



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

TO: Interested Parties / Applicant
DATE: October 19, 2005
RE: Torque Traction / 085-21260-00033
FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Registration

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 4-21.5-3-4(d) this order is effective when it is served. When served by U.S. mail, the order is effective three (3) calendar days from the mailing of this notice pursuant to IC 4-21.5-3-2(e).

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days 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
FN-REGIS.dot 1/10/05



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Mitchell E. Daniels, Jr.
Governor

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Commissioner

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October 19, 2005

Kevin Harney, Plant Manager
Torque-Traction Manufacturing Technologies, Inc.
501 W. Railroad Avenue
Syracuse, IN 46567

Re: Registered Construction and Operation Status,
085-21260-00033

Dear Mr. Harney:

The application from Torque-Traction Manufacturing Technologies, Inc., received on June 2, 2005, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-5.5, it has been determined that the following stationary axle component distribution facility, located at 501 W. Railroad Avenue, Syracuse, Indiana 46567, is classified as registered:

- (a) One (1) natural gas-fired heated washer, identified as Washer #13, constructed in 1998, exhausting to Stack S56, heat input capacity: 0.300 million British thermal units per hour.
- (b) Three (3) natural gas-fired air makeup units, identified as Air Makeup Units #1 through #3, constructed in 1979, exhausting to Stacks S5, S8 and S39 respectively, heat input capacity: 5.00, 3.125 and 3.125 million British thermal units per hour, respectively.
- (c) Two (2) natural gas-fired air makeup units, identified as Air Makeup Units #4 and #5, constructed in 1986, exhausting to Stacks S10 and S11 respectively, heat input capacity: 5.00 million British thermal units per hour, each.
- (d) One (1) natural gas-fired air makeup unit, identified as Air Makeup Unit #6, constructed in 1970, exhausting to Stack S14, heat input capacity: 4.125 million British thermal units per hour.
- (e) One (1) natural gas-fired air makeup unit, identified as Air Makeup Unit #7, constructed in 1986, exhausting to Stack S40, heat input capacity: 5.00 million British thermal units per hour.
- (f) Three (3) natural gas-fired air makeup units, identified as Air Make Units #8 through #10, installed in 2000, exhausting to Sacks S52, S53 and S55 respectively, capacity: 4.800 million British thermal units per hour, each.
- (g) Two (2) natural gas-fired space heaters, identified as Space Heaters #1 and #2, constructed in 1990, exhausting to Stacks S3 and S4 respectively, heat input capacity: 0.200 million British thermal units per hour, each.
- (h) Two (2) natural gas-fired space heaters, identified as Space Heaters #3 and #22, constructed in 1995, exhausting to Stacks S37 and S38 respectively, heat input capacity: 0.250 and 0.125 million British thermal units per hour, respectively.

- (i) One (1) natural gas-fired space heater, identified as Space Heater #4, constructed in 1985, exhausting to Stack S43, heat input capacity: 0.125 million British thermal units per hour.
- (j) One (1) natural gas-fired space heater, identified as Space Heater #6, constructed in 1985, exhausting to Stack S44, heat input capacity: 0.125 million British thermal units per hour.
- (k) Two (2) natural gas-fired space heaters, identified as Space Heaters #7 and #8, constructed in 1990, exhausting to Stacks S21 and S22 respectively, heat input capacity: 0.240 and 0.225 million British thermal units per hour, respectively.
- (l) One (1) natural gas-fired space heater, identified as Space Heater #9, constructed in 1995, exhausting to Stack S45, heat input capacity: 0.150 million British thermal units per hour.
- (m) One (1) natural gas-fired space heater, identified as Space Heater #10, constructed in 1985, exhausting to Stack S23, heat input capacity: 0.200 million British thermal units per hour.
- (n) Three (3) natural gas-fired space heaters, identified as Space Heaters #11 through #13, constructed in 1996, exhausting to Stacks S49 through S51 respectively, heat input capacity: 0.200 million British thermal units per hour, each.
- (o) One (1) natural gas-fired space heater, identified as Space Heater #14, constructed in 1979, exhausting to Stack S1, heat input capacity: 0.180 million British thermal units per hour.
- (p) One (1) natural gas-fired space heater, identified as Space Heater #15, constructed in 1991, exhausting to Stack S2, heat input capacity: 0.250 million British thermal units per hour.
- (q) Three (3) natural gas-fired space heaters, identified as Space Heaters #16 through #18, constructed in 1991, exhausting to Stacks S9, S15 and S16 respectively, heat input capacity: 0.250 million British thermal units per hour, each.
- (r) One (1) natural gas-fired space heater, identified as Space Heater #19, constructed in 1991, exhausting to Stack S24, heat input capacity: 0.150 million British thermal units per hour.
- (s) Two (2) natural gas-fired space heaters, identified as Space Heaters #20 and #24, constructed in 1979, exhausting to Stacks S26 and S48 respectively, heat input capacity: 0.120 million British thermal units per hour, each.
- (t) One (1) natural gas-fired space heater, identified as Space Heater #21, constructed in 1991, exhausting to Stack S27, heat input capacity: 0.120 million British thermal units per hour.
- (u) One (1) natural gas-fired space heater, identified as Space Heater #23, constructed before 1977, exhausting to Stack S46, heat input capacity: 0.200 million British thermal units per hour.
- (v) One (1) natural gas-fired space heater, identified as Space Heater #25, constructed in 1998, exhausting to Stack S54, heat input capacity: 0.075 million British thermal units per hour.

