



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
(800) 451-6027
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TO: Interested Parties / Applicant
DATE: December 31, 2007
RE: Federal Mogul Corporation / 091-24502-00091
FROM: Matthew Stuckey, Deputy Branch 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, Suite N 501E, 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.dot12/03/07



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Federally Enforceable State Operating Permit Renewal OFFICE OF AIR QUALITY

**Federal-Mogul Corporation
402 Royal Road
Michigan City, Indiana 46360**

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

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

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

Operation Permit No.: F091-24502-00091	
Issued by: <i>Original signed by Matt Stuckey for Chrystal Wagner, Section Chief Permits Branch Office of Air Quality</i>	Issuance Date: December 31, 2007 Expiration Date: December 31, 2017

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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 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

The Permittee owns and operates a stationary Wind Shield Wiper Manufacturing Plant.

Source Address:	402 Royal Road, Michigan City, Indiana 46360
Mailing Address:	402 Royal Road, Michigan City IN, 46360
General Source Phone Number:	219-872-5150
SIC Code:	3714
County Location:	LaPorte
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) One (1) metal wiper arm and blade surface coating operation, identified as E-Coat-2, consisting of the following:
 - (1) One (1) paint booth, identified as E-Coat-2 paint booth, equipped with electrostatic air atomized spray applicators and dry filters for PM overspray control, installed in 1990, exhausted through stack 153, capacity: 4.39 gallons of paint per hour.
 - (2) One natural gas-fired dry off oven, exhausted through stack 147, rated at 0.50 million British thermal units per hour.
 - (3) One (1) natural gas-fired E-Coat- oven, exhausted through stacks 135 and 145, rated at 2.00 million British thermal units per hour.
 - (4) One (1) natural gas-fired hot water tank, exhausted through stack 148, rated at 8.00 million British thermal units per hour.
 - (5) One (1) dip tank, identified as E-Coat-2 main tank, installed in 1990, exhausted through stack 139, capacity: 3,000 square feet of metal wiper arm and blade surfaces per hour.
- (b) One (1) natural gas fired burn-off oven, identified as EU 33, installed in 1988, rated at 1.20 million British thermal units per hour, exhausted through stack 33.
- (c) Two (2) natural gas-fired boilers, identified as boilers 1 and 2, installed in 1961, exhausted through stacks 121 and 122, respectively, rated at a total of 9.3 million British thermal units per hour.

- (d) Three (3) belt blasters, identified collectively as 2226, equipped with a baghouse, exhausted through stack 31, capacity: 1,000 parts per hour, each.
- (e) One (1) cabinet blaster, identified as 2562, equipped with a baghouse, exhausted through stack 30, capacity: 120,000 parts per hour.
- (f) One (1) cabinet blaster, identified as 2365, equipped with a baghouse, exhausted through stack 29, capacity: 20,571 parts per hour.
- (g) One (1) cabinet blaster, identified as 3343, equipped with a baghouse, exhausted through stack 177, capacity: 6 parts per hour.
- (h) Four (4) cabinet blasters identified as 2193, 2298, 3201, and 2181, capacity: 80 parts per hour.

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

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, totaling 15.6 million British thermal units per hour, including:
 - (1) One (1) blackened line heater, exhausted to stack 27, rated at 0.244 million British thermal units per hour.
 - (2) One (1) burner associated with the main melting pot, exhausted to stack 212, rated at 1.29 million British thermal units per hour.
 - (3) One (1) rubber dryer, located in the rubber room, exhausted to stack 167, rated at 0.165 million British thermal units per hour.
 - (4) One (1) burner associated with the salt tanks, located in the rubber room, exhausted to stack 184, rated at 0.250 million British thermal units per hour.
 - (5) Two (2) compression line dryers, located in the rubber room, exhausted to stacks 199 and 200, respectively, rated at 0.740 million British thermal units per hour, total.
 - (6) Three (3) extrusion post bake off ovens, located in the rubber room, exhausted to stack 207, rated at 0.900 million British thermal units per hour, total.
 - (7) Two (2) dryers, located in the rubber department, identified as rubber graphite operation dryer #2 and extrusion slitter dryer #1. Dryer #2 is exhausted to stack 289, and dryer #1 is exhausted to stack 290. Each dryer is rated at 0.600 million British thermal units per hour.
 - (8) One (1) boot drying oven, located in the boot room, exhausted to stack 60, rated at 1.00 million British thermal units per hour.
 - (9) Thirteen (13) air make-up units, exhausted to stacks 7, 22, 48, 94, 152, 174, 201, 225, 226, 251, 255, 256, and 271 respectively, rated at 6.11 million British thermal units per hour, total.

- (10) Seven (7) hot water heaters, exhausted to stacks 110, 143, 195, 206, 249 250, and 291, respectively, rated at 1.72 million British thermal units per hour, total.
 - (11) One (1) sludge dryer, exhausted to stack 107, rated at 0.153 million British thermal units per hour.
 - (12) Three (3) burners for the insignificant degreasing operations, exhausted to stacks 12, 14, 15, and 263, rated at 1.98 million British thermal units per hour, total.
 - (13) One (1) pan washer, and one (1) chipper washer, exhausted to stacks 9 and 21, respectively, rated at 0.475 million British thermal units per hour, total.
 - (14) Six (6) Reznor Heaters, exhaust to stacks 291 and 296. rated at 1.2 million British thermal units per hour.
- (b) Vessels storing lubricating oil, hydraulic oils, machining oils, and machining fluids.
 - (c) Filling drums, pails or other packaging containers with lubricating oils, waxes, and greases.
 - (d) Machining where an aqueous cutting coolant continuously floods the machining interface.
 - (e) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6, including:
 - (1) Five (5) maintenance and tools degreasers, installed in 1985, capacity: 0.30 gallons of solvent per day, each. [326 IAC 8-3-3]
 - (2) Three (3) production parts degreasers, installed in 1985, capacity: 3.0 gallons of alkaline-based cleaner per day, each.
 - (f) Cleaners and solvents characterized as follows: a) having a vapor pressure equal to or less than 2 kilopascals; 15 millimeters of mercury; or 0.3 pounds per square inch measured at 38 degrees Celsius (100 degrees Fahrenheit) or; b) having a vapor pressure equal to or less than 0.7 kilopascals; 5 millimeters of mercury; or 0.1 pounds per square inch measured at 20 degrees Celsius (68 degrees Fahrenheit); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
 - (g) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches soldering equipment, welding equipment. [326 IAC 6-3-2].
 - (h) Closed loop heating and cooling systems.
 - (i) Any operation using aqueous solutions containing less than 1 percent by weight of VOCs excluding HAPs.
 - (j) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
 - (k) Heat exchanger cleaning and repair.
 - (l) Process vessel degassing and cleaning to prepare for internal repairs.
 - (m) Trimmers that do not produce fugitive emissions and that are equipped with a dust collec-

- tion or trim material recovery device such as a bag filter or cyclone. [326 IAC 6-3-2].
- (n) Stockpiled soils from soil remediation activities that are covered and waiting transport for disposal.
 - (o) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4].
 - (p) Asbestos abatement projects regulated by 326 IAC 14-10.
 - (q) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
 - (r) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
 - (s) On-site fire and emergency response training approved by the department.
 - (t) Emergency generators as follows: Diesel generators not exceeding 1,600 horsepower, and natural gas turbines or reciprocating engines not exceeding 16,000 horsepower, including the following:

One (1) emergency diesel generator, installed in 1985, rated at 4.1 million British thermal units per hour.
 - (u) Other