



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: September 27, 2006
RE: Dexter Axle Company Plant 11 / 039-23206-00455
FROM: Nisha Sizemore
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 03/23/06



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 Indianapolis, Indiana 46204-2251
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Minor Source Operating Permit OFFICE OF AIR QUALITY

**Dexter Axle Company - Plant 11
 222 and 500 Collins Road
 Elkhart, Indiana 46515**

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

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 MSOP under 326 IAC 2-6.1.

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.: 039-23206-00455	
Original signed by: Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: September 27, 2006 Expiration Date: September 27, 2011

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SECTION A

SOURCE SUMMARY

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

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a trailer axles and components manufacturing and painting source.

Authorized individual:	Facility Manager
Source Address:	222 and 500 Collins Road, Elkhart, Indiana 46515
Mailing Address:	222 Collins Road, Elkhart, Indiana 46515
General Source Phone:	(574) 295-1900
SIC Code:	3714
Source Location Status:	Elkhart
Source Status:	Nonattainment for Ozone based on the 8-hour standard Attainment for all other criteria pollutants Minor Source Operating Permit Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act

A.2 Source Definition

This stationary trailer axles and components manufacturing source company consists of two (2) plants:

- (a) Plant 11 is located at 222 Collins Road, Elkhart, Indiana 46575;
- (b) The Engineering Plant is located at 500 Collins Road, Elkhart, Indiana 46575.

Since the two (2) plants are located in contiguous properties, have the same SIC codes and are owned by one (1) company, they will be considered one (1) source. The Engineering Plant is currently only a storage facility.

A.3 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) paint booth, identified as ESB-1, installed in 2006, equipped with electrostatic air atomized spray applicators and dry filters for overspray control, exhausting to Stack ESB-1S, capacity: 225 metal parts per hour.
- (b) One (1) flash tunnel, identified as FT-2, installed in 2006, exhausting to Stack FT-2S, capacity: 225 metal parts per hour.
- (c) Two (2) pad metal inert gas (MIG) welders, identified as 222PW-2 and 222PW-3, installed in 1980, exhausting to Stacks 222PW-2 and 222PW-3, respectively, capacity: 75 metal parts or 2,600 pounds and 20.88 pounds of weld material per hour, each.
- (d) Two (2) spindle metal inert gas (MIG) welders, identified as 222W-2 and 222W-3, installed in 1980, exhausting to Stacks 222W-2 and 222W-3, respectively capacity: 75 metal parts or 2,600 pounds and 20.88 pounds of weld material per hour, each.

- (e) Three (3) manual metal inert gas (MIG) welders, identified as 222M-5, 222M-6, and 222M-7, installed in 1980, exhausting to Stacks 222M-5, 222M-6, and 222M-7, respectively, capacity: 20.88 pounds of wire and 273 pounds of parts per hour, each.
- (f) One (1) robotic metal inert gas (MIG) welder, identified as RWS-1, installed in 1996, capacity: 20.88 pounds of carbon weld electrode per hour and 450 pounds of steel spindles per hour.
- (g) One (1) Torflex axle manufacturing line, installed in 2004, capacity: 60 parts (4,830 pounds) per hour, consisting of:
 - (1) Four (4) MIG welding stations, identified as BRKT-TACK, BRKT-W1, BRKT-W2, and IB/SPND-W1, equipped with Torit filters, exhausting inside, capacity: 20.88 pounds of weld wire per hour, per station.
 - (2) One (1) MIG welding station, identified as RB/SPND-W1, equipped with a Torit filter, exhausting inside, capacity: 32.6 pounds of weld wire per hour.
- (h) One (1) natural gas-fired air makeup unit, identified as 222M-1, rated at: 3.5 million British thermal units per hour.
- (i) Nine (9) natural gas-fired space heaters, identified as 222SH-1 - 222SH-9, rated at: 0.2 million British thermal units per hour, total.
- (j) Ten (10) natural gas-fired space heaters, identified as 222SH-10 - 222SH-19, rated at: 0.25 million British thermal units per hour, total.
- (k) Eighteen (18) natural gas-fired space heaters, identified as 222SH-20 - 222SH-37, rated at: 0.16 million British thermal units per hour, total.
- (l) Fifteen (15) natural gas-fired space heaters, identified as 222SH-38 - 222SH-52, rated at: 0.15 million British thermal units per hour, total.
- (m) Seven (7) natural gas-fired space heaters, identified as 222SH-53 - 222SH-59, rated at: 0.1 million British thermal units per hour, total.
- (n) One (1) natural gas-fired heating unit in the Engineering Plant, identified as 500 SH-103, rated at: 0.25 million British thermal units per hour.