- (w) One (1) natural gas-fired backup generator, heat input capacity: 0.100 million British thermal units per hour.
- (x) One (1) parts washer, installed after July 1, 1990, capacity: 0.150 gallons of cold cleaner per day.
- (y) One (1) gasoline storage tank, identified as T1, constructed in 1980, capacity: 2,000 gallons.
- (z) One (1) hydraulic oil storage tank, identified as T7, constructed in 1980, capacity: 10,000 gallons.
- (bb) One (1) cutting oil storage tank, identified as T8, constructed in 1980, capacity: 10,000 gallons.
- (cc) One (1) sulfuric acid storage tank, identified as T9, constructed in 1985, capacity: 10,000 gallons.
- (dd) One (1) magnesium hydroxide storage tank, identified as T10, constructed in 1985, capacity: 10,000 gallons.

The following conditions shall be applicable:

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 letter:
 - (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.
2. Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:
 - (a) equip the cleaner with a cover;
 - (b) equip the cleaner with a facility for draining cleaned parts;
 - (c) close the degreaser cover whenever parts are not being handled in the cleaner;
 - (d) drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
 - (e) provide a permanent, conspicuous label summarizing the operating requirements;
 - (f) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.
3. Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are

met:

- (a) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (1) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (2) The solvent is agitated; or
 - (3) The solvent is heated.
- (b) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
- (c) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
- (d) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
- (e) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (1) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (2) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (3) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (f) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
 - (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

- (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

In accordance with 326 IAC 2-1.1-9.5, this registration issued to this source shall supersede the requirements from all previous approvals. The source may operate according to 326 IAC 2-5.5.

An authorized individual shall provide an annual notice to the Office of Air Quality that the source is in operation and in compliance with this registration pursuant to 326 IAC 2-5.5-4(a)(3). The annual notice shall be submitted to:

**Compliance Data Section
Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204**

no later than March 1 of each year, with the annual notice being submitted in the format attached.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,
Original signed by

Nysa L. James, Section Chief
Permits Branch
Office of Air Quality

MSS/MES

cc: File - What County
Kosciusko County Health Department
Air Compliance - Doyle Houser
Northern Regional Office
Permit Tracking
Compliance Data Section
Office of Enforcement
Administrative & Development Section

Registration Annual Notification

This form should be used to comply with the notification requirements under 326 IAC 2-5.5-4(a)(3)

Company Name:	Torque-Traction Manufacturing Technologies, Inc.
Address:	501 W. Railroad Avenue
City:	Syracuse, IN 46567
Authorized individual:	Kevin Harney, Plant Manager
Phone #:	574-457-7728
Registration #:	R 085-21260-00033

I hereby certify that Torque-Traction Manufacturing Technologies, Inc. is still in operation and is in compliance with the requirements of Registration 085-21260-00033.

