



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: October 3, 2005
RE: Dexstar Wheel Company / 039-20599-00247
FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER.dot 1/10/05



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

**Dexstar Wheel Company
400 Collins Road
Elkhart, Indiana 46515**

(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 provision of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; and denial of a permit renewal application. 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 039-20599-00247	
Issued by: Original Signed By: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: October 3, 2005 Expiration Date: October 3, 2010

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in Conditions A.1, A.2, and 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 metal wheel rim manufacturing source.

Authorized individual:	Plant Engineer
Source Address:	400 Collins Road, Elkhart, Indiana 46515
Mailing Address:	400 Collins Road, Elkhart, Indiana 46515
General Source Phone:	(574) 295-3535
SIC Code:	3499
Source Location Status:	Elkhart
	Nonattainment for ozone under the 8-hour standard
	Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP)
	Minor Source, under PSD and Emission Offset 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:

One (1) primer electrodeposition (E-coat) station, identified as EU-1, constructed in 1995, where coatings are applied with a dipping operation, exhausting to one (1) stack, identified as Stack 1, maximum capacity: 600 metal parts 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) One (1) powder coating spray operation, equipped with a bag filter product recovery unit exhausting inside, capacity: 600 metal parts per hour and 0.15 pounds of coatings per part. [326 IAC 6-3-2] [40 CFR 52, Subpart P]
- (b) The following welding stations, collectively identified as EU-5, and exhausting through stack 5: [326 IAC 6-3-2] [40 CFR 52, Subpart P]
 - (1) Two (2) robotic MIG welders, capacity: 140 pounds of wire per hour, total.
 - (2) One (1) auto MIG welder, capacity: 0.23 pound of wire per hour.
- (c) Two (2) stick welding stations, identified as EU-7, and exhausting through stack 7, capacity: 1.40 pounds of electrodes per hour, total. [40 CFR 52, Subpart P].
- (d) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, collectively identified as EU-3, including:
 - (1) One (1) air makeup unit, capacity: 4.38 million British thermal units per hour.

- (2) Two (2) air makeup units, capacity: 2.40 million British thermal units per hour, each.
 - (3) One (1) powder coat oven, capacity: 3.00 million British thermal units per hour.
 - (4) One (1) E-coat oven, capacity: 8.00 million British thermal units per hour.
 - (5) One (1) Rite boiler in the E-coat area, constructed in 1995, exhausting to two (2) stacks, capacity: 8.40 million British thermal units per hour. [326 IAC 6-2-4]
 - (6) Tube heaters, capacity: 1.600 million British thermal units per hour, total.
 - (7) Miscellaneous combustion units, not including boilers, capacity: 0.16 million British thermal units per hour, total.
 - (8) One (1) natural gas-fired 10-stage wheel assembly washer, installed in 1995, using only water and a caustic solution to clean parts, maximum capacity: 600 parts and 5.0 million British thermal units per hour.
- (e) One (1) pad printing station, capacity: 4.41 pounds of ink per day.
 - (f) Parts washers, identified as EU-8, using only non-HAP materials, capacity: 0.15 tons per year of makeup solvent, total. [326 IAC 8-3-2]

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(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, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) 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 source's 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 April 15 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 and the 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 Number: 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) The 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 not 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, Indiana 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 deadline 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 13-17-3-2] [IC13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a 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] [IC 13-17-3-2]

- (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 [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than one hundred (100) pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 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.
- (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) 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 that the source's potential to emit does not exceed the above specified limits.

(c) 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 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

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.

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

C.9 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.10 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.11 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.12 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.13 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.14 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.15 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.16 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee 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.

Stratospheric Ozone Protection

C.17 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)]: Primer Electrodeposition (E-coat) Station

One (1) primer electrodeposition (E-coat) station, identified as EU-1, constructed in 1995, where coatings are applied with a dipping operation, exhausting to one (1) stack, identified as Stack 1, maximum capacity: 600 metal 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 Compound (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9, the owner or operator of the one (1) primer electrodeposition (E-coat) station shall not allow the discharge into the atmosphere VOC in excess of three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator.

D.1.2 Volatile Organic Compound (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 the one (1) primer electrodeposition (E-coat) station 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.1.3 FESOP HAPs Limit [326 IAC 2-8-4]

- (a) The amount of each individual HAP input to the primer electrodeposition (E-coat) station shall be limited to less than 10 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This limit is required to limit the potential to emit each individual HAP to less than ten (10) tons per year from the entire source.
- (b) The amount of any combination of HAPs input to the primer electrodeposition (E-coat) station shall be limited to no more than 24.2 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This limit is required to limit the potential to emit any combination of HAPs to less than twenty-five (25) tons per year from the entire source.

Compliance with these limits makes 326 IAC 2-7, Part 70, not applicable.

D.1.4 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 primer electrodeposition (E-coat) station.

Compliance Determination Requirements

D.1.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC content limitation contained in Condition D.1.1 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.

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

D.1.6 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.3, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limit and the HAP usage limits established in Conditions D.1.1 and D.1.3. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The VOC, individual HAP and total 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 individual HAP and total HAP usage for each month; and
 - (4) The weight of each individual HAP and total HAPs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.7 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.3(a) and (b) 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 an "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)]: Insignificant Activities

- (a) One (1) powder coating spray operation, equipped with a bag filter product recovery unit exhausting inside, capacity: 600 metal parts per hour and 0.15 pounds of coatings per part. [326 IAC 6-3-2] [40 CFR 52, Subpart P]
- (b) The following welding stations, collectively identified as EU-5, and exhausting through stack 5: [326 IAC 6-3-2] [40 CFR 52, Subpart P]
 - (1) Two (2) robotic MIG welders, capacity: 140 pounds of wire per hour, total.
 - (2) One (1) auto MIG welder, capacity: 0.23 pound of wire per hour.
- (c) Two (2) stick welding stations, identified as EU-7, and exhausting through stack 7, capacity: 1.40 pounds of electrodes per hour, total. [40 CFR 52, Subpart P]
- (d) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, collectively identified as EU-3, including:
 - (1) One (1) air makeup unit, capacity: 4.38 million British thermal units per hour.
 - (2) Two (2) air makeup units, capacity: 2.40 million British thermal units per hour, each.
 - (3) One (1) powder coat oven, capacity: 3.00 million British thermal units per hour.
 - (4) One (1) E-coat oven, capacity: 8.00 million British thermal units per hour.
 - (5) One (1) Rite boiler in the E-coat area, constructed in 1995, exhausting to two (2) stacks, capacity: 8.40 million British thermal units per hour. [326 IAC 6-2-4]
 - (6) Tube heaters, capacity: 1.600 million British thermal units per hour, total.
 - (7) Miscellaneous combustion units, not including boilers, capacity: 0.16 million British thermal units per hour, total.
 - (8) One (1) natural gas-fired 10-stage wheel assembly washer, installed in 1995, using only water and a caustic solution to clean parts, maximum capacity: 600 parts and 5.0 million British thermal units per hour.
- (e) One (1) pad printing station, capacity: 4.41 pounds of ink per day.
- (f) Parts washers, identified as EU-8, using only non-HAP materials, capacity: 0.15 tons per year of makeup solvent, total. [326 IAC 8-3-2]

(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 [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the PM emissions from the 8.40 million British thermal units per hour heat input boiler shall be limited to 0.6 pounds per million British thermal units heat input.

D.2.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for the parts washers which are cold cleaning operations constructed after January 1, 1980, the Permittee shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.2.3 Particulate [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the welding stations identified EU-5 shall be limited by 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:

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

- (b) The bag filter product recovery unit for the powder coating spray operation must be in operation and control emissions from the powder coating spray operation at all times when the powder coating spray operation is in operation in order for the bag filter product recovery unit to be considered integral to the process. Any change or modification in which the bag filter product recovery unit does not operate or is not considered integral to the process shall cause the powder coating spray operation to be subject to 326 IAC 6-3 and may cause the source to become subject to 326 IAC 2-7, Part 70. Therefore, such change or modification shall require prior IDEM, OAQ, approval.

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

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

Source Name: Dexstar Wheel Company
Source Address: 400 Collins Road, Elkhart, Indiana 46515
Mailing Address: 400 Collins Road, Elkhart, Indiana 46515
FESOP No.: F 039-20599-00247

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:

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: Dexstar Wheel Company
Source Address: 400 Collins Road, Elkhart, Indiana 46515
Mailing Address: 400 Collins Road, Elkhart, Indiana 46515
FESOP No.: F 039-20599-00247

This form consists of 2 pages

Page 1 of 2

- | |
|---|
| <input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) <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: Dexstar Wheel Company
Source Address: 400 Collins Road, Elkhart, Indiana 46515
Mailing Address: 400 Collins Road, Elkhart, Indiana 46515
FESOP No.: F 039-20599-00247
Facility: Primer electrodeposition (E-coat) station
Parameter: Individual HAP input
Limit: Less than 10 tons per twelve (12) consecutive month period, with compliance determined at the end of each month

YEAR: _____

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

- No deviation occurred in this month.
- Deviation/s occurred in this month.
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: Dexstar Wheel Company
Source Address: 400 Collins Road, Elkhart, Indiana 46515
Mailing Address: 400 Collins Road, Elkhart, Indiana 46515
FESOP No.: F 039-20599-00247
Facility: Primer electrodeposition (E-coat) station
Parameter: Total HAP input
Limit: 24.2 tons per twelve (12) consecutive month period, with compliance determined at the end of each month

YEAR: _____

Month	Total HAP Input (tons)	Total HAP Input (tons)	Total HAP Input (tons)
	This Month	Previous 11 Months	12 Month Total

- No deviation occurred in this month.
- Deviation/s occurred in this month.
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: Dexstar Wheel Company
Source Address: 400 Collins Road, Elkhart, Indiana 46515
Mailing Address: 400 Collins Road, Elkhart, Indiana 46515
FESOP No.: F 039-20599-00247

Months: _____ to _____ Year: _____

Page 1 of 2

<p>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 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".</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> 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:	

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

Indiana Department of Environmental Management Office of Air Quality

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

Source Name:	Dexstar Wheel Company
Source Location:	400 Collins Road, Elkhart, IN 46515
County:	Elkhart
FESOP:	F 039-20599-00247
SIC Code:	3499
Permit Reviewer:	CarrieAnn Paukowits/MES

On August 24, 2005, the Office of Air Quality (OAQ) had a notice published in the Elkhart Truth, Elkhart, Indiana, stating that Dexstar Wheel Company had applied for a Federally Enforceable State Operating Permit (FESOP) to operate a metal wheel rim manufacturing source. The notice also stated that OAQ proposed to issue a FESOP for this operation and provided information on how the public could review the proposed 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 FESOP should be issued as proposed.

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

Change 1:

The 326 IAC 6-3 revisions that became effective on June 12, 2002, were approved into the State Implementation Plan on September 23, 2005. These rules replace the previous version of 326 IAC 6-3 (Process Operations) that had been part of the SIP; therefore, the requirements of the previous version of 326 IAC 6-3-2 are no longer applicable to this source. Condition C.1 has been revised to remove (a) which contained these requirements, and Condition D.2.4, which also contained these requirements, has been removed.

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.~~

~~D.2.4 Particulate Matter (PM) [40 CFR 52, Subpart P]~~

~~Pursuant to 40 CFR 52, Subpart P, the allowable particulate matter (PM) from the one (1) powder coating spray operation, two (2) stick welding stations, identified as EU-7, and two (2) insignificant robotic MIG welders and the one (1) insignificant auto MIG welder, collectively identified as EU-5, 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:~~

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

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

Technical Support Document (TSD) for a Federally Enforceable State Operating Permit
(FESOP)

Source Background and Description

Source Name:	Dexstar Wheel Company
Source Location:	400 Collins Road, Elkhart, IN 46515
County:	Elkhart
SIC Code:	3499
Operation Permit No.:	F 039-20599-00247
Permit Reviewer:	CarrieAnn Paukowits/MES

The Office of Air Quality (OAQ) has reviewed a FESOP application from Dexstar Wheel Company relating to the operation of a metal wheel rim manufacturing source. This is a transition from a Part 70 Operating Permit (T 039-17508-00455), issued on February 16, 2004, to a FESOP.

Source Definition

The following determination was made during the review of F 039-19277-00455 for Tomkins Industries, Dexter Axle Company:

During the review of T039-17508-00455, issued on February 16, 2004, it was determined that three (3) Tomkins Industries, Dexter Axle Company plants, Plant 11 located at 222 Collins Road, Plant 14 located at 400 Collins Road, and the Engineering Plant located at 500 Collins Road, were all part of the same source because they had the same SIC Code, operate on contiguous properties and were owned by the same company. Since that time, Tomkins Industries, Dexter Axle Company, sold Plant 14, located at 400 Collins Road, to Dexstar Wheel Company. The Dexstar Wheel source and the Tomkins Industries, Dexter Axle Company plants are separately owned and operated. They do not share any common owners, corporate officers or managers, are not under common control by any person, business or entity, and do not have a contractual relationship. Therefore, although the Dexstar Wheel source and the Tomkins Industries, Dexter Axle Company source are still on contiguous properties, they are considered separate sources. Tomkins Industries, Dexter Axle Company retained plant ID 039-00455 and will be permitted in F 039-19277-00455. Dexstar Wheel Company has the plant ID 039-00247, and will be permitted in this FESOP.

Permitted Emission Units and Pollution Control Equipment

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

One (1) primer electrodeposition (E-coat) station, identified as EU-1, constructed in 1995, where coatings are applied with a dipping operation, exhausting to one (1) stack, identified as Stack 1, maximum capacity: 600 metal parts per hour.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted emission units operating at this source during this review process.

New Emission Units and Pollution Control Equipment Receiving Advanced Source Modification Approval

There are no new emission units proposed at this time.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) One (1) powder coating spray operation, equipped with a bag filter product recovery unit exhausting inside, capacity: 600 metal parts per hour and 0.15 pounds of coatings per part. [326 IAC 6-3-2] [40 CFR 52, Subpart P]
- (b) The following welding stations, collectively identified as EU-5, and exhausting through stack 5: [326 IAC 6-3-2] [40 CFR 52, Subpart P]
 - (1) Two (2) robotic MIG welders, capacity: 140 pounds of wire per hour, total.
 - (2) One (1) auto MIG welder, capacity: 0.23 pound of wire per hour.
- (c) Two (2) stick welding stations, identified as EU-7, and exhausting through stack 7, capacity: 1.40 pounds of electrodes per hour, total. [40 CFR 52, Subpart P]
- (d) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, collectively identified as EU-3, including:
 - (1) One (1) air makeup unit, capacity: 4.38 million British thermal units per hour.
 - (2) Two (2) air makeup units, capacity: 2.40 million British thermal units per hour, each.
 - (3) One (1) powder coat oven, capacity: 3.00 million British thermal units per hour.
 - (4) One (1) E-coat oven, capacity: 8.00 million British thermal units per hour.
 - (5) One (1) Rite boiler in the E-coat area, constructed in 1995, exhausting to two (2) stacks, capacity: 8.40 million British thermal units per hour. [326 IAC 6-2-4]
 - (6) Tube heaters, capacity: 1.600 million British thermal units per hour, total.
 - (7) Miscellaneous combustion units, not including boilers, capacity: 0.16 million British thermal units per hour, total.
 - (8) One (1) natural gas-fired 10-stage wheel assembly washer, installed in 1995, using only water and a caustic solution to clean parts, maximum capacity: 600 parts and 5.0 million British thermal units per hour.
- (e) One (1) pad printing station, capacity: 4.41 pounds of ink per day.
- (f) Parts washers, identified as EU-8, using only non-HAP materials, capacity: 0.15 tons per year of makeup solvent, total. [326 IAC 8-3-2]

Existing Approvals

The source has been operating under the previous Part 70 Operating Permit Renewal (T 039-17508-00455), issued on February 16, 2004, and Minor Permit Revision 039-19038, issued on June 25, 2004.

All conditions from previous approvals were incorporated into this FESOP except the following:

- (a) T 039-17508-00455, issued on February 16, 2004:

Condition D.1.1, Volatile Organic Compounds (VOC) [326 IAC 8-2-9], "Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the three (3) axle paint lines and two (2) electrocoaters shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for air dried or forced warm air dried coatings. Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized."

