



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant
DATE: July 12, 2005
RE: Federal Mogul Corporation / 023-21272-00003
FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision – Approval

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 326 IAC 2, this approval was effective immediately upon submittal of the application.

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



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Mitchell E. Daniels, Jr.
Governor

July 12, 2005

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Indianapolis, Indiana 46204
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Thomas W. Easterly
Commissioner

Jeff Michael
Federal Mogul Corporation
2845 West State Road 28
Frankfort, IN 46041-8779

Re: 023-21272-00003
Notice-Only Change to
MSOP 023-12906-00003

Dear Mr. Michael,

Federal Mogul Corporation was issued a minor source operating permit (MSOP) on January 6, 2003 for an oil seal manufacturing plant located at 2845 West State Road 28, Frankfort, IN 46041-8779. A letter requesting changes was received on June 6, 2005. The changes involve the following:

- (1) Several emission units will be removed from the permit.
(2) One (1) parts washer, two (2) rinse tanks, one (1) ultrasonic cleaning system and maintenance MIG welding will be added to the permit.
(3) The description will be revised on two (2) existing dip tanks,
(4) The "volume weighted average" compliance option will be eliminated. Adhesives will comply with 326 IAC 8-2-9 on both an "as supplied" and an "as applied" basis.

OAQ has determined that emissions increases from the additional emission units are less than the thresholds classifiable as exempt under 326 IAC 2-1.1-3(e)(1). Pursuant to the provisions of 326 IAC 2-6.1-6(d)(13), the permit is hereby revised as follows:

A.2 Emission Units and Pollution Control Equipment Summary

This stationary source is approved to operate the following emission units and pollution control devices:

- (a) one (1) phoscoating adhesive dip tank line, constructed in 1986 and modified in 1995, consisting of fifteen (15) sixteen (16) stations with the following units:
(1) Station 1 - Load/Unload;
(2) Station 2 - one (1) forced air adhesive dryer tank, exhausting through stack E3;
(3) Station 3 - one (1) Y-70 adhesive dip tank, with a maximum throughput of 5,445 units per hour, exhausting through stack E3;
(4) Station 4 - one (1) Y-68 adhesive dip tank, with a maximum throughput of 3,705 units per hour, exhausting through stack E3;
(4) (5) Station 5 - one (1) Y-39 adhesive dip tank, with a maximum throughput of 850 units per hour, exhausting through stack E3;
(5) (6) Station 6 - one (1) forced air phosphate dryer tank, exhausting through stack E3;
(6) (7) Station 7 - one (1) caustic cleaner dip tank, exhausting through stack E4;
(7) (8) Station 8 - one (1) hot water rinse dip tank, exhausting through stack E4;
(8) (9) Station 9 - one (1) caustic cleaner dip tank, exhausting through stack E4;
(9) (10) Station 10 - one (1) hot water rinse dip tank, exhausting through stack E4;
(10) (11) Station 11 - one (1) acid pickle dip tank, exhausting through stack E4;
(11) (12) Station 12 - one (1) hot cold water rinse dip tank, exhausting through stack E4;

- ~~(12)(13)~~ Station 13 - one (1) ~~sealer dip tank, with a maximum throughput of 10,000 units per hour~~ **cold water rinse dip tank**, exhausting through stack E4;
- ~~(13)(14)~~ Station 14 - one (1) cold water rinse dip tank, exhausting through stack E4;
- ~~(14)(15)~~ Station 15 - one (1) calcium modified zinc phosphate dip tank, with a maximum throughput of 10,000 units per hour, exhausting through stack E4; and
- ~~(15)(16)~~ Station 16 - one (1) zinc phosphate dip tank, with a maximum throughput of 10,000 units per hour, exhausting through stack E4.
- (b) ~~one (1) surface coating spray booth, identified as Redicoat Booth, for paint and primer application, constructed in 1986, utilizing an electrostatic disc spray coating application system, with a maximum throughput of 10,000 units per hour, using dry filters for particulate matter control, exhausting through stack E2;~~
- ~~(e)~~ one (1) surface coating spray booth, identified as E8, utilizing a High Volume Low Pressure (HVLP) spray coating application system, with a maximum throughput of 114 units per hour, using dry filters for particulate matter control, exhausting through stack E8
(Note: this unit has not yet been installed; potential emissions are at exempt levels pursuant to 326 IAC 2-1.1-3);
- ~~(d)~~ ~~one (1) Redicoat disc washer, with a maximum throughput of 0.125 units per hour, exhausting through stack GV;~~
- (c) ~~(e)~~ ~~two (2)~~ **three (3)** parts washers, identified as PW1, and PW2 and PW3, with a total maximum solvent usage rate of ~~220~~ **330** gallons per year;
- ~~(f)~~ ~~one (1) hot oil dip tank, using a maximum of 2.89 gallons of oil per hour;~~
- (d) ~~(g)~~ The following natural gas combustion sources:
- (1) six (6) space heaters, identified as H1 through H5, each rated at 0.200 million British thermal units (MMBtu) per hour;
 - (2) one (1) space heater, identified as H6, rated at 0.250 MMBtu per hour;
 - (3) one (1) radiant heater, identified as H7, rated at 0.100 MMBtu/hr;
 - (4) two (2) radiant heaters, identified as H8 and H9, each rated at 0.150 MMBtu/hr;
 - (5) one (1) unit heater, identified as H10, rated at 0.050 MMBtu/hr;
 - (6) two (2) duct heaters, identified as H11 and H12, each rated at 0.250 MMBtu/hr;
 - (7) one (1) unit heater, identified as H13, rated at 0.100 MMBtu/hr;
 - (8) one (1) unit heater, identified as H14, rated at 0.165 MMBtu/hr;
 - (9) one (1) unit heater, identified as H15, rated at 0.125 MMBtu/hr;
 - (10) seven (7) space heaters, identified as H16, H17, and H19 through H23, each rated at 1.875 MMBtu/hr;
 - (11) two (2) make-up air units, identified as H18 and H24, each rated at 0.500 MMBtu/hr;
 - (12) one (1) space heater, identified as H25, rated at 0.236 MMBtu/hr;
 - (13) one (1) space heater, identified as H26, rated at 0.860 MMBtu/hr;
 - (14) one (1) make-up air unit, identified as H27, rated at 0.490 MMBtu/hr;
 - (15) one (1) make-up air unit, identified as H28, rated at 3.800 MMBtu/hr;
 - (16) one (1) make-up air unit, identified as H29, rated at 5.400 MMBtu/hr;
 - (17) one (1) package unit, identified as H30, rated at 0.087 MMBtu/hr;
 - (18) one (1) package unit, identified as H31, rated at 0.120 MMBtu/hr;
 - (19) one (1) make-up air unit, identified as H32, rated at 1.750 MMBtu/hr;
 - (20) two (2) space heaters, identified as H33 and H34, each rated at 0.200 MMBtu/hr;
 - (21) two (2) radiant heaters, identified as H35 and H38, each rated at 0.250 MMBtu/hr;