Name (typed):
Title:
Signature:
Date:

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

Technical Support Document (TSD) for a Registration

Source Background and Description

Source Name:	Torque-Traction Manufacturing Technologies, Inc.
Source Location:	501 W. Railroad Avenue, Syracuse, Indiana 46567
County:	Kosciusko
SIC Code:	3714
Operation Permit No.:	R 085-21260-00033
Permit Reviewer:	Michael S. Schaffer

The Office of Air Quality (OAQ) has reviewed an application from Torque-Traction Manufacturing Technologies, Inc. relating to the operation of a stationary axle component distribution facility.

History

Torque-Traction Manufacturing Technologies, Inc. was issued a Minor Source Operating Permit (MSOP) on January 24, 2000, which expired on January 24, 2005.

On June 2, 2005, Torque-Traction Manufacturing Technologies, Inc. submitted a letter to IDEM, OAQ stating that certain emissions units had been removed from service and requested guidance regarding the appropriate permit level for this source. On August 31, 2005, Torque-Traction Manufacturing Technologies, Inc. submitted additional information to IDEM, OAQ specifying which emission units were still in operation at their plant and that a registration under 326 IAC 2-5.1 would be required.

Permitted Emission Units and Pollution Control Equipment

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

- (a) One (1) natural gas-fired heated washer, identified as Washer #13, constructed in 1998, exhausting to Stack S56, heat input capacity: 0.300 million British thermal units per hour.
- (b) Three (3) natural gas-fired air makeup units, identified as Air Makeup Units #1 through #3, constructed in 1979, exhausting to Stacks S5, S8 and S39 respectively, heat input capacity: 5.00, 3.125 and 3.125 million British thermal units per hour, respectively.
- (c) Two (2) natural gas-fired air makeup units, identified as Air Makeup Units #4 and #5, constructed in 1986, exhausting to Stacks S10 and S11 respectively, heat input capacity: 5.00 million British thermal units per hour, each.
- (d) One (1) natural gas-fired air makeup unit, identified as Air Makeup Unit #6, constructed in 1970, exhausting to Stack S14, heat input capacity: 4.125 million British thermal units per hour.
- (e) One (1) natural gas-fired air makeup unit, identified as Air Makeup Unit #7, constructed in 1986, exhausting to Stack S40, heat input capacity: 5.00 million British thermal units per hour.

- (f) Three (3) natural gas-fired air makeup units, identified as Air Make Units #8 through #10, installed in 2000, exhausting to Sacks S52, S53 and S55 respectively, capacity: 4.800 million British thermal units per hour, each.
- (g) Two (2) natural gas-fired space heaters, identified as Space Heaters #1 and #2, constructed in 1990, exhausting to Stacks S3 and S4 respectively, heat input capacity: 0.200 million British thermal units per hour, each.
- (h) Two (2) natural gas-fired space heaters, identified as Space Heaters #3 and #22, constructed in 1995, exhausting to Stacks S37 and S38 respectively, heat input capacity: 0.250 and 0.125 million British thermal units per hour, respectively.
- (i) One (1) natural gas-fired space heater, identified as Space Heater #4, constructed in 1985, exhausting to Stack S43, heat input capacity: 0.125 million British thermal units per hour.
- (j) One (1) natural gas-fired space heater, identified as Space Heater #6, constructed in 1985, exhausting to Stack S44, heat input capacity: 0.125 million British thermal units per hour.
- (k) Two (2) natural gas-fired space heaters, identified as Space Heaters #7 and #8, constructed in 1990, exhausting to Stacks S21 and S22 respectively, heat input capacity: 0.240 and 0.225 million British thermal units per hour, respectively.
- (l) One (1) natural gas-fired space heater, identified as Space Heater #9, constructed in 1995, exhausting to Stack S45, heat input capacity: 0.150 million British thermal units per hour.
- (m) One (1) natural gas-fired space heater, identified as Space Heater #10, constructed in 1985, exhausting to Stack S23, heat input capacity: 0.200 million British thermal units per hour.
- (n) Three (3) natural gas-fired space heaters, identified as Space Heaters #11 through #13, constructed in 1996, exhausting to Stacks S49 through S51 respectively, heat input capacity: 0.200 million British thermal units per hour, each.
- (o) One (1) natural gas-fired space heater, identified as Space Heater #14, constructed in 1979, exhausting to Stack S1, heat input capacity: 0.180 million British thermal units per hour.
- (p) One (1) natural gas-fired space heater, identified as Space Heater #15, constructed in 1991, exhausting to Stack S2, heat input capacity: 0.250 million British thermal units per hour.
- (q) Three (3) natural gas-fired space heaters, identified as Space Heaters #16 through #18, constructed in 1991, exhausting to Stacks S9, S15 and S16 respectively, heat input capacity: 0.250 million British thermal units per hour, each.
- (r) One (1) natural gas-fired space heater, identified as Space Heater #19, constructed in 1991, exhausting to Stack S24, heat input capacity: 0.150 million British thermal units per hour.
- (s) Two (2) natural gas-fired space heaters, identified as Space Heaters #20 and #24, constructed in 1979, exhausting to Stacks S26 and S48 respectively, heat input capacity: 0.120 million British thermal units per hour, each.

