three (3) metal inert gas (MIG) welding stations, using L50 welding wire, nominal capacity: 6.00 pounds of welding wire per hour each.
- (c) Paved and unpaved roads and parking lots with public access.
- (d) Grinding and machining operation controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, consisting of the following:
- One (1) bullard system, consisting of eight (8) bullard machines, equipped with dry filters for particulate control, nominal capacity: 85 parts (3,443 pounds) 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.3.1 Volatile Organic Compounds (VOC) [326 IAC 2-8-4]

Any change or modification that increases the potential to emit from insignificant activities to greater than 0.834 tons of VOC per year may render the requirements of 326 IAC 2-7 applicable and shall require prior IDEM, OAQ approval.

D.3.2 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate from the insignificant bullard system, shall not exceed 5.90 pounds per hour when operating at a process weight rate of 1.72 tons per hour.

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

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

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

D.3.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the insignificant shoe grinders and the insignificant bullard system and any control devices.

Compliance Determination Requirements

D.3.4 Particulate Control

In order to comply with Condition D.3.2, the dry filters for particulate control shall be in operation and control emissions from the insignificant bullard system at all times that the insignificant bullard system is in operation.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

There are no specific Compliance Monitoring Requirements applicable to these insignificant activities.

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

There are no specific Record Keeping and Reporting Requirements applicable to these insignificant activities

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Dexter Axle Company
Source Address: 500 South Seventh Street, Albion, Indiana 46701
Mailing Address: P.O. Box 108, Albion, Indiana 46701
FESOP No.: F 113-17172-00008

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify) _____
- Report (specify) _____
- Notification (specify) _____
- Affidavit (specify) _____
- Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
Indianapolis, Indiana 46204
Phone: 317-233-5674
Fax: 317-233-5967**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: Dexter Axle Company
Source Address: 500 South Seventh Street, Albion, Indiana 46701
Mailing Address: P.O. Box 108, Albion, Indiana 46701
FESOP No.: F 113-17172-00008

This form consists of 2 pages

Page 1 of 2

<p>☛ This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none">○ The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and○ The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM ₁₀ , SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

FESOP Quarterly Report

Source Name: Dexter Axle Company
Source Address: 500 South Seventh Street, Albion, Indiana 46701
Mailing Address: P.O. Box 108, Albion, Indiana 46701
FESOP No.: F 113-17172-00008
Facility: Spray Paint Booth (EU-15)
Parameter: Input of solids
Limit: Not to exceed 99.6 tons per twelve consecutive month period with compliance determined at the end of each month, equivalent to 24.9 tons of PM and PM₁₀ per year each.

YEAR: _____

Month	Input of Solids (tons)	Input of Solids (tons)	Input of Solids (tons)
	This Month	Previous 11 Months	12 Month Total

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Dexter Axle Company
Source Address: 500 South Seventh Street, Albion, Indiana 46701
Mailing Address: P.O. Box 108, Albion, Indiana 46701
FESOP No.: F 113-17172-00008

Months: _____ to _____ Year: _____

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in the report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".	
<input type="radio"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="radio"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Significant Permit Revision to a Federally Enforceable State Operating Permit

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
Operation Permit Issuance Date:	March 23, 2004
Significant Permit Revision No.:	SPR 113-20098-00008
Permit Reviewer:	Michael S. Schaffer

The Office of Air Quality (OAQ) has reviewed a significant permit revision application from Dexter Axle Company relating to the operation of its surface coating operations as well as the grinding system, identified as EU-14.

The following equipment is involved in this modification (changes to any permitted equipment appear as ~~strikeouts~~, new language appears in **bold** using the equipment list from AAF 173-19295).

- (a) One (1) shoe dip tank constructed in 1974, identified as EU-06, exhausting to Stack 6, **nominal** 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, **nominal** 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, **nominal** 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 overspray, exhausting to Stack 12, **nominal** 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, **nominal** 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,~~ **dry filters** for particulate control, exhausting to ~~Stack 14~~ **inside**, **nominal** capacity: 1,800 pounds of friction material per hour.

History

On March 23, 2004, Dexter Axle Company was issued a Federally Enforceable State Operating Permit (FESOP). On June 25, 2004, Dexter Axle Company was issued First FESOP Administrative Amendment 113-19334-00008 to add ten (10) insignificant natural gas-fired combustion units, identified as Building 1 parts washer, Building 2 parts washer, and Building 2 heating and air conditioning units. On June 30, 2004, Dexter Axle Company was issued First Minor Permit Revision 113-19132-00008 to construct and operate one (1) spray paint booth, identified as EU-15. On July

27, 2004, Dexter Axle Company was issued Second Administrative Amendment 113-19295-00008 to revise the number of spray guns in spray paint booths EU-11 and EU-12.

On September 23, 2004, Dexter Axle company submitted an application to revise the existing testing and compliance monitoring requirements in Section D.2 of F 113-17172-00008, issued on March 23, 2004, since the grinding system, identified as EU-14, no longer exhausts to outside and the HEPA Filtration System has been replaced with Torit Filters.

In addition, on November 18, 2004, the HAP ethylene glycol mono-butyl ether (EGBE), which is the only glycol ether that is currently being used at EU-06, EU-07, EU-11, EU-12, and EU-15, was delisted by USEPA. As result, the FESOP limitations on the use of a single and the total HAPs are no longer necessary to render the requirements of 326 IAC 2-7 not applicable to this source. Therefore, the FESOP limitations in Conditions D.1.1(a) and (b) will be removed from the FESOP as part of this revision.

Enforcement Issue

A Notice of Violation (Case No. 2004-14194-A) for this source was signed on December 7, 2004, and consisted of the following violation:

The source failed to receive a MACT determination or exemption, while constructing and operating a dip tank, identified as EU-7 in the year 2000. Since EU-7 was being operated as a major source of a single HAP, the emission unit was considered to be in violation of 326 IAC 2-4.1-1, which incorporates 40 CFR 63, Subpart B by reference.