- (22) one (1) make-up air unit, identified as H36, rated at 3.456 MMBtu/hr;
 - (23) one (1) make-up air unit, identified as H37, rated at 2.200 MMBtu/hr;
 - (24) ~~one (1) paint drying oven, identified as PO1, rated at 0.404 MMBtu/hr;~~
 - (25) ~~eight (8) rubber post-cure ovens, identified as PC2 through PC6, PC8, PC9, and PC11, each rated at 1.2 MMBtu/hr;~~
 - (25)(26) nine (9) catalytic oxidizers, identified as CO2 through CO10, each rated at 0.075 MMBtu/hr;
 - (26)(27) one (1) boiler, identified as B1, constructed in 1978, rated at 4.2 MMBtu/hr;
 - (27)(28) one (1) boiler, identified as B2, constructed in 1985, rated at 2.1 MMBtu/hr; and
 - (28)(29) one (1) wastewater evaporator unit, identified as EV1, rated at 0.395 MMBtu/hr.
- (e) ~~(h)~~ four (4) electric rubber post-cure ovens, all identified as PC10;
- (f) ~~(i)~~ one (1) rubber manufacturing process, identified as the Banbury operation, constructed in 1986, with a maximum rubber production capacity of 3,914,192.15 pounds per year, consisting of the following:
- (1) bulk rubber chemical bins, with a maximum throughput of 206.19 pounds of powdered chemical per hour, with one (1) baghouse (~~BH5 BH1~~) for particulate matter controls, exhausting through stack ~~BH5 BH1~~;
 - (2) the Minors area, with one (1) baghouse (BH4) for particulate matter control, exhausting through stack BH4;
 - (3) rubber compounding, with one (1) baghouse (BH1) for particulate matter control, exhausting through stack BH1; and
 - (4) ~~one (1) rubber molding sandblasting unit, with one (1) baghouse (BH2) for particulate matter control, exhausting through stack BH2.~~
- (g) ~~(j)~~ one (1) tooling and machining sandblasting unit, with one (1) baghouse (BH3) for particulate matter control, exhausting through stack BH3;
- (h) ~~(k)~~ ~~one (1) TIG welding, MIG welding and station and one (1) stick welding station used for maintenance purposes only;~~
- (i) ~~(l)~~ one (1) oxyacetylene cutting station utilizing oxymethane and oxyacetylene gas with a maximum metal consumption rate of 0.4 inches per minute;
- ~~(m) one (1) 3,000 gallon isopropanol bulk storage tank, identified as T002; and~~
- (j) ~~(n)~~ one (1) 3,000 gallon used oil bulk storage tank, identified as T003.
- (k) **one (1) ultrasonic cleaning system, including one sonic tank, exhausting through stack E5.**
- (l) **two (2) rinse tanks, exhausting through stack E6.**

D.1.1 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9, the owner or operator shall not allow the discharge into the atmosphere VOC in excess of three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, as applied to metal parts in the adhesive dip tank line, and delivered to the applicators at each of the Redicoat spray booth and the new spray booth, identified as E8.

