



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 17, 2005
RE: Carlisle Industrial Brake and Friction / 017-21262-00021
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



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

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

**Carlisle Industrial Brake and Friction
1441 Holland Street
Logansport, Indiana 46947**

(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.: F017-21262-00021	
Issued by: Original signed by Paul Dubenetzky, Acting Assistant Commissioner Permits Branch Office of Air Quality	Issuance Date: October 17, 2005 Expiration Date: October 17, 2010

TABLE OF CONTENTS

SECTION A	SOURCE SUMMARY	4
A.1	General Information [326 IAC 2-8-3(b)]	
A.2	Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]	
A.3	Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]	
A.4	FESOP Applicability [326 IAC 2-8-2]	
A.5	Prior Permits Superseded [326 IAC 2-1.1-9.5]	
SECTION B	GENERAL CONDITIONS	7
B.1	Permit No Defense [IC 13]	
B.2	Definitions [326 IAC 2-8-1]	
B.3	Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5]	
B.4	Enforceability [326 IAC 2-8-6]	
B.5	Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]	
B.6	Severability [326 IAC 2-8-4(4)]	
B.7	Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]	
B.8	Duty to Provide Information[326 IAC 2-8-4(5)(E)]	
B.9	Compliance Order Issuance [326 IAC 2-8-5(b)]	
B.10	Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]	
B.11	Annual Compliance Certification [326 IAC 2-8-5(a)(1)]	
B.12	Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]	
B.13	Emergency Provisions [326 IAC 2-8-12]	
B.14	Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]	
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]	
B.16	Permit Renewal [326 IAC 2-8-3(h)]	
B.17	Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]	
B.18	Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]	
B.19	Permit Revision Requirement [326 IAC 2-8-11.1]	
B.20	Inspection and Entry [326 IAC 2-8-5(a)(2)][IC13-14-2-2][IC 13-17-3-2][IC13-30-3-1]	
B.21	Transfer of Ownership or Operational Control [326 IAC 2-8-10]	
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]	
B.23	Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314][326 IAC 1-1-6]	
SECTION C	SOURCE OPERATION CONDITIONS	16
	Emission Limitations and Standards [326 IAC 2-8-4(1)]	
C.1	Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]	
C.2	Overall Source Limit [326 IAC 2-8]	
C.3	Opacity [326 IAC 5-1]	
C.4	Open Burning [326 IAC 4-1][IC 13-17-9]	
C.5	Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]	
C.6	Fugitive Dust Emissions [326 IAC 6-4]	
C.7	Operation of Equipment [326 IAC 2-8-5(a)(4)]	
C.8	Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61 Subpart M]	
	Testing Requirements [326 IAC 2-8-4(3)]	
C.9	Performance Testing [326 IAC 3-6]	
	Compliance Requirements [326 IAC 2-1.1-11]	
C.10	Compliance Requirements [326 IAC 2-1.1-11]	

TABLE OF CONTENTS (Continued)

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

C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

C.12 Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5]

C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]
[326 IAC 2-8-5]

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

C.15 General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]

C.16 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

Stratospheric Ozone Protection

C.17 Compliance with 40 CFR 82 and 326 IAC 22-1

SECTION D.1 FACILITY OPERATION CONDITIONS..... 22

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

D.1.1 (Particulate Emissions Limitations for Sources of Indirect Heating) [326 IAC 6-2-3]

SECTION D.2 FACILITY OPERATION CONDITIONS..... 23

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

D.2.1 FESOP [326 IAC 2-8-4]

D.2.2 Volatile Organic Compounds (VOC) [326 IAC 8-6]

D.2.3 Volatile Organic Compound (VOC) [326 IAC 8-1-6]

D.2.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

Compliance Determination Requirements

D.2.5 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants [326 IAC 8-1-2][326 IAC 8-1-4]

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

D.2.6 Record Keeping Requirements

D.2.7 Reporting Requirements

SECTION D.3 FACILITY OPERATION CONDITIONS..... 26

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

D.3.1 Particulate Emission Limitations [326 IAC 6-3]

Compliance Determination Requirements

D.3.2 Particulate Control

Certification Form 27

Emergency Occurrence Form 28

Quarterly Report Forms 30-34

Quarterly Deviation and Compliance Monitoring Report Form 35

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

The Permittee owns and operates a stationary friction materials manufacturing plant.

Authorized individual:	Director of Operations
Source Address:	1441 Holland Street, Logansport, Indiana 46947
Mailing Address:	1441 Holland Street, Logansport, Indiana 46947
General Source Phone:	(574) 753-6391
SIC Code:	3292, 3299
Source Location Status:	Cass County
	Attainment for all criteria pollutants
	Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP)
	Minor Source, under PSD Rules;
	Minor Source, Section 112 of the Clean Air Act
	Not 1 of 28 Source Categories

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

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

- (a) One (1) natural gas fired boiler, constructed in 1972, identified as B-1, with a maximum capacity of 20.9 MMBtu per hour, and exhausting to stack B-1.
- (b) One (1) natural gas fired boiler, constructed in 1975, identified as B-2, with a maximum capacity of 16.7 MMBtu per hour, and exhausting to stack B-2.
- (c) One (1) extrusion operations area, constructed in 1975, with a maximum capacity of 210 pounds per hour of non-asbestos brake pads and clutch linkings, equipped with three (3) extruders, collectively identified as EU-01, exhausting through stacks 202, 203 and 204, and six (6) steam heated dry-out ovens (using steam generated by boilers B-1 and B-2), collectively identified as EU-02, exhausting through stacks 213, 214, 215, 216, 217 and 218.
- (d) One (1) adhesive application area, identified as EU-03, with a maximum capacity of 810 pounds of brake parts per hour, consisting of the following operations:
 - (1) One (1) adhesive spray booth, constructed in 1975, for applying adhesive to non-metallic friction materials with low pressure spray application techniques, with a maximum capacity of 1.2 pounds of VOC per hour, with emissions exhausting to stack 209.
 - (2) Two (2) roll coating machines, identified as 110 and 111, constructed in 1975, for applying adhesives to non-metallic friction materials with rolling application techniques, with a maximum capacity of 3.3 pounds of VOC per hour, with emissions exhausting to stacks 210 and 211, respectively.
 - (3) One (1) roll coating machine, identified as RC-1, constructed in 1998, for applying adhesives to non-metallic friction materials with rolling application techniques, with a maximum capacity of 6.8 pounds of VOC per hour, with emissions exhausting to stack 212.

- (4) One dipcoater, constructed in 1975, for applying adhesives to the metal backings of brake parts, using dip application techniques, with a maximum capacity of less than 2.1 pounds of VOC per hour, with emissions exhausting inside the building. This emission unit is an insignificant activity.
- (5) One (1) hand roll coater, constructed in 1994, for applying adhesives to the metal backings of brake parts, using hand rolling application techniques, with a maximum capacity of less than 0.2 pounds of VOC per hour, with emissions exhausting inside the building. This emission unit is an insignificant activity.