On March 23, 2005 a Notice of Dismissal for Case No. 2004-14194-A was ordered at the recommendation of IDEM, OAQ staff since the HAP EGBE was delisted by the USEPA on November 18, 2004.

Recommendation

The staff recommends to the Commissioner that the FESOP Significant Permit Revision be approved. This recommendation is based on the following facts and conditions:

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

An application for the purposes of this review was received on September 23, 2004. Additional information was received on October 29 and November 15, 2004 as well as March 24, 2005.

Emission Calculations

For informational purposes, the revised PM and PM₁₀ emission calculations for the one (1) grinding system, identified as EU-14 as well as the revised HAPs emissions calculations for EU-06, EU-07, EU-11, EU-12, and EU-15, have been provided on Pages 1 and 2 of 2 in Appendix A of this document.

Potential To Emit of Revision

The unrestricted potential to emit PM and PM₁₀ from the one (1) grinding system, identified as EU-14, has decreased from 391 to 276 tons each per year, as indicated by the emissions calculations on Page 1 of 2 in Appendix A of this document.

Justification for Revision

The FESOP is being revised through a FESOP Significant Permit Revision. This revision is being performed pursuant to 326 IAC 2-8-11.1(f) since the stack testing requirement for EU-14 will now only be required if the emission unit is ever redirected to the outside atmosphere and the HAPs emission limitations on EU-06, EU-07, EU-11, EU-12, and EU-15 will be removed.

County Attainment Status

The source is located in Noble 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 (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Noble County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x 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) Noble County has been classified as attainment or unclassifiable in Indiana for PM, PM₁₀, NO₂, SO₂, 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 8,760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	108
PM ₁₀	91.0
SO ₂	0.091
VOC	99.8
CO	12.7
NO _x	15.2

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of two-hundred fifty (250) tons per year or more, and it is not one of the twenty-eight (28) listed source categories.
- (b) These emissions are based upon the information contained on Page 4 of 17 in the TSD to 113-19132-00008, issued on June 30, 2004

Potential to Emit After Issuance

The limited potential to emit of the one (1) grinding system, identified as EU-14, as stated in Condition D.2.1 of F 113-17172-00008, issued on March 23, 2004, will remain unchanged as a result of this revision. However, since the HAP EGBE has been delisted by USEPA, for informational purposes the following table shows the revised Potential to Emit After Issuance, including all revisions and amendments issued after the FESOP:

Process/facility	Potential to Emit (tons/year)						
	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
Surface Coating (EU-06, EU-07, EU-11 and EU-12)	4.48	4.48	-	85.8	-	-	Single 0.316
Surface Coating (EU-15)	24.9	24.9	-	13.2	-	-	-
Source-wide Insignificant Natural Gas Combustion	0.321	1.28	0.102	0.930	14.2	17.0	Single 0.305 Total 0.319
Insignificant MIG Welding	1.90	1.90	-	-	-	-	Single 0.003 Total 0.004
Grinding (U-14)	52.6	52.6	-	-	-	-	-
Insignificant Bullard System	12.8	1.28	-	-	-	-	-
Unpaved Roads	10.83	4.73	-	-	-	-	-
Total Emissions	108	91.1	0.102	99.9	14.2	17.0	Single <10 Total <25

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) included in this proposed revision.
- (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) included in this proposed revision.

State Rule Applicability - Individual Facilities

All state rule requirements applicable to EU-06, EU-07, EU-11, EU-12, and EU-15 and the one (1) grinding system, identified as EU-14, shall remain applicable in this revision. However, since the HAP EGBE has been delisted by U.S. EPA, all HAP FESOP limitations will be removed as a result of this revision.

Compliance Requirements

Permits issued under 326 IAC 2-8 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 2-8-4. 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.

The compliance monitoring requirements applicable to the one (1) grinding system, identified as EU-14, will be modified in this revision to the following:

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the dry filters. To monitor the performance of the dry filters, weekly observations shall be made of the visible emissions from the one (1) grinding system, identified as EU-14 when exhausting to the outside atmosphere. 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.
- (b) The Permittee shall implement an operator-training program.
 - (1) All operators that perform grinding operations using grinding equipment shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained upon issuance of SPR 113-20098-00008 if training was not completed within the last twelve (12) months. All new operators shall be trained within thirty (30) days of hiring or transfer.
 - (2) Training shall include proper filter alignment, filter inspection on a daily basis, maintenance, and trouble shooting practices. The training program shall be written and include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within 1 hour for inspection by IDEM, OAQ.
 - (3) All operators shall be given refresher training annually.

- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the dry filters for particulate control at the one (1) grinding system, identified as EU-14, must operate properly to ensure compliance with 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), 326 IAC 2-2, and 326 IAC 2-8 (FESOP).

Testing Requirements

Since the exhaust for the one (1) grinding system, identified as EU-14, is now inside and there is no outlet exhaust from EU-14 to test, the testing requirement in Condition D.2.5 of F 113-17172-00008, issued on March 23, 2004 will be revised to the following:

For any change or modification that causes the exhaust from the one (1) grinding system, identified as EU-14 to vent to the outside atmosphere, within one hundred eighty (180) days after the change or modification, to demonstrate compliance with Condition D.2.1, the Permittee shall perform PM and PM₁₀ testing on the exhaust for EU-14 utilizing methods approved by the Commissioner. When venting to the outside atmosphere, the test shall be repeated at least once every five (5) years from the date of the valid demonstration. When venting to the outside atmosphere, testing shall be conducted in accordance with Section C - Performance Testing.

Note that since most grinding systems emit very little condensable PM₁₀, the statement that PM₁₀ includes filterable and condensable PM₁₀ will be removed from the testing requirement.