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-1.1-1]

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 2-1.1-1) shall prevail.

B.2 Permit Term [326 IAC 2-6.1-7(a)] [326 IAC 2-1.1-9.5] [IC 13-15-3-6(a)]

-
- (a) This permit, 039-23206-00455, 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 of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal 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.

B.3 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability

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 Severability

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.6 Property Rights or Exclusive Privilege

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

B.7 Duty to Provide Information

-
- (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 an "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.8 Certification

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

- (a) An annual notification shall be submitted by an authorized individual 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) The annual notice 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
Indianapolis, Indiana 46204-2251
- (c) 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.10 Preventive Maintenance Plan [326 IAC 1-6-3]

- (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 46204-2251

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

- (b) 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 PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) 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.11 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to 039-23206-00455 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.12 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

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 ninety (90) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

B.13 Permit Renewal [326 IAC 2-6.1-7]

- (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 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require the certification by an "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 46204-2251

- (b) A timely renewal application is one that is:
 - (1) Submitted at least ninety (90) days prior to the date of the expiration of this permit; and
 - (2) 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) 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 2-6.1 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 being needed to process the application.

B.14 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 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 46204-2251

Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1(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.15 Source Modification Requirement

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

B.16 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] [IC13-17-3-2] [IC 13-30-3-1]

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 permitted 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.17 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 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 46204-2251
- The application which shall be submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

B.18 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, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.19 Credible Evidence [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

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(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 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 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 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.6 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 46204-2251

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 2-1.1-1(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 2-6.1-5(a)(2)]

C.7 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 46204-2251

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

- (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 "authorized individual" as defined by "authorized individual".
- (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.8 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 2-6.1-5(a)(2)]

C.9 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.10 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.

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

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 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.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
Indianapolis, Indiana 46204-2251

- (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, 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 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, 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.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Painting Operations

- (a) One (1) paint booth, identified as ESB-1, installed in 2006, equipped with electrostatic air atomized spray applicators and dry filters for overspray control, exhausting to Stack ESB-1S, capacity: 225 metal parts per hour.
- (b) One (1) flash tunnel, identified as FT-2, installed in 2006, exhausting to Stack FT-2S, capacity: 225 metal parts per hour.

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

Emission Limitations and Standards

D.1.1 Minor Permit Revision - VOC Emission Limit

Pursuant to 326 IAC 2-8-11(d) and MPR 039-23268-00455, issued on July 14, 2006, the usage of VOC, including coatings, dilution solvents, and cleaning solvents delivered to the paint booth, identified as ESB-1, 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. Compliance with this limit rendered the requirements of 326 IAC 2-8-11.1(f) not applicable in MPR 039-23268-00455, issued on July 14, 2006.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

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

D.1.3 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment of the paint booth, identified as ESB-1, 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.1.4 Particulate [326 IAC 6-3-2(d)]

- (a) Pursuant to 326 IAC 6-3-2(d), the dry filters for particulate control shall be in operation in accordance with manufacturer's specifications and control emissions from the paint booth, identified as ESB-1, at all times when the paint booth, identified as ESB-1, is in operation.
- (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 B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control device.

Compliance Determination Requirements

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

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.7 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage and content limits and the VOC emission limits established in Conditions D.1.1 and D.1.2. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.

- (1) The VOC content of each coating material and solvent used.
- (2) The amount of coating material and solvent less water used on monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
- (3) The cleanup solvent usage for each month;
- (4) The total VOC usage for each month; and
- (5) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Condition D.1.4, the Permittee shall maintain records in accordance with D.1.4.

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

D.1.8 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 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.