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

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

- (a) Activities with emissions equal to or less than 5 pounds per hour or 25 pounds per day of PM10 and PM, including:
 - (1) One (1) dry sander, identified as S-6, constructed in 1994, having a maximum process weight of 360 pounds of paper or 80 pounds of cork per hour with particulate emissions controlled by baghouse BH-7. [326 IAC 6-3-2]
 - (2) Two (2) horizontal mills, identified as HM-1 and HM-2, constructed in 1994, each having a maximum process weight of 21.6 pounds of paper or 4.8 pounds of cork per hour, with particulate emissions controlled by baghouse BH-7. [326 IAC 6-3-2]
 - (3) Grinding, sawing, sanding, routing, milling and pressing operations, each with a maximum process weight of 360 pounds per hour, with particulate emissions controlled by six bag filters (BH-1 through BH-6). [326 IAC 6-3-2]
- (b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-3-2]
- (c) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
- (d) Natural gas-fired combustion sources with heat input equal to or less than ten (10) MMBtu/hr; including one (1) 0.65 MMBtu per hour, natural gas fired oven identified as OV-19.
- (e) Propane or liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than six (6) MMBtu/hr.
- (f) A petroleum fuel, other than 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.
- (g) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;
- (h) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
- (i) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (l) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (j) Heat exchanger and repair.

- (k) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any product process.
- (l) Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling tower.
- (m) A laboratory as defined in 326 IAC 2-7-1(21)(D).
- (n) Two (2) fixed-roof, above ground storage tanks, each with a capacity of 10,500 gallons and used to store VOC.

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

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

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

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

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

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

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

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

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

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

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

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

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

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

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

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

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

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1 when furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

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

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

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

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This

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

- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

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

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

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

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

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

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

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

The PMP extension notification does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.13 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, 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
Indianapolis, Indiana 46204

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

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

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
 - (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
 - (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
 - (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

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

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

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

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

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

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

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

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

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

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

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

Request for renewal shall be submitted to:

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

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

- (1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

- (2) If IDEM, OAQ upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

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

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

Any such application shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

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

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

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

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

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

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

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

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

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC13-30-3-1]

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

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

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

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

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

- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 Overall Source Limit [326 IAC 2-8]

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

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also satisfy the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-3 (Emission Offset) not applicable;
- (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 the emission units vented to the control equipment are in operation.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The

notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

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

C.9 Performance Testing [326 IAC 3-6]

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

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

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

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

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ, not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

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

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

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

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

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

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

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

C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

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

C.15 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring

sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.16 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 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 Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) The first report covered the period commencing on the date of issuance of the original FESOP and ended on the last day of the reporting period. All subsequent reporting periods shall be based on calendar years, unless otherwise specified 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.17 Compliance with 40 CFR 82 and 326 IAC 22-1

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

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

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

- (a) One (1) natural gas fired boiler, constructed in 1972, identified as B-1, with a maximum capacity of 20.9 MMBtu per hour, and exhausting to stack B-1.
- (b) One (1) natural gas fired boiler, constructed in 1975, identified as B-2, with a maximum capacity of 16.7 MMBtu per hour, and exhausting to stack B-2.

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

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

D.1.1 (Particulate Emissions Limitations for Sources of Indirect Heating) [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3(e), particulate emissions from indirect heating (Boilers B-1 and B-2) shall be limited to 0.6 pounds per MMBtu heat input.

SECTION D.2

FACILITY OPERATION CONDITIONS

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

- (c) One (1) extrusion operations area, constructed in 1975, with a maximum capacity of 210 pounds per hour of non-asbestos brake pads and clutch linkings, equipped with three (3) extruders, collectively identified as EU-01, exhausting through stacks 202, 203 and 204, and six (6) steam heated dry-out ovens (using steam generated by boilers B-1 and B-2), collectively identified as EU-02, exhausting through stacks 213, 214, 215, 216, 217 and 218.
- (d) One (1) adhesive application area, identified as EU-03, with a maximum capacity of 810 pounds of brake parts per hour, consisting of the following operations:
 - (1) One (1) adhesive spray booth, constructed in 1975, for applying adhesive to non-metallic friction materials with low pressure spray application techniques, with a maximum capacity of 1.2 pounds of VOC per hour, with emissions exhausting to stack 209.
 - (2) Two (2) roll coating machines, identified as 110 and 111, constructed in 1975, for applying adhesives to non-metallic friction materials with rolling application techniques, with a maximum capacity of 3.3 pounds of VOC per hour, with emissions exhausting to stacks 210 and 211, respectively.
 - (3) One (1) roll coating machine, identified as RC-1, constructed in 1998, for applying adhesives to non-metallic friction materials with rolling application techniques, with a maximum capacity of 6.8 pounds of VOC per hour, with emissions exhausting to stack 212.
 - (4) One dipcoater, constructed in 1975, for applying adhesives to the metal backings of brake parts, using dip application techniques, with a maximum capacity of less than 2.1 pounds of VOC per hour, with emissions exhausting inside the building. This emission unit is an insignificant activity.
 - (5) One (1) hand roll coater, constructed in 1994, for applying adhesives to the metal backings of brake parts, using hand rolling application techniques, with a maximum capacity of less than 0.2 pounds of VOC per hour, with emissions exhausting inside the building. This emission unit is an insignificant activity.

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

D.2.1 FESOP [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4, the Permittee shall limit the usage of VOC and HAP as follows:

- (a) The total VOC delivered to the extrusion operations area (EU-01) and the adhesive application operations (EU-03), including cleanup solvents, shall be limited to less than ninety-nine (99) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) The total single HAP delivered to the extrusion operations area (EU-01) and the adhesive application operations (EU-03), including cleanup solvents, shall be limited to less than nine and six-tenths (9.6) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (c) The total HAPs delivered to the extrusion operations area (EU-01) and the adhesive application operations (EU-03), including cleanup solvents, shall be limited to less than twenty-four and six tenths (24.6) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Combined with VOC and HAP emissions from other emission units at this source, these limits will ensure that source-wide emissions of VOC, a single HAP, and any combination of HAPs do not exceed one-hundred (100), ten (10), and twenty-five (25) tons per year, respectively. Therefore, the requirements of 326 IAC 2-7, 40 CFR 63, Subpart QQQQQ, 40 CFR 63, Subpart DDDDD, and 40 CFR 63, Subpart MMMM do not apply.

D.2.2 Volatile Organic Compounds (VOC) [326 IAC 8-6]

Pursuant to T017-7737-00021, issued on November 16, 2000, the usage of VOC at the extrusion operations shall be limited to less than 100 tons per twelve (12) month consecutive period, with compliance determined at the end of each month. Therefore, the requirements of 326 IAC 8-6 do not apply to the extrusion operations area (EU-01).

D.2.3 Volatile Organic Compound (VOC) [326 IAC 8-1-6]

The usage of volatile organic compounds (VOC) at the Roll Coater (RC-1) facility shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Therefore, the requirements of 326 IAC 8-1-6 do not apply.