Proposed Changes

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

Change 1

At the request of the source the language in the equipment lists for Conditions A.2 and A.3 have been revised as follows:

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, **nominal** 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, **nominal** 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, **nominal** 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 overspray, exhausting to Stack 12, **nominal** 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 tack 15, **nominal** 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,~~ **dry filters** for particulate control, exhausting to ~~Stack 14~~ **inside**, **nominal** capacity: 1,800 pounds of friction material per hour.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

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

- (a) Source-wide natural gas-fired combustion, **nominally** rated at 34.62 million British thermal units per hour total, consisting of the following:
- (1) Three (3) air makeup units, **nominal** heat input capacity: 5.00 million British thermal units per hour each;
 - (2) Eight (8) heaters/air conditioners, **nominal** heat input capacity: 0.475 million British thermal units per hour each;
 - (3) Twenty-five (25) natural gas-fired space heaters, **nominal** heat input capacity: 0.150 million British thermal units per hour each;
 - (4) Three (3) bonders, **nominal** heat input capacity: 0.800 million British thermal units per hour each;
 - (5) Three (3) parts washers, **nominal** heat input capacity: 0.650 million British thermal units per hour each;
 - (6) One (1) parts washer, **nominal** heat input capacity: 0.880 million British thermal units per hour;
 - (7) One (1) parts washer, **nominal** heat input capacity: 1.80 million British thermal units per hour;
 - (8) One (1) parts washer, **nominal** heat input capacity: 4.80 million British thermal units per hour; and
 - (9) Three (3) office furnaces, **nominal** heat input capacity: 0.080 million British thermal units per hour each.
- (b) Three (3) metal inert gas (MIG) welding stations, using L50 welding wire, **nominal** capacity: 6.00 pounds of welding wire per hour each.
- (c) Paved and unpaved roads and parking lots with public access.
- (d) Grinding and machining operation controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, consisting of the following:
- One (1) bullard system, consisting of eight (8) bullard machines, equipped with dry filters for PM and PM₁₀ control, **nominal** capacity: 85 parts (3,443 pounds) per hour.

- (e) One (1) natural gas-fired Building 1 parts washer, with a **nominal** heat input capacity of 0.8 million British thermal units per hour. This washer uses a non-VOC and a non-HAP spray cleaner.
- (f) One (1) natural gas-fired Building 2 parts washer, with a **nominal** heat input capacity of 1.8 mmBtu/hr. This washer uses a non-VOC and a non-HAP spray cleaner.
- (g) Eight (8) natural gas-fired Building 2 heating and air conditioning units, each are **nominally** rated at 0.175 million British thermal units per hour for a **nominal total** of 1.4 mmBtu/hr.

This same changes were made in the equipment description boxes for Sections D.1, D.2, and D.3.

Change 2:

The term "use either" has been removed from Condition A.4.

Change 3:

Conditions B.10(b) will be revised to clarify that the certification form may cover more than one document that is submitted and Condition B.18(d) will be added to state that backup fuel switches will not be considered alternative operating scenarios as follows:

B.10 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. **One (1) certification may cover multiple forms in one (1) submittal.**

B.18 Operational Flexibility [326 IAC 2-8-15] [326 IAC 2-8-11.1]

- (d) **Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.**

Change 4:

The phone number for OAQ, Billing, Licensing, and Training Section in Condition B.22(c) will be revised as follows:

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-~~4320~~ **4230** (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

Change 5:

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. § 7413 (a); and a letter from the United States Environmental Protection Agency (USEPA) to IDEM, OAQ dated May, 18 2004, all permits must address the use of credible evidence; otherwise, USEPA will object to the permits. The following language will be incorporated into this revision as Condition B.23 to address credible evidence:

B.23 Credible Evidence [326 IAC 2-8-4(3)] [326 IAC 2-8-5] [62 FR 8314] [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

Change 6:

The source has requested that the requirements in Condition C.9 (Asbestos Abatement Projects) be replaced with the following:

C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

The Permittee shall comply with the applicable requirements of 326 IAC 14-10, 326 IAC 18, and 40 CFR 61.140.

- (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

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 the "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

- ~~(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.~~

Change 7:

To clarify what a calendar year is defined as in Condition C.19, paragraph (e) of that condition will be revised as follows:

C.19 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (e) The first report covered the period commencing on the date of issuance of the original FESOP and ended on the last day of the reporting period. All subsequent reporting periods shall be based on calendar years, **unless otherwise specified by this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.**

Change 8:

Since the source is no longer a major source of HAPs, Conditions D.1.1(a) and (b), Condition D.1.8, and the subsequent quarterly report forms will be deleted, and Conditions D.1.11 and D.1.12 (now Condition D.1.10 and D.1.11) will be revised as follows:

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.~~

- (e) 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.1.8 Hazardous Air Pollutants (HAPs) [326 IAC 8-1-2] [326 IAC 8-1-4]~~

~~Compliance with the HAPs usage limitations contained in Conditions D.1.1(a) and (b) shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" HAP data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.~~

D.1.14 10 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the ~~HAPs usage limits as well as the~~ VOC requirement and content limits established in Conditions D.1.1 and D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The VOC ~~and HAP~~ content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (3) The volume weighted average VOC content of the coatings used for each day at EU-15;
 - (4) The cleanup solvent usage for each month;
 - (5) The total VOC ~~and HAP~~ usage for each month; and
 - (6) The weight of VOC ~~and HAPs~~ emitted for each compliance period.
- (b) To document compliance with Condition D.1.4, the Permittee shall maintain records of the input of solids to EU-15 each month.
- (c) To document compliance with Condition D.1.4~~0~~ **9**, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.12 11 Reporting Requirements

A quarterly summary of the information to document compliance with ~~Conditions D.1.1(a) and (b) as well as~~ Condition D.1.4 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their

equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

FESOP Quarterly Report

Source Name: ~~_____ Dexter Axle Company~~
Source Address: ~~_____ 500 South Seventh Street, Albion, Indiana 46704~~
Mailing Address: ~~_____ P.O. Box 108, Albion, Indiana 46704~~
FESOP No.: ~~_____ F 113-17172-00008~~
Facilities: ~~_____ Surface Coating Operations (EU-06, EU-07, EU-11, EU-12, and EU-15)~~
Parameter: ~~_____ Individual HAP Usage~~
Limit: ~~_____ Total not to exceed 9.70 tons per twelve (12) consecutive month period with compliance determined at the end of each month.~~

