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October 19, 2006

Mr. Bruce Crenshaw
Donaldson Company, Inc.
3260 W. State Road 28
Frankfort, Indiana 46041

Re: Response to Review Request No. 023-23377-00024
Permit status evaluation
Plant ID: 023-00024

Dear Mr. Crenshaw:

Donaldson Company, Inc. was issued a Part 70 Operating Permit No. 023-8315-00024 on October 25, 2000 for a stationary air filter manufacturing plant located at 3260 W. State Road 28, Frankfort, Indiana 46041. A letter was received on July 18, 2006, relating to the construction or modification of the following emission units:

Hoosier Element Assembly Line

- (a) one (1) gasket adhesion unit, identified as emission unit H8, constructed in 2006, with a maximum capacity of 0.413 pounds of cyanoacrylate adhesive per hour, with emissions uncontrolled and fugitive; and
- (b) one (1) boot gasket adhesion unit, identified as emission unit H9, constructed in 2006, with a maximum capacity of 0.103 pounds of cyanoacrylate adhesive per hour, with emissions uncontrolled and fugitive.

Hybrid Line

- (c) one (1) electric media dry off oven, identified as emission unit D11, constructed in 2006, with a maximum capacity of 700 pounds of filter media per hour, with emissions uncontrolled and exhausting to stack V6; associated equipment includes an electric filter element cure oven (emission unit D16) with emissions uncontrolled and exhausting to stack V5.

Printing Ink and Solvents Operation

- (d) printing units, identified as emission unit S1, constructed in 2006, using an ink jet, pad printing, or UV-cure screen printing methods, coating paper, plastic, and metal, with a maximum capacity of 2 pounds of printing ink per hour, with emissions uncontrolled. Note: these items are fugitive and used on all production lines.

Maintenance Operation

- (e) one (1) ultrasonic parts washer, identified as emission unit F2, constructed in 2006, with a maximum volume of 8.5 gallons and a maximum usage rate of 0.236 pound per hour of non-halogenated cleaning solvent, with emissions uncontrolled and fugitive.

Mold Release Operation

- (f) mold release application used on the Hybrid Line, identified as emission unit M1, constructed in 1992 (modified in 2006), coating plastic molds prior to applying adhesive, with a maximum capacity of 1.8 pounds per hour of mold release with emissions uncontrolled and exhausting to stack V5; associated equipment includes electric mold preheat ovens, constructed in 2006, with emissions uncontrolled and fugitive.

Hybrid Line

- (g) The following insignificant activities, as defined in 326 IAC 2-7-1(21), that are not specifically regulated:
- (1) one (1) polyurethane dispensing station, identified as emission unit D13, constructed in 2006, with a maximum capacity of 140 pounds per hour, with a negligible potential to emit regulated pollutants;

Based on the information provided by Donaldson Company, Inc. and verified by OAQ as correct and accurate, the potential to emit regulated pollutants for the new and modified units is as follows:

Table 1 - Potential to Emit of Modification								
Emission Unit ID (process description)	Uncontrolled Potential to Emit (tons/year)							Worst Single HAP
	PM	PM10 ⁽¹⁾	SO ₂	NO _x	VOC	CO	Total HAPs	
H8 (gasket adhesion unit)	0	0	0	0	0.034	0	0	0
H9 (booth gasket adhesion unit)	0	0	0	0	0.009	0	0	0
D11 (media dry off oven)	0	0	0	0	included ⁽²⁾	0	included ⁽²⁾	included ⁽²⁾
D16 (electric filter element cure oven)	0	0	0	0	included ⁽³⁾	0	included ⁽³⁾	included ⁽³⁾
S1 (printing units and solvents)	0	0	0	0	0.221	0	0.221	0.221 (MEK)
F2 (ultrasonic parts washer)	0	0	0	0	1.034	0	0	0
M1 (mold application/preheat ovens)	0	0	0	0	3.576	0	1.35 ⁽⁴⁾	0.32 (xylenes) ⁽⁴⁾
D13 (urethane dispense station)	0	0	0	0	negl.	0	negl.	negl.
Total PTE of Modification	0	0	0	0	4.874	0	1.571	0.32 (xylenes)

negl. = negligible
 (1) US EPA has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions
 (2) Potential emissions from the media dry off oven (D11) are already included in the existing emission calculations for the electric infrared media heater (D4).
 (3) Potential emissions from the electric filter element cure oven (D16) are already included in the existing emission calculations for the electric infrared media heater (D4).
 (4) Mold release material contains approximately 90% by weight petroleum distillates (naphtha solvent). Potential emissions from the mold release application were calculated assuming that the petroleum distillate has a composition similar to gasoline with approximately 22% by weight total hazardous air pollutants (9% by weight xylenes).

Since the total combined uncontrolled potential to emit for the new emission units is less than the thresholds specified in 326 IAC 2-1.1-3(e)(1), the source is not required to obtain a pre-construction approval for these new or modified units.

Applicable state and federal requirements for these units, including any applicable requirements under 40 CFR 63, Subpart Mmmm, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Miscellaneous Metal Parts and Products, and 40 CFR 63, Subpart Pppp, NESHAP for Surface Coating of Plastic Parts and Products, shall be included in the Part 70 Operating Permit Renewal No. 023-23535-00024. The source will continue to operate subject to the conditions contained in the existing Part 70 Permit No. 023-8315-00024 until the renewal has been issued.

Questions should be directed to Nathan C. Bell, c/o OAQ, 100 North Senate Avenue, Indianapolis, Indiana, 46204-2251, at 317-234-3350 or at 1-800-451-6027 (ext 43350).

Sincerely,

Original signed by

Nisha Sizemore, Chief
Permits Branch
Office of Air Quality

ncb

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