D.2.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.2.5 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants [326 IAC 8-1-2][326 IAC 8-1-4]

Compliance with the VOC and HAP usage and content limitations contained in Conditions D.2.1, D.2.2, and D.2.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC and HAP data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.2.6 Record Keeping Requirements

- (a) To document compliance with Conditions D.2.1 and D.2.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits established in Conditions D.2.1 and D.2.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The amount, VOC content and HAP content of each extrusion material, adhesive and solvent used on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (2) The total VOC usage for each month.
 - (3) The total single HAP usage for each month.
 - (4) The total usage of a combination of HAPs for each month.
 - (5) The weight of VOCs and HAPs emitted for each compliance period.
- (b) To document compliance with Condition D.2.3, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits established in Condition D.2.3 for the roll coating machine (RC-1).

- (1) The amount and VOC content of each adhesive and solvent used in roll coating machine RC-1, less water, on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (2) The total VOC usage for each month; and
 - (3) The weight of VOCs emitted for each compliance period.
- (c) In order to document compliance with Condition D.2.4, the Permittee shall maintain records of the inspections prescribed by the Preventative Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.7 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.2.1, D.2.2, and D.2.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.3 FACILITY OPERATION CONDITIONS

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

Insignificant Activities:

- (a) Activities with emissions equal to or less than 5 pounds per hour or 25 pounds per day of PM₁₀ and PM, including:
- (1) One (1) dry sander, identified as S-6, constructed in 1994, having a maximum process weight of 360 pounds of paper or 80 pounds of cork per hour with particulate emissions controlled by baghouse BH-7. [326 IAC 6-3-2]
 - (2) Two (2) horizontal mills, identified as HM-1 and HM-2, constructed in 1994, each having a maximum process weight of 21.6 pounds of paper or 4.8 pounds of cork per hour, with particulate emissions controlled by baghouse BH-7. [326 IAC 6-3-2]
 - (3) Grinding, sawing, sanding, routing, milling and pressing operations, each with a maximum process weight of 360 pounds per hour, with particulate emissions controlled by six bag filters (BH-1 through BH-6). [326 IAC 6-3-2]
- (b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-3-2]

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

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

D.3.1 Particulate Emission Limitations [326 IAC 6-3]

Pursuant to 326 IAC 6-3-2:

- (a) The particulate emissions from the dry sander and the insignificant grinding, sawing, sanding, routing, milling and pressing operations shall not exceed 1.3 pounds per hour each when operating at a maximum process weight of 360 pounds per hour.

The pound per hour limitation was calculated with the following equation:
Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

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

- (b) The particulate emissions from the brazing, cutting, soldering, welding, and horizontal mills shall not exceed 0.551 pounds per hour, when operating at a maximum process weight of less than 100 pounds per hour.

Compliance Determination Requirements

D.3.2 Particulate Control

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), and in order to comply with Condition D.3.1, the bag filters and baghouses (BH-1 through BH-7) for particulate control shall be in operation and control emissions from the dry sander (S-6), horizontal mills (HM-1, HM-2), and the insignificant grinding, sawing, sanding, routing, milling and pressing operations at all times that these facilities are in operation.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Carlisle Industrial Brake and Friction
Source Address: 1441 Holland Street, Logansport, Indiana 46947
Mailing Address: 1441 Holland Street, Logansport, Indiana 46947
FESOP No.: F017-21262-00021

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

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

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

Source Name: Carlisle Industrial Brake and Friction
Source Address: 1441 Holland Street, Logansport, Indiana 46947
Mailing Address: 1441 Holland Street, Logansport, Indiana 46947
FESOP No.: F017-21262-00021

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**

FESOP Quarterly Report

Source Name: Carlisle Industrial Brake and Friction
Source Address: 1441 Holland Street, Logansport, Indiana 46947
Mailing Address: 1441 Holland Street, Logansport, Indiana 46947
FESOP No.: F017-21262-00021
Facility: Extrusion (EU-01) and Adhesive Application (EU-03) Operations
Parameter: Usage of Volatile Organic Compounds (VOC)
Limit: Less than ninety-nine (99) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

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

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Carlisle Industrial Brake and Friction
Source Address: 1441 Holland Street, Logansport, Indiana 46947
Mailing Address: 1441 Holland Street, Logansport, Indiana 46947
FESOP No.: F017-21262-00021
Facility: Extrusion (EU-01) and Adhesive Application (EU-03) Operations
Parameter: Single HAP
Limit: Less than nine and six tenths (9.6) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

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

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Carlisle Industrial Brake and Friction
Source Address: 1441 Holland Street, Logansport, Indiana 46947
Mailing Address: 1441 Holland Street, Logansport, Indiana 46947
FESOP No.: F017-21262-00021
Facility: Extrusion (EU-01) and Adhesive Application (EU-03) Operations
Parameter: Combination of HAPs
Limit: Less than twenty-four and six tenths (24.6) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

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

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Carlisle Industrial Brake and Friction
Source Address: 1441 Holland Street, Logansport, Indiana 46947
Mailing Address: 1441 Holland Street, Logansport, Indiana 46947
FESOP No.: F017-21262-00021
Facility: Roll Coater RC-1
Parameter: VOC Usage [326 IAC 8-1-6 Limit: Condition D.2.3]
Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

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

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Carlisle Industrial Brake and Friction
Source Address: 1441 Holland Street, Logansport, Indiana 46947
Mailing Address: 1441 Holland Street, Logansport, Indiana 46947
FESOP No.: F017-21262-00021
Facility: Extrusion Operations (EU-01)
Parameter: VOC Usage [326 IAC 8-6 Limit: Condition D.2.2]

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

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

Source Name: Carlisle Industrial Brake and Friction
 Source Address: 1441 Holland Street, Logansport, Indiana 46947
 Mailing Address: 1441 Holland Street, Logansport, Indiana 46947
 FESOP No.: F017-21262-00021

Months: _____ to _____ Year: _____

Page 1 of 2

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

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

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

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

Source Background and Description

Source Name:	Carlisle Industrial Brake and Friction
Source Location:	1441 Holland Street, Logansport, Indiana 46947
County:	Cass
SIC Code:	3292, 3299
Operation Permit No.:	T017-7737-00021
Operation Permit Issuance Date:	November 16, 2000
Permit Transition No.:	F017-21262-00021
Permit Reviewer:	ERG/ST

The Office of Air Quality (OAQ) has reviewed a FESOP Transition application from Carlisle Industrial Brake and Friction relating to the operation of a stationary friction materials manufacturing plant.

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 boiler, constructed in 1972, identified as B-1, with a maximum capacity of 20.9 MMBtu per hour, and exhausting to stack B-1.
- (b) One (1) natural gas fired boiler, constructed in 1975, identified as B-2, with a maximum capacity of 16.7 MMBtu per hour, and exhausting to stack B-2.
- (c) One (1) extrusion operations area, constructed in 1975, with a maximum capacity of 210 pounds per hour of non-asbestos brake pads and clutch linkings, equipped with three (3) extruders, collectively identified as EU-01, exhausting through stacks 202, 203 and 204, and six (6) steam heated dry-out ovens (using steam generated by boilers B-1 and B-2), collectively identified as EU-02, exhausting through stacks 213, 214, 215, 216, 217 and 218.
- (d) One (1) adhesive application area, identified as EU-03, with a maximum capacity of 810 pounds of brake parts per hour, consisting of the following operations:
 - (1) One (1) adhesive spray booth, constructed in 1975, for applying adhesive to non-metallic friction materials with low pressure spray application techniques, with a maximum capacity of 1.2 pounds of VOC per hour, with emissions exhausting to stack 209.
 - (2) Two (2) roll coating machines, identified as 110 and 111, constructed in 1975, for applying adhesives to non-metallic friction materials with rolling application techniques, with a maximum capacity of 3.3 pounds of VOC per hour, with emissions exhausting to stacks 210 and 211, respectively.
 - (3) One (1) roll coating machine, identified as RC-1, constructed in 1998, for applying adhesives to non-metallic friction materials with rolling application techniques, with a maximum capacity of 6.8 pounds of VOC per hour, with emissions exhausting to stack 212.