- (t) One (1) natural gas-fired space heater, identified as Space Heater #21, constructed in 1991, exhausting to Stack S27, heat input capacity: 0.120 million British thermal units per hour.
- (u) One (1) natural gas-fired space heater, identified as Space Heater #23, constructed before 1977, exhausting to Stack S46, heat input capacity: 0.200 million British thermal units per hour.
- (v) One (1) natural gas-fired space heater, identified as Space Heater #25, constructed in 1998, exhausting to Stack S54, heat input capacity: 0.075 million British thermal units per hour.
- (w) One (1) natural gas-fired backup generator, heat input capacity: 0.100 million British thermal units per hour.
- (x) One (1) parts washer, installed after July 1, 1990, capacity: 0.150 gallons of cold cleaner per day.
- (y) One (1) gasoline storage tank, identified as T1, constructed in 1980, capacity: 2,000 gallons.
- (z) One (1) hydraulic oil storage tank, identified as T7, constructed in 1980, capacity: 10,000 gallons.
- (aa) One (1) cutting oil storage tank, identified as T8, constructed in 1980, capacity: 10,000 gallons.
- (bb) One (1) sulfuric acid storage tank, identified as T9, constructed in 1985, capacity: 10,000 gallons.
- (cc) One (1) magnesium hydroxide storage tank, identified as T10, constructed in 1985, capacity: 10,000 gallons.

Unpermitted Emission Units and Pollution Control Equipment

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

Existing Approvals

The source operating under previous approvals including, but not limited to, the following:

- (a) MSOP 085-10675-00033, issued on January 24, 2000, expired on January 24, 2005;
- (b) First Notice Only Change 085-12066-00033, issued on May 15, 2000; and
- (c) Second Notice Only Change 085-12009-00033, issued on October 3, 2000.

All conditions from the previous approvals are no longer applicable since the source never applied for an operating permit renewal and most of the process equipment from this source has been removed from service. This registration shall serve as a new operating approval for this source.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temperature (°F)
S56	Washer #13	26.0	0.83	62.0	450
S5	Air Makeup Unit #1	27.0	1.00	83.0	450
S8	Air Makeup Unit #2	32.5	1.00	52.0	450
S39	Air Makeup Unit #3	28.0	1.00	52.0	450
S10	Air Makeup Unit #4	20.0	Not Provided	84.0	450
S11	Air Makeup Unit #5	20.0	Not Provided	84.0	450
S14	Air Makeup Unit #6	11.0	Not Provided	69.0	450
S40	Air Makeup Unit #7	35.0	1.00	84.0	450
S52	Air Makeup Unit #8	20.0	Not Provided	84.0	450
S53	Air Makeup Unit #9	20.0	Not Provided	84.0	450
S55	Air Makeup Unit #10	20.0	Not Provided	84.0	450
S3	Space Heater #1	24.0	0.67	3.40	450
S4	Space Heater #2	24.0	0.67	3.40	450
S37	Space Heater #3	28.0	0.41	4.20	450
S38	Space Heater #22	28.0	0.41	4.20	450
S43	Space Heater #4	28.0	0.41	4.20	450
S44	Space Heater #6	28.0	0.41	4.20	450
S21	Space Heater #7	28.0	0.50	1.13	450
S22	Space Heater #8	28.0	0.67	4.20	450
S45	Space Heater #9	28.0	0.34	2.50	450
S23	Space Heater #10	28.0	0.67	3.40	450
S49	Space Heater #11	27.0	0.67	60.0	450
S50	Space Heater #12	27.0	0.67	60.0	450
S51	Space Heater #13	27.0	0.67	60.0	450
S1	Space Heater #14	20.0	Not Provided	4.20	450
S2	Space Heater #15	20.0	Not Provided	4.20	450
S9	Space Heater #16	20.0	Not Provided	4.20	450
S15	Space Heater #17	20.0	Not Provided	4.20	450
S16	Space Heater #18	20.0	Not Provided	4.20	450

Stack ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temperature (°F)
S24	Space Heater #19	28.0	0.34	2.50	450
S26	Space Heater #20	25.0	Not Provided	2.50	450
S48	Space Heater #24	25.0	Not Provided	2.50	450
S27	Space Heater #21	25.0	Not Provided	2.50	450
S46	Space Heater #23	14.0	1.00	3.40	450
S54	Space Heater #25	30.0	0.30	48.0	450

Recommendation

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

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

A complete application for the purposes of this review was received on June 2, 2005. Additional information was received on September 27, 2005

Emission Calculations

See Pages 1 through 3 of 3 in Appendix A of this document for detailed emission calculations

Potential to Emit of the Source Before Controls

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

Pollutant	Potential to Emit (tons/yr)
PM	0.413
PM ₁₀	1.65
SO ₂	0.130
VOC	1.74
CO	18.2
NO _x	21.7

HAPs	Potential to Emit (tons/yr)
Benzene	0.0005
Dichlorobenzene	0.0003
Formaldehyde	0.016
Hexane	0.391
Toluene	0.0007
Lead	0.0001
Cadmium	0.0002
Chromium	0.0003
Manganese	0.00008
Nickel	0.0005
Total	0.410

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of NO_x is less than twenty-five (25) tons per year, but greater than ten (10) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-5.5. A registration will be issued.
- (b) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

County Attainment Status

The source is located in Kosciusko County.

Pollutant	Status
PM _{2.5}	attainment
PM ₁₀	attainment
SO ₂	attainment
NO ₂	attainment
1-Hour Ozone	attainment
8-Hour Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and nitrogen oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are con-

sidered when evaluating the rule applicability relating to ozone. Kosciusko County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability - Entire Source section of this document.

- (b) Kosciusko County has been classified as unclassifiable or attainment for PM_{2.5}. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM_{2.5} emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM_{2.5} emissions, it has directed states to regulate PM₁₀ emissions as a surrogate for PM_{2.5} emissions. See the State Rule Applicability - Entire Source section of this document.
- (c) Kosciusko County has been classified as attainment or unclassifiable in Indiana for PM₁₀, SO₂, CO, lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability - Entire Source section of this document.

Source Status

Existing Source PSD, Part 70, or FESOP Definition (emissions after controls, based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/yr)
PM	0.413
PM ₁₀	1.65
SO ₂	0.130
VOC	1.74
CO	18.2
NO _x	21.7
Single HAP	0.391
Combination HAPs	0.410

- (a) This existing source is **not** a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories.
- (b) The emissions were based on information provided in Pages 1 through 3 of 3 in Appendix A of this document and the information for the source-wide storage tank potential VOC emissions provided on Page 8 of 12 in the TSD to MSOP 085-10675-00033, issued on January 24, 2000.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from this permit R 085-21260-00033, is still not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) criteria pollutant is less than 100 tons per year,
- (b) single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) combination of HAPs is less than 25 tons per year.

This status is based on all the air approvals issued to the source. This status has been verified by the OAQ inspector assigned to the source.

Federal Rule Applicability

- (a) The requirements of the New Source Performance Standards, 326 IAC 12 (40 CFR 60, Subparts K, Ka, and Kb), are not included in the permit for this source because the storage capacities of the eight (8) storage tanks, identified as T1 and T7 though T10, are each less than 75 cubic meters (19,813 gallons).
- (d) The requirements of 40 CFR 63, Subpart T, National Emissions Standards for Hazardous Air Pollutants for Halogenated Solvent Cleaning, are not included in the permit for this source. The one (1) parts washers, does not use any halogenated solvents.
- (c) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 20 and 40 CFR Part 61, 63) included in the permit for this source.

State Rule Applicability – Entire Source

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

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

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

The operation of the entire source will emit less than ten (10) tons per year of a single HAP and twenty-five (25) tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply to any emission unit at this source.

326 IAC 2-6 (Emission Reporting)

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

326 IAC 5-1 (Opacity Limitations)

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

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

State Rule Applicability – Individual Facilities

326 IAC 8-3-2 (Cold Cleaner Operations)

The one (1) parts washer uses organic solvents in a cold cleaning operation to clean axle component parts. Since the washer was constructed after January 1, 1980, the washer is subject to the requirements 326 IAC 8-3-2 as follows:

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

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

326 IAC 8-3-5(Cold Cleaner Degreaser Operation and Control)

Since the one (1) parts washer was constructed after January 1, 1990, and does not have a remote solvent reservoir, the washer is also subject to the requirements of 326 IAC 8-3-5 as follows.

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications

where an internal type cannot fit into the cleaning system.

- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

326 IAC 8-4-3 (Petroleum liquid storage facilities)

The storage capacities of the eight (8) storage tanks, identified as T1, T3 through T5, and T7 though T10, are each less than 35,000 gallons. Therefore, the requirements of 326 IAC 8-4-3 are not applicable to these storage tanks.

Conclusion

The operation of this stationary axle component distribution facility shall be subject to the conditions of the Registration 085-21260-00033.

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

<u>Emission Unit</u>	<u>Rating (mmBtu/hr)</u>
Washer 13	0.300
Air Makeup Unit 1 - 3	11.25
Air Makeup Units 4 and 5	10.0
Air Makeup Unit 6	4.125
Air Makeup Unit 7	5.00
Air Makeup Units 8 - 10	14.4
Space Heaters 1 and 2	0.400
Space Heaters 3 and 22	0.375
Space Heater 4	0.125
Space Heater 6	0.125
Space Heaters 7 and 8	0.465
Space Heater 9	0.150
Space Heater 10	0.200
Space Heaters 11 - 13	0.600
Space Heater 14	0.180
Space Heater 15	0.250
Space Heaters 16 - 18	0.750
Space Heater 19	0.150
Space Heaters 20 and 24	0.240
Space Heater 21	0.120
Space Heater 23	0.200
Space Heater 25	0.075
Backup Generator	0.100
Total	49.58

Company Name: Torque-Traction Manufacturing Technologies, Inc.
Address City IN Zip: 501 West Railroad Avenue, Syracuse, Indiana 46567
Permit Number: R 085-21260
Plt ID: 085-00033
Reviewer: Michael S. Schaffer
Application Date: June 2, 2005

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
49.58	434

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx 100 **see below	VOC	CO
Potential Emission in tons/yr	0.413	1.65	0.130	21.7	1.19	18.2

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
 **Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

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

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

Company Name: Torque-Traction Manufacturing Technologies, Inc.
Address City IN Zip: 501 West Railroad Avenue, Syracuse, Indiana 46567
Permit Number: R 085-21260
Plt ID: 085-00033
Reviewer: Michael S. Schaffer
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HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 0.00210	Dichlorobenzene 0.00120	Formaldehyde 0.07500	Hexane 1.80000	Toluene 0.00340
Potential Emission in tons/yr	0.0005	0.0003	0.016	0.391	0.0007

HAPs - Metals						
Emission Factor in lb/MMcf	Lead 0.0005	Cadmium 0.0011	Chromium 0.0014	Manganese 0.0004	Nickel 0.0021	Total
Potential Emission in tons/yr	0.00011	0.0002	0.0003	0.00008	0.0005	0.410

Methodology is the same as page 1.

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

**Appendix A: Emission Calculations
Cold Cleaning**

Company Name: Torque-Traction Manufacturing Technologies, Inc.
Address City IN Zip: 501 West Railroad Avenue, Syracuse, Indiana 46567
Permit Number: R 085-21260
Plt ID: 085-00033
Reviewer: Michael S. Schaffer
Application Date: June 2, 2005

Material	Usage (gal/day)	Density (lbs/gal)	Weight % VOC	VOC Emissions (tons/yr)
Parts Washer				
Material	0.1507	6.42	100%	0.177

Methodology

VOC emissions (tons/yr) = Usage (gal/day) x Density (lbs/gal) x Weight % VOC x 365 days/yr / 2,000 lbs/ton