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Welding Operations

- (c) Two (2) pad metal inert gas (MIG) welders, identified as 222PW-2 and 222PW-3, installed in 1980, exhausting to Stacks 222PW-2 and 222PW-3, respectively, capacity: 75 metal parts or 2,600 pounds and 20.88 pounds of weld material per hour, each.
- (d) Two (2) spindle metal inert gas (MIG) welders, identified as 222W-2 and 222W-3, installed in 1980, exhausting to Stacks 222W-2 and 222W-3, respectively capacity: 75 metal parts or 2,600 pounds and 20.88 pounds of weld material per hour, each.
- (e) Three (3) manual metal inert gas (MIG) welders, identified as 222M-5, 222M-6, and 222M-7, installed in 1980, exhausting to Stacks 222M-5, 222M-6, and 222M-7, respectively, capacity: 20.88 pounds of wire and 273 pounds of parts per hour, each.
- (f) One (1) robotic metal inert gas (MIG) welder, identified as RWS-1, installed in 1996, capacity: 20.88 pounds of carbon weld electrode per hour and 450 pounds of steel spindles per hour.
- (g) One (1) Torflex axle manufacturing line, installed in 2004, capacity: 60 parts (4,830 pounds) per hour, consisting of:
 - (1) Four (4) MIG welding stations, identified as BRKT-TACK, BRKT-W1, BRKT-W2, and IB/SPND-W1, equipped with Torit filters, exhausting inside, capacity: 20.88 pounds of weld wire per hour, per station.
 - (2) One (1) MIG welding station, identified as RB/SPND-W1, equipped with a Torit filter, exhausting inside, capacity: 32.6 pounds of weld wire per hour.

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

Emission Limitations and Standards

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emission rate from the:

- (a) Five (5) MIG welding stations at the Torflex Axle Manufacturing Line shall not exceed 7.40 pounds per hour, total, when operating at a process weight rate of 4,830 pounds per hour, total.
- (b) Two (2) spindle welders shall not exceed 4.91 pounds per hour, each, when operating at a process weight rate of 2,620.88 pounds per hour, each.
- (c) Two (2) pad welders shall not exceed 4.91 pounds per hour, each, when operating at a process weight rate of 2,620.88 pounds per hour, each.
- (d) One (1) robotic MIG welder, identified as RWS-1, shall not exceed 1.56 pounds per hour when operating at a process weight rate of 470.88 pounds per hour.
- (e) Three (3) manual welders, identified as identified as 222M-5, 222M-6, and 222M-7, shall not exceed 1.13 pounds per hour, each, when operating at a process weight rate of 293.88 pounds per hour, each.

The pounds 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:

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

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

MSOP Quarterly Report

Source Name: Dexter Axle Company - Plant 11
Source Address: 222 and 500 Collins Road, Elkhart, Indiana 46515
Mailing Address: 222 Collins Road, Elkhart, Indiana 46515
MSOP No.: 039-23206-00455
Facility: Paint booth, identified as ESB-1
Parameter: VOC delivered to the applicators
Limit: Less than twenty five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month

YEAR: _____

Month	VOC Delivered (tons)	VOC Delivered (tons)	VOC Delivered (tons)
	This Month	Previous 11 Months	12 Month Total

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

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE 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:	Dexter Axle Company – Plant 11
Address:	222 and 500 Collins Road
City:	Elkhart, Indiana 46515
Phone #:	574 – 295 – 1900
MSOP #:	039-23206-00455

I hereby certify that Dexter Axle Company – Plant 11 is still in operation.
 no longer in operation.

I hereby certify that Dexter Axle Company – Plant 11 is
 in compliance with the requirements of MSOP 039-23206-00455.
 not in compliance with the requirements of MSOP 039-23206-00455.

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 - 317 233-6865**

**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: _____ PHONE NO. () _____
LOCATION: (CITY AND COUNTY) _____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: ____/____/20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/20____ _____ 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:

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

Technical Support Document (TSD) for a Minor Source Operating Permit

Source Background and Description

Source Name:	Dexter Axle Company – Plant 11
Source Location:	222 and 500 Collins Road, Elkhart, Indiana 46515
County:	Elkhart
SIC Code:	3714
Operation Permit No.:	MSOP 039-23206-00455
Permit Reviewer:	Mark L. Kramer

The Office of Air Quality (OAQ) has reviewed an application from Dexter Axle Company – Plant 11 relating to the operation of a trailer axles and components manufacturing and painting source.