D.1.3 Volatile Organic Compounds (VOC)

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the Permittee shall comply with the following requirements for the ~~two (2) parts washers (PW1 and PW2):~~

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

D.1.4 Particulate [326 IAC 6-3-2(d)]

- (a) Particulate from the surface coating in the ~~Redicoat booth and the new surface coating spray booth, identified as E8,~~ shall be controlled by a dry particulate filter, waterwash or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:
 - (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
 - (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

D.1.6 Volatile Organic Compounds (VOC)[326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC content contained in ~~condition D.1.1 for the Redicoat spray booth and the new spray booth, identified as E8,~~ **Condition D.1.1** shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.7 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

Compliance with the VOC content limit in condition D.1.1 for the adhesive dip tank line shall be determined pursuant to ~~326 IAC 8-1-2(a)(10), using a volume weighted average of coatings on a monthly basis. This volume weighted average shall be determined by the following equation:~~

$$A = \frac{\sum C_i \times U_i}{\sum U_i}$$

Where: ~~A = the volume weighted average in pounds VOC per gallon less water as applied;~~
~~C_i = the VOC content of each coating in pounds VOC per gallon less water as applied~~
~~= [coating density, lb/gal * wt. % organics] / [1 - vol. % water * coating density lb/gal~~
~~/ density of water lb/gal]~~
~~U_i = the usage rate of each coating in gallons per month.~~

D.1.7 & Record Keeping Requirements

- (a) To document compliance with ~~condition~~ **Condition D.1.1**, the Permittee shall maintain records in accordance with (1) through ~~(6)~~ **(2)** below. Records maintained for (1) through ~~(6)~~ **(2)** shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC content limit established in Condition D.1.1.
- (1) The VOC content of each coating material and solvent used less water.
 - (2) The amount of coating material and solvent used on monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. **Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.**
 - ~~(3) A log of the dates of use;~~
 - ~~(4) The volume weighted average VOC content of the coatings used for each month;~~
 - ~~(5) The monthly cleanup solvent usage; and~~
 - ~~(6) The total VOC usage for each month.~~
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the following facilities shall be limited as shown in the table below based on the following:

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

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

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

Emission Unit ID	Process Weight (tons/hr)	Allowable Particulate Emissions (lb/hr)
Bulk Rubber Chemical Bins (baghouse BH-5)	0.10	0.89
Rubber Compounding (baghouse BH-1)	< 100 lbs/hr	0.551

D.3.2 Particulate Matter (PM)

In order to comply with D.3.1, ~~the baghouses BH-5 and~~ **baghouse BH-1** for PM control shall be in operation and control emissions from the bulk rubber chemical bins and the rubber compounding

process at all times that the bulk rubber chemical bins and the rubber compounding process are in operation.

Furthermore, the facility description in Section D.1 is hereby amended as follows:

Facility Description:

- (a) one (1) phoscoating adhesive dip tank line, constructed in 1986 and modified in 1995, consisting of **fifteen (15)** ~~sixteen (16)~~ stations with the following units:
- (1) Station 1 - Load/Unload;
 - (2) Station 2 - one (1) forced air adhesive dryer tank, exhausting through stack E3;
 - (3) ~~Station 3 - one (1) Y-70 adhesive dip tank, with a maximum throughput of 5,445 units per hour, exhausting through stack E3;~~
 - (4) Station 4 - one (1) ~~Y-68~~ adhesive dip tank, with a maximum throughput of 3,705 units per hour, exhausting through stack E3;
 - (4)** ~~(5)~~ Station 5 - one (1) ~~Y-39~~ adhesive dip tank, with a maximum throughput of 850 units per hour, exhausting through stack E3;
 - (5)** ~~(6)~~ Station 6 - one (1) forced air phosphate dryer tank, exhausting through stack E3;
 - (6)** ~~(7)~~ Station 7 - one (1) caustic cleaner dip tank, exhausting through stack E4;
 - (7)** ~~(8)~~ Station 8 - one (1) hot water rinse dip tank, exhausting through stack E4;
 - (8)** ~~(9)~~ Station 9 - one (1) caustic cleaner dip tank, exhausting through stack E4;
 - (9)** ~~(10)~~ Station 10 - one (1) hot water rinse dip tank, exhausting through stack E4;
 - (10)** ~~(11)~~ Station 11 - one (1) acid pickle dip tank, exhausting through stack E4;
 - (11)** ~~(12)~~ Station 12 - one (1) ~~hot~~ **cold** water rinse dip tank, exhausting through stack E4;
 - (12)** ~~(13)~~ Station 13 - one (1) ~~sealer dip tank, with a maximum throughput of 10,000 units per hour~~ **cold water rinse dip tank**, exhausting through stack E4;
 - (13)** ~~(14)~~ Station 14 - one (1) cold water rinse dip tank, exhausting through stack E4;
 - (14)** ~~(15)~~ Station 15 - one (1) calcium modified zinc phosphate dip tank, with a maximum throughput of 10,000 units per hour, exhausting through stack E4; and
 - (15)** ~~(16)~~ Station 16 - one (1) zinc phosphate dip tank, with a maximum throughput of 10,000 units per hour, exhausting through stack E4.
- (b) ~~one (1) surface coating spray booth, identified as Redicoat Booth, for paint and primer application, constructed in 1986, utilizing an electrostatic disc spray coating application system, with a maximum throughput of 10,000 units per hour, using dry filters for particulate matter control, exhausting through stack E2;~~
- (c) ~~one (1) surface coating spray booth, identified as E8, utilizing a High Volume Low Pressure (HVLP) spray coating application system, with a maximum throughput of 114 units per hour, using dry filters for particulate matter control, exhausting through stack E8 (Note: this unit has not yet been installed; potential emissions are at exempt levels pursuant to 326 IAC 2-1.1-3);~~
- ~~(d) one (1) Redicoat disc washer, with a maximum throughput of 0.125 units per hour, exhausting through stack G-V;~~
- (c) (e) two (2) three (3) parts washers, identified as PW1, and PW2 and PW3, with a total maximum solvent usage rate of 229 330 gallons per year;**
- ~~(f) one (1) hot oil dip tank, using a maximum of 2.89 gallons of oil per hour;~~