- (4) One dipcoater, constructed in 1975, for applying adhesives to the metal backings of brake parts, using dip application techniques, with a maximum capacity of less than 2.1 pounds of VOC per hour, with emissions exhausting inside the building. This emission unit is an insignificant activity.
- (5) One (1) hand roll coater, constructed in 1994, for applying adhesives to the metal backings of brake parts, using hand rolling application techniques, with a maximum capacity of less than 0.2 pounds of VOC per hour, with emissions exhausting inside the building. This emission unit is an insignificant activity.

Unpermitted Emission Units and Pollution Control Equipment

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

Insignificant Activities

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

- (a) Activities with emissions equal to or less than 5 pounds per hour or 25 pounds per day of PM10 and PM, including:
 - (1) One (1) dry sander, identified as S-6, constructed in 1994, having a maximum process weight of 360 pounds of paper or 80 pounds of cork per hour with particulate emissions controlled by baghouse BH-7. [326 IAC 6-3-2]
 - (2) Two (2) horizontal mills, identified as HM-1 and HM-2, constructed in 1994, each having a maximum process weight of 21.6 pounds of paper or 4.8 pounds of cork per hour, with particulate emissions controlled by baghouse BH-7. [326 IAC 6-3-2]
 - (3) Grinding, sawing, sanding, routing, milling and pressing operations, each with a maximum process weight of 360 pounds per hour, with particulate emissions controlled by six bag filters (BH-1 through BH-6). [326 IAC 6-3-2]
- (b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-3-2]
- (c) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
- (d) Natural gas-fired combustion sources with heat input equal to or less than ten (10) MMBtu/hr; including one (1) 0.65 MMBtu per hour, natural gas fired oven identified as OV-19.
- (e) Propane or liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than six (6) MMBtu/hr.
- (f) A petroleum fuel, other than 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.
- (g) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;
- (h) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
- (i) Machining where an aqueous cutting coolant continuously floods the machining interface.

- (l) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (j) Heat exchanger and repair.
- (k) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any product process.
- (l) Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling tower.
- (m) A laboratory as defined in 326 IAC 2-7-1(21)(D).
- (n) Two (2) fixed-roof, above ground storage tanks, each with a capacity of 10,500 gallons and used to store VOC.

Existing Approvals

The source has been operating under Title V Operating Permit T017-7737-00021, issued on November 16, 2000, with an expiration date of November 16, 2005, and the following amendments:

- (a) First Administrative Amendment 017-16649-00021, issued on October 22, 2002, and
- (b) Second Administrative Amendment 017-20772-00021, issued on March 24, 2005.

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

- (a) Condition D.1.2 – Reporting Requirements: The natural gas fired boiler certification shall be submitted when submitting monitoring, testing reports/results or other documents as required by this permit to the address listed in Section C – General Reporting Requirements, of this permit, using the certification form located at the end of this permit, or its equivalent.

Reason not incorporated: No certification form is required for these boilers since they can combust only natural gas.

- (b) Condition D.2.2 – Volatile Organic Compounds (VOCs) [326 IAC 2-1][326 IAC 8-1-6]: Any change or modification of adhesive application (EU-03) that would lead to an increase in potential to emit VOC to 25 tons per year from the operation must obtain prior approval by the Office of Air Quality (OAQ) before such change can occur.

Reason not incorporated: The adhesive application area EU-03 consisted of one spray booth and two roll coating machines (units 210 and 211). These units were constructed prior to the January 1, 1980 applicability date for 326 IAC 8-1-6 and are not subject to this rule.

- (c) Condition D.2.3 – Particulate Matter [326 IAC 6-3-2(c)]: The PM from the adhesive application area, identified as EU-03, utilizing one (1) adhesive spray booth and two (2) roll coating machines exhausting through three (3) stacks (IDs 210, 211, and 212) shall not exceed the pound per hour emission rate established as E in the following formula:

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

$$E = 4.10P^{0.67}$$

Where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour.

Reason not incorporated: The application of adhesives using low pressure spray application methods and roll coaters does not generate particulate emissions. Therefore, the requirements of 326 IAC 6-3 do not apply to these facilities.

Enforcement Issues

- (a) IDEM is aware that the source did not apply for a Title V renewal or FESOP 9 months prior to the expiration of the source's current Title V permit. IDEM is reviewing this matter and will take appropriate action.
- (b) IDEM is aware that the source undertook a modification that increased the potential to emit VOC from roll coating machine RC-1 from 3.1 tons per year to 29.4 tons per year without prior approval from IDEM. Since the source was operating under the Part 70 Permit Program, the Permittee should have applied for a Source Modification Permit under the requirements of 326 IAC 2-7-10.5 and a Permit Modification under the requirements of 326 IAC 2-7-12. IDEM is reviewing this matter and will take appropriate action.

Recommendation

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

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

An administratively complete FESOP application for the purposes of this review was received on June 2, 2005.

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

Emission Calculations

See Appendix A of this document for detailed emissions calculations (pages 1 through 4).

Potential To Emit for the Source

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/year)
PM	41.1
PM-10	41.1
SO ₂	0.10
VOC	331
CO	14.1
NO _x	16.8

HAPs	Potential To Emit (tons/year)
Toluene	265
Phenol	2.16
MEK	54.3
Formaldehyde	0.41

Chlorobenzene	0.9
TOTAL	323

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC are greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7. The source will be issued a FESOP because the source will limit its emissions below the Title V levels.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7. The source will be issued a FESOP because the source will limit its emissions below the Title V levels.
- (c) **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 applicability.

Potential to Emit After Issuance

The source has elected to operated pursuant to the FESOP Program (326 IAC 2-8). The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this FESOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/emission unit	Potential To Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Boilers (B-1, B-2) and insignificant oven OV-19	1.27	1.27	0.1	0.92	14.1	16.8	0.32
Extrusion (EU-01, EU-02)	0	0	0	Less than 99 ^(a)	0	0	Single: Less than 9.6 Combination: Less than 24.6
Adhesive (EU-03)	0	0	0		0	0	
Dry Sander, Horizontal Mills, Insig. Grinding, Sawing, Sanding, Routing, Milling and Pressing, Cutting, Soldering and Welding	39.8 ^(b)	39.8 ^(b)	0	0	0	0	0
Total Emissions	41.1	41.1	0.1	Less than 100	14.1	16.8	Single: Less than 10 Combination: Less than 25

(a) Emissions of VOC, a single HAP, and a combination of HAP from the Extrusion and Adhesive operations are limited by conditions in the permit.
 (b) Particulate emissions from the insignificant activities represent allowable emissions under 326 IAC 6-3-2.

County Attainment Status

The source is located in Cass County.

Pollutant	Status
PM10	Attainment
PM2.5	Attainment or Unclassifiable
SO ₂	Attainment
NO ₂	Attainment
1-hour Ozone	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Cass County has been classified as unclassifiable or attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM2.5 emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions. See the State Rule Applicability for the source section.
- (b) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) emissions 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 the ozone standards. Cass County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD) and 326 IAC 2-2. See the State Rule Applicability for the source section.
- (c) Cass 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) and 326 IAC 2-2. See the State Rule Applicability for the source section.

Source Status

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

Pollutant	Limited PTE (tons/yr)	2003 Actuals
PM	41.1	NR
PM-10	41.1	NR
SO ₂	0.1	NR
VOC	Less than 100	73
CO	14.1	1
NO _x	16.8	1
Single HAP	Less than 10	NR
Combination HAPs	Less than 25	NR

NR – No data reported.

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.

Federal Rule Applicability

- (a) The requirements of the New Source Performance Standards for Fossil-Fuel-Fired Steam Generators (326 IAC 12, 40 CFR 60, Subpart D) are not included in this permit for the two (2) natural gas-fired boilers because the maximum heat input of these boilers is less than 250 MMBtu/hour.
- (b) The requirements of the New Source Performance Standards for Electric Utility Steam Generating Units (326 IAC 12, 40 CFR 60, Subpart Da) are not included in this permit for the two (2) natural gas-fired boilers because these boilers are not electric utility steam generating units.
- (c) The requirements of the New Source Performance Standards for Industrial-Commercial-Institutional Steam Generating Units (326 IAC 12, 40 CFR 60, Subpart Db) are not included in this permit for the two (2) natural gas-fired boilers because these boilers have a heat input capacity less than 100 MMBtu/hour.
- (d) The requirements of the New Source Performance Standards for Small Industrial-Commercial-Institutional Steam Generating Units (326 IAC 12, 40 CFR 60, Subpart Dc)

are not included in this permit for the two (2) natural gas-fired boilers. These boilers were constructed prior to June 9, 1989.

- (e) The requirements of 40 CFR 60, Subparts K, Ka, or Kb are not included in this permit for the VOC storage tanks because these tanks have storage capacities of 10,500 gallons (39.7 cubic meters), which is less than the 40,000 gallon applicability thresholds for Subpart K and Ka and less than the 19,813 gallon applicability threshold for Subpart Kb. In addition, the solvent used in these tanks does not meet the definition of petroleum liquid as defined in 40 CFR 60.111 (Subpart K) and 40 CFR 60.111a (Subpart Ka).
- (f) The requirements of the National Emission Standards for Hazardous Air Pollutants for Friction Materials Manufacturing Facilities (40 CFR 63, Subpart QQQQQ) are not included in this permit for this source because the source has accepted federally enforceable limits prior to the October 18, 2005 compliance date for this rule, which limits the amount of hazardous air pollutants (HAPs) emitted such that the amount of any single HAP emitted is limited to less than ten (10) tons per year and the amount of any combination of HAPs is limited to less than twenty-five (25) tons per year.
- (g) The requirements of the National Emission Standards for Miscellaneous Metal Parts and Products Surface Coating Operations (40 CFR 63, Subpart MMMM) are not included in this permit for this source because the source has accepted federally enforceable limits prior to the January 2, 2007 compliance date for this rule, which limits the amount of hazardous air pollutants (HAPs) emitted such that the amount of any single HAP emitted is limited to less than ten (10) tons per year and the amount of any combination of HAPs is limited to less than twenty-five (25) tons per year.
- (h) The requirements of the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD are not applicable to the two (2) natural gas-fired boilers (B-1, B-2) because the source has accepted federally enforceable limits prior to the September 13, 2007 compliance date for this rule, which limits the amount of hazardous air pollutants (HAPs) emitted such that the amount of any single HAP emitted is limited to less than ten (10) tons per year and the amount of any combination of HAPs is limited to less than twenty-five (25) tons per year.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

This source is not in one of the 28 source categories and there were no applicable NSPS promulgated prior to August 7, 1980. Therefore, fugitive emissions of PM and VOC are not counted towards applicability of PSD.

This source is located in Cass County and was initially constructed in the early 1970s. At the time that the PSD rules were promulgated, the PTE for all criteria pollutants are believed to have been less than 250 tons per year. In 1994, an insignificant hand roll coater was added to the source. This modification did not trigger PSD review because the increase in PTE due to this modification was less than 250 tons per year. The source remained a minor source under PSD after this modification. At the time of issuance of the source's current Title V permit, the PTE for VOC was calculated to be less than 130 tons per year. The PTE for all other criteria pollutants were less than 100 tons per year. Hence, this source was a minor source under PSD.

Between 2000 and 2005, modifications to the plant resulted in an increase in the potential to emit of VOC. The potential to emit from the roll coater line was increased by 26.3 tons per year and the extrusion lines by 154 tons per year over the levels specified in Appendix A of the Technical Support Document for their current Title V permit (see T017-7737-00021, issued November 16, 2000). These modifications did not trigger PSD review and since the VOC emissions from the extrusion lines are limited to 100 tons per year by a VOC limit in their current Title V permit. The source remained a minor source after these modifications.

326 IAC 2-6 (Emission Reporting)

This source is located in Cass County and is not required to operate under a Part 70 permit. Therefore, 326 IAC 2-6 does not apply.

326 IAC 2-8-4 (FESOP)

The unrestricted potential emissions of VOC from the source exceed one hundred (100) tons per year. The unrestricted potential emissions of a single HAP from the source exceed ten (10) tons per year. The unrestricted potential emissions of a combination of HAPs from the source exceed twenty-five (25) tons per year. Pursuant to 326 IAC 2-8-4, and in order to limit the source-wide emissions of VOC, a single HAP and any combination of HAPs to less than one-hundred (100), ten (10), and twenty-five (25) tons per year, respectively, the Permittee shall limit the usage of VOC and HAP as follows:

- (a) The total VOC delivered to the extrusion operations area (EU-01) and the adhesive application operations (EU-03), including cleanup solvents, shall be limited to less than ninety-nine (99) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Combined with other VOC emissions at the source, this will limit source-wide VOC emissions to less than 100 tons per year.
- (b) The total single HAP delivered to the extrusion operations area (EU-01) and the adhesive application operations (EU-03), including cleanup solvents, shall be limited to less than nine and six tenths (9.6) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This will limit source-wide emissions of a single HAP to less than ten (10) tons per year.
- (c) The total HAPs delivered to the extrusion operations area (EU-01) and the adhesive application operations (EU-03), including cleanup solvents, shall be limited to less than twenty-four and six tenths (24.6) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Combined with other HAP emissions at the source, this will limit source-wide emissions of any combination of HAPs to less than twenty-five (25) tons per year.

Compliance with the limitations makes the requirements of 326 IAC 2-7 (Part 70 Program) not applicable.

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.

326 IAC 6-4 (Fugitive Dust Emissions)

Pursuant to 326 IAC 6-4, the source shall not generate fugitive dust to the extent that some portion of the material escapes beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located.

326 IAC 2-4.1-1 (New Source Toxics Control)

- (a) The extrusion operations (EU-01) and the adhesive application facilities identified as the adhesive spray booth, roll coating machines 110 and 111, the dipcoater and the hand roll coater were constructed prior to July 27, 1997. Therefore, the requirements of 326 IAC 2-4.1 do not apply.
- (b) The adhesive application facility identified as the roll coating machine (RC-1) was

constructed after July 27, 1997. However, the potential to emit of this facility is less than ten (10) tons per year of a single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, the requirements of 326 IAC 2-4.1 do not apply.

State Rule Applicability – Extrusion Operations and Adhesive Application Operations

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

- (a) The operation of the extrusion machine does not result in the formation of airborne particulate matter.
- (b) The two (2) rollcoater machines in the adhesive application operations transfer adhesive to surfaces with 100% transfer efficiency.
- (c) The adhesive spray booth applies adhesives to brake pad, clutch and gear surfaces using low pressure application methods that do not result in the formation of airborne particulate.
- (d) The dipcoater and hand roll coater transfer adhesives to surfaces with 100% transfer efficiency. No airborne particulate is formed.

Therefore, the requirements of 326 IAC 6-3-2 do not apply to these emission units.

326 IAC 8-1-6 (New Facilities, General Reduction Requirements)

- (a) The extrusion operations (EU-01) and the adhesive application facilities identified as the adhesive spray booth, roll coating machines 110 and 111, and the dipcoater were constructed prior to January 1, 1980. Therefore, the requirements of 326 IAC 8-1-6 do not apply.
- (b) The adhesive application facility identified as the hand roll coater was constructed after January 1, 1980, but the potential to emit of VOC of this facility is less than 25 tons per year. Therefore, the requirements of 326 IAC 8-1-6 do not apply.
- (c) The roll coater machine (RC-1) was constructed after January 1, 1980 and the potential to emit of VOC of this facility is greater than 25 tons per year. When this emission unit was constructed in 1998, the PTE for VOC was less than 25 tons per year, so no limits on the usage of VOC were added to the construction permit or to the source's current operating permit (T017-7737-00021, issued on November 16, 2000) to avoid the requirements of 326 IAC 8-1-6 (Best Available Control Technology (BACT)). Although the potential to emit of VOC from this facility is now 29.4 tons per year, the actual emissions of VOC from this facility have never exceeded 25 tons per year, therefore, no violation of 326 IAC 8-1-6 has occurred. The Permittee has accepted a limit on the usage of VOC at the roll coater machine (RC-1) of less than 25 tons per twelve consecutive month period, with compliance determined at the end of each month. This limit shall make the requirements of 326 IAC 8-1-6 not applicable.

The following limit is included in this Permit:

The usage of VOC at the Roll Coater (RC-1) facility shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Therefore, the requirements of 326 IAC 8-1-6 do not apply.

326 IAC 8-2-9 (Surface Coating Emission Limitations: Miscellaneous Metal Coating)

- (a) The adhesive application facility identified as the dipcoater applies adhesives (surface coatings) to metal parts. However, this facility is located in Cass County and was constructed prior to November 1, 1980. Therefore, the requirements of 326 IAC 8-2-9 do not apply.
- (b) The adhesive application facilities identified as the adhesive spray booth and roll coating machines (110 and 111) are located in Cass County and were constructed prior to

November 1, 1980. However, these facilities do not apply adhesives (surface coatings) to metal parts. Therefore, the requirements of 326 IAC 8-2-9 do not apply.

- (c) The roll coating machine RC-1 is located in Cass County, was constructed after July 1, 1990, and has actual emissions of VOC that are greater than fifteen (15) pounds per day before add-on controls. However, this facility does not apply adhesives (surface coatings) to metal parts. Therefore, the requirements of 326 IAC 8-2-9 do not apply.
- (d) The adhesive application facility identified as the hand roll coater is located in Cass County, was constructed after July 1, 1990, and applies adhesives (surface coatings) to metal parts. However, the actual emissions of VOC from this facility are less than fifteen (15) pounds per day, before add-on controls. Therefore, the requirements of 326 IAC 8-2-9 do not apply.

326 IAC 8-6 (Organic Solvent Emission Limitations)

This source is located in Cass County, commenced operation after October 7, 1974 and prior to January 1, 1980 and is not subject to another Article 8 rule. The unlimited potential to emit VOC for the extrusion operation (EU-01) is greater than 100 tons per year. Pursuant to Operating Permit T017-7737-00021, issued on November 16, 2000, the usage of solvent from the extrusion operations shall be limited to less than ninety-nine (99) tons per year. Therefore, the requirements of 326 IAC 8-6 do not apply.

State Rule Applicability – Boilers

326 IAC 6-2-3 (Particulate Emissions Limitations for Sources of Indirect Heating)

Both the 20.9 MMBtu/hr natural gas fired boiler, constructed in 1972, and the 16.7 MMBtu/hr natural gas fired boiler, constructed in 1975, are subject to 326 IAC 6-2-3 (Particulate Emissions Limitations for Sources of Indirect Heating). Pursuant to this rule, particulate emissions from indirect heating facilities shall be limited by the following equation:

for the 20.9 MMBtu/hr boiler (constructed after June 8, 1972):

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}} = \frac{50 \times 0.67 \times 31}{76.5 \times 20.9^{0.75} \times 1^{0.25}} = 1.39 \text{ lb/MMBtu}$$

for the 16.7 MMBtu/hr boiler (constructed in 1975):

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}} = \frac{50 \times 0.67 \times 33.5}{76.5 \times (20.9+16.7)^{0.75} \times 2^{0.25}} = 0.81 \text{ lb/MMBtu}$$

Where

- C = max ground level concentration (= 50 F m/m³)
- Pt = emission rate limit (lbs/MMBtu)
- Q = total source heat input capacity (MMBtu/hr)
- N = number of stacks
- a = plume rise factor = 0.67
- h = stack height (ft)

The allowable particulate emission rate from the 20.9 and 16.7 MMBtu/hr boilers, based on the above equation, are 1.39 and 0.81 pounds per MMBtu heat input, respectively, which are both higher than the maximum of 0.6 pounds per MMBtu heat input allowed by 326 IAC 6-2-3(e). Therefore, the allowable particulate emissions for the two boilers are each 0.6 pounds per MMBtu heat input. Each of the two boilers emits less than 0.01 pounds of particulate emissions per MMBtu heat input (see page 3 of 4, Appendix A), and, therefore, are in compliance with 326 IAC 6-2-3.

State Rule Applicability – Insignificant Activities

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

- (a) The particulate emissions from the dry sander and the insignificant grinding, sawing, sanding, routing, milling and pressing operations shall not exceed 1.3 pounds per hour each when operating at a maximum process weight of 360 pounds per hour.