YEAR: _____

Month	Individual HAP Usage (tons)	Individual HAP Usage (tons)	Individual HAP Usage (tons)
	This Month	Previous 11 Months	12 Month Total

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

~~INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION~~

~~FESOP Quarterly Report~~

Source Name: ~~_____ Dexter Axle Company~~
 Source Address: ~~_____ 500 South Seventh Street, Albion, Indiana 46701~~
 Mailing Address: ~~_____ P.O. Box 108, Albion, Indiana 46701~~
 FESOP No.: ~~_____ F 113-17172-00008~~
 Facilities: ~~_____ Surface Coating Operations (EU-06, EU-07, EU-11, EU-12, and EU-15)~~
 Parameter: ~~_____ Combination of HAPs Usage~~
 Limit: ~~_____ Total not to exceed 24.6 tons per twelve (12) consecutive month period with compliance determined at the end of each month.~~

YEAR: _____

Month	Combination of HAPs Usage (tons)	Combination of HAPs Usage (tons)	Combination of HAPs Usage (tons)
	This Month	Previous 11 Months	12 Month Total

~~9~~ _____ No deviation occurred in this quarter.

~~9~~ _____ Deviation/s occurred in this quarter.
 Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Change 9:

Conditions D.1.6 and D.2.2 will be revised to remove the cite "T 113-6949-00008, issued on January 19, 1999 as follows:

D.1.6 Particulate [326 IAC 6-3-2(d)]

~~Pursuant to T 113-6949-00008, issued on January 19, 1999 and 326 IAC 6-3-2(d), particulate from the three (3) spray paint booths (EU-11, EU-12, and EU-15) shall be controlled dry filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.~~

D.2.2 Particulate [326 IAC 6-3-2]

~~Pursuant to T 113-6949-00008, issued on January 19, 1999 and 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate from the one (1) grinding system, identified as EU-14, shall not exceed 3.82 pounds per hour when operating at a process weight rate of 0.900 tons per hour.~~

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

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

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

Change 10:

Condition D.2.4, the testing requirements in Condition D.2.5 and the monitoring requirements in Condition D.2.6 will be revised as follows:

D.2.4 Particulate Control

In order to comply with Conditions D.2.1 and D.2.2, the **HEPA dry** filters for particulate control shall be in operation and control emissions from the one (1) grinding system, identified as EU-14, at all times that the one (1) grinding system, identified as EU-14, is in operation.

D.2.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

For any change or modification that causes the exhaust from the one (1) grinding system, identified as EU-14 to vent to the outside atmosphere, within one hundred eighty (180) days after the issuance of this permit after the change or modification, to demonstrate compliance with Condition D.2.1, the Permittee shall perform PM and PM₁₀ testing on Stack 14 for the exhaust for EU-14 one (1) grinding system, identified as EU-14, utilizing methods as approved by the Commissioner. When venting to the outside atmosphere, This the test shall be repeated at least once every five (5) years from the date of this the valid compliance demonstration. PM₄₀ includes filterable and condensable PM₄₀. Testing when venting to the outside atmosphere, shall be conducted in accordance with Section C - Performance Testing.

D.2.6 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the **HEPA dry** filters. To monitor the performance of the **HEPA dry** filters, weekly observations shall be made of the visible emissions from ~~Stack 14~~ the one (1) grinding system, identified as EU-14, ~~is in operation~~ **when exhausting to the outside atmosphere.** 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.

~~(b) Monthly inspections shall be performed of the grinding emissions from the stack and the presence of visible emissions 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 visible emissions, or evidence of visible emissions are 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.~~

(b) The Permittee shall implement an operator-training program.

(1) All operators that perform grinding operations using grinding equipment shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained upon issuance of SPR 113-20098-00008 if training was not completed within the last twelve (12) months. All new operators shall be trained within thirty (30) days of hiring or transfer.

(2) Training shall include proper filter alignment, filter inspection on a daily basis, maintenance, and trouble shooting practices. The training program shall be written and include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within one (1) hour for inspection by IDEM, OAQ.

(3) All operators shall be given refresher training annually.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Change 11:

As a result of Change 8, the record keeping required in Condition D.2.7(a) will be revised as follows:

D.2.7 Record Keeping Requirements

(a) To document compliance with Conditions D.2.6(a) ~~and (b)~~, the Permittee shall maintain records of the results of the inspections required under Conditions D.2.6(a) ~~and (b)~~.

Change 12:

The third sentence on the Quarterly Deviation and Compliance Monitoring report form has been replaced with the following sentence to be consistent with Section B - Deviations from Permit Requirements and Conditions:

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. ~~Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.~~ **A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.** Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

Change 13:

IDEM, OAQ's mailing address and the zip code was changed throughout the entire FESOP as follows:

100 North Senate Avenue, ~~P.O. Box 6015~~
Indianapolis, Indiana 462064

Conclusion

This proposed revision shall be subject to the conditions of the attached proposed FESOP Significant Permit Revision No. 113-20098-00008.

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

Addendum to the Technical Support Document for a
Significant Permit Revision to a Federally Enforceable State Operating Permit (FESOP)

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
Significant Permit Revision No.:	SPR 113-20098-00008
Permit Reviewer:	Michael S. Schaffer

On April 22, 2005, the Office of Air Quality (OAQ) had a notice published in the News-Sun in Kendallville, Indiana, stating that Dexter Axle Company had applied for a Significant Permit Revision to a Federally Enforceable State Operating Permit (FESOP) to make significant revisions to the operating requirements in Sections D.1 and D.2. The notice also stated that OAQ proposed to issue a Significant Permit Revision to a FESOP and provided information on how the public could review the proposed Significant Permit Revision to a FESOP 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 Significant Permit Revision to a FESOP should be issued as proposed.

On May 19, 2005, David L. Hatchett, Esq. of Hatchett & Hauck, LLP submitted comments on behalf of Dexter Axle Company for the proposed Significant Permit Revision to a FESOP. The comments are as follows: The permit language, if changed, has deleted language as ~~strikeouts~~ and new language **bolded**.

Comment 1:

Proposed Condition A.3(d) (Insignificant Activities) and the facility description box for Section D.3: Dexter requests this condition be revised as follows:

- (d) Grinding and machining operation controlled with fabric filter(s), scrubber(s), mist collector(s), wet collector(s) or electrostatic precipitator(s) with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a nominal gas flow rate less than or equal to 4,000 actual cubic feet per minute, consisting of the following:

One (1) bullard system, consisting of eight (8) bullard machines, equipped with dry filters for particulate control, nominal capacity: 85 parts (3,443 pounds) per hour.

Not all of the listed particulate controls are actually employed on the bullard system. In addition, the use of "particulate" recognizes that dry filters do not necessarily control condensable PM₁₀.

Response 1:

Grinding and machining operations is a specified category for insignificant activities under 326 IAC 2-7-1(21) and 326 IAC 2-8-3(c)(3)(I). The one (1) insignificant bullard system falls under the specified grinding and machining category in Condition A.3(d). However, to provide further clarification for the source as to what pollutants the dry filters at the insignificant bullard system actually control, IDEM, OAQ has agreed to revise the equipment list in Condition A.3(d) and the equipment description box for Section D.3 as follows:

One (1) bullard system, consisting of eight (8) bullard machines, equipped with ~~to fit~~ **dry** filters for ~~PM and PM₁₀~~ **particulate** control, **nominal** capacity: 85 parts (3,443 pounds) per hour.

Comment 2:

Proposed Condition A.4 (FESOP Applicability): Please strike the word "use" after OAQ.

Response 2:

IDEM, OAQ agrees with the above statement. Condition A.4 has been revised as follows:

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) ~~use~~ for a Federally Enforceable State Operating Permit (FESOP).

Comment 3

Proposed Condition B.10(b): Please revise as follows:

- (b) One (1) certification shall be included, using the attached Certification Form, or its equivalent, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal. The certification may be included in the text of the submittal.

Response 3:

Dexter Axle Company's requests have been incorporated into Condition B.10(b) as follows:

B.10 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(a)(1)]

- (b) One (1) certification shall be included, using the attached Certification Form, **or its equivalent**, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal. **The certification may be included in the text of the submittal.**

Comment 4:

Proposed Condition B.8(a): Please revise as follows:

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may reasonably request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.

Comment 5:

Proposed Condition B.8(b): there should be a period after "327 IAC 17.1."

Comment 6:

Proposed Condition B.12(a)(1): Please revise as follows:

- (1) Identification of the individual(s) (by job title(s) or classification(s)) responsible for inspecting, maintaining, and repairing emission control devices;

The potential turnover or promotion of employees makes it appropriate to identify titles as opposed to the names of individuals in the Preventive Maintenance Plan.

Comment 7:

Proposed Condition B.12(b): Please revise as follows:

- (b) The Permittee shall implement the PMPs, including any required record keeping.

The “as necessary” language creates a vague and subjective standard, which would make it impossible for the Permittee to ascertain and certify compliance with this provision. Condition B.12(c) already provides the appropriate response for any exceedance tied to PMP requirements.

Comment 8:

Proposed Condition B.13 (Emergency Provisions): Subsection (h) should be removed. Emergencies will already be reported pursuant to the terms of this permit; their inclusion in the periodic Deviation and Compliance Monitoring Report is not required by rule and would be duplicative.

Comment 9:

Proposed Condition B.14(a): Please revise as follows:

- (a) Deviations from any permit requirements (except for emergencies see Section B – Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

using the attached Semi-annual Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does need to be included in this report.

The Semi-annual Deviation and Compliance Monitoring Report does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

Dexter requests that the periodic Deviation and Compliance Monitoring Report only be required on a semi-annual as opposed to a quarterly basis. Semi-annual reporting is all that is required by 326 IAC 2-8-4(3)(c). Also, consistent with Comment No. 8 and the actual rule language, emergencies should be exempted from periodic reporting.

Comment 10:

Proposed Condition B.22 (Annual Fee Payment): Please strike the references to 326 IAC 2-7-19 and 326 IAC 2-1.1-7, as well as the last sentence in subsection(a), as these provisions do not apply to FESOPs.

Comment 11:

Proposed Condition C.1 (Particulate Emissions Limitations): Please add to the end of subsection (b) a provision stating that this condition is not federally enforceable. Dexter notes that the Monaco

Coach Corporation Part 70 Operating Permit No. 039-15246-00182 issued on April 12, 2005 ("Monaco Coach Permit") contained a similar provision in Condition C.1(2).

Comment 12:

Proposed Condition C.2: Please change the word "sources" to "source's."

Comment 13:

Proposed Condition C.2(b): This subsection should be removed. There is no need for a permit limitation to avoid the PSD program. Of the emissions units listed in Condition A.2, only the metal backing plate dip tank (EU-07) and the new spray line (EU-15) were constructed after the PSD program became applicable in 1977. These two units add up to 28 tpy PTE for PM, which is only a tenth of the PSD threshold. Thus, there is no authority for the PSD-based limitation.

Comment 14:

Proposed Conditions C.4 (Open Burning), C.5 (Incineration), and C.6 (Fugitive Dust Emissions): In each of these conditions, the permit should state that none of these provisions are federally enforceable. Dexter notes that the Monaco Coach Permit contains similar provisions in permit Conditions C.3, C.4, and C.5.

Comment 15:

Proposed Condition C.12 (Compliance Monitoring): Dexter requests that the first paragraph of this condition be changed as follows:

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, The Permittee shall be responsible for installing any necessary equipment specified in Section D and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

* * *

Only equipment and monitoring required by this permit should be subject to this condition.