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

The facility description in Section D.2 is hereby amended as follows:

Facility Description:

(d) (g) The following natural gas combustion sources:

- (1) six (6) space heaters, identified as H1 through H5, each rated at 0.200 million British thermal units (MMBtu) per hour;
- (2) one (1) space heater, identified as H6, rated at 0.250 MMBtu per hour;
- (3) one (1) radiant heater, identified as H7, rated at 0.100 MMBtu/hr;
- (4) two (2) radiant heaters, identified as H8 and H9, each rated at 0.150 MMBtu/hr;
- (5) one (1) unit heater, identified as H10, rated at 0.050 MMBtu/hr;
- (6) two (2) duct heaters, identified as H11 and H12, each rated at 0.250 MMBtu/hr;
- (7) one (1) unit heater, identified as H13, rated at 0.100 MMBtu/hr;
- (8) one (1) unit heater, identified as H14, rated at 0.165 MMBtu/hr;
- (9) one (1) unit heater, identified as H15, rated at 0.125 MMBtu/hr;
- (10) seven (7) space heaters, identified as H16, H17, and H19 through H23, each rated at 1.875 MMBtu/hr;
- (11) two (2) make-up air units, identified as H18 and H24, each rated at 0.500 MMBtu/hr;
- (12) one (1) space heater, identified as H25, rated at 0.236 MMBtu/hr;
- (13) one (1) space heater, identified as H26, rated at 0.860 MMBtu/hr;
- (14) one (1) make-up air unit, identified as H27, rated at 0.490 MMBtu/hr;
- (15) one (1) make-up air unit, identified as H28, rated at 3.800 MMBtu/hr;
- (16) one (1) make-up air unit, identified as H29, rated at 5.400 MMBtu/hr;
- (17) one (1) package unit, identified as H30, rated at 0.087 MMBtu/hr;
- (18) one (1) package unit, identified as H31, rated at 0.120 MMBtu/hr;
- (19) one (1) make-up air unit, identified as H32, rated at 1.750 MMBtu/hr;
- (20) two (2) space heaters, identified as H33 and H34, each rated at 0.200 MMBtu/hr;
- (21) two (2) radiant heaters, identified as H35 and H38, each rated at 0.250 MMBtu/hr;
- (22) one (1) make-up air unit, identified as H36, rated at 3.456 MMBtu/hr;
- (23) one (1) make-up air unit, identified as H37, rated at 2.200 MMBtu/hr;
- (24) ~~one (1) paint drying oven, identified as PO1, rated at 0.404 MMBtu/hr;~~
- (25) eight (8) rubber post-cure ovens, identified as PC2 through PC6, PC8, PC9, and PC11, each rated at 1.2 MMBtu/hr;
- (25)(26) nine (9) catalytic oxidizers, identified as CO2 through CO10, each rated at 0.075 MMBtu/hr;
- (26)(27) one (1) boiler, identified as B1, constructed in 1978, rated at 4.2 MMBtu/hr;
- (27)(28) one (1) boiler, identified as B2, constructed in 1985, rated at 2.1 MMBtu/hr; and
- (28)(29) one (1) wastewater evaporator unit, identified as EV1, rated at 0.395 MMBtu/hr.

(e) (h) four (4) electric rubber post-cure ovens, all identified as PC10;

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

The facility description in Section D.3 is hereby amended as follows:

Facility Description:

- (f) ~~(f)~~ one (1) rubber manufacturing process, identified as the Banbury operation, constructed in 1986, with a maximum rubber production capacity of 3,914,192.15 pounds per year, consisting of the following:
 - (1) bulk rubber chemical bins, with a maximum throughput of 206.19 pounds of powdered chemical per hour, with one (1) baghouse (~~BH5~~ **BH1**) for particulate matter controls, exhausting through stack ~~BH5~~ **BH1**;
 - (2) the Minors area, with one (1) baghouse (BH4) for particulate matter control, exhausting through stack BH4;
 - (3) rubber compounding, with one (1) baghouse (BH1) for particulate matter control, exhausting through stack BH1; ~~and~~
 - ~~(4) one (1) rubber molding sandblasting unit, with one (1) baghouse (BH2) for particulate matter control, exhausting through stack BH2.~~
- (g) ~~(g)~~ one (1) tooling and machining sandblasting unit, with one (1) baghouse (BH3) for particulate matter control, exhausting through stack BH3;
- (h) ~~(h)~~ ~~one (1) TIG welding, MIG welding and station and one (1) stick welding station used for maintenance purposes only;~~
- (i) ~~(i)~~ one (1) oxyacetylene cutting station utilizing oxymethane and oxyacetylene gas with a maximum metal consumption rate of 0.4 inches per minute;
- ~~(m) one (1) 3,000 gallon isopropanol bulk storage tank, identified as T002; and~~
- (j) ~~(n)~~ one (1) 3,000 gallon used oil bulk storage tank, identified as T003.
- (k) **one (1) ultrasonic cleaning system, including one sonic tank, exhausting through stack E5.**
- (l) **two (2) rinse tanks, exhausting through stack E6.**

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

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Mr. Allen R. Davidson at (800) 451-6027, press 0 and ask for extension 3-5693, or dial (317) 233-5693.

Sincerely,

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

Attachments

ARD

cc: File - Clinton County
Clinton County Health Department
U.S. EPA, Region V
Air Compliance Section Inspector - Dave Rice
Compliance Data Section
Administrative and Development



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

MINOR SOURCE OPERATING PERMIT OFFICE OF AIR QUALITY

**Federal Mogul Corporation
2845 West State Road 28
Frankfort, Indiana 46041**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 023-12906-00003	
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: January 6, 2003 Expiration Date: January 6, 2008
First Administrative Amendment 023-21272-00003	Pages Amended: 2, 4-6, 15-17, 20-21
Issued by: Original signed by Nysa L. James, Section Chief Office of Air Quality	Issuance Date: July 12, 2005



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**Annual Notification
Malfunction Report**

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 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary plant manufacturing oil seals for the automotive industry.

Authorized Individual: Jeff Michael, Environmental Manager
Source Address: 2845 West State Road 28, Frankfort, Indiana 46041
Mailing Address: 2845 West State Road 28, Frankfort, Indiana 46041
General Source Phone: 765-654-8761
SIC Code: 3053
County Location: Clinton
Source Location Status: Attainment for all criteria pollutants
Source Status: Minor Source Operating Permit
Minor Source, under PSD Rules

A.2 Emission Units and Pollution Control Equipment Summary

This stationary source is approved to operate the following emission units and pollution control devices:

(a) one (1) phoscoating adhesive dip tank line, constructed in 1986 and modified in 1995, consisting of fifteen (15) stations with the following units:

- (1) Station 1 - Load/Unload;
- (2) Station 2 - one (1) forced air adhesive dryer tank, exhausting through stack E3;
- (3) Station 4 - one (1) adhesive dip tank, with a maximum throughput of 3,705 units per hour, exhausting through stack E3;
- (4) Station 5 - one (1) adhesive dip tank, with a maximum throughput of 850 units per hour, exhausting through stack E3;
- (5) Station 6 - one (1) forced air phosphate dryer tank, exhausting through stack E3;
- (6) Station 7 - one (1) caustic cleaner dip tank, exhausting through stack E4;
- (7) Station 8 - one (1) hot water rinse dip tank, exhausting through stack E4;
- (8) Station 9 - one (1) caustic cleaner dip tank, exhausting through stack E4;
- (9) Station 10 - one (1) hot water rinse dip tank, exhausting through stack E4;
- (10) Station 11 - one (1) acid pickle dip tank, exhausting through stack E4;
- (11) Station 12 - one (1) cold water rinse dip tank, exhausting through stack E4;
- (12) Station 13 - one (1) cold water rinse dip tank, exhausting through stack E4;
- (13) Station 14 - one (1) cold water rinse dip tank, exhausting through stack E4;
- (14) Station 15 - one (1) calcium modified zinc phosphate dip tank, with a maximum throughput of 10,000 units per hour, exhausting through stack E4; and
- (15) Station 16 - one (1) zinc phosphate dip tank, with a maximum throughput of 10,000 units per hour, exhausting through stack E4.

- (b) one (1) surface coating spray booth, identified as E8, utilizing a High Volume Low Pressure (HVLP) spray coating application system, with a maximum throughput of 114 units per hour, using dry filters for particulate matter control, exhausting through stack E8;
- (c) three (3) parts washers, identified as PW1, PW2 and PW3, with a total maximum solvent usage rate of 330 gallons per year;
- (d) The following natural gas combustion sources:
 - (1) six (6) space heaters, identified as H1 through H5, each rated at 0.200 million British thermal units (MMBtu) per hour;
 - (2) one (1) space heater, identified as H6, rated at 0.250 MMBtu per hour;
 - (3) one (1) radiant heater, identified as H7, rated at 0.100 MMBtu/hr;
 - (4) two (2) radiant heaters, identified as H8 and H9, each rated at 0.150 MMBtu/hr;
 - (5) one (1) unit heater, identified as H10, rated at 0.050 MMBtu/hr;
 - (6) two (2) duct heaters, identified as H11 and H12, each rated at 0.250 MMBtu/hr;
 - (7) one (1) unit heater, identified as H13, rated at 0.100 MMBtu/hr;
 - (8) one (1) unit heater, identified as H14, rated at 0.165 MMBtu/hr;
 - (9) one (1) unit heater, identified as H15, rated at 0.125 MMBtu/hr;
 - (10) seven (7) space heaters, identified as H16, H17, and H19 through H23, each rated at 1.875 MMBtu/hr;
 - (11) two (2) make-up air units, identified as H18 and H24, each rated at 0.500 MMBtu/hr;
 - (12) one (1) space heater, identified as H25, rated at 0.236 MMBtu/hr;
 - (13) one (1) space heater, identified as H26, rated at 0.860 MMBtu/hr;
 - (14) one (1) make-up air unit, identified as H27, rated at 0.490 MMBtu/hr;
 - (15) one (1) make-up air unit, identified as H28, rated at 3.800 MMBtu/hr;
 - (16) one (1) make-up air unit, identified as H29, rated at 5.400 MMBtu/hr;
 - (17) one (1) package unit, identified as H30, rated at 0.087 MMBtu/hr;
 - (18) one (1) package unit, identified as H31, rated at 0.120 MMBtu/hr;
 - (19) one (1) make-up air unit, identified as H32, rated at 1.750 MMBtu/hr;
 - (20) two (2) space heaters, identified as H33 and H34, each rated at 0.200 MMBtu/hr;
 - (21) two (2) radiant heaters, identified as H35 and H38, each rated at 0.250 MMBtu/hr;
 - (22) one (1) make-up air unit, identified as H36, rated at 3.456 MMBtu/hr;
 - (23) one (1) make-up air unit, identified as H37, rated at 2.200 MMBtu/hr;
 - (24) eight (8) rubber post-cure ovens, identified as PC2 through PC6, PC8, PC9, and PC11, each rated at 1.2 MMBtu/hr;
 - (25) nine (9) catalytic oxidizers, identified as CO2 through CO10, each rated at 0.075 MMBtu/hr;
 - (26) one (1) boiler, identified as B1, constructed in 1978, rated at 4.2 MMBtu/hr;
 - (27) one (1) boiler, identified as B2, constructed in 1985, rated at 2.1 MMBtu/hr; and
 - (28) one (1) wastewater evaporator unit, identified as EV1, rated at 0.395 MMBtu/hr.
- (e) four (4) electric rubber post-cure ovens, all identified as PC10;
- (f) one (1) rubber manufacturing process, identified as the Banbury operation, constructed in 1986, with a maximum rubber production capacity of 3,914,192.15 pounds per year, consisting of the following:
 - (1) bulk rubber chemical bins, with a maximum throughput of 206.19 pounds of powdered chemical per hour, with one (1) baghouse (BH1) for particulate matter controls, exhausting through stack BH1;
 - (2) the Minors area, with one (1) baghouse (BH4) for particulate matter control, exhausting through stack BH4;
 - (3) rubber compounding, with one (1) baghouse (BH1) for particulate matter control, exhausting through stack BH1.

- (g) one (1) tooling and machining sandblasting unit, with one (1) baghouse (BH3) for particulate matter control, exhausting through stack BH3;
- (h) TIG welding, MIG welding and stick welding for maintenance purposes only;
- (i) one (1) oxyacetylene cutting station utilizing oxymethane and oxyacetylene gas with a maximum metal consumption rate of 0.4 inches per minute;
- (j) one (1) 3,000 gallon used oil bulk storage tank, identified as T003.
- (k) one (1) ultrasonic cleaning system, including one sonic tank, exhausting through stack E5.
- (l) two (2) rinse tanks, exhausting through stack E6.

SECTION B GENERAL CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

B.1 Permit No Defense [IC 13]

This permit to operate does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Definitions

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 2-1.1-1 shall prevail.

B.3 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

B.4 Permit Term and Renewal [326 IAC 2-6.1-7(a)][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 of this permit do not affect the expiration date.

The Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date. If a timely and sufficient permit application for a renewal has been made, this permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

B.5 Modification to Permit [326 IAC 2]

All requirements and conditions of this operating permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of operating permits pursuant to 326 IAC 2 (Permit Review Rules).

B.6 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.
- (c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

Compliance Branch, Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015
- (d) The notification 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.

B.7 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation 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 contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept 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.8 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

- (a) Permit revisions are governed by the requirements of 326 IAC 2-6.1-6.
- (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, P.O. Box 6015
Indianapolis, Indiana 46206-6015
- Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1.
- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.9 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)] [IC 13-14-2-2]

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

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

- (b) Have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;
- (c) Inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.10 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)] :

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, within thirty (30) days of the change.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) IDEM, OAQ, shall issue a revised permit.

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.

B.11 Annual Fee Payment [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.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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, the allowable particulate matter emissions rate 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), the allowable particulate emissions rate 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 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

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 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.5 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, P.O. Box 6015
Indianapolis, Indiana 46206-6015

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 an "authorized individual" as defined by 326 IAC 2-7-1(34).

- (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) **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 that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

Testing Requirements

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

- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. 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, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date.