History

Dexter Axle Company – Plant 11 has been operating under a Federally Enforceable State Operating Permit (FESOP), F 039-19277-00455, issued on July 7, 2005. On June 9, 2006, the Dexter Axle Company – Plant 11 requested a transition from a FESOP to a Minor Source Operating Permit (MSOP).

In order to qualify for an MSOP, the potential to emit all criteria pollutants, except particulate, must be less than one hundred (100) tons per year. In addition, the potential to emit a single hazardous air pollutant (HAP) must be less than ten (10) tons per year and the potential to emit a combination of HAPs must be less than twenty five (25) tons per year, respectively. The potential to emit particulate must be less than two hundred and fifty (250) tons per year. Since Dexter Axle Company - Plant 11 has changed materials used for surface coating, the source now qualifies for an MSOP.

Source Definition

This source definition from the FESOP (F 039-19277-00455) was incorporated into this permit as follows:

The source determination for the remaining two (2) Tomkins Industries, Dexter Axle Company plants still applies. This trailer axle and components manufacturing operation consists of two (2) plants:

- (1) Plant 11 is located at 222 Collins Road, Elkhart, Indiana 46575; and
- (2) The Engineering Plant is located at 500 Collins Road, Elkhart, Indiana 46575.

Since the two (2) plants are located in contiguous properties, have the same SIC codes and are owned by one (1) company, they will be considered one (1) source. The Engineering Plant is currently only a storage facility.

Permitted Emission Units and Pollution Control Equipment

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

Plant 11

- (a) One (1) paint booth, identified as ESB-1, installed in 2006, equipped with electrostatic air atomized spray applicators and dry filters for overspray control, exhausting to Stack ESB-1S, capacity: 225 metal parts per hour.
- (b) One (1) flash tunnel, identified as FT-2, installed in 2006, exhausting to Stack FT-2S, capacity: 225 metal parts per hour.
- (c) Two (2) pad metal inert gas (MIG) welders, identified as 222PW-2 and 222PW-3, installed in 1980, exhausting to Stacks 222PW-2 and 222PW-3, respectively, capacity: 75 metal parts or 2,600 pounds and 20.88 pounds of weld material per hour, each.
- (d) Two (2) spindle metal inert gas (MIG) welders, identified as 222W-2 and 222W-3, installed in 1980, exhausting to Stacks 222W-2 and 222W-3, respectively capacity: 75 metal parts or 2,600 pounds and 20.88 pounds of weld material per hour, each.
- (e) Three (3) manual metal inert gas (MIG) welders, identified as 222M-5, 222M-6, and 222M-7, installed in 1980, exhausting to Stacks 222M-5, 222M-6, and 222M-7, respectively, capacity: 20.88 pounds of wire and 273 pounds of parts per hour, each.
- (f) One (1) robotic metal inert gas (MIG) welder, identified as RWS-1, installed in 1996, capacity: 20.88 pounds of carbon weld electrode per hour and 450 pounds of steel spindles per hour.
- (g) One (1) Torflex axle manufacturing line, installed in 2004, capacity: 60 parts (4,830 pounds) per hour, consisting of:
 - (1) Four (4) MIG welding stations, identified as BRKT-TACK, BRKT-W1, BRKT-W2, and IB/SPND-W1, equipped with Torit filters, exhausting inside, capacity: 20.88 pounds of weld wire per hour, per station.
 - (2) One (1) MIG welding station, identified as RB/SPND-W1, equipped with a Torit filter, exhausting inside, capacity: 32.6 pounds of weld wire per hour.
- (h) One (1) natural gas-fired air makeup unit, identified as 222M-1, rated at: 3.5 million British thermal units per hour.
- (i) Nine (9) natural gas-fired space heaters, identified as 222SH-1 - 222SH-9, rated at: 0.2 million British thermal units per hour, total.
- (j) Ten (10) natural gas-fired space heaters, identified as 222SH-10 - 222SH-19, rated at: 0.25 million British thermal units per hour, total.
- (k) Eighteen (18) natural gas-fired space heaters, identified as 222SH-20 - 222SH-37, rated at: 0.16 million British thermal units per hour, total.
- (l) Fifteen (15) natural gas-fired space heaters, identified as 222SH-38 - 222SH-52, rated at: 0.15 million British thermal units per hour, total.
- (m) Seven (7) natural gas-fired space heaters, identified as 222SH-53 - 222SH-59, rated at: 0.1 million British thermal units per hour, total.
- (n) One (1) natural gas-fired heating unit in the Engineering Plant, identified as 500 SH-103, rated at: 0.25 million British thermal units per hour.

Unpermitted Emission Units and Pollution Control Equipment

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

New Emission Units and Pollution Control Equipment

There are no proposed emission units during this review process.

Emission Units and Pollution Control Equipment Removed

The following facilities have been removed from the source and are not included in the proposed permit:

Three (3) axle paint lines, each installed in 2003, identified as 222P-A, 222P-B, and 222P-C, each line consisting of two (2) high-volume low-pressure spray guns plus an additional four (4) guns, using dry filters as control, exhausting to Stacks 222P-A, 222P-B, and 222P-C, respectively, capacity: 75 metal parts per hour, per line.

Existing Approvals

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

- (a) F 039-19277-00455 issued on July 7, 2005, and
- (b) Minor Permit Revision 039-23268-00455, issued on July 14, 2006.

All Section D conditions from previous approvals were incorporated into this MSOP except the following:

F 039-19277-00455 issued on July 7, 2005:

Condition D.1.5 - Any change or modification that increases the potential PM₁₀ or VOC emissions to 100 tons per year or more, the potential emissions of any individual HAP to 10 tons per year or more, or the potential emissions of any combination of HAPs to 25 tons per year or more shall require additional limitations in this permit, and prior IDEM, OAQ, approval.

Reason not incorporated: Since the unrestricted potential to emit of each of the criteria pollutants, except particulate, is less than one hundred (100) tons per year and the potential to emit HAPs are less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for the combination of HAPs, the source qualifies for an MSOP. Any change in the potential to emit of these criteria pollutants and/or HAPs above these levels would require prior approval by IDEM, OAQ.

Stack Summary

Stack ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temperature (°F)
ESB-1S	Paint Booth	30	1.83	9,900	Ambient
FT-2S	Flash Tunnel	30	1.83	9,900	Ambient
222PW-2	Pad Welder	30	2.00	9,112	Ambient

Stack ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temperature (°F)
222PW-3	Pad Welder	30	2.00	9,112	Ambient
222W-2	Spindle Welder	30	2.00	9,112	Ambient
222W-3	Spindle Welder	30	2.00	9,112	Ambient
222M-5	Manual Welder	12.0	1.30	3,365	Ambient
222M-6	Manual Welder	12.0	1.30	3,365	Ambient
222M-7	Manual Welder	12.0	1.30	3,365	Ambient

Enforcement Issue

There are no enforcement actions pending.

Recommendation

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

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

An application for the purposes of this review was received on June 9, 2006, with additional information received on July 5 and 11, 2006.

Emission Calculations

See pages 1 - 5 of Appendix A of this document for detailed emission calculations.

Potential to Emit of the Source Before Controls

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

Pollutant	Potential to Emit (tons/yr)
PM	22.9
PM ₁₀	23.0
SO ₂	0.012
VOC	28.8
CO	1.70
NO _x	2.02

HAPs	Potential to Emit (tons/yr)
Benzene	0.0004
Dichlorobenzene	0.00002
Formaldehyde	0.002
Hexane	0.036
Toluene	0.00007
Lead Compounds	0.00001
Cadmium Compounds	0.00002
Chromium Compounds	0.00003
Manganese Compounds	0.620
Nickel Compounds	0.00004

- (a) The potential to emit of all criteria pollutants is less than one hundred (100) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. An MSOP will be issued.
- (b) The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. An MSOP will be issued.
- (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 and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2003 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM _{2.5}	2
PM ₁₀	3
SO ₂	0
VOC	13
CO	2
NO _x	5
HAPs	Not reported

County Attainment Status

The source is located in Elkhart County.

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

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

Source Status

Existing Source PSD, Part 70, or FESOP Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/yr)
PM	8.46
PM ₁₀	8.57
SO ₂	0.012
VOC	25.1
CO	1.70
NO _x	2.02

Pollutant	Emissions (tons/yr)
Single HAP (Manganese Compounds)	0.620
Combination HAPs	0.658

- (a) This existing source is **not** a major stationary source because no attainment regulated pollutant is emitted at a rate of two-hundred fifty (250) tons per year or greater and it is not in one of the twenty-eight (28) listed source categories.
- (b) This existing source is **not** a major stationary source because no nonattainment regulated pollutant is emitted at a rate of one-hundred (100) tons per year or greater and it is not in one of the twenty-eight (28) listed source categories.
- (c) The usage of VOC, including coatings, dilution solvents, and cleaning solvents delivered to the paint booth, identified as ESB-1, 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. Compliance with this limit rendered the requirements of 326 IAC 2-8-11.1(f) not applicable in MPR 039-23268-00455.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from this permit (039-23206-00455) is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than one-hundred (100) tons per year,
- (b) a single hazardous air pollutant (HAP) is less than ten (10) tons per year, and
- (c) the combination of HAPs is less than twenty-five (25) tons per year.

This status has been verified by the OAQ inspector assigned to the source.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14, 326 IAC 20, 40 CFR Part 61 and 40 CFR Part 63) included in this permit.
- (c) The requirements of 40 CFR 63, Subpart M, the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products are not included in the permit for this source. This source is not a major source of HAPs.

State Rule Applicability – Entire Source

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

The unrestricted potential PM, PM₁₀, SO₂ and CO emissions are less than two-hundred fifty (250) tons per year, each. Therefore, this source is a minor source pursuant to 326 IAC 2-2, PSD.

326 IAC 2-3 (Emission Offset)

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

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

The operation of this trailer axle and component manufacturing and painting source will emit less than ten (10) tons per year of a single HAP and twenty-five (25) tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

This source is located in Elkhart County does not emit five (5) tons per year or more of lead and does not require a Part 70 Operating Permit. Therefore, the requirements of 326 IAC 2-6 do not apply.

326 IAC 2-8-11.1 (Permit Revisions)

The Minor Permit Revision 039-23268-00455 to the source's FESOP was issued on July 14, 2006 pursuant to 326 IAC 2-8-11.1(d)(5) since the potential to emit VOC from the paint booth and flash tunnel was limited to less than twenty-five (25) tons per year. This limit has been retained in the MSOP because without the limit, the revision would have been a Significant Permit Revision to a FESOP.

326 IAC 5-1 (Opacity Limitations)

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

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

State Rule Applicability – Individual Facilities

326 IAC 6-3-2 (Particulate emission limitations, work practices and control technologies)

- (a) Pursuant to 326 IAC 6-3-2(d), the dry filters for particulate control shall be in operation in accordance with manufacturer's specifications and control emissions from the paint booth, identified as ESB-1, at all times when the paint booth, identified as ESB-1, is in operation.
- (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.

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

- (a) The unrestricted potential PM emissions from the five (5) MIG welding stations all on the Torflex axle manufacturing line, are greater than 0.551 pounds per hour, total. In addition, the five (5) MIG welding stations consume more than six hundred and twenty-five (625) pounds of weld wire per day. Therefore, the requirements of 326 IAC 6-3-2 are applicable.

Pursuant to 326 IAC 6-3-2, the particulate from the five (5) MIG welding stations shall not exceed 7.40 pounds per hour, total, when operating at a process weight rate of 4,830 pounds per hour, total. Since the unrestricted potential particulate emissions from the five (5) MIG welding stations is 0.639 pounds per hour, the five (5) MIG welding stations can comply with this rule. This limitation is based upon the following:

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

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

- (b) All welding operations that are not part of the Torflex axle manufacturing line are part of the same axle manufacturing process. The unrestricted potential PM emissions from those eight (8) welders are greater than 0.551 pounds per hour, total. In addition the welders consume more than six hundred and twenty-five (625) pounds of weld wire per day. Therefore, the requirements of 326 IAC 6-3-2 are applicable.
 - (1) Pursuant to 326 IAC 6-3-2, the particulate from the two (2) spindle welders and two (2) pad welders shall not exceed 4.91 pounds per hour, each, when operating at a process weight rate of 2,620.88 pounds per hour, each. Since the unrestricted potential particulate emissions from the two (2) spindle welders and two (2) pad welders is 0.115 pounds per hour, each, the two (2) spindle welders and two (2) pad welders can comply with this rule.
 - (2) Pursuant to 326 IAC 6-3-2, the particulate from the one (1) robotic MIG welder, identified as RWS-1, shall not exceed 1.56 pounds per hour when operating at a process weight rate of 470.88 pounds per hour. Since the unrestricted potential particulate emissions from the one (1) robotic MIG welder, identified as RWS-1, is 0.115 pound per hour, the one (1) robotic MIG welder, identified as RWS-1, can comply with this rule.
 - (3) Pursuant to 326 IAC 6-3-2, the particulate from the three (3) manual welders, identified as identified as 222M-5, 222M-6, and 222M-7, shall not exceed 1.13 pounds per hour, each, when operating at a process weight rate of 293.88 pounds per hour, each. Since the unrestricted potential particulate emissions from the three (3) manual welders is 0.115 pound per hour, the three (3) manual welders, can comply with this rule.

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

Pursuant to 326 IAC 8-2-9, the owner or operator of the paint booth, identified as ESB-1, shall not allow the discharge into the atmosphere VOC in excess of three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator for extreme performance coatings.

Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment of the paint booth, identified as ESB-1, 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.

Based on the MSDS submitted by the source and calculations made, the paint booth, identified as ESB-1, can comply with this requirement.

Compliance Requirements

Permits issued under 326 IAC 2-6.1 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 2-6.1-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

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

There are no compliance monitoring requirements included in this permit.

Conclusion

The operation of this trailer axles and components manufacturing and painting source shall be subject to the conditions of the Minor Source Operating Permit 039-23206-00455.

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

Company Name: Dexter Axle Company - Plant 11
Address City IN Zip: 222 and 500 Collins Road, Elkhart, Indiana 46515
Permit Number: MSOP 039-23206
Plt ID: 039-00455
Reviewer: Mark L. Kramer
Application Date: June 9, 2006

Material	Density (lbs/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Spray Booth (ESB-1) & Flash Tunnel (FT-2)																
Z Shield 7900	10.76	33.0%	3.0%	30.0%	3.9%	56.00%	0.00902	225	3.36	3.23	6.55	157.2	28.7	16.0	5.76	75%

PM Control Efficiency: 90.00%

State Potential Emissions

Add worst case coating to all solvents

Uncontrolled	6.55	157.2	28.7	16.0
Controlled	6.55	157	28.7	1.60

METHODOLOGY

Limited and Controlled			Less than 25	1.60
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- Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
- Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
- Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
- Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
- Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
- Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
- Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
- Total = Worst Coating + Sum of all solvents used

No HAPs contained in Z Shield 7900

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

Company Name: Dexter Axle Company - Plant 11
Address City IN Zip: 222 and 500 Collins Road, Elkhart, Indiana 46515
Permit Number: MSOP 039-23206
Plt ID: 039-00455
Reviewer: Mark L. Kramer
Application Date: June 9, 2006

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr			
4.61	40			
Emission Unit	#of Units	Rating MMBTU/hr	Total Rating MMBTU/hr	
222M-1	1	3.50	3.50	
222SH-1-9	9	0.20	0.20	
222SH-10-19	10	0.25	0.25	
222SH-20-37	18	0.16	0.16	
222SH-38-52	15	0.15	0.15	
222SH-53-59	7	0.10	0.10	
500SH-103	1	0.25	0.25	
Total	61		4.61	

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.90	7.60	0.600	100 **see below	5.50	84.0
Potential Emission in tons/yr	0.038	0.153	0.012	2.02	0.111	1.70

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

Methodology

All emission factors are based on normal firing.
 MMBtu = 1,000,000 Btu
 MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
 Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
 See page 3 for HAPs emissions calculations.

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

HAPs Emissions

Company Name: Dexter Axle Company - Plant 11
Address City IN Zip: 222 and 500 Collins Road, Elkhart, Indiana 46515
Permit Number: MSOP 039-23206
Plt ID: 039-00455
Reviewer: Mark L. Kramer
Application Date: June 9, 2006

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 0.00210	Dichlorobenzene 0.00120	Formaldehyde 0.07500	Hexane 1.80000	Toluene 0.00340
Potential Emission in tons/yr	0.000042	0.000024	0.001514	0.036345	0.000069

HAPs - Metals						
Emission Factor in lb/MMcf	Lead 0.0005	Cadmium 0.0011	Chromium 0.0014	Manganese 0.0004	Nickel 0.0021	Total
Potential Emission in tons/yr	0.00001	0.00002	0.00003	0.00001	0.00004	0.038

Methodology is the same as page 2.

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

**Appendix A: Emissions Calculations
Welding**

**Company Name: Dexter Axle Company - Plant 11
Address City IN Zip: 222 and 500 Collins Road, Elkhart, Indiana 46515
Permit Number: MSOP 039-23206
Pit ID: 039-00455
Reviewer: Mark L. Kramer
Application Date: June 9, 2006**

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
			PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
WELDING											
Two (2) pad welders (222 PW-2 and 222PW-3)											
Metal Inert Gas (MIG)(carbon steel)	2	20.88	0.0055	0.0005		0.230	0.021	0	0	0.021	
Two (2) spindle welders (222W-2 and 222W-3)											
Metal Inert Gas (MIG)(carbon steel)	2	20.88	0.0055	0.0005		0.230	0.021	0	0	0.021	
Three (3) manual welders (222M-5, 222M-6 and 222M-7)											
Metal Inert Gas (MIG)(carbon steel)	3	20.88	0.0055	0.0005		0.345	0.031	0	0	0.031	
Robotic welder (RWS-1)											
Metal Inert Gas (MIG)(carbon steel)	1	20.88	0.0055	0.0005		0.115	0.010	0	0	0.010	
Torflex Axle Line											
BRKT-TACK, BRKT-W1, BRKT-W2 and IB/SPND-W1											
Metal Inert Gas (MIG)(carbon steel)	4	20.88	0.0055	0.0005		0.459	0.042	0	0	0.042	
RB/SPND-W1											
Metal Inert Gas (MIG)(carbon steel)	1	32.6	0.0055	0.0005		0.179	0.016	0	0	0.016	
EMISSION TOTALS											
Potential Emissions lbs/hr						1.56	0.142	0.00	0.00	0.142	
Potential Emissions lbs/day						37.4	3.40	0.00	0.00	3.40	
Potential Emissions tons/year						6.82	0.620	0.00	0.00	0.620	

METHODOLOGY

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

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

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

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

**Appendix A: Emissions Calculations
Summary**

Company Name: Dexter Axle Company - Plant 11
Address City IN Zip: 222 and 500 Collins Road, Elkhart, Indiana 46515
Permit Number: MSOP 039-23206
Plt ID: 039-00455
Reviewer: Mark L. Kramer
Application Date: #####

Summary of Emissions

Uncontrolled Potential Emissions

Emission Units	PM	PM-10	SO2	NOx	VOC	CO	HAPs
	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)
Spray Booth and Flash Tunnel	16.0	16.0	0.00	0.00	28.7	0.00	0.00
Natural Gas Combustion	0.038	0.153	0.012	2.02	0.111	1.70	0.038
Welding	6.82	6.82	0.00	0.00	0.00	0.00	0.620
Total	22.9	23.0	0.012	2.02	28.8	1.70	0.658

Controlled Potential Emissions

Emission Units	PM	PM-10	SO2	NOx	VOC	CO	HAPs
	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)
Spray Booth and Flash Tunnel	1.60	1.60	0.00	0.00	28.7	0.00	0.000
Natural Gas Combustion	0.038	0.153	0.012	2.02	0.111	1.70	0.038
Welding	6.82	6.82	0.00	0.00	0.00	0.00	0.620
Total	8.46	8.57	0.012	2.02	28.8	1.70	0.658

Limited & Controlled Potential Emissions

Emission Units	PM	PM-10	SO2	NOx	VOC	CO	HAPs
	(tons/yr)						
Spray Booth and Flash Tunnel	1.60	1.60	0.00	0.00	25.0	0.00	0.00
Natural Gas Combustion	0.038	0.153	0.012	2.02	0.111	1.70	0.038
Welding	6.82	6.82	0.00	0.00	0.00	0.00	0.620

Total	8.46	8.57	0.012	2.02	25.1	1.70	0.658
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