Reason not incorporated: The requirements of 326 IAC 8-2-9 are still applicable to the one (1) E-coat station, and those requirements will remain in the permit. However, the three (3) axle paint lines are no longer part of this source, and there was never a second electrocoater. Therefore, only one (1) E-coat station will be included in the condition. The appropriate requirements will for the three (3) axle paint lines will be included in the Tomkins Industries, Dexter Axle Company FESOP, 039-19277-00455.

- (b) T 039-17508-00455, issued on February 16, 2004:

Conditions D.1.4, D.1.5, D.1.9, and D.1.10, including provisions relating to NESHAP, 40 CFR Part 63, Subpart Mmmm, Miscellaneous Metal Parts and Products

Reason not incorporated: This source is not a major source of HAPs. Therefore, the requirements of 40 CFR 63, Subpart Mmmm, the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products are not included in the permit. The change took place because Plants 11 and 14 are no longer part of the same source. Since the initial compliance date for the rule has not passed, the requirements of the rule are not included in the permit.

- (c) T 039-17508-00455, issued on February 16, 2004:

Conditions D.1.2, D.1.3, and D.1.7: Provision involving 326 IAC 6-3-2 and particulate emissions from the three (3) axle paint lines.

Reason not incorporated: The three (3) axle paint lines are no longer part of this source. The appropriate requirements will for the three (3) axle paint lines will be included in the Tomkins Industries, Dexter Axle Company FESOP, 039-19277-00455.

- (d) T 039-17508-00455, issued on February 16, 2004:

Condition D.2.1: Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the three spindle welders and three pad welders shall not exceed 4.89 pounds per hour when operating at a process weight rate of 2,600 pounds per hour.

Reason not incorporated: The three (3) spindle welders and three (3) pad welders are no longer part of this source. The appropriate requirements for the pad welders and spindle welders will be included in the Tomkins Industries, Dexter Axle Company FESOP, 039-19277-00455.

- (e) First Minor Permit Modification 039-19038-00455, issued on June 25, 2004:

Condition D.3.1: Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the five (5) MIG welding stations at the Torflex axle manufacturing line shall not exceed 7.40 pounds per hour, total, when operating at a process weight rate of 4,830 pounds per hour, total.

Reason not incorporated: The Torflex axle manufacturing line is no longer part of this source. The appropriate requirements for the Torflex axle manufacturing line will be included in the Tomkins Industries, Dexter Axle Company FESOP, 039-19277-00455.

Air Pollution Control Justification as an Integral Part of the Process

The company has submitted the following justification such that the bag filter product recovery unit be considered as an integral part of the insignificant powder coating process:

- (a) The main purpose of the bag filter product recovery unit is to reclaim the powder coating for future use.
- (b) The overspray is collected in the dust collector and reused in the process. Ninety-eight percent (98%) of the powder coat material is ultimately put onto parts, with two percent (2%) estimated lost through spills are releases to the air within the powder coating room. The maximum powder coat input rate is 394.2 tons per year. Seventy-five percent (75%) is transferred to the part. Ninety-nine percent (99%) of the remaining 98.55 tons is collected. Thus, 97.6 tons per year is collected and reused. At a cost of \$3 per pound, there is a savings of \$585,387 per year. The annual operating costs of the product recovery unit are approximately \$1,770 per year, including replacement filters. The capital cost of the bag filter product recovery unit is \$15,000, and the capital recovery cost of the unit is \$1,943/year based on a 10 year life and a 5% interest rate. Thus, the cost savings associated with operating the unit (\$585,387) is significantly more than the cost of operating the unit (\$3,713). Therefore, it is a significant economic incentive for the source to reclaim the powder coating through the use of the bag filter product recovery unit.

IDEM, OAQ has evaluated the justifications and agreed that the bag filter product recovery unit will be considered as an integral part of the powder coating. Therefore, the permitting level will be determined using the potential to emit after the bag filter product recovery unit. Operating conditions in the proposed permit will specify that this bag filter product recovery unit shall operate at all times when the powder coating is in operation.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

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

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

An administratively incomplete FESOP application for the purposes of this review was received on January 27, 2005. Additional information received on May 5, 2005 makes the FESOP renewal application administratively complete. Additional information was received on May 26 and July 25, 2005.

There was no notice of completeness letter mailed to the source.

Emission Calculations

See Appendix A of this document for detailed emission calculations (pages 1 through 8).

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous FESOP.

Pollutant	Unrestricted Potential Emissions (tons/yr)
PM	4.79
PM ₁₀	5.68
SO ₂	0.093
VOC	57.4
CO	13.0
NO _x	15.5
HAPs	Unrestricted Potential Emissions (tons/yr)
Glycol Ethers	20.1
Cyanide	23.9
Formaldehyde	0.012
Hexane	0.279
Manganese	0.313
Cumene	0.040
Xylene	0.040
Benzene	Negligible
Dichlorobenzene	Negligible
Toluene	Negligible
Lead	Negligible
Cadmium	Negligible
Chromium	Negligible
Nickel	Negligible
Total	44.7

- (a) The unrestricted potential emissions of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7. The source will be issued a FESOP because the source will limit its emissions below the Title V levels.
- (b) **Fugitive Emissions**
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Potential to Emit After Issuance

The source has opted to become a FESOP source. The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this FESOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/emission unit	Potential To Emit (tons/year)						HAPs
	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	
E-coat Station	0.00	0.00	0.00	56.0	0.00	0.00	less than 10 individual; 24.2 total
Insignificant Activities	4.79	5.68	0.093	1.36	13.0	15.5	0.685 total
Total Emissions	4.79	5.68	0.093	57.4	13.0	15.5	less than 10 individual; less than 25 total

The values in this table represented the unrestricted potential to emit for all pollutants except HAPs. The potential to emit HAPs is limited as indicated under “326 IAC 2-8 (FESOP)” in the State Rule Applicability - Entire Source section of this document.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM _{2.5}	Attainment
PM ₁₀	Attainment
SO ₂	Attainment
NO ₂	Attainment
1-Hour Ozone	Attainment

Pollutant	Status
8-Hour Ozone	Basic nonattainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and nitrogen oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements of 326 IAC 2-3, Emission Offset.
- (b) Elkhart County has been classified as unclassifiable or attainment for PM_{2.5}. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM_{2.5} emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM_{2.5} emissions, it has directed states to regulate PM₁₀ emissions as surrogate for PM_{2.5} emissions.
- (c) Elkhart County has been classified as attainment or unclassifiable in Indiana for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit.
- (b) The one (1) boiler has a capacity less than two hundred and fifty (250) million British thermal units per hour. Therefore, the requirements of 40 CFR 60, Subparts D and Da, Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction is Commenced After August 17, 1971, and Standards of Performance for Electric Utility Steam Generating Units for Which Construction is Commenced After September 18, 1978, are not included in the permit.
- (c) The one (1) boiler has a capacity less than one hundred (100) million British thermal units per hour. Therefore, the requirements of 40 CFR 60, Subpart Db, Standards of Performance for Industrial-commercial-Institutional Steam Generating Units, are not included in the permit.
- (d) The one (1) boiler, which was constructed after June 9, 1989, has a maximum design heat input capacity less than ten (10) million British thermal units per hour. Therefore, the requirements of 40 CFR 60, Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, are not included in the permit.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14, 326 IAC 20, 40 CFR Part 61 and 40 CFR Part 63) included in this permit.
- (c) This source is not a major source of HAPs. Therefore, the requirements of 40 CFR 63, Subpart MMMM, National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products, are not included in the permit.

- (d) The parts washers at this source do not use halogenated solvents. Therefore, the requirements of 40 CFR 63, Subpart T, National Emission Standards for Halogenated Solvent Cleaning, are not included in the permit.

State Rule Applicability – Entire Source

326 IAC 2-3 (Emission Offset)

The unrestricted potential VOC emissions and the unrestricted potential NO_x emissions are each less than one hundred (100) tons per year. Therefore, this source is a minor source pursuant to 326 IAC 2-3, Emission Offset.

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

The unrestricted potential emissions of each attainment criteria pollutant are less than two hundred-fifty (250) tons per year. Therefore, this source, which is not one of the twenty-eight (28) listed source categories, is a minor source pursuant to 326 IAC 2-2, PSD.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The primer electrodeposition (E-coat) station was constructed prior to July 27, 1997. Therefore, the requirements of 326 IAC 2-4.1 are not applicable.

326 IAC 2-6 (Emission Reporting)

This source is not located in Lake or Porter County with the potential to emit greater than twenty-five (25) tons per year of NO_x, does not emit five (5) tons per year or more of lead and does not require a Part 70 Operating Permit. Therefore, the requirements of 326 IAC 2-6 do not apply.

326 IAC 2-8 (FESOP)

The emissions of each individual HAP will be limited to less than ten (10) tons per year, and the total HAP emissions will be limited to less than twenty-five (25) tons per year in order for this source to comply with the requirements of 326 IAC 2-8, FESOP. The specific limitations are as follows:

- (a) The amount of each individual HAP input to the primer electrodeposition (E-coat) station shall be limited to less than 10 tons per twelve (12) consecutive month period. This will limit the potential to emit each individual HAP to less than ten (10) tons per year.
- (b) The amount of any combination of HAPs input to the primer electrodeposition (E-coat) station shall be limited to no more than 24.2 tons per twelve (12) consecutive month period. This will limit the potential to emit any combination of HAPs to less than twenty-five (25) tons per year (24.2 tons + 0.685 tons from insignificant activities < 25 tons).

326 IAC 5-1 (Opacity Limitations)

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

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

State Rule Applicability – Individual Facilities

326 IAC 6-2 (Particulate Emissions Limitations for Sources of Indirect Heating)

The one (1) Rite boiler in the E-coat area was constructed in 1995. Therefore, the boiler is subject to the requirements of 326 IAC 6-2-4. The particulate emission limitations of 326 IAC 6-2-4 are based on the following equation given in 326 IAC 6-2-4:

$$Pt = 1.09 / Q^{0.26}$$

where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu) heat input.

Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

$$Pt = 1.09 / 8.40^{0.26} = 0.63 \text{ lb/MMBtu}$$

Pursuant to 326 IAC 6-2-4, "For Q less than 10 MMBtu/hr, Pt shall not exceed 0.6." Therefore, the limitation for the boiler is 0.6 lb/MMBtu.

Based on Appendix A and AP-42, the potential to emit PM from the natural gas-fired boiler is:

$$1.90 \text{ lb/MMcf} \times 1 \text{ MMcf}/1,000 \text{ MMBtu} = 0.0019 \text{ lb/MMBtu}$$

Therefore, the boiler will comply with this rule.

326 IAC 6-3-2 (Process Operations)

On June 12, 2002, revisions to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) became effective; this rule was previously referred to as 326 IAC 6-3 (Process Operations). As of the date this permit is being issued these revisions have not been approved by EPA into the Indiana State Implementation Plan (SIP); therefore, the requirements from the previous version of 326 IAC 6-3 (Process Operations) which has been approved into the SIP would remain applicable requirements until the revisions to 326 IAC 6-3 are approved into the SIP. The process operations at this source which have potential particulate emissions include the powder coating operation, two (2) stick welding stations, identified as EU-7, and two (2) insignificant robotic MIG welders and the one (1) insignificant auto MIG welder, collectively identified as EU-5. The particulate matter (PM) from those processes shall be limited by the following:

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

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

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

- (a) The primer electrodeposition (E-coat) station is a dip coating operation. Therefore, pursuant to 326 IAC 6-3-1(b)(5), the E-coat station is exempt from the requirements of 326 IAC 6-3-2.
- (b) The natural gas combustion units and the pad printing station have potential particulate emissions less than 0.551 pounds per hour. Therefore, pursuant to 326 IAC 6-3-1(b)(14), the diesel air compressors are exempt from the requirements of 326 IAC 6-3-2.
- (c) The powder coating operation has potential particulate emissions less than 0.551 pounds per hour. Therefore, pursuant to 326 IAC 6-3-1(b)(14), the powder coating is exempt from the requirements of 326 IAC 6-3-2. The bag filter product recovery unit for the powder coating must be in operation and control emissions from the powder coating operation at all times when the powder coating is in operation in order for the bag filter product recovery unit to be considered integral to the process.
- (d) The two (2) stick welding stations, identified as EU-7, consume less than six hundred and twenty-five (625) pounds of welding rod per day. Therefore, pursuant to 326 IAC 6-3-1(b)(9), the stick welding stations are exempt from the requirements of 326 IAC 6-3.
- (e) The particulate from the two (2) insignificant robotic MIG welders and the one (1) insignificant auto MIG welder, collectively identified as EU-5, shall be limited by the following:

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

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

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

The potential SO₂ emissions from this source are less than ten (10) pounds per hour and twenty-five (25) tons per year. Therefore, this source is not subject to the requirements of 326 IAC 7-1.1.

326 IAC 8-1-6 (New facilities; General reduction requirements)

- (a) The primer electrodeposition (E-coat) station is regulated by 326 IAC 8-2-9. Therefore, the requirements of 326 IAC 8-1-6 are not applicable.
- (b) The unrestricted potential VOC emissions from all other facilities, all constructed after January 1, 1980, are less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 are not applicable.

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

- (a) The actual VOC emissions from each of the primer electrodeposition (E-coat) station, constructed after July 1, 1990, are greater than 15 pounds per day. Therefore, the primer electrodeposition (E-coat) station is subject to the requirements of 326 IAC 8-2-9. Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of the coating used at the primer electrodeposition (E-coat) station shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS submitted by the source and calculations made, the primer electrodeposition (E-coat) station is in compliance with this requirement.

- (b) There are no VOC emissions from the insignificant powder coating operation. Therefore, the requirements of 326 IAC 8-2-9 are not applicable.

326 IAC 8-3 (Organic Solvent Degreasing Operations)

- (a) The parts washers at this source are cold cleaner degreasers that were constructed after January 1, 1980. Therefore, the parts washers are subject to 326 IAC 8-3-2. Pursuant to 326 IAC 8-3-2, the Permittee shall:

- (1) Equip the cleaner with a cover;
- (2) Equip the cleaner with a facility for draining cleaned parts;
- (3) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (5) Provide a permanent, conspicuous label summarizing the operation requirements;
- (6) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

- (b) The parts washers at this source are cold cleaner degreasers that are equipped with remote solvent reservoirs. Therefore, the requirements of 326 IAC 8-3-5 are not applicable.

- (c) The one (1) natural gas-fired 10-stage wheel assembly washer does not use organic solvents. Therefore, the requirements of 326 IAC 8-3 are not applicable.

326 IAC 9-1 (Carbon Monoxide Emission Limits)

This source does not consist of petroleum refining operations, ferrous metal smelting or a refuse incinerator. Therefore, the source is not subject to the requirements of 326 IAC 9-1.

326 IAC 10-4 (Nitrogen Oxides Budget Trading Program)

The combustion facilities at this source have capacities less than 250 million British thermal units per hour. Thus, they are not large affected units pursuant to 326 IAC 10-4-2. They are also not electricity generating units, pursuant to 326 IAC 10-4-2, because they do not produce electricity for sale. Therefore, the requirements of 326 IAC 10-4 are not applicable.

Testing Requirements

There is no testing specifically required at this time.

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 in 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 this source are as follows:

There are no compliance monitoring conditions specifically applicable. The bag filter product recovery unit must operate properly in order to be considered integral to the insignificant powder coating spray operation. However, the recovery unit exhausts inside and there is no specific monitoring required.

Conclusion

The operation of this metal wheel rim manufacturing source shall be subject to the conditions of the FESOP 039-20599-00247.

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

**Company Name: Dexstar Wheel Company
Address City IN Zip: 400 Collins Road, Elkhart, Indiana 46515
Permit Number: F 039-20599-00247
Reviewer: CarrieAnn Paukowits
Application Date: January 27, 2005**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
E-coat Primer																
Paste	13.2	43.650%	30.0%	13.7%	47.2%	40.30%	0.004592	600	3.41	1.80	4.96	119.14	21.74	0.00	4.47	100%
Resin	8.8	64.830%	62.0%	2.8%	32.8%	65.10%	0.024550	600	0.37	0.25	3.67	88.04	16.07	0.00	0.38	100%
Hexyl Cellusolve	7.4	100.000%	0.0%	100.0%	0.0%	0.00%	0.000378	600	7.40	7.40	1.68	40.28	7.35	0.00	n/a	100%
Butyl Cellusolve	7.5	100.000%	0.0%	100.0%	0.0%	0.00%	0.000070	600	7.50	7.50	0.32	7.56	1.38	0.00	n/a	100%
Acetic Acid	8.9	100.000%	0.0%	100.0%	0.0%	0.00%	0.000400	600	8.90	8.90	2.14	51.26	9.36	0.00	n/a	100%
Formic Acid	10.0	100.000%	0.0%	100.0%	0.0%	0.00%	0.000002	600	10.00	10.00	0.01	0.29	0.05	0.00	n/a	100%
As Applied	9.45	61.16%	53.65%	7.51%	34.1%	59.5%	0.03	600	1.08	0.71	12.77	306.58	55.95	0.00	1.19	100%

PM Control Efficiency: 0.00%

State Potential Emissions	Add worst case coating to all solvents	Uncontrolled	12.8	307	56.0	0.00
		Controlled	12.8	307	56.0	0.00

METHODOLOGY

- Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
- Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
- Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
- Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
- Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
- Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
- Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
- Total = Worst Coating + Sum of all solvents used

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

Company Name: Dexstar Wheel Company
Address City IN Zip: 400 Collins Road, Elkhart, Indiana 46515
Permit Number: F 039-20599-00247
Reviewer: CarrieAnn Paukowits
Application Date: January 27, 2005

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Glycol Ethers	Weight % Cyanide	Glycol Ether Emissions (ton/yr)	Cyanide Emissions (ton/yr)	Total Emissions (ton/yr)
E-coat Primer								
Paste	13.2	0.004592	600	0.00%	15.00%	0.00	23.89	23.89
Resin	8.8	0.024550	600	2.00%	0.00%	11.36	0.00	11.36
Hexyl Cellusolve	7.4	0.000378	600	100.00%	0.00%	7.35	0.00	7.35
Butyl Cellusolve	7.5	0.000070	600	100.00%	0.00%	1.38	0.00	1.38
Acetic Acid	8.9	0.000400	600	0.00%	0.00%	0.00	0.00	0.00
Formic Acid	10.0	0.000002	600	0.00%	0.00%	0.00	0.00	0.00

Total State Potential Emissions **20.1 23.9 44.0**

METHODOLOGY

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

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

Company Name: Dexstar Wheel Company
Address City IN Zip: 400 Collins Road, Elkhart, Indiana 46515
Permit Number: F 039-20599-00247
Reviewer: CarrieAnn Paukowits
Application Date: January 27, 2005

Material	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Material Usage (lbs/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency
Powder Coat	0.000%	0.0%	0.0%	0.0%	100.00%	0.15	600	0.00	0.00	0.00	0.00	0.00	98.55	75%

PM Control Efficiency: 99.00%

State Potential Emissions	Add worst case coating to all solvents	Uncontrolled	0.00	0.00	0.00	98.6
		Controlled	0.00	0.00	0.00	0.986

METHODOLOGY

The control device is considered integral. Therefore, the unrestricted potential emissions are the controlled emissions.

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Material Usage (lbs/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Material Usage (lbs/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Material Usage (lbs/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Uncontrolled Particulate Potential Tons per Year = (units/hour) * (lbs/unit) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

Controlled Particulate Potential Tons per Year = (units/hour) * (lbs/unit) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs) * (1-Cor

Total = Worst Coating + Sum of all solvents used

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

Company Name: Dexstar Wheel Company
Address City IN Zip: 400 Collins Road, Elkhart, Indiana 46515
Permit Number: F 039-20599-00247
Reviewer: CarrieAnn Paukowits
Application Date: January 27, 2005

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
			PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
WELDING											
Submerged Arc	0	0	0.036	0.011			0.000	0.000	0.000	0.000	0.000
Metal Inert Gas (MIG)(carbon steel)	2	70	0.0055	0.0005			0.770	0.070	0.000	0.000	0.070
Metal Inert Gas (MIG)(carbon steel)	1	0.23	0.0055	0.0005			0.001	0.000	0.000	0.000	0.000
Stick (E7018 electrode)	2	0.7	0.0211	0.0009			0.030	0.001	0.000	0.000	0.001
Tungsten Inert Gas (TIG)(carbon steel)	0	0	0.0055	0.0005			0.000	0.000	0.000	0.000	0.000
Oxyacetylene(carbon steel)	0	0	0.0055	0.0005			0.000	0.000	0.000	0.000	0.000
EMISSION TOTALS											
Potential Emissions lbs/hr							0.801	0.071	0.00	0.00	0.071
Potential Emissions lbs/day							19.2	1.71	0.00	0.00	1.71
Potential Emissions tons/year							3.51	0.313	0.00	0.00	0.313

METHODOLOGY

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

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

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

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

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

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

**Company Name: Dexstar Wheel Company
Address City IN Zip: 400 Collins Road, Elkhart, Indiana 46515
Permit Number: F 039-20599-00247
Reviewer: CarrieAnn Paukowits
Application Date: January 27, 2005**

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.90	7.60	0.600	100	5.50	84.0
				**see below		

*PM emission factor is filterable PM only. PM-10 emission factor is filterable and condensable PM-10 combined.

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

Equipment	Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr	Potential Emission in tons/yr					
			PM*	PM10*	SO2	NOx	VOC	CO
10-stage Washer	5.00	43.8	0.042	0.166	0.013	2.190	0.120	1.840
Air Makeup Units	9.18	80.4168	0.076	0.306	0.024	4.021	0.221	3.378
Powder Coat Oven	3.00	26.28	0.025	0.100	0.008	1.314	0.072	1.104
E-coat Oven	8.00	70.08	0.067	0.266	0.021	3.504	0.193	2.943
Rite Boiler	8.40	73.584	0.070	0.280	0.022	3.679	0.202	3.091
Tube Heaters	1.60	14.016	0.013	0.053	0.004	0.701	0.039	0.589
Miscellaneous	0.16	1.4016	0.001	0.005	0.000	0.070	0.004	0.059
Total	35.34	310	0.294	1.18	0.093	15.5	0.851	13.0

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

See page 6 for HAPs emissions calculations.

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

**Company Name: Dexstar Wheel Company
 Address City IN Zip: 400 Collins Road, Elkhart, Indiana 46515
 Permit Number: F 039-20599-00247
 Reviewer: CarrieAnn Paukowits
 Application Date: January 27, 2005**

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 0.0021	Dichlorobenzene 0.0012	Formaldehyde 0.0750	Hexane 1.8000	Toluene 0.0034
Potential Emission in tons/yr	0.0003	0.0002	0.012	0.279	0.0005

HAPs - Metals

Emission Factor in lb/MMcf	Lead 0.0005	Cadmium 0.0011	Chromium 0.0014	Manganese 0.0004	Nickel 0.0021	Total HAPs
Potential Emission in tons/yr	0.0001	0.0002	0.0002	0.0001	0.0003	0.292

Methodology is the same as page 5.

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

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

**Company Name: Dexstar Wheel Company
Address City IN Zip: 400 Collins Road, Elkhart, Indiana 46515
Permit Number: F 039-20599-00247
Reviewer: CarrieAnn Paukowits
Application Date: January 27, 2005**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/day)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency
Printing Ink 450-JK	13.5	45.000%	0.0%	45.0%	0.0%		0.327	6.08	6.08	1.99	0.363	0.00	100%

PM Control Efficiency: 0.00%

State Potential Emissions	Add worst case coating to all solvents	Uncontrolled	1.99	0.363	0.00
		Controlled	1.99	0.363	0.00

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/day) * (365 days/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (gal/day) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(365 days/yr) *(1 ton/2000 lbs)
Total = Worst Coating + Sum of all solvents used

Material	Density (Lb/Gal)	Gallons of Material (gal/day)	Weight % Cumene	Weight % Xylene	Xylene Emissions (ton/yr)	Cumene Emissions (ton/yr)
Printing Ink 450-JK	13.5	0.327	5.00%	5.00%	0.040	0.040

Total State Potential Emissions **0.040** **0.040**

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/day) * Weight % HAP * 365 days/yr * 1 ton/2000 lbs

**Appendix A: Emission Calculations
Summary of Total Emissions**

**Company Name: Dexstar Wheel Company
Address City IN Zip: 400 Collins Road, Elkhart, Indiana 46515
Permit Number: F 039-20599-00247
Reviewer: CarrieAnn Paukowits
Application Date: January 27, 2005**

Unrestricted Potential to Emit

Process	Pollutant Emissions (tons/yr)						HAP Emissions (tons/yr)							
	PM	PM10	SO2	NOx	VOC	CO	Glycol Ethers	Cyanide	Formaldehyde	Hexane	Manganese	Xylene	Cumene	Total HAPs
Significant Activities														
E-coat Station	0.00	0.00	0.00	0.00	56.0	0.00	20.1	23.9	0.00	0.00	0.00	0.00	0.00	44.0
Insignificant Activities														
Powder Coating Spray Operation	0.986	0.986	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Welding	3.51	3.51	0.00	0.0	0.00	0.00	0.00	0.00	0.00	0.313	0.00	0.00	0.00	0.313
Natural gas Combustion	0.294	1.18	0.093	15.5	0.851	13.0	0.00	0.00	0.012	0.279	0.00	0.00	0.00	0.292
Pad printing	0.00	0.00	0.00	0.00	0.363	0.00	0.00	0.00	0.00	0.00	0.00	0.040	0.040	0.080
Parts Washers	0.00	0.00	0.00	0.00	0.15	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	4.79	5.68	0.093	15.5	57.4	13.0	20.1	23.9	0.012	0.279	0.313	0.040	0.040	44.7

Limited Emissions

Process	Pollutant Emissions (tons/yr)						HAP Emissions (tons/yr)							
	PM	PM10	SO2	NOx	VOC	CO	Glycol Ethers	Cyanide	Formaldehyde	Hexane	Manganese	Xylene	Cumene	Total HAPs
Significant Activities														
E-coat Station	0.00	0.00	0.00	0.00	56.0	0.00	<10	<10	0.00	0.00	0.00	0.00	0.00	24.2
Insignificant Activities														
Powder Coating Spray Operation	0.986	0.986	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Welding	3.51	3.51	0.00	0.0	0.00	0.00	0.00	0.00	0.00	0.313	0.00	0.00	0.00	0.313
Natural gas Combustion	0.294	1.18	0.093	15.5	0.851	13.0	0.00	0.00	0.012	0.279	0.00	0.00	0.00	0.292
Pad printing	0.00	0.00	0.00	0.00	0.363	0.00	0.00	0.00	0.00	0.00	0.00	0.040	0.040	0.080
Parts Washers	0.00	0.00	0.00	0.00	0.15	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	4.79	5.68	0.093	15.5	57.4	13.0	<10	<10	0.012	0.279	0.313	0.040	0.040	24.9

Only HAPs emitted at a rate of 0.01 tons per year or more are included on this summary sheet.