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.
- (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 the IDEM, OAQ, if the source 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.7 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

C.8 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.9 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

C.10 Actions Related to Noncompliance Demonstrated by a Stack Test

- (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 emissions unit 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 documents submitted pursuant to this condition do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1.

Record Keeping and Reporting Requirements

C.11 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.12 General Record Keeping Requirements [326 IAC 2-6.1-5]

- (a) Records of all required data, reports and support information 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 kept 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 when operation begins.

C.13 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) Reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) 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.
- (c) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

SECTION D.1

EMISSIONS UNIT OPERATION CONDITIONS

Facility Description:

- (a) one (1) phoscoating adhesive dip tank line, constructed in 1986 and modified in 1995, consisting of fifteen (15) stations with the following units:
- (1) Station 1 - Load/Unload;
 - (2) Station 2 - one (1) forced air adhesive dryer tank, exhausting through stack E3;
 - (3) Station 4 - one (1) adhesive dip tank, with a maximum throughput of 3,705 units per hour, exhausting through stack E3;
 - (4) Station 5 - one (1) adhesive dip tank, with a maximum throughput of 850 units per hour, exhausting through stack E3;
 - (5) Station 6 - one (1) forced air phosphate dryer tank, exhausting through stack E3;
 - (6) Station 7 - one (1) caustic cleaner dip tank, exhausting through stack E4;
 - (7) Station 8 - one (1) hot water rinse dip tank, exhausting through stack E4;
 - (8) Station 9 - one (1) caustic cleaner dip tank, exhausting through stack E4;
 - (9) Station 10 - one (1) hot water rinse dip tank, exhausting through stack E4;
 - (10) Station 11 - one (1) acid pickle dip tank, exhausting through stack E4;
 - (11) Station 12 - one (1) cold water rinse dip tank, exhausting through stack E4;
 - (12) Station 13 - one (1) cold water rinse dip tank, exhausting through stack E4;
 - (13) Station 14 - one (1) cold water rinse dip tank, exhausting through stack E4;
 - (14) Station 15 - one (1) calcium modified zinc phosphate dip tank, with a maximum throughput of 10,000 units per hour, exhausting through stack E4; and
 - (15) Station 16 - one (1) zinc phosphate dip tank, with a maximum throughput of 10,000 units per hour, exhausting through stack E4.
- (b) one (1) surface coating spray booth, identified as E8, utilizing a High Volume Low Pressure (HVLP) spray coating application system, with a maximum throughput of 114 units per hour, using dry filters for particulate matter control, exhausting through stack E8;
- (c) three (3) parts washers, identified as PW1, PW2 and PW3, with a total maximum solvent usage rate of 330 gallons per year;

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

Emission Limitations and Standards

D.1.1 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9, the owner or operator shall not allow the discharge into the atmosphere VOC in excess of three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, as applied to metal parts.

D.1.2 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

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

D.1.3 Volatile Organic Compounds (VOC)

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the Permittee shall comply with the following requirements for the parts washers:

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

D.1.4 Particulate [326 IAC 6-3-2(d)]

- (a) Particulate from the surface coating in the spray booth shall be controlled by a dry particulate filter, waterwash or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:
 - (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
 - (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

D.1.5 Preventive Maintenance Plan [326 IAC 1-6-3]

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

Compliance Determination Requirements

D.1.6 Volatile Organic Compounds (VOC)[326 IAC 8-1-2] [326 IAC 8-1-4]

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

Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.7 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC content limit established in Condition D.1.1.
- (1) The VOC content of each coating material and solvent used less water.
 - (2) The amount of coating material and solvent used on monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2

EMISSIONS UNIT OPERATION CONDITIONS

Facility Description:

- (d) The following natural gas combustion sources:
- (1) six (6) space heaters, identified as H1 through H5, each rated at 0.200 million British thermal units (MMBtu) per hour;
 - (2) one (1) space heater, identified as H6, rated at 0.250 MMBtu per hour;
 - (3) one (1) radiant heater, identified as H7, rated at 0.100 MMBtu/hr;
 - (4) two (2) radiant heaters, identified as H8 and H9, each rated at 0.150 MMBtu/hr;
 - (5) one (1) unit heater, identified as H10, rated at 0.050 MMBtu/hr;
 - (6) two (2) duct heaters, identified as H11 and H12, each rated at 0.250 MMBtu/hr;
 - (7) one (1) unit heater, identified as H13, rated at 0.100 MMBtu/hr;
 - (8) one (1) unit heater, identified as H14, rated at 0.165 MMBtu/hr;
 - (9) one (1) unit heater, identified as H15, rated at 0.125 MMBtu/hr;
 - (10) seven (7) space heaters, identified as H16, H17, and H19 through H23, each rated at 1.875 MMBtu/hr;
 - (11) two (2) make-up air units, identified as H18 and H24, each rated at 0.500 MMBtu/hr;
 - (12) one (1) space heater, identified as H25, rated at 0.236 MMBtu/hr;
 - (13) one (1) space heater, identified as H26, rated at 0.860 MMBtu/hr;
 - (14) one (1) make-up air unit, identified as H27, rated at 0.490 MMBtu/hr;
 - (15) one (1) make-up air unit, identified as H28, rated at 3.800 MMBtu/hr;
 - (16) one (1) make-up air unit, identified as H29, rated at 5.400 MMBtu/hr;
 - (17) one (1) package unit, identified as H30, rated at 0.087 MMBtu/hr;
 - (18) one (1) package unit, identified as H31, rated at 0.120 MMBtu/hr;
 - (19) one (1) make-up air unit, identified as H32, rated at 1.750 MMBtu/hr;
 - (20) two (2) space heaters, identified as H33 and H34, each rated at 0.200 MMBtu/hr;
 - (21) two (2) radiant heaters, identified as H35 and H38, each rated at 0.250 MMBtu/hr;
 - (22) one (1) make-up air unit, identified as H36, rated at 3.456 MMBtu/hr;
 - (23) one (1) make-up air unit, identified as H37, rated at 2.200 MMBtu/hr;
 - (24) eight (8) rubber post-cure ovens, identified as PC2 through PC6, PC8, PC9, and PC11, each rated at 1.2 MMBtu/hr;
 - (25) nine (9) catalytic oxidizers, identified as CO2 through CO10, each rated at 0.075 MMBtu/hr;
 - (26) one (1) boiler, identified as B1, constructed in 1978, rated at 4.2 MMBtu/hr;
 - (27) one (1) boiler, identified as B2, constructed in 1985, rated at 2.1 MMBtu/hr; and
 - (28) one (1) wastewater evaporator unit, identified as EV1, rated at 0.395 MMBtu/hr.
- (e) four (4) electric rubber post-cure ovens, all identified as PC10;

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

Emission Limitations and Standards

D.2.1 Particulate Matter (PM) [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3(e) (Particulate Emission Limitations for Sources of Indirect Heating), particulate emissions from any facility used for indirect heating purposes which has 250 MMBtu/hr heat input or less and which began operation after June 8, 1972, shall in no case exceed 0.6 lb/MMBtu heat input. Therefore, the PM emissions from the 4.2 MMBtu per hour heat input boiler, B1, shall be limited to 0.6 pounds per MMBtu heat input.

D.2.2 Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4(a) (Particulate Emission Limitations for Sources of Indirect Heating), the PM emissions from the 2.1 MMBtu per hour heat input boiler shall be limited to 0.6 pound per MMBtu heat input.

SECTION D.3

EMISSIONS UNIT OPERATION CONDITIONS

Facility Description:

- (f) one (1) rubber manufacturing process, identified as the Banbury operation, constructed in 1986, with a maximum rubber production capacity of 3,914,192.15 pounds per year, consisting of the following:
 - (1) bulk rubber chemical bins, with a maximum throughput of 206.19 pounds of powdered chemical per hour, with one (1) baghouse (BH1) for particulate matter controls, exhausting through stack BH1;
 - (2) the Minors area, with one (1) baghouse (BH4) for particulate matter control, exhausting through stack BH4;
 - (3) rubber compounding, with one (1) baghouse (BH1) for particulate matter control, exhausting through stack BH1.
- (g) one (1) tooling and machining sandblasting unit, with one (1) baghouse (BH3) for particulate matter control, exhausting through stack BH3;
- (h) TIG welding, MIG welding and stick welding for maintenance purposes only;
- (i) one (1) oxyacetylene cutting station utilizing oxymethane and oxyacetylene gas with a maximum metal consumption rate of 0.4 inches per minute;
- (j) one (1) 3,000 gallon used oil bulk storage tank, identified as T003.
- (k) one (1) ultrasonic cleaning system, including one sonic tank, exhausting through stack E5.
- (l) two (2) rinse tanks, exhausting through stack E6.

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

Emission Limitations and Standards

D.3.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the following facilities shall be limited as shown in the table below based on the following:

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

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

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

Emission Unit ID	Process Weight (tons/hr)	Allowable Particulate Emissions (lb/hr)
Bulk Rubber Chemical Bins	0.10	0.89
Rubber Compounding	< 100 lbs/hr	0.551

Compliance Determination Requirements

D.3.2 Particulate Matter (PM)

In order to comply with D.3.1, baghouse BH-1 for PM control shall be in operation and control emissions from the bulk rubber chemical bins and the rubber compounding process at all times that the bulk rubber chemical bins and the rubber compounding process are in operation.

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	Federal Mogul Corporation
Address:	2845 West State Road 28
City:	Frankfort, Indiana 46041
Phone #:	765-654-8761
MSOP #:	023-12906-00003

I hereby certify that Federal Mogul Corp. is still in operation.
 no longer in operation.

I hereby certify that Federal Mogul Corp. is in compliance with the requirements of MSOP 023-12906-00003.
 not in compliance with the requirements of MSOP 023-12906-00003.

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

MALFUNCTION REPORT

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
FAX NUMBER - 317 233-5967**

This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: Federal Mogul Corporation PHONE NO. (765) 654-8761 _____

LOCATION: (CITY AND COUNTY) Frankfort, Clinton County

PERMIT NO. 023-12906 AFS PLANT ID: 023-00003 AFS POINT ID: _____ INSP: David Rice

CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: ____/____/19____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/19____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:
