INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

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: July 05, 2005

RE: Allomatic Products Company / 153-20733-00015

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) RENEWAL WITH SIGNIFICANT PERMIT REVISION OFFICE OF AIR QUALITY

Allomatic Products Company
609 East Chaney Street
Sullivan, IN 47882-7452

(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. This permit also addresses New Source Review requirements and is intended to fulfill the New Source Review procedures and permit revision requirements pursuant to 326 IAC 2-8-11.1, applicable to those conditions.

Operation Permit No.: 153-20733-00015	
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: July 05, 2005 Expiration Date: July 05, 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 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates an automobile transmission parts manufacturing plant:

Authorized Individual:	Operations Manager
Source Address:	609 East Chaney Street, Sullivan, IN 47882-7452
Mailing Address:	P. O. Box 267, Sullivan, IN 47882-0267
General Source Phone:	(812) 268-0322
SIC Code:	3714
Source Location Status:	Sullivan County Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD 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 emission source consists of the following emission units and pollution control devices:

(a) One (1) adhesive coating line, identified as RM2002, capable of coating 625 torque rings per hour or 110 friction band pads per hour. The adhesive is applied through a curtain coater. VOC and HAP emissions are controlled by a natural gas fired catalytic oxidation unit rated at 1.0 million British thermal units per hour (MMBtu/hr), identified as RE6001, before exhausting through stack S10.

(b) One (1) yarn saturation line, identified as RM5020. The adhesive is applied through a dip coater. VOC emissions from the yarn saturation line are controlled by catalytic oxidation unit RE6001 before exhausting through stack S10.

(c) One (1) natural gas fired drying oven rated at 2.0 million Btu per hour. VOC and HAP emissions are controlled by catalytic oxidation unit RE6001 before exhausting through stack S10.

(d) Various natural gas-fired space heaters, identified as ID5, with a maximum total heat input capacity of 16 million British thermal units per hour (MMBtu/hr).

(e) Two (2) etching lines, identified as M2002 and M2027, capable of etching a total of 10,200 steel plates per hour, and having a maximum usage of 4 pounds of acid per hour. PM and PM_{10} emissions from these emission units are controlled by a packed tower scrubber before exhausting through stack S1.

(f) Two (2) adhesive coating lines, identified as M2003 and M2028, which are capable of coating a total of 10,200 steel friction cores per hour. The adhesive is applied through roll coater. VOC and HAP emissions are controlled by a natural gas fired catalytic oxidation unit rated at 1.5 million British thermal units per hour (MMBtu/hr), identified as E6003, before exhausting through stack S2.

(g) Two (2) O.D. sanders, identified as M2010.1 and M2010.2, capable of sanding a total of 11,400 bonded assemblies per hour. PM and PM_{10} emissions from these emission units are controlled by baghouse M2024 before exhausting through stack S6.

(h) Two (2) opposed disk grinders, identified as M2048 and M2049, capable of grinding a total of 19,000 friction assemblies per hour. PM and PM_{10} emissions from these emission units are controlled by baghouse M2024 before exhausting through stack S6.

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

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

(a) Various natural gas-fired heaters, burners and ovens, including the incinerators with a total heat input capacity of 6.5 million Btu per hour.

(b) Combustion source flame safety purging on startup.

(c) A petroleum fuel dispensing facility, other than a gasoline dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.

(d) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughput less than 12,000 gallons.

(e) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

(f) Machining where an aqueous cutting coolant continuously floods the machining interface.

(g) Degreasing operations that do not exceed 145 gallons per 12 months, and are not subject to 326 IAC 20-6.

(h) Cleaners and solvents characterized as follows:

(1) Having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38 degrees C (100 F) or;

(2) Having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20 degrees C (680 F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

(i) The following equipment related to manufacturing activities not resulting in the emissions of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

(j) Closed loop heating and cooling systems.

(k) Activities associated with the treatment of wastewater streams with an oil and greases content less than or equal to 1% by volume.

(l) Any operation using aqueous solutions containing less than 1% by weight of VOC excluding HAP.

(m) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other filtration equipment.

(n) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as bag filter or cyclone.

(o) Paved and unpaved roads and parking lots with public access.

(p) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks and fluid handling equipment.

(q) On-site fire and emergency response training approved by the department.

(r) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying and woodworking operations.

(s) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees C).

(t) A laboratory, as defined in 326 IAC 2-7-1(20)(C).

(u) Other activities, not previously identified, with emissions equal to or less than the insignificant thresholds:

(1) Three (3) induction bonders, identified as M2033, M2045 and M2046, with a total rate of 1,800 pounds of clutch per hour, venting to stack S3.

(2) Two (2) rotary bonders, identified as M2008, with a rate of 270 pounds per hour and M2009 with a rate of 230 pounds per hour, venting to stack S4 and stack S5, respectively.

(3) S-11 Bonding oven.

(4) S-7 Electric batch oven.

(5) One (1) degreaser, identified as RM6012, with two (2) compartments. One compartment has a capacity of 336 gallons of liquid wash and the other compartment has capacity of 336 gallons of liquid rinse. The degreaser has a 1.8 million Btu per hour liquid heater and 0.8 million Btu per hour dryer.

(6) Fugitive - steel blanking (die lubricant, rust prevention application).

(7) Two (2) paper blanking facilities, identified as M5001 and M5002, with a total capacity of 290 friction paper per hour, and 11,000 paper rings per hour. Particulate matter emissions are controlled by a cyclone before exhausting through stack S9.

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

This emission 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) to renew 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) deleted

by 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 the 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. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, Room N1001
Indianapolis, IN 46204-2222

(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, that 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 maintain and implement Preventive Maintenance Plans (PMPs), 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.

(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 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

(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, Room N1001
Indianapolis, IN 46204-2222

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, Room N1001
Indianapolis, IN 46204-2222

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

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

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

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

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)]

The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

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

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

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, Room N1001
Indianapolis, IN 46204-2222

(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, Room N1001
Indianapolis, IN 46204-2222

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, Room N1001
Indianapolis, IN 46204-2222

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]

(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, Room N1001
Indianapolis, IN 46204-2222

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 Advanced Source Modification Approval [326 IAC 2-8-4(11)] [326 IAC 2-1.1-9]

(a) The requirements to obtain a permit revision under 326 IAC 2-8-11.1 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities listed in Section A of this permit.

(b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction work is suspended for a continuous period of one (1) year or more.

B.24 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

(a) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 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 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 from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also satisfy the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD));

(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 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 any emission unit vented to the control equipment is in operation.

C.8 Stack Height [326 IAC 1-7]

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

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

(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, Room N1001
Indianapolis, IN 46204-2222

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.10 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, Room N1001
Indianapolis, IN 46204-2222

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

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

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.11 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

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

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

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

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

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

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

C.14 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

(a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ("2%) of full scale reading.

(b) Whenever a condition in this permit requires the measurement of a temperature, duct pressure, or fan amperage, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ("2%) of full scale reading.

(c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

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

C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

(a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.16 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.17 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and is comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and

(2) An expected time frame for taking reasonable response steps.

If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall be considered a deviation from the permit.

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within “normal” parameters and no response steps are required.

(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

(e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.18 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.19 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.20 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 IAC2-1.1-1(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 Data Section, Office of Air Quality
100 North Senate Avenue, Room N1001
Indianapolis, IN 46204-2222

(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) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.21 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)]:

(a) One (1) adhesive coating line, identified as RM2002, capable of coating 625 torque rings per hour or 110 friction band pads per hour. The adhesive is applied through a curtain coater. VOC and HAP emissions are controlled by a natural gas fired catalytic oxidation unit rated at 1.0 million British thermal units per hour (MMBtu/hr), identified as RE6001, before exhausting through stack S10.

(b) One (1) yarn saturation line, identified as RM5020. The adhesive is applied through a dip coater. VOC emissions from the yarn saturation line are controlled by catalytic oxidation unit RE6001 before exhausting through stack S10.

(c) One (1) natural gas fired drying oven rated at 2.0 million Btu per hour. VOC and HAP emissions are controlled by catalytic oxidation unit RE6001 before exhausting through stack S10.

(f) Two (2) adhesive coating lines, identified as M2003 and M2028, which are capable of coating a total of 10,200 steel friction cores per hour. The adhesive is applied through roll coater. VOC and HAP emissions are controlled by a natural gas fired catalytic oxidation unit rated at 1.5 million British thermal units per hour (MMBtu/hr), identified as E6003, before exhausting through stack S2.

(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 Miscellaneous Metal Coating Operations [326 IAC 8-2-9]

(a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), volatile organic compound (VOC) emissions from the coatings delivered to RM2002, RM5020, M2003 and M2028 shall be limited to 3.5 pounds of VOC per gallon of coating, less water, for coatings that are air dried or forced warm air dried.

(b) Pursuant to 326 IAC 8-1-2(b), the VOC emissions shall be limited to no greater than the equivalent emissions, expressed as pounds of VOC per gallon of coating solids, allowed in (a). This equivalency is determined by the following equation:

$$E = L / (1 – (L/D))$$

Where:
L = Applicable emission limit in pounds of VOC per gallon of coating.
D = Density of VOC in coating in pounds per gallon of VOC.
E = Equivalent limit in pounds of VOC per gallon of coating solids as applied.

A solvent density of 7.36 pounds of VOC per gallon shall be used to determine equivalent pounds of VOC per gallon of solids for the applicable emission limit. For an emission limit of 3.5 pounds of VOC per gallon of coating, this equation provides an equivalent emission limit of 6.67 pounds of VOC per gallon of solids.

(c) Pursuant to 326 IAC 8-1-2(c), the overall efficiency of the capture systems and control devices shall be no less than the equivalent calculated by the following equation:

$$O = (V – E) / V * 100$$

Where:

V = The actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content of all coatings, as applied to the subject coating line as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids as applied.

E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.

O = Equivalent overall efficiency of the capture system and control device as a percentage.

(1) The overall efficiency of catalytic oxidation unit RE6001 shall be greater than 81.34% to comply with 326 IAC 8-1-2(c). However, this requirement is superseded by a more stringent requirement elsewhere in this permit.

(2) The overall efficiency of catalytic oxidation unit E6003 shall be greater than 75.95% to comply with 326 IAC 8-1-2(c). However, this requirement is superseded by a more stringent requirement elsewhere in this permit.

D.1.2 VOC and HAP Emission Limitations [326 IAC 2-8]

(a) The Permittee shall operate catalytic oxidation unit RE6001 at 95% control efficiency, at a minimum.

(b) The Permittee shall operate catalytic oxidation unit E6003 at 85% control efficiency, at a minimum.

(c) Any change or modification which may increase potential VOC emissions to 100 tons per year or more from the equipment covered in this permit must be approved by the Office of Air Quality (OAQ) before such change may occur.

(d) Any change or modification which may increase potential emissions of any single HAP to 10 tons per year or more from the equipment covered in this permit must be approved by the Office of Air Quality (OAQ) before such change may occur.

(e) Any change or modification which may increase combined HAP potential emissions to 25 tons per year or more from the equipment covered in this permit must be approved by the Office of Air Quality (OAQ) before such change may occur.

Compliance with this condition and Condition D.1.6 will render 326 IAC 2-7 as not applicable for VOC and HAP emissions.

D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and the control devices.

Compliance Determination Requirements

D.1.4 Compliance Methods

Pursuant to 326 IAC 8-1-2(a), the Permittee shall comply with the requirements of 326 IAC 8-2-9 using catalytic incineration.

(a) The Permittee shall vent emission units RM2002 and RM5020 and the drying oven to catalytic oxidation unit RE6001.

(b) The Permittee shall vent emission units M2003 and M2028 to catalytic oxidation unit E6003.

D.1.5 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

(a) Compliance stack tests shall be performed for each of the two (2) catalytic oxidation units at least once every five (5) years from the date of the previous valid compliance demonstration. The stack tests shall be performed utilizing Method 25 (40 CFR 60, Appendix A), or other methods as approved by the Commissioner.

(b) In addition to the requirements stated above, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

D.1.6 Capture System

The volatile organic compound (VOC) capture systems for the adhesive lines shall meet the criteria of a permanent total enclosure. Permanent total enclosure is defined as a permanently installed enclosure that completely surrounds a source of emissions such that all VOC emissions are captured and contained for discharge through a control device:

(a) Natural Draft Opening (NDO) is defined as any permanent opening in the enclosure that remains open during operation of the facility and is not connected to a duct in which a fan is installed. Any NDO shall be at least four (4) equivalent opening diameters from each VOC emitting point.

(b) The total area of all NDOs shall not exceed five (5) percent of the surface area of the enclosure's four walls, floor, and ceiling.

(c) The average facial velocity (FV) of air through all NDOs shall be at least 3,600 m/hr (200 fpm). The direction of air through all NDOs shall be into the enclosure.

(d) All access doors and windows whose areas are not included in condition (b) and are not included in the calculation in condition (c) shall be closed during routine operation of the process.

(e) All VOC emissions must be captured and contained for discharge through a control device.

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

D.1.7 Continuous Monitoring System Required

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the catalytic oxidation units for measuring operating temperature. The output of this system shall be recorded as an hourly average. The Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports whenever the hourly average temperature is below the minimum. An hourly average temperature that is below the minimum is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports shall be considered a deviation from this permit.

(b) The Permittee shall determine the hourly average temperature from the most recent valid stack test that demonstrates compliance with limits in Condition D.1.1, as approved by IDEM.

(c) The Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports whenever the hourly average temperature is below the hourly average temperature as

observed during the compliant stack test. An hourly average temperature that is below the hourly average temperature as observed during the compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports shall be considered a deviation from this permit.

D.1.8 Parametric Monitoring

(a) The Permittee shall determine fan amperage or duct pressure from the most recent valid stack test that demonstrates compliance with limits in Condition D.1.1, as approved by IDEM.

(b) The duct pressure or fan amperage shall be observed at least once per day when the catalytic oxidation units are operation. When for any one reading, the duct pressure or fan amperage is outside the normal range as established in most recent compliant stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A reading that is outside the range as established in the most recent compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports shall be considered a deviation from this permit.

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

D.1.9 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC and HAP emission limits:

(1) The amount, VOC content and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

(2) The total VOC and HAP usage for each month.

(3) The weight of VOC and HAP emitted for each compliance period.

(4) The continuous temperature records for the catalytic oxidation units.

(5) Records of the duct pressure and fan amperage.

(b) To document compliance with Condition D.1.3, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.

(c) To document compliance with Condition D.1.5(a), the Permittee shall maintain a copy of the compliance stack test results which established the operating temperature, fan amperage, and duct velocity that correspond to the required minimum control efficiency.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2 FACILITY OPERATION CONDITIONS

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

(e) Two (2) etching lines, identified as M2002 and M2027, capable of etching a total of 10,200 steel plates per hour, and having a maximum usage of 4 pounds of acid per hour. PM and PM_{10} emissions from these emission units are controlled by a packed tower scrubber before exhausting through stack S1.

(g) Two (2) O.D. sanders, identified as M2010.1 and M2010.2, capable of sanding a total of 11,400 bonded assemblies per hour. PM and PM_{10} emissions from these emission units are controlled by baghouse M2024 before exhausting through stack S6.

(h) Two (2) opposed disk grinders, identified as M2048 and M2049, capable of grinding a total of 19,000 friction assemblies per hour. PM and PM_{10} emissions from these emission units are controlled by baghouse M2024 before exhausting through stack S6.

(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 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate for process weight rates up to 60,000 pounds per hour shall be accomplished by use of the following equation:

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

(a) For etching lines M2002 and M2027, with a process weight rate of 0.51 tons per hour, the equation provides an emission limit of 2.61 pounds per hour.

(b) For O.D. sanders M2010.1 and M2010.2, with a process weight rate of 0.57 tons per hour, the equation provides an emission limit of 2.81 pounds per hour.

(c) For opposed disk grinders M2048 and M2049, with a process weight rate of 0.95 tons per hour, the equation provides an emission limit of 3.96 pounds per hour.

D.2.2 PM, PM_{10} and HAP Emission Limitations [326 IAC 2-8]

(a) Hydrochloric acid mist emissions from etching lines M2002 and M2027 shall not exceed 0.45 pounds per hour.

(b) Baghouse M2024, controlling O.D. sanders M2010.1 and M2010.2 and opposed disk grinders M2048 and M2049, shall control PM and PM_{10} emissions to 6.77 pounds per hour or less.

Compliance with this condition limits shall render 326 IAC 2-7 as not applicable for PM, PM_{10} and HAP emissions.

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

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.2.4 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

(a) The Permittee shall perform PM_{10} testing on baghouse M2024 at least once every five (5) years from the date of the previous valid compliance demonstration, utilizing Methods 201 or 201A and 202 (40 CFR 51, Appendix M) or other methods as approved by the Commissioner. PM_{10} includes filterable and condensible PM_{10}.

(b) In addition to the requirements stated above, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

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

D.2.5 Visible Emissions Notations

(a) Daily visible emission notations of the baghouse M2024 stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports shall be considered a deviation from this permit.

D.2.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across baghouse M2024 at least once per day when any of the disk grinders and sanders is in operation and venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the range of 0.4 to 3.0 inches of water, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

D.2.7 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags in baghouse M2024 when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.

D.2.8 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

(b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

D.2.9 Record Keeping Requirements

(a) To document compliance with Condition D.2.5, the Permittee shall maintain records of daily visible emission notations of baghouse M2024.

(b) To document compliance with Condition D.2.6, the Permittee shall maintain the following:

(1) Daily records of the total static pressure drop across baghouse M2024.

(2) Documentation of all response steps implemented, per event.

(3) Operation and preventive maintenance logs, including work purchases orders.

(4) Quality Assurance/Quality Control (QA/QC) procedures.

(5) Operator standard operating procedures (SOP).

(6) Manufacturer's specifications or its equivalent.

(7) Equipment "troubleshooting" contingency plan.

(c) To document compliance with Condition D.2.7, the Permittee shall maintain records of the results of the inspections required under Condition D.2.7.

(d) To document compliance with Condition D.2.3, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.

(e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3 FACILITY OPERATION CONDITIONS

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

(d) Various natural gas-fired space heaters, identified as ID5, with a maximum total heat input capacity of 16 million British thermal units per hour (MMBtu/hr).

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

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

D.3.1 Emission Limitations

There are no applicable emission limitations for this facility.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Allomatic Products Company
Source Address: 609 East Chaney Street, Sullivan, IN 47882-7452
Mailing Address: P. O. Box 267, Sullivan, IN 47882-0267
FESOP No.: 153-20733-00015

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, Room N1001
Indianapolis, IN 46204-2222
Phone: 317-233-5674
Fax: 317-233-5967

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT

Source Name: Allomatic Products Company
Source Address: 609 East Chaney Street, Sullivan, IN 47882-7452
Mailing Address: P. O. Box 267, Sullivan, IN 47882-0267
FESOP No.: 153-20733-00015

This form consists of 2 pages **Page 1 of 2**

☐ This is an emergency as defined in 326 IAC 2-7-1(12).

- 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

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

Source Name: Allomatic Products Company
Source Address: 609 East Chaney Street, Sullivan, IN 47882-7452
Mailing Address: P. O. Box 267, Sullivan, IN 47882-0267
FESOP No.: 153-20733-00015

Months: _____ **to** _____ **Year:** _____

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."

☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

☐ 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:	

Page 2 of 2

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: ____________________________________

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

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

Source Background and Description

Source Name:	**Allomatic Products Company**
Source Location:	**609 East Chaney Street, Sullivan, IN 47882-7452**
County:	**Sullivan**
SIC Code:	**3714**
Operation Permit No.:	**153-12504-00015**
Operation Permit Issuance Date:	**November 2, 2000**
Revision No.:	**153-20733-00015**
Permit Reviewer:	**Allen R. Davidson**

On May 6, 2005, the Office of Air Quality (OAQ) had a notice published in the *Sullivan Daily Times* stating that Allomatic Products Company had applied for a Federally Enforceable State Operating Permit (FESOP) to operate an automobile transmission parts manufacturing plant. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Katherine Basham and Charles Staehler of August Mack Environmental, Inc., a consultant representing Allomatic Products Company, submitted comments on the proposed FESOP. In addition, one internal comment was received. Upon further review, OAQ has decided to make revisions to the permit as follows. Bolded language has been added, and language with a line through it has been deleted. The Table Of Contents has been modified to reflect these changes.

Comment 1a:

In Condition A.2(g), please describe the two sanders as “O.D.” sanders.

Comment 1b:

In Condition D.2. facility description, please revise all references to “opposed disk sanders” to state “O.D. sanders”.

Comment 1c:

In Condition D.2.1(b), please revise all references to “opposed disk sanders” to state “O.D. sanders”.

Comment 1d:

In Condition D.2.1(c). please revise this condition to state “opposed disk grinders M2048 and M2049”.

Comment 1e:

In Condition D.2.2(b), please revise this condition to state "Baghouse M2024, controlling O.D. sanders M2010.1 and N2010.2 and opposed disk grinders M2048 and M2049, shall control PM and PM_{10} emissions to 6.77 pounds per hour or less."

Response 1:

The requested changes affect descriptive information only. The permit has been changed as follows:

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

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

(a) One (1) adhesive coating line, identified as RM2002, capable of coating 625 torque rings per hour or 110 friction band pads per hour. The adhesive is applied through a curtain coater. VOC and HAP emissions are controlled by a natural gas fired catalytic oxidation unit rated at 1.0 million British thermal units per hour (MMBtu/hr), identified as RE6001, before exhausting through stack S10.

(b) One (1) yarn saturation line, identified as RM5020. The adhesive is applied through a dip coater. VOC emissions from the yarn saturation line are controlled by catalytic oxidation unit RE6001 before exhausting through stack S10.

(c) One (1) natural gas fired drying oven rated at 2.0 million Btu per hour. VOC and HAP emissions are controlled by catalytic oxidation unit RE6001 before exhausting through stack S10.

(d) Various natural gas-fired space heaters, identified as ID5, with a maximum total heat input capacity of 16 million British thermal units per hour (MMBtu/hr).

(e) Two (2) etching lines, identified as M2002 and M2027, capable of etching a total of 10,200 steel plates per hour, and having a maximum usage of 4 pounds of acid per hour. PM and PM10 emissions from these emission units are controlled by a packed tower scrubber before exhausting through stack S1.

(f) Two (2) adhesive coating lines, identified as M2003 and M2028, which are capable of coating a total of 10,200 steel friction cores per hour. The adhesive is applied through roll coater. VOC and HAP emissions are controlled by a natural gas fired catalytic oxidation unit rated at 1.5 million British thermal units per hour (MMBtu/hr), identified as E6003, before exhausting through stack S2.

(g) Two (2) ~~opposed disk~~ **O.D.** sanders, identified as M2010.1 and M2010.2, capable of sanding a total of 11,400 bonded assemblies per hour. PM and PM_{10} emissions from these emission units are controlled by baghouse M2024 before exhausting through stack S6.

(h) Two (2) opposed disk grinders, identified as M2048 and M2049, capable of grinding a total of 19,000 friction assemblies per hour. PM and PM_{10} emissions from these emission units are controlled by baghouse M2024 before exhausting through stack S6.

D.2.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate for process weight rates up to 60,000 pounds per hour shall be accomplished by use of the following equation:

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

(a) For etching lines M2002 and M2027, with a process weight rate of 0.51 tons per hour, the equation provides an emission limit of 2.61 pounds per hour.

(b) For ~~opposed disk~~ **O.D.** sanders M2010.1 and M2010.2, with a process weight rate of 0.57 tons per hour, the equation provides an emission limit of 2.81 pounds per hour.

(c) For opposed disk **grinders M2048 and M2049** ~~sanders M2010.1 and M2010.2~~, with a process weight rate of 0.95 tons per hour, the equation provides an emission limit of 3.96 pounds per hour.

D.2.2 PM, PM_{10} and HAP Emission Limitations [326 IAC 2-8]

(a) Hydrochloric acid mist emissions from etching lines M2002 and M2027 shall not exceed 0.45 pounds per hour.

(b) Baghouse M2024, controlling ~~opposed disk~~ **O.D.** sanders M2010.1 and M2010.2 and opposed disk **grinders M2048 and M2049** ~~sanders M2010.1 and M2010.2~~, shall control PM and PM_{10} emissions to 6.77 pounds per hour or less.

Compliance with this condition limits shall render 326 IAC 2-7 as not applicable for PM, PM_{10} and HAP emissions.

Also, the facility description in Section D.2 is hereby amended as follows:

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

(e) Two (2) etching lines, identified as M2002 and M2027, capable of etching a total of 10,200 steel plates per hour, and having a maximum usage of 4 pounds of acid per hour. PM and PM_{10} emissions from these emission units are controlled by a packed tower scrubber before exhausting through stack S1.

(g) Two (2) ~~opposed disk~~ **O.D.** sanders, identified as M2010.1 and M2010.2, capable of sanding a total of 11,400 bonded assemblies per hour. PM and PM_{10} emissions from these emission units are controlled by baghouse M2024 before exhausting through stack S6.

(h) Two (2) opposed disk grinders, identified as M2048 and M2049, capable of grinding a total of 19,000 friction assemblies per hour. PM and PM_{10} emissions from these emission units are controlled by baghouse M2024 before exhausting through stack S6.

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

Comment 2:

In Condition D.1.1(a), the adhesive coating utilized on coating lines RM2002, M2003 and M2028 meet the requirements of 326 IAC 8-2-9(d)(2). Therefore, all three coating lines should be limited to 3.5 pounds of VOC per gallon of coating, less water.

Response 2:

The change will eliminate any coatings subject to the 3.0 pounds per gallon limit and the equivalent limit calculation to which it corresponds. This change also decreases the overall efficiency necessary to comply with 326 IAC 8-2-9. Condition D.1.1 has been changed to read as follows:

D.1.1 Miscellaneous Metal Coating Operations [326 IAC 8-2-9]

(a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations)**,** ~~:~~

~~(1)~~ ~~Volatile~~ **volatile** organic compound (VOC) emissions from the coatings delivered to RM2002**,** ~~and~~ RM5020**, M2003 and M2028** shall be limited to 3.5 pounds of VOC per gallon of coating, less water, for coatings that are air dried or forced warm air dried.

~~(2) Volatile organic compound (VOC) emissions from the coatings delivered to M2003 and M2028 shall be limited to 3.0 pounds of VOC per gallon of coating, less water, for coatings that are not otherwise limited by 326 IAC 8-2-9.~~

(b) Pursuant to 326 IAC 8-1-2(b), the VOC emissions shall be limited to no greater than the equivalent emissions, expressed as pounds of VOC per gallon of coating solids, allowed in (a). This equivalency is determined by the following equation:

$$E = L / (1 – (L/D))$$

Where:
L = Applicable emission limit in pounds of VOC per gallon of coating.
D = Density of VOC in coating in pounds per gallon of VOC.
E = Equivalent limit in pounds of VOC per gallon of coating solids as applied.

A solvent density of 7.36 pounds of VOC per gallon shall be used to determine equivalent pounds of VOC per gallon of solids for the applicable emission limit.

~~(1)~~ For an emission limit of 3.5 pounds of VOC per gallon of coating, this equation provides an equivalent emission limit of 6.67 pounds of VOC per gallon of solids.

~~(2) For an emission limit of 3.0 pounds of VOC per gallon of coating, this equation provides an equivalent emission limit of 5.06 pounds of VOC per gallon of solids.~~

(c) Pursuant to 326 IAC 8-1-2(c), the overall efficiency of the capture systems and control devices shall be no less than the equivalent calculated by the following equation:

$$O = (V – E) / V * 100$$

Where:
V = The actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content of all coatings, as applied to the subject coating line as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids as applied.
E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.
O = Equivalent overall efficiency of the capture system and control device as a percentage.

(1) The overall efficiency of catalytic oxidation unit RE6001 shall be greater than 81.34% to comply with 326 IAC 8-1-2(c). However, this requirement is superseded by a more stringent requirement elsewhere in this permit.

(2) The overall efficiency of catalytic oxidation unit E6003 shall be greater than **75.95%** ~~84.93%~~ to comply with 326 IAC 8-1-2(c). However, this requirement is superseded by a more stringent requirement elsewhere in this permit.

Comment 3a:

In Condition D.2.6, please revise this condition to state a pressure drop range of 0.4 to 3.0 inches of water. A very small pressure drop range was established during the compliance stack test. The manufacturer of the unit has suggested a pressure drop range of 0.4 to 3.0 inches of water.

Comment 3b:

Why not reduce the monitoring to once per day for baghouse M2024? FESOP sources can be monitored once per day to demonstrate compliance now.

Response 3:

OAQ will revise the condition to state the manufacturer's recommended pressure drop range. Also, OAQ will reduce the frequency of compliance monitoring, from once per shift to once per day. Condition D.2.6 has been changed to read as follows:

D.2.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across baghouse M2024 at least once per ~~shift~~ **day** when any of the disk grinders and sanders is in operation and venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the range **of 0.4 to 3.0 inches of water** ~~established during the latest stack test~~, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

Comment 4:

In Condition D.2.9(b), Allomatic Products Company will monitor the pressure drop range as required to demonstrate compliance with Condition D.2.6. It will be extremely difficult for Allomatic Products Company to record the cleaning cycle frequency and differential pressure. This record-keeping requirement is not necessary and will be burdensome. Please remove item D.2.9(b)(1)(B) from this condition.

Response 4:

Condition D.2.6 requires Allomatic Products Company to the record the total static pressure drop across baghouse M2024 at least once per day when any of the disk grinders and sanders is in operation and venting to the atmosphere. These total static pressure drop records will be maintained to satisfy the requirement to document compliance. Condition D.2.9(b)(1) will be changed to read as follows.

D.2.9 Record Keeping Requirements

(a) To document compliance with Condition D.2.5, the Permittee shall maintain records of daily visible emission notations of baghouse M2024.

(b) To document compliance with Condition D.2.6, the Permittee shall maintain the following:

(1) **Daily records of the total static pressure drop across baghouse M2024.** ~~Records of the following operational parameters during normal operation when venting to the atmosphere:~~

~~(A) Inlet and outlet differential static pressure; and~~

~~(B) Cleaning cycle: frequency and differential pressure.~~

(2) Documentation of all response steps implemented, per event .

(3) Operation and preventive maintenance logs, including work purchases orders,

(4) Quality Assurance/Quality Control (QA/QC) procedures.

(5) Operator standard operating procedures (SOP).

(6) Manufacturer's specifications or its equivalent.

(7) Equipment "troubleshooting" contingency plan.

(c) To document compliance with Condition D.2.7, the Permittee shall maintain records of the results of the inspections required under Condition D.2.7.

(d) To document compliance with Condition D.2.3, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.

(e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a
Federally Enforceable State Operating Permit (FESOP) Renewal
With Significant Permit Revision

Source Background and Description

Source Name:	**Allomatic Products Company**
Source Location:	**609 East Chaney Street, Sullivan, IN 47882-7452**
County:	**Sullivan**
SIC Code:	**3714**
Operation Permit No.:	**153-12504-00015**
Operation Permit Issuance Date:	**November 2, 2000**
Permit Renewal No.:	**153-20733-00015**
Permit Reviewer:	**Allen R. Davidson**

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from Allomatic Products Company relating to the operation of an automobile transmission parts manufacturing plant located at 609 East Chaney Street, Sullivan, IN 47882-7452.

Permitted Emission Units and Pollution Control Equipment

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

(a) One (1) adhesive coating line, identified as RM2002. The adhesive is applied through a curtain coater. VOC and HAP emissions are controlled by a natural gas fired catalytic oxidation unit rated at 1.0 million British thermal units per hour (MMBtu/hr) before exhausting through stack S10.

(b) Various natural gas-fired space heaters, identified as ID5, with a maximum total heat input capacity of 16 million British thermal units per hour (MMBtu/hr).

(c) Two (2) etching lines, identified as M2002 and M2027, capable of etching a total of 10,200 steel plates per hour, and having a maximum usage of 4 pounds of acid per hour. The particulate matter emissions from these emission units are controlled by a packed tower scrubber before exhausting through stack S1;

(d) Two (2) adhesive coating lines, identified as M2003 and M2028, which are capable of coating a total of 10,200 steel friction cores per hour. The adhesive is applied through roll coater. VOC and HAP emissions are controlled by a natural gas fired catalytic oxidation unit rated at 1.5 million British thermal units per hour (MMBtu/hr) before exhausting through stack S2.

(e) Two (2) opposed disk sanders, identified as M2010.1 and M2010.2, capable of sanding a total of 11,400 bonded assemblies per hour. PM and PM_{10} emissions from these emission units are controlled by baghouse M2024 before exhausting through stack S6.

(f) Two (2) opposed disk grinders, identified as M2048 and M2049, capable of grinding a total of 19,000 friction assemblies per hour. PM and PM_{10} emissions from these emission units are controlled by baghouse M2024 before exhausting through stack S6.

Unpermitted Emission Units and Pollution Control Equipment

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

Revision to Emission Units and Pollution Control Equipment

On February 7, 2005, the Office of Air Quality (OAQ) received an application for a Significant Permit Revision relating to the FESOP. These changes, along with the previous revisions, will be incorporated into the FESOP renewal.

The following changes are being proposed for this renewal:

(a) One existing natural gas fired catalytic oxidation unit rated at 1.0 million British thermal units per hour (MMBtu/hr) and exhausting through stack S10, will be identified as catalytic oxidation unit RE6001.

(b) One existing natural gas fired catalytic oxidation unit rated at 1.5 million British thermal units per hour (MMBtu/hr) and exhausting through stack S2, will be identified as catalytic oxidation unit E6003.

(c) One (1) yarn saturation line, identified as RM5020, will be installed. The adhesive is applied through a dip coater. VOC emissions from the yarn saturation line will be controlled by catalytic oxidation unit RE6001.

(d) One (1) natural gas fired drying oven rated at 2.0 million Btu per hour will be installed. Emissions from the drying oven will be controlled by catalytic oxidation unit RE6001.

(e) The required minimum control efficiency of catalytic oxidation unit RE6001 will be increased from 79% to 95%. As a result, the VOC limit on adhesive coating line RM2002, of 5.36 pounds per gallon of coating solids delivered to the applicator, will no longer be required.

(f) Production capacity from adhesive coating line RM2002 will increase to 625 torque rings per hour or 110 friction band pads per hour.

Insignificant Activities

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

(a) Various natural gas-fired heaters, burners and ovens, including the incinerators with a total heat input capacity of 6.5 million Btu per hour.

(b) Combustion source flame safety purging on startup.

(c) A petroleum fuel dispensing facility, other than a gasoline dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.

(d) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughput less than 12,000 gallons.

(e) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

(f) Machining where an aqueous cutting coolant continuously floods the machining interface.

(g) Degreasing operations that do not exceed 145 gallons per 12 months, and are not subject to 326 IAC 20-6.

(h) Cleaners and solvents characterized as follows:

(1) Having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38 degrees C (100 F) or;

(2) Having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20 degrees C (680 F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

(i) The following equipment related to manufacturing activities not resulting in the emissions of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

(j) Closed loop heating and cooling systems.

(k) Activities associated with the treatment of wastewater streams with an oil and greases content less than or equal to 1% by volume.

(l) Any operation using aqueous solutions containing less than 1% by weight of VOC excluding HAPs.

(m) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other filtration equipment.

(n) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as bag filter or cyclone.

(o) Paved and unpaved roads and parking lots with public access.

(p) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks and fluid handling equipment.

(q) On-site fire and emergency response training approved by the department.

(r) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying and woodworking operations.

(s) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees C).

(t) A laboratory, as defined in 326 IAC 2-7-1(20)(C).

(u) Other activities, not previously identified, with emissions equal to or less than the insignificant thresholds:

(1) Three (3) induction bonders, identified as M2033, M2045 and M2046, with a total rate of 1,800 pounds of clutch per hour, venting to stack S3.

(2) Two (2) rotary bonders, identified as M2008, with a rate of 270 pounds per hour and M2009 with a rate of 230 pounds per hour, venting to stack S4 and stack S5, respectively.

(3) S-11 Bonding oven.

(4) S-7 Electric batch oven.

(5) One (1) degreaser, identified as RM6012, with two (2) compartments. One compartment has a capacity of 336 gallons of liquid wash and the other compartment has capacity of 336 gallons of liquid rinse. The degreaser has a 1.8 million Btu per hour liquid heater and 0.8 million Btu per hour dryer.

(6) Fugitive - steel blanking (die lubricant, rust prevention application).

(7) Two (2) paper blanking facilities, identified as M5001 and M5002, with a total capacity of 290 friction paper per hour, and 11,000 paper rings per hour. The particulate matter emissions from facilities are controlled by a cyclone (S/V- ID S9).

Existing Approvals

This emission source has been operating under FESOP 153-12504-00015, issued on November 2, 2000. The FESOP has since received the following revisions:

(a) Administrative Amendment 153-13814-00015, issued February 9, 2001, which moved equipment within the emission source.

(b) Administrative Amendment 153-18801-00015, issued April 19, 2004, which changed the authorized individual.

(c) Administrative Amendment 153-19535-00015, issued September 20, 2004, which again changed the authorized individual.

All conditions from previous approvals have been either incorporated as originally stated, revised, or deleted by this FESOP.

Enforcement Issues

There are no enforcement actions pending against this emission source.

Recommendation

The staff recommends to the Commissioner that the applicant be issued a FESOP renewal with signifint permit revision. This recommendation is based on the following facts and conditions:

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

An administratively complete application for a Significant Permit Revison was received on February 7, 2005. An administratively complete FESOP renewal application for the purposes of this review was received on February 8, 2005.

Emission Calculations

The applicant has requested that the exact chemical composition of their yarn saturant be kept as confidential information. Therefore, the emission calculations do not contain detailed calculations for yarn saturation line RM5020.

Appendix A gives a summary of emissions for the yarn saturation line. Appendix A of this document also gives detailed emission calculations regarding the revised adhesive coating line RM2002, the original calculations regarding adhesive coating lines M2003, M2028 and RM2002, and natural gas combustion calculations for the drying oven and for the revised source. (5 pages total.)

Unrestricted Potential Emissions

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

Pollutant	Unrestricted Potential Emissions (tons/yr)
PM	430.0
PM-10	430.0
SO_2	0.1
VOC	75.5
CO	8.3
NO_x	9.8

HAPs	Unrestricted Potential Emissions (tons/yr)
Methyl Ethyl Ketone	14.3
Methanol	2.8
Formaldehyde	0.3
Hydrochloric Acid	6.2
Total	23.6

This emission source is potentially subject to the provisions of 326 IAC 2-7 due to the following:

(a) Potential emissions of criteria pollutants are equal to or greater than 100 tons per year.

(b) Potential emissions of a single hazardous air pollutant (HAP) are equal to or greater than ten (10) tons per year; and

(c) Potential emissions of a combination of HAP are greater than or equal to twenty-five (25) tons per year.

The applicant has opted to remain a FESOP source. As a result, 326 IAC 2-8 will apply instead.

This existing source is not a major source for Prevention of Significant Deterioration, 326 IAC 2-2. No attainment regulated pollutant has the potential to emit at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories.

The revision's unrestricted potential emissions are as follows:

Pollutant	Unrestricted Potential Emissions (tons/yr)
PM	0.1
PM_{10}	0.1
SO_2	0.0
VOC	221.0
CO	0.7
NO_x	0.9

HAPs	Unrestricted Potential Emissions (tons/yr)
Methyl Ethyl Ketone	65.4
Toluene	114.3
Formaldehyde	2.9
Phenol	14.6
Total	195.7

The revision is classifiable as a significant permit revision under 326 IAC 2-8-11.1(f)(1). Potential emissions of PM, PM_{10} and VOC are equal to or greater than 25 tons per year. Potential emissions of a single hazardous air pollutant (HAP) are equal to or greater than ten (10) tons per year; and potential emissions of a combination of HAP are greater than or equal to twenty-five (25) tons per year.

Potential to Emit After Issuance

The source has opted to remain 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:

Emission Unit	PM	PM_{10}	SO2	NO_X	VOC	CO
RM2002	-	-	-	-	12.0	-
RM5020	-	-	-	-	0.3	-
M2003 & M2028	-	-	-	-	2.5	-
M2002 & M2007	0.3	0.3	-	-	-	-
M2048 & M2049	11.8	11.8	-	-		-
M2010.1 & M2010.2	9.5	9.5	-	-		-
Fuel Combustion Units	0.2	0.8	0.1	10.7	0.6	9.0
Total	21.8	22.4	0.1	10.7	15.4	9.0

Emission Unit	HAP#1	HAP#2	HAP#3	HAP#4	HAP#5	HAP#6	Total
RM2002	3.50	6.13	0.15	0.73	-	-	10.5
RM5020	0.18	-	0.01	0.05	-	-	0.2
M2003 & M2028	0.71	-	0.01	-	0.14	-	0.9
M2002 & M2007	-	-	-	-	-	0.3	0.3
M2048 & M2049	-	-	-	-	-	-	-
M2010.1 & M2010.2	-	-	-	-	-	-	-
Fuel Combustion Units	-	-	-	-	-	-	-
Total	4.4	6.1	0.2	0.8	0.1	0.3	11.9

HAP#1 = Methyl Ethyl Ketone
HAP#2 = Toluene
HAP#3 = Formaldehyde
HAP#4 = Phenol
HAP#5 = Methanol
HAP#6 = Hydrochloric Acid

The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single hazardous air pollutant (HAP) from this emission source is less than ten (10) tons per year.

County Attainment Status

The source is located in Sullivan County.

Pollutant	Status
PM_{10}	attainment
$PM_{2.5}$	attainment
SO_2	attainment
NO_2	attainment
Ozone (1-hour)	attainment
Ozone (8-hour)	attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) and nitrogen oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Sullivan County has been designated as attainment or unclassifiable for ozone and for all other pollutants. Therefore, VOC and NO_X emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) Sullivan County has been classified as attainment or unclassifiable for $PM_{2.5}$. U.S. EPA has not yet establied 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 PM_{10} emissions as surrogate for $PM_{2.5}$ emissions.

(c) Sullivan County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

See "State Rule Applicability – Entire Source" for more details regarding PSD applicabiliity.

Federal Rule Applicability

326 IAC 12 and 40 CFR 60 (New Source Performance Standards (NSPS))

There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR 60) included in this permit. 40 CFR 60.110, Subpart Kb "Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984" is not applicable to the storage tanks listed as insignificant activities since the capacities are each less than 75 cubic meters (19,183 gallons).

326 IAC 14 and 40 CFR 63 (National Emission Standards for Hazardous Air Pollutants (NESHAP))

There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR 63) included in this permit. 40 CFR 63.460, Subpart T "Halogenated Emission Standards for Halogenated Solvent Cleaning" is not applicable, since no halogenated solvents are used in the degreasing process.

State Rule Applicability – Entire Source

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

This existing source is not a major source for Prevention of Significant Deterioration, 326 IAC 2-2. No attainment regulated pollutant has the potential to emit at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories.

The revision is not a major modification for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 because the increase in potential to emit every attainment pollutant is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

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

This source is not subject to 326 IAC 2-4.1-1 (New Source Toxics Control). The source was existing as of July 27, 1997. Also, the source has limited emissions to less than 10 tons per year of any HAP and less than 25 tons per year of any combination of HAP.

326 IAC 2-6 (Emission Reporting)

This source is located in Sullivan County, and the potential to emit each criteria pollutant is less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 2-8 (Federally Enforceable State Operating Permit Program)

Emissions of PM, PM_{10} and VOC will be controlled to less than 100 tons per year, emissions of any single HAP will be controlled to less than 10 tons per year and the combination of HAP will be controlled to less than 25 tons per year, by federally enforceable requirements as follows:

(a) VOC and HAP emissions from adhesive coating lines RM2002, RM5020 and the new drying oven shall be controlled by catalytic incineration achieving a minimum overall reduction efficiency of 95%.

(b) VOC and HAP emissions from adhesive coating lines M2003 and M2028 and the new drying oven shall be controlled by catalytic incineration achieving a minimum overall reduction efficiency of 85%.

(c) PM and PM_{10} emissions from Opposed Disk Sanders M2010.1 and M2010.2 and Opposed Disk Grinders M2048 and M2049 shall be controlled by fabric filters achieving a control efficiency of 99%.

(d) The packed tower scrubber controlling etching lines M2002 and M2027 shall control hydrochloric acid mist emissions to 0.45 pounds per hour or less.

This source, after federally enforceable controls and limits, will not be subject to the provisions of 326 IAC 2-7, but will be instead subject to the provisions of 326 IAC 2-8.

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:

(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 – Adhesive Coating Line RM5020 and Drying Oven.

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

These emission units are subject to 326 IAC 8-2-9. Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) emissions from coating delivered to the applicator shall be limited to 3.5 pounds of VOC per gallon of coating, less water, for coatings that are air dried or forced warm air dried at temperatures up to ninety degrees Celsius (90°C) (one hundred ninety-four degrees Fahrenheit (194°F)).

326 IAC 8-2-9(f) is not applicable since there are no spray applicators. This coating line uses dip coating as the application method.

326 IAC 8-1-2 (Compliance Methods)

(a) Pursuant to 8-1-2(a)(2), the applicant shall comply with 326 IAC 8-2-9 by catalytic incineration.

(b) Pursuant to 326 IAC 8-1-2(b), VOC emissions shall be limited to no greater than the equivalent emissions, expressed as pounds of VOC per gallon of coating solids, determined by the following equation:

$$E = L / (1 – (L/D))$$

Where:
L = Applicable emission limit in pounds of VOC per gallon of coating.
D = Density of VOC in coating in pounds per gallon of VOC.
E = Equivalent limit in pounds of VOC per gallon of coating solids as applied.

A solvent density of 7.36 pounds of VOC per gallon shall be used to determine equivalent pounds of VOC per gallon of solids for the applicable emission limit. For an emission limit of 3.5 pounds of VOC per gallon of coating, this equation provides an equivalent emission limit of 6.67 pounds of VOC per gallon of solids.

(c) Pursuant to 326 IAC 8-1-2(c), the overall efficiency of the control device shall be no less than the equivalent calculated by the following equation:

$O = (V – E) / V * 100$

Where:
V = The actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content of all coatings, as applied to the subject coating line as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids as applied.
E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.
O = Equivalent overall efficiency of the capture system and control device as a percentage.

The overall efficiency of the capture system and control device shall be greater than 32.25%. See Appendix A for detailed calculations.

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

These emission units are not subject to 326 IAC 6-3. Surface coating using dip coating is expressly exempted under 326 IAC 6-3-1(b)(5).

State Rule Applicability – Adhesive Coating Line RM2002.

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

This emission unit is subject to 326 IAC 8-2-9. Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) emissions from coating delivered to the applicator shall be limited to 3.5 pounds of VOC per gallon of coating, less water, for coatings that are air dried or forced warm air dried at temperatures up to ninety degrees Celsius (90°C) (one hundred ninety-four degrees Fahrenheit (194°F)).

326 IAC 8-2-9(f) is not applicable since there are no spray applicators. This coating line uses flow coating as the application method.

326 IAC 8-1-2 (Compliance Methods)

(a) Pursuant to 8-1-2(a)(2), the applicant shall comply with 326 IAC 8-2-9 by catalytic incineration.

(b) Pursuant to 326 IAC 8-1-2(b), VOC emissions shall be limited to no greater than the equivalent emissions, expressed as pounds of VOC per gallon of coating solids, determined by the following equation:

$$E = L / (1 – (L/D))$$

Where:
L = Applicable emission limit in pounds of VOC per gallon of coating.
D = Density of VOC in coating in pounds per gallon of VOC.
E = Equivalent limit in pounds of VOC per gallon of coating solids as applied.

A solvent density of 7.36 pounds of VOC per gallon shall be used to determine equivalent pounds of VOC per gallon of solids for the applicable emission limit. For an emission limit of 3.5 pounds of VOC per gallon of coating, this equation provides an equivalent emission limit of 6.67 pounds of VOC per gallon of solids.

(c) Pursuant to 326 IAC 8-1-2(c), the overall efficiency of the control device shall be no less than the equivalent calculated by the following equation:

$$O = (V – E) / V * 100$$

Where:
V = The actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content of all coatings, as applied to the subject coating line as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids as applied.
E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.
O = Equivalent overall efficiency of the capture system and control device as a percentage.

The overall efficiency of the capture system and control device shall be greater than 81.34%. See Appendix A for detailed calculations.

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

This emission unit is not subject to 326 IAC 6-3. Surface coating using flow coating is expressly exempted under 326 IAC 6-3-1(b)(7).

State Rule Applicability – Adhesive Coating Lines M2003 and M2028

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

These emission units are subject to 326 IAC 8-2-9. Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) emissions from coating delivered to the applicator shall be limited to 3.0 pounds of VOC per gallon of coating, less water, for types of coatings not otherwise limited by the rule.

326 IAC 8-2-9(f) is not applicable since there are no spray applicators. These coating lines use roll coating as the application method.

326 IAC 8-1-2 (Compliance Methods)

(a) Pursuant to 8-1-2(a)(2), the applicant shall comply with 326 IAC 8-2-9 by catalytic incineration.

(b) Pursuant to 326 IAC 8-1-2(b), VOC emissions shall be limited to no greater than the equivalent emissions, expressed as pounds of VOC per gallon of coating solids, determined by the following equation:

E = L / (1 – (L/D))

Where:
L = Applicable emission limit in pounds of VOC per gallon of coating.
D = Density of VOC in coating in pounds per gallon of VOC.
E = Equivalent limit in pounds of VOC per gallon of coating solids as applied.

A solvent density of 7.36 pounds of VOC per gallon shall be used to determine equivalent pounds of VOC per gallon of solids for the applicable emission limit. For an emission limit of 3.0 pounds of VOC per gallon of coating, this equation provides an equivalent emission limit of 5.06 pounds of VOC per gallon of solids.

(c) Pursuant to 326 IAC 8-1-2(c), the overall efficiency of the capture system and control device shall be no less than the equivalent calculated by the following equation:

O = (V – E) / V * 100

Where:
V = The actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content of all coatings, as applied to the subject coating line as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids as applied.
E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.
O = Equivalent overall efficiency of the capture system and control device as a percentage.

The overall efficiency of the capture system and control device shall be greater than 84.93%. See Appendix A for detailed calculations.

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

These emission units are not subject to 326 IAC 6-3. Surface coating using roll coating is expressly exempted under 326 IAC 6-3-1(b)(6).

State Rule Applicability – Acid Etching Lines M2002 and M2027

326 IAC 6-3-2 (Particulate Emissions Limitations)

These emission units are subject to 326 IAC 6-3-2. Pursuant to 326 IAC 6-3-2 (Particulate Emissions Limitations), particulate matter (PM) emissions shall be limited by the following equation for process weight rates up to sixty thousand (60,000) pounds per hour:

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

For a process weight rate of 0.51 tons per hour, this equation provides an emission limit of 2.61 pounds per hour.

State Rule Applicability – Opposed Disk Sanders M2010.1 and M2010.2

326 IAC 6-3-2 (Particulate Emissions Limitations)

These emission units are subject to 326 IAC 6-3-2. Pursuant to 326 IAC 6-3-2 (Particulate Emissions Limitations), particulate matter (PM) emissions shall be limited by the following equation for process weight rates up to sixty thousand (60,000) pounds per hour:

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

For a process weight rate of 0.57 tons per hour, this equation provides an emission limit of 2.81 pounds per hour. The control equipment shall be in operation at all times this emission unit is in operation, in order to comply with this limit.

State Rule Applicability – Opposed Disk Grinders M2048 and M2049

326 IAC 6-3-2 (Particulate Emissions Limitations)

These emission units are subject to 326 IAC 6-3-2. Pursuant to 326 IAC 6-3-2 (Particulate Emissions Limitations), particulate matter (PM) emissions shall be limited by the following equation for process weight rates up to sixty thousand (60,000) pounds per hour:

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

For a process weight rate of 0.95 tons per hour, this equation provides an emission limit of 3.96 pounds per hour. The control equipment shall be in operation at all times this emission unit is in operation, in order to comply with this limit.

State Rule Applicability – Fuel Combustion Units

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

These emission units are not subject to 326 IAC 6-3. Manufacturing processes with potential emissions less than five hundred fifty-one thousandths (0.551) pound per hour are expressly exempted under 326 IAC 6-3-1(b)(14).

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, 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 approporiate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

(a) The catalytic oxidation units shall be in operation at all times when any emission unit or drying oven that it controls is in operation.

(b) A continuous monitoring system shall be installed and shall be operated at all times when a catalytic oxidation unit is in operation. The monitoring system shall continuously measure and record the operating temperature of the catalytic oxidation units.

(c) The applicant shall determine fan amperage or duct pressure from the most recent valid stack test that demonstrates compliance as approved by IDEM.

(d) The duct pressure or fan amperage shall be observed at least once per day when the catalytic oxidation units are operation. When for any one reading, the duct pressure or fan amperage is outside the normal range as established in most recent compliant stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A reading that is outside the range as established in the most recent compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports shall be considered a deviation from this permit.

(e) Compliance stack tests shall be performed for each of the two (2) catalytic oxidation units at least once every five (5) years. Compliance stack tests shall establish the operating temperature, fan amperage, and duct velocity that will correspond to the required minimum control efficiency. When operating, each catalytic oxidation unit shall be operated at or above the minimum operating temperature, duct velocity and fan amperage.

(f) Daily visible emission notations of the baghouse M2024 stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(1) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(2) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(3) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

(g) The Permittee shall record the total static pressure drop across baghouse M2024, at least once weekly when any of the disk grinders and sanders is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the range for any one reading.

(h) An inspection shall be performed each calendar quarter of all bags in baghouse M2024 when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.

These monitoring conditions are necessary to ensure compliance with 326 IAC 2-8 and to render 326 IAC 2-7 (Part 70 Permits) as not applicable.

Conclusion

The operation of this emission source shall be subject to the conditions of FESOP 153-20733-00015.

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

Company Name: Allomatic Products Company
Address City IN Zip: 609 E. Chaney Street, Sullivan IN 47882-7452
ID: 153-20733-00015
Reviewer: Allen R. Davidson
Date: 7/5/2005

Material	Density (Lb/Gal)	Weight % Volatile (H_20 & 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
Adhesive: PL606M	8.10	70.12%	0.00%	70.12%	0.00%	24.00%	0.07460	110	5.68	5.68	46.61	1118.59	204.14	0.00	23.67	100%
Solvent: Toluene	7.31	100.00%	0.00%	100.00%	0.00%	0.00%	0.01000	110	7.31	7.31	8.04	192.98	35.22	0.00	#DIV/0!	100%
Total for Friction Plates											54.65	1311.57	239.36	0.00		
Adhesive: PL700	7.60	73.55%	0.00%	73.55%	0.00%	22.00%	0.00560	625	5.59	5.59	19.56	469.54	85.69	0.00	25.41	100%
Solvent: Methyl Ethyl Ketone	6.72	100.00%	0.00%	100.00%	0.00%	0.00%	0.00190	625	6.72	6.72	7.98	191.52	34.95	0.00	#DIV/0!	100%
Total for Torque Rings											27.54	661.06	120.64	0.00		
State VOC and PM Potential Emissions											54.65	1311.57	239.36	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

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % HAP#1	Weight % HAP#2	Weight % HAP#3	Weight % HAP#4	Weight % HAP#5	Weight % HAP#6	Weight % HAP#7	Emissions HAP#1 (ton/yr)	Emissions HAP#2 (ton/yr)	Emissions HAP#3 (ton/yr)	Emissions HAP#4 (ton/yr)	Emissions HAP#5 (ton/yr)	Emissions HAP#6 (ton/yr)	Emissions HAP#7 (ton/yr)
Adhesive: PL606M	8.10	0.07460	110	30.00%	1.00%	5.00%	0.00%	0.00%	0.00%	0.00%	87.34	2.91	14.56	0.00	0.00	0.00	0.00
Solvent: Toluene	7.31	0.01000	110	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	35.22	0.00	0.00	0.00	0.00	0.00	0.00
Total for Friction Plates											122.56	2.91	14.56	0.00			
Adhesive: PL700	7.60	0.00560	625	0.00%	1.00%	5.00%	30.00%	0.00%	0.00%	0.00%	0.00	1.17	5.83	34.95	0.00	0.00	0.00
Solvent: Methyl Ethyl Ketone	6.72	0.00190	625	0.00%	0.00%	0.00%	100.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	34.95	0.00	0.00	0.00
Total for Torque Rings											0.00	1.17	5.83	69.90			
State HAP Potential Emissions									Uncontrolled: (ton/yr)		122.56	2.91	14.56	69.90		Total for all:	209.93
METHODOLOGY							After	95.0%	Control Efficiency: (ton/yr)		6.13	0.15	0.73	3.50		Total for all:	10.50

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

LEGEND

HAP#1 =	Toluene
HAP#2 =	Formaldehyde
HAP#3 =	Phenol
HAP#4 =	Methyl Ethyl Ketone
HAP#5 =	n/a
HAP#6 =	n/a
HAP#7 =	n/a

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

Company Name: Allomatic Products Company
Address City IN Zip: 609 E. Chaney Street, Sullivan IN 47882-7452
ID: 153-20733-00015
Reviewer: Allen R. Davidson
Date: 7/5/2005

Material	Density (Lb/Gal)	Weight % Volatile (H_20 & 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
Friction M2003/M2028																
R84048/Ethanol	7.5	76.00%	1.6%	74.4%	1.4%	16.60%	0.00020	10200.000	5.66	5.58	11.38	273.20	49.86	0.00	33.61	100%
Torque Ring RM2002																
PL700	7.7	70.00%	0.0%	70.0%	0.0%	21.20%	0.00353	300.000	5.39	5.39	5.71	136.99	25.00	0.00	25.42	100%
State VOC and PM Potential Emissions											17.09	410.19	74.86	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

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % HAP#1	Weight % HAP#2	Weight % HAP#3	Weight % HAP#4	Weight % HAP#5	Weight % HAP#6	Weight % HAP#7	Emissions HAP#1 (ton/yr)	Emissions HAP#2 (ton/yr)	Emissions HAP#3 (ton/yr)	Emissions HAP#4 (ton/yr)	Emissions HAP#5 (ton/yr)	Emissions HAP#6 (ton/yr)	Emissions HAP#7 (ton/yr)
Friction M2003/M2028																	
R84048/Ethanol	7.50	0.00020	10200	0.00%	4.23%	0.35%	0.00%	0.00%	0.00%	0.00%	0.00	2.83	0.23	0.00%	0.00%	0.00%	0.00%
Torque Ring RM2002																	
PL700	7.70	0.00353	300	40.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	14.29	0.00	0.00	0.00%	0.00%	0.00%	0.00%
State HAP Potential Emissions									Uncontrolled: (ton/yr)		14.29	2.83	0.23			Total for all:	17.36
METHODOLOGY							After	95.0%	Control Efficiency: (ton/yr)		0.71	0.14	0.01			Total for all:	0.87

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

LEGEND

HAP#1 = Methyl Ethyl Ketone
HAP#2 = Methanol
HAP#3 = Formaldehyde
HAP#4 = n/a
HAP#5 = n/a
HAP#6 = n/a
HAP#7 = n/a

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

Company Name: Allomatic Products Company
Address City IN Zip: 609 E. Chaney Street, Sullivan IN 47882-7452
ID: 153-20733-00015
Reviewer: Allen R. Davidson
Date: 7/5/2005

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
2.000	17.5

Pollutant

	PM*	PM10*	SO_2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.0	0.1	0.0	0.9	0.0	0.7

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

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

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	1.840E-05	1.051E-05	6.570E-04	1.577E-02	2.978E-05

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	4.380E-06	9.636E-06	1.226E-05	3.329E-06	1.840E-05

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

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
Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

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

Company Name: Allomatic Products Company
Address City IN Zip: 609 E. Chaney Street, Sullivan IN 47882-7452
ID: 153-20733-00015
Reviewer: Allen R. Davidson
Date: 7/5/2005

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
24.500	214.6

Pollutant

	PM*	PM10*	SO_2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.2	0.8	0.1	10.7	0.6	9.0

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

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

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	2.254E-04	1.288E-04	8.048E-03	1.932E-01	3.649E-04

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	5.366E-05	1.180E-04	1.502E-04	4.078E-05	2.254E-04

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

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
Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

Company Name: Allomatic Products Company
Address City IN Zip: 609 E. Chaney Street, Sullivan IN 47882-7452
ID: 153-20733-00015
Reviewer: Allen R. Davidson
Date: 7/5/2005

		VOC		HAP	
RM2002:	new estimate of uncontrolled potential =	239.36	ton/yr	209.93	ton/yr
	old estimate of uncontrolled potential =	25.00	ton/yr	14.2	ton/yr
	increase =	214.36	ton/yr	195.73	ton/yr

		VOC		HAP	
RM2002:	new estimate of PTE:				
= uncontrolled potential * (100% - 95.00%) =		11.97	ton/yr	10.50	ton/yr
	old estimate of PTE:				
= uncontrolled potential * (100% - 95.00%) =		1.25	ton/yr	0.71	ton/yr
	increase =	10.72	ton/yr	9.79	ton/yr

RM5020: estimate of uncontrolled potential:

VOC: 0.04 ton/yr / (100% - 99.40%) = 6.67 ton/yr

HAP:				
2%	of VOC as	Formaldehyde	0.13	ton/yr
15%	of VOC as	Phenol	1.00	ton/yr
53%	of VOC as	Methyl Ethyl Ketone	3.53	ton/yr
Total:			4.67	ton/yr

To maintain confidentiality, the actual HAP concentrations were not used.
The stated HAP concentrations should be considered as "worst-case" values.

RM5020: estimate of PTE:

6.67 ton/yr * (100% - 95.00%) = 0.33 ton/yr

2%	of VOC as	Formaldehyde	0.01	ton/yr
15%	of VOC as	Phenol	0.05	ton/yr
53%	of VOC as	Methyl Ethyl Ketone	0.18	ton/yr
Total:			0.23	ton/yr

Company Name: Allomatic Products Company
Address City IN Zip: 609 E. Chaney Street, Sullivan IN 47882-7452
ID: 153-20733-00015
Reviewer: Allen R. Davidson
Date: 7/5/2005

Calculation of emission limit equivalent to: 3.50 lb VOC/gal

$$E = \frac{3.5 \text{ lb VOC / gal}}{1 - \frac{3.5 \text{ lb VOC / gal}}{7.36 \text{ lb VOC / gal}}} = 6.67 \text{ lb VOC / gal solids}$$

Calculation of emission limit equivalent to: 3.50 lb VOC/gal

$$E = \frac{3.5 \text{ lb VOC / gal}}{1 - \frac{3.5 \text{ lb VOC / gal}}{7.36 \text{ lb VOC / gal}}} = 6.67 \text{ lb VOC / gal solids}$$

RM2002: Calculation of actual emissions as applied:

$$V = 23.67 * \frac{239.36}{204.14} = 27.75 \text{ lb VOC / gal solids for Friction Plates}$$

$$O = \frac{27.75 - 6.67}{27.75} * 100\% = 75.95\%$$

$$V = 25.41 * \frac{120.64}{85.69} = 35.77 \text{ lb VOC / gal solids for Torque Rings}$$

$$O = \frac{35.77 - 6.67}{35.77} * 100\% = 81.34\%$$

M2003/M2028: Calculation of actual emissions as applied:

$$V = 33.61 \text{ lb VOC / gal solids}$$

$$O = \frac{33.61 - 6.67}{33.61} * 100\% = 80.15\%$$

RM5020: Calculation of actual emissions as applied:

$$V = 9.85 \text{ lb VOC / gal solids}$$

$$O = \frac{9.85 - 6.67}{9.85} * 100 = 32.25\%$$