The pound per hour limitation was calculated with the following equation:
Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

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

- (b) The particulate emissions from the brazing, cutting, soldering, welding, and horizontal mills shall not exceed 0.551 pounds per hour, when operating at a maximum process weight of less than 100 pounds per hour.

The bag filters shall be in operation at all times the dry sander, the horizontal mills, and the insignificant grinding, sawing, routing, milling and pressing operations are in operation in order to comply with this limit.

Testing Requirements

Testing is not required for VOC for the extrusion operations and the adhesive application operations because there are no control devices in operation and the source is required to keep records of all VOC usage.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

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

No compliance monitoring requirements are included in this permit. Compliance with the VOC and HAP limitations will be demonstrated using monthly records of the amount and VOC and HAP content of each material used at the plant.

Conclusion

The operation of this friction materials manufacturing plant shall be subject to the conditions of the attached proposed FESOP No.: F017-21262-00021.

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

**Addendum to a Technical Support Document (TSD) for a
Federally Enforceable State Operating Permit (FESOP) Transition**

Source Background and Description

Source Name:	Carlisle Industrial Brake and Friction
Source Location:	1441 Holland Street, Logansport, Indiana 46947
County:	Cass
SIC Code:	3292, 3299
Operation Permit No.:	T017-7737-00021
Operation Permit Issuance Date:	November 16, 2000
Permit Transition No.:	F017-21262-00021
Permit Reviewer:	ERG/ST

On September 13, 2005, the Office of Air Quality (OAQ) had a notice published in the Pharos Tribune, Logansport, Indiana, stating that Carlisle Industrial Brake and Friction had applied for a Federally Enforceable State Operating Permit (FESOP) Transition to operate a stationary friction materials manufacturing plant with control. 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.

Upon further review, the OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table of Contents has been modified, if applicable, to reflect these changes.

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

Appendix A: Emission Calculations
VOC Emissions From Extrusion and Adhesive Application Operations

Company Name: Carlisle Industrial Brake and Friction
Address: 1441 Holland Street, Logansport, Indiana 46947
FESOP: 017-21262-00021
Reviewer: ERG/ST
Date: August 31, 2005

Emissions Unit ID		Material	Density (lbs/gal)	Weight % Water	Weight % VOC	Weight % Solids	Application Rate (gal/unit)	Maximum Throughput (units/year)	PTE VOC (lbs/hour)	PTE VOC (tons/year)
Extrusion Operations (EU-01, EU-02)		S-1015*	7.39	0.0%	100%	0.0%	0.0275	2628000	61.0	267.0
		Toluene*	7.26	0.0%	100%	0.0%	0.0275	2628000	59.9	262.3
Adhesive Application (EU-03)	Roll Coater 110	PL-605-4	7.81	0.0%	65.0%	30.0%	0.0029	1051200	1.74	7.63
		MEK Cleaner	6.75	0.0%	100%	0.0%	0.0019	1051200	1.54	6.74
	Roll Coater 111	PL-605-4	7.81	0.0%	65.0%	30.0%	0.0029	1051200	1.74	7.63
		MEK Cleaner	6.75	0.0%	100%	0.0%	0.0019	1051200	1.54	6.74
	Roll Coater RC-1	PL-605-51	7.99	0.0%	56.0%	35.0%	0.0012	3504000	2.15	9.41
		MEK Cleaner	6.75	0.0%	100%	0.0%	0.0017	3504000	4.59	20.1
	Spray Booth	R-81005	8.25	1.9%	70.1%	21.9%	0.0017	525600	0.59	2.58
		MEK Cleaner	6.75	0.0%	100%	0.0%	0.0013	525600	0.53	2.34
	Dipcoater	PL-605-4	7.81	0.0%	65.0%	30.0%	0.0008	3504000	1.58	6.94
		MEK Cleaner	6.75	0.0%	100%	0.0%	0.0002	3504000	0.54	2.37
Hand Rollcoater	PL-605-4	7.81	0.0%	65.0%	30.0%	0.0001	1576800	0.09	0.40	
	MEK Cleaner	6.75	0.0%	100%	0.0%	0.0001	1576800	0.11	0.48	
PTE Totals (tons/year)									340	

* Extrusion Operations EU-01 and EU-02 use either S-1015 or Toluene as solvent. Solvent S-1015 represents the worst case for VOC emissions.

METHODOLOGY

PTE VOC (tons/year) = Density (lbs/gal) x Weight % VOC x Application rate (gal/unit) x Throughput (units/hour) x 8760 (hours/year) x 1ton/2000 lbs

Appendix A: Emission Calculations

HAP Emissions From Extrusion and Adhesive Application Operations

Company Name: Carlisle Industrial Brake and Friction
Address: 1441 Holland Street, Logansport, Indiana 46947
FESOP: 017-21262-00021
Reviewer: ERG/ST
Date: August 31, 2005

HAP Content										
Emissions Unit ID	Material	Density (lbs/gal)	Maximum Usage (gal/unit)	Maximum Throughput (unit/year)	Weight % Toluene	Weight % Phenol	Weight % MEK	Weight % Formaldehyde	Weight % Chlorobenzene	
Extrusion Operations (EU-01, EU-02)	S-1015*	7.39	0.0275	2628000	0.00%	0.00%	0.00%	0.00%	0.00%	
	Toluene*	7.26	0.0275	2628000	100%	0.00%	0.00%	0.00%	0.00%	
Adhesive Application (EU-03)	Roll Coater 110	PL-605-4	7.81	0.0029	1051200	5.00%	5.00%	45.0%	1.00%	0.00%
		MEK Cleaner	6.75	0.0019	1051200	0.00%	0.00%	100%	0.00%	0.00%
	Roll Coater 111	PL-605-4	7.81	0.0029	1051200	5.00%	5.00%	45.0%	1.00%	0.00%
		MEK Cleaner	6.75	0.0019	1051200	0.00%	0.00%	100%	0.00%	0.00%
	Roll Coater RC-1	PL-605-51	7.99	0.0012	3504000	5.00%	5.00%	40.0%	1.00%	0.00%
		MEK Cleaner	6.75	0.0017	3504000	0.00%	0.00%	100%	0.00%	0.00%
	Spray Booth	R-81005	8.25	0.0017	525600	3.89%	3.89%	29.1%	0.11%	24.4%
		MEK Cleaner	6.75	0.0013	525600	0.00%	0.00%	100%	0.00%	0.00%
	Dipcoater	PL-605-4	7.81	0.0008	3504000	5.00%	5.00%	45.0%	1.00%	0.00%
		MEK Cleaner	6.75	0.0002	3504000	0.00%	0.00%	100%	0.00%	0.00%
	Hand Rollcoater	PL-605-4	7.81	0.0001	1576800	5.00%	5.00%	45.0%	1.00%	0.00%
		MEK Cleaner	6.75	0.0001	1576800	0.00%	0.00%	100%	0.00%	0.00%

Potential to Emit of HAPs										
Emissions Unit ID	Material	Density (lbs/gal)	Maximum Usage (gal/unit)	Maximum Throughput (unit/year)	PTE of Toluene (tons/year)	PTE of Phenol (tons/year)	PTE of MEK (tons/year)	PTE of Formaldehyde (tons/year)	PTE of Chlorobenzene (tons/year)	
Extrusion Operations (EU-01, EU-02)	S-1015*	7.39	0.0275	2628000	0.0	0.00	0.00	0.00	0.00	
	Toluene*	7.26	0.0275	2628000	262.3	0.00	0.00	0.00	0.00	
Adhesive Application (EU-03)	Roll Coater 110	PL-605-4	7.81	0.0029	1051200	0.59	0.59	5.28	0.12	0.00
		MEK Cleaner	6.75	0.0019	1051200	0.00	0.00	6.74	0.00	0.00
	Roll Coater 111	PL-605-4	7.81	0.0029	1051200	0.59	0.59	5.28	0.12	0.00
		MEK Cleaner	6.75	0.0019	1051200	0.00	0.00	6.74	0.00	0.00
	Roll Coater RC-1	PL-605-51	7.99	0.0012	3504000	0.84	0.84	6.72	0.17	0.00
		MEK Cleaner	6.75	0.0017	3504000	0.00	0.00	20.1	0.00	0.00
	Spray Booth	R-81005	8.25	0.0017	525600	0.14	0.14	1.07	0.00	0.90
		MEK Cleaner	6.75	0.0013	525600	0.00	0.00	2.34	0.00	0.00
	Dipcoater	PL-605-4	7.81	0.0008	3504000	0.53	0.53	4.80	0.11	0.00
		MEK Cleaner	6.75	0.0002	3504000	0.00	0.00	2.37	0.00	0.00
	Hand Rollcoater	PL-605-4	7.81	0.0001	1576800	0.03	0.03	0.28	0.01	0.00
		MEK Cleaner	6.75	0.0001	1576800	0.00	0.00	0.48	0.00	0.00
Totals					265	2.72	62.2	0.52	0.90	

*- Extrusion Operations EU-01 and EU-02 use either S-1015 or Toluene as solvent. Toluene represents the worst case for HAP emissions. S-1015 contains no HAPs.

METHODOLOGY

PTE of HAP (tons/year) = Density (lbs/gal) x Max. Throughput (unit/hour) x Max. Usage (gal/unit) x Weight % HAP x 8760 (hours/year) x 1 ton/2000 lbs

**Appendix A: Emission Calculations
Combustion Emissions for Natural Gas Fired Boilers**

Company Name: Carlisle Industrial Brake and Friction
Address: 1441 Holland Street, Logansport, Indiana 46947
FESOP: 017-21262-00021
Reviewer: ERG/ST
Date: August 31, 2005

Emission Unit Description	Emission Unit ID	Heat Input Capacity (MMBtu/hr)	Maximum Potential Throughput (MMCF/yr)
Natural Gas-Fired Boiler	B-1	20.9	183
Natural Gas-Fired Boiler	B-2	16.7	146
Oven	OV-19	0.7	6

Pollutant Emission Factors (lbs/MMCF)						
PM*	PM10*	SO ₂	NO _x **	CO	VOC	HAPs
7.6	7.6	0.6	100	84.0	5.5	1.89

Potential To Emit (tons/yr)							
Emission Unit ID	PM	PM10	SO ₂	NO _x	CO	VOC	HAPs
B-1	0.70	0.70	0.05	9.15	7.69	0.50	0.17
B-2	0.56	0.56	0.04	7.31	6.14	0.40	0.14
OV-19	0.02	0.02	0.002	0.28	0.24	0.02	0.01
TOTALS	1.27	1.27	0.10	16.8	14.1	0.92	0.32

* PM and PM10 emission factor are for condensable and filterable PM and PM10 combined.

**Emission factors for NO_x: Uncontrolled = 100 lb/MMCF

Emission factors are from AP-42, Chapter 1.4 - Natural Gas Combustion, Tables 1.4-1, 1.4-2, 1.4-3 and 1.4-4. SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03. (AP-42 Supplement D 7/98)

1 MMBtu = 1,000,000 Btu

1 MMCF = 1,000,000 cubic feet of gas

All emission factors are based on normal firing.

Methodology

Max. Potential Throughput (MMCF/year) = Heat Input Capacity (MMBtu/hour) x 8,760 (hours/year) x 1 MMCF/1,000 MMBtu

PTE (tons/year) = Max. Potential Throughput (MMCF/year) x Emission Factor (lbs/MMCF) x 1 ton/2,000 lbs

Appendix A: Emission Calculations
Particulate Emissions from Dry Sander, Horizontal Mills,
Insignificant Grinding, Sawing, Sanding, Routing, Milling and Pressing

Company Name: Carlisle Industrial Brake and Friction
Address: 1441 Holland Street, Logansport, Indiana 46947
FESOP: 017-21262-00021
Reviewer: ERG/ST
Date: August 31, 2005

Emissions Unit/Baghouse ID	Air Flow Rate (acfm)	Outlet Grain Loading (grain/dscf)	Control Efficiency (%)	Uncontrolled PTE of PM/PM10 (ton/yr)	Controlled PTE of PM/PM10 (ton/yr)	Maximum Throughput Capacity (lbs/hr)	326 IAC 6-3-2 Allowable PM Emission Rate (lbs/hr)
Grinding BH-1	25,000	0.000056	99.0%	5.26	0.053	360	1.3
Sawing BH-2	40,000	0.000056	99.0%	8.41	0.084	360	1.3
Sanding BH-3	8,000	0.000027	99.0%	0.82	0.008	360	1.3
Routing BH-4	8,000	0.000085	99.0%	2.56	0.026	360	1.3
Milling BH-5	15,000	0.000033	99.0%	1.88	0.019	360	1.3
Pressing BH-6	25,000	0.000011	99.0%	1.06	0.011	360	1.3
Dry Sander (S-6), Horizontal Mills (HM-1, HM-2)	8,000	0.000021	99.0%	0.64	0.006	360	1.3
Totals				20.6	0.21		

Assume all PM is equal to PM10.

Methodology

PTE of PM/PM10 Controlled (tons/yr) = Flow Rate (acfm) x Outlet Grain Loading (gr/ascf) x 60 (min/hr) x 8760 (hr/yr) x 1/7000 (lb/gr) x 1 ton/2000 lbs

PTE of PM/PM10 Uncontrolled (tons/yr) = Flow Rate (acfm) x Outlet Grain Loading (gr/ascf) x 60 (min/hr) x 8760 (hr/yr) x 1/7000 (lb/gr) x 1 ton/2000 lb Control Eff. (%)

Allowable PM Emission Rate (lb/hr) = 4.1 x (Throughput (lbs/hr)/2000)^.67

Actual PM Emission Rate (lb/hr) = Flow Rate (acfm) x Outlet Grain Loading (gr/ascf) x 60 (min/hr) x 1/7000 (lb/gr)

Actual PM Emissions (lbs/hr)
0.0120
0.0192
0.0019
0.0058
0.0043
0.0024
0.0015