Comment 16:

Proposed Condition C.16 (Compliance Response Plan): This condition should be removed entirely because there is no regulatory authority for it. In the alternative, the condition should be revised to eliminate the requirement to update the CRP every time response steps are taken and should be further clarified that Section D specifies when response steps are to be initiated. The updating requirement is unduly burdensome and will lead to a large and unusable document that will impede the timeliness of response steps when corrective action steps are needed. These changes would read as follows:

(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 is comprised of:

(1) Reasonable response steps that may be implemented in the event that a response

step is required by Section D and an expected time frame for taking reasonable response steps.

- (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
 - (3) Failure to take reasonable response steps shall be considered a deviation from the permit if such failure results in a violation of an underlying applicable requirement.
- (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 modification to the permit, and such request has not been denied.
 - (3) A measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps required by Section D are taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) 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.

Comment 17:

Proposed Condition C.17(a) (Actions Related to Noncompliance Demonstrated by a Stack Test):
Please revise as follows:

- (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 response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take reasonable steps to minimize excess emissions from the affected facility

while the response actions are being implemented.

Comment 18:

Proposed Condition C.19: As described previously in Comment 9, Dexter believes that semi-annual reporting as provided in 326 IAC 2-8-4(3)(C) is appropriate for this source. Additionally, in subsection (d), Dexter requests that the last sentence be revised to reflect that not every submittal requires a certification:

- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports required in Section D require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Responses 4 - 18:

The requests in Comments 3 - 18 are outside the scope of this FESOP significant permit revision in accordance with 326 IAC 2-8-11.1(f). This permit revision covers only the following items:

- (1) Language updates to Conditions B.10, B.18, C.9, and C.19 as well the addition of Condition B.23;
- (2) An update to the telephone numbers in Condition B.22(c);
- (3) The addition of the word "nominal" in each paragraph within the equipment lists in Conditions A.2 and A.3;
- (4) Revisions to Section D.1 of the permit due to the delisting of EGBE as a HAP by the USEPA on November 18, 2004; and
- (5) Changes to the description of the one (1) grinding system, identified as EU-14, as well as significant changes to the existing compliance determination and compliance monitoring requirements in Section D.2 of the permit.

Therefore, comments submitted on conditions outside of these issues, except for typographical errors, will remain unchanged. Note that IDEM, OAQ has noted the above requests and reserves the right to reopen the permit at a later date if some of the above requests are found to be reasonable.

Also, note that a period has been added after 327 IAC 17.1 in Conditions B.8(b) and "sources" has been changed to "source's" in Condition C.2 as requested.

Comment 19:

Proposed Condition D.1.2: To clarify the meaning of this provision, please revise as follows:

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.

Response 19:

The commas requested have been added to Condition D.1.2 as follows:

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.

Comment 20:

Proposed Condition D.1.5 (Particulate Matter): The first paragraph of this provision should be revised as follows:

Pursuant to 40 CFR 52 Subpart P, the PM from the three (3) spray paint booths (EU-11, EU-12, and EU-15) shall not exceed the pound per hour emission rate established as E in the following formula:

Response 20:

IDEM, OAQ agrees with the above statement. The first paragraph in Condition D.1.5 has been revised as follows:

D.1.5 Particulate Matter (PM) [40 CFR 52, Subpart P]

Pursuant to 40 CFR 52 Subpart P ~~40 CFR 52 Subpart P~~, the PM from the three (3) spray paint booths (EU-11, EU-12, and EU-15) shall not exceed the pound per hour emission rate established as E in the following formula:

Comment 21:

Proposed Condition D.1.6 (Particulate): This condition should include a statement that it is not federally enforceable. Dexter notes that the Monaco Coach Permit contained similar language in permit Conditions D.1.8, D.2.6, and D.3.5. Dexter also suggests inserting the word "by" between words "controlled" and "dry."

Response 21:

Pursuant to 326 IAC 2-8-6(b), "all terms and conditions in a FESOP, including any provisions designed to limit a source's potential to emit, are enforceable by the U.S. EPA and citizens under the CAA." The Monaco Coach permit in question is a Part 70 Operating Permit, not a FESOP. Therefore, a statement indicating that the condition is not "federally enforceable" cannot be added to a condition.

However, the word "by" has been added to Condition D.1.6 as follows:

D.1.6 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the three (3) spray paint booths (EU-11, EU-12, and EU-15) shall be controlled **by** dry filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

Comment 22:

Proposed Condition D.1.9 and D.2.6 (Monitoring): Dexter believes that it should be allowed to use training in lieu of these burdensome daily and monthly monitoring requirements. In support, Dexter notes that the Monaco Coach Permit contains similar language in permit Conditions D.1.10, D.3.12, and D.2.8. It is unfair to apply more burdensome conditions to Dexter. Dexter requests that this condition be revised as follows:

- (a) The Permittee shall implement an operator-training program.

- (1) All operators that perform spray paint or grinding operation(s) using the spray booth equipment or grinding operation shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained no later than 30 days after issuance of 113-20098-00008 if training was not completed within the last twelve (12) months. All new operators shall be trained no later than thirty (30) days after hiring or transfer.
- (2) Training shall include proper filter alignment, filter inspection on a daily basis, maintenance, and trouble shooting practices. The training program shall be written and include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within 1 hour for inspection by IDEM, OAQ.
- (3) All operators shall be given refresher training annually.

Comment 23:

Proposed Condition D.1.10(c) and D.2.7 (Record Keeping Requirements): To conform this provision with the changes notes above for Condition D.1.9, Dexter requests that this provision be revised as follows:

- (c) The Permittee shall maintain a record of inspections prescribed by the Preventive Maintenance Plan.

Dexter notes that the Monaco Coach Permit contains similar language in Condition D.1.11(c).

Dexter also requests that Condition D.2.7(a) be removed to comply with the changes to the monitoring and training requirements of Condition D.2.6 as noted above in Comment 22.

Responses 22 and 23:

- (a) IDEM, OAQ is justified in requiring the daily and/or monthly inspections that are currently required in Conditions D.1.9 and D.2.6 of the FESOP since:

- (1) Dexter Axle Company must comply with limits to render the requirements of PSD not applicable as well as FESOP requirements by assuring that PM and PM₁₀ emissions from the entire source do not exceed 250 and 100 tons per year, respectively and that PM and PM₁₀ emissions from EU-15 do not exceed twenty-five (25) tons per year. The source cannot continuously assure that the emission levels will not be exceeded without performing continuous compliance monitoring.

Note that the emission units in the Monaco Coach Permit are not operating under any emissions cap. When there is no emissions cap on PM or PM₁₀ for the entire source, IDEM, OAQ can determine on a case by case basis whether or not a continuous monitoring requirement is necessary.

and

- (2) The requests in Comments 22 and 23 in regards to Conditions D.1.9 and D.1.10(c)(1) are outside the scope of this FESOP significant permit revision in accordance with 326 IAC 2-8-11.1(f). This permit revision covers only the following items:

- (A) Language updates to Conditions B.10, B.18, C.9, and C.19 as well the addition of Condition B.23;
- (B) An update to the telephone numbers in Condition B.22(c);
- (C) The addition of the word "nominal" in each paragraph within the equipment lists in Conditions A.2 and A.3;
- (D) Revisions to Section D.1 of the permit due to the delisting of EGBE as a HAP by the USEPA on November 18, 2004; and
- (E) Changes to the description of the one (1) grinding system, identified as EU-14, as well as significant changes to the existing compliance determination and compliance monitoring requirements in Section D.2 of the permit.

Therefore, comments submitted on conditions outside of these issues, except for typographical errors, will remain unchanged.

- (b) Regarding comment on when the source is required to have an operator training program in place for Condition D.2.6:

Dexter Axle Company was provided an ample amount of time to create the operator training program that is proposed in Condition D.2.6. IDEM, OAQ informed Dexter Axle Company prior to the public comment period of this revision that an operator training program would be required in place of monthly visible inspections from the rooftops since the exhaust from EU-14 does not vent to the outside atmosphere. The monthly inspections requirement was used as a method for insuring continuous compliance with the FESOP limits contained in Condition D.2.1. Therefore, in order to maintain continuous insurance of compliance, Dexter Axle Company must have their Operator Training Program in place upon the issuance of this revision.

Comment 24:

Proposed Condition D.1.11 (Reporting Requirements): Dexter requests that the quarterly reporting be revised as described above in Comment No. 9:

A semi-annual summary of the information to document compliance with Condition D.1.4 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the semi-annual period. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Response 24:

The requests in Comment 24 are outside the scope of this FESOP significant permit revision in accordance with 326 IAC 2-8-11.1(f). This permit revision covers only the following items:

- (1) Language updates to Conditions B.10, B.18, C.9, and C.19 as well the addition of Condition B.23;
- (2) An update to the telephone numbers in Condition B.22(c);
- (3) The addition of the word "nominal" in each paragraph within the equipment lists in Conditions A.2 and A.3;

- (4) Revisions to Section D.1 of the permit due to the delisting of EGBE as a HAP by the USEPA on November 18, 2004; and
- (5) Changes to the description of the one (1) grinding system, identified as EU-14, as well as significant changes to the existing compliance determination and compliance monitoring requirements in Section D.2 of the permit.

Therefore, comments submitted on conditions outside of these issues, except for typographical errors, will remain unchanged.

Comment 25:

Proposed Condition D.2.1 (Particulate Matter): As explained above, references to PSD should be eliminated. In addition, because PM is not a criteria pollutant and is not a separately regulated pollutant from PM₁₀, the condition should be revised as follows:

D.2.1 Particulate Matter Less Than Ten Microns (PM₁₀) [326 IAC 2-8-4]

The PM₁₀ emission rate from the one (1) grinding system, identified as EU-14, shall not exceed 12.0 pounds per hour, equivalent to 52.6 tons of PM and PM₁₀ per year. This limit shall limit the potential to emit PM₁₀ from the entire source to less than one hundred (100) tons per year. Compliance with this limit shall render the requirements of 326 IAC 2-7 not applicable.

Response 25:

If this source is not limited to less than two hundred fifty (250) tons per year, this source is considered a major source under PSD Rules.

Since this source needs to operate a control device to remain under major PSD source levels, IDEM, OAQ has the authority to place practically enforceable limitations within any FESOP to render the requirements 326 IAC 2-2 not applicable. Therefore, the PM limit in Condition D.2.1 has remained unchanged.

Comment 26:

Proposed Condition D.2.2 (Particulate): Dexter requests that particulate emissions be limited in a manner consistent with 326 IAC 6-3-2, that the condition be recognized as not federally enforceable, and that the limitation be subject to the exemptions described in the rule. The modified provision reads as follows:

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate from the one (1) grinding system, identified as EU-14, shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

The particulate limit shall be calculated in accordance with the provisions of 326 IAC 6-3-2. This condition is not federally enforceable.

Response 26:

While IDEM, OAQ recognizes that the capacity listed in the Section D.2 facility description box is descriptive information and does not constitute enforceable conditions, Condition D.2.2 specifies the PM pound per hour limitation when operating at that maximum capacity. Therefore, this condition shall remain unchanged

Note: For information regarding whether any Condition in a FESOP is considered “federally enforceable,” see Response 21.

Comment 27:

Proposed Condition D.2.4 (Particulate Control): Dexter requests language indicating that this condition is not federally enforceable. Dexter notes that the Monaco Coach Permit contains similar language in permit Conditions D.1.8, D.2.6, and D.3.5.

Response 27:

Pursuant to 326 IAC 2-8-6(b), “all terms and conditions in a FESOP, including any provisions designed to limit a source's potential to emit, are enforceable by the U.S. EPA and citizens under the CAA.” The Monaco Coach permit in question is a Part 70 Operating Permit, not a FESOP. Therefore, a statement indicating that the condition is not “federally enforceable” cannot be added to Condition D.2.4.

Comment 28:

Proposed Condition D.2.5 (Testing Requirements): Dexter requests that the requirement to test for condensable PM be removed because condensable PM is not associated with a grinding operation:

For any change or modification that causes the exhaust from the one (1) grinding system, identified as EU-14 to vent to the outside atmosphere, then within one hundred eighty (180) days after the change or modification, to demonstrate compliance with Condition D.2.1, the Permittee shall perform filterable PM₁₀ testing on the exhaust for EU-14, utilizing methods as approved by the Commissioner. When venting to the outside atmosphere, the test shall be repeated at least once every five (5) years from the date of the valid compliance demonstration. Because grinding operations are not expected to emit condensable PM₁₀, filterable only testing will be sufficient. Testing when venting to the outside atmosphere, shall be conducted in accordance with Section C - Performance Testing.

Response 28:

If Dexter Axle Company intends to redirect the exhaust EU-14 to the outside atmosphere, they may request that Condition D.2.5 be revised in accordance with 326 IAC 2-8-11.1 at that time. The requirements of Condition D.2.5 shall remain unchanged at this time.

Comment 29:

Proposed Condition D.3.2 (Particulate): Dexter requests that particulate emissions be limited as provided in 326 IAC 6-3-2, that the condition be recognized as not federally enforceable, and that the limitation be subject to the exemptions described in the rule. The modified provision reads as follows:

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate from the insignificant bullard system, shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

The particulate limit shall be calculated in accordance with the provisions of 326 IAC 6-3-2. This condition is not federally enforceable.

Comment 30:

Proposed Condition D.3.3 (Preventive Maintenance Plan): Dexter requests that this condition be removed as no preventive maintenance plan should be required for an insignificant unit.

Comment 31:

Proposed Condition D.3.4 (Particulate Control): Dexter requests inserting a condition indicating that this provision is not federally enforceable. Dexter notes that the Monaco Coach Permit contained similar language in permit conditions D.1.8, D.2.6, and D.3.5.

Comment 32:

In Forms, Emergency Occurrence Report: In the upper box, the word "daytime" should be added in between "four (4)" and "business hours" to reflect the rule's language.

Comment 33:

Forms: Dexter requests that these forms be revised to account for semi-annual reporting as opposed to quarterly reporting.

Responses 29 - 33:

The requests in Comment 24 are outside the scope of this FESOP significant permit revision in accordance with 326 IAC 2-8-11.1(f). This permit revision covers only the following items:

- (1) Language updates to Conditions B.10, B.18, C.9, and C.19 as well the addition of Condition B.23;
- (2) An update to the telephone numbers in Condition B.22(c);
- (3) The addition of the word "nominal" in each paragraph within the equipment lists in Conditions A.2 and A.3;
- (4) Revisions to Section D.1 of the permit due to the delisting of EGBE as a HAP by the USEPA on November 18, 2004; and
- (5) Changes to the description of the one (1) grinding system, identified as EU-14, as well as significant changes to the existing compliance determination and compliance monitoring requirements in Section D.2 of the permit.

Therefore, comments submitted on conditions outside of these issues, except for typographical errors, will remain unchanged.

**Appendix A: Emissions Calculations
Particulate Emissions From Grinding**

Company Name: Dexter Axle Company
Address City IN Zip: 500 South Seventh Street, Albion, Indiana 46701
Permit Number: SPR 113-20098
Plt ID: 113-00008
Reviewer: Michael S. Schaffer
Application Date: September 23, 2004

Shoe Grinding Systems

Emission Unit	Capacity (lbs/hr)	Percentage (%) of Capacity Collected	Potential to Emit PM and PM-10 Before Controls (lbs/hr)	Potential to Emit PM and PM-10 Before Controls (tons/yr)	Control Efficiency Percentage (%)	Potential to Emit PM and PM-10 After Controls (tons/yr)
EU-14	1800	3.50%	63.0	276	99.99%	0.028

Note that the grinding systems are controlled by a HEPA Filtration System

Methodology

The Percentage Capacity Collected is based on the amount of non-asbestos material processed through the grinding system

Potential to Emit PM and PM-10 Before Controls (lbs/hr) = Capacity (lbs/hr) * Percentage (%) Capacity Collected

Potential to Emit PM and PM-10 Before Controls (tons/yr) = Potential to Emit PM and PM-10 (lbs/hr) * (1 ton/2,000 lbs) * (8,760 hrs/yr)

Potential to Emit PM and PM-10 After Controls (tons/yr) = Potential to Emit PM and PM-10 Before Controls (tons/yr) * (1 - Control Efficiency %)

Asbestos has been replaced with Friction Material at this Emission Unit.

Friction Material does not contain any HAPs

**Appendix A: Emission Calculations
HAP Emission Calculations**

Company Name: Dexter Axle Company
Address City IN Zip: 500 South Seventh Street, Albion, Indiana 46701
Minor Permit Revision: MPR 113-19132
PIt ID: 113-00008
Reviewer: Michael S. Schaffer
Application Date: May 6, 2004

Material	Density (lbs/gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Glycol Ethers	Glycol Ether Emissions (tons/yr)
Spray Paint Booth EU-15					
Black (water based) W44250	11.29	0.0055	429	5.00%	5.83
Tan (water based) W44090	12.50	0.0065	429	5.00%	7.63
Red Enamel (water based) 3-0824	12.00	0.0065	429	1.30%	1.91
Red Oxide (water based) W44092	12.30	0.0085	429	5.00%	9.82
Blue Lacquer 5025	8.41	0.0032	429	6.56%	3.32

9.82
9.82

METHODOLOGY

HAPs emission rate (tons/yr) = Density (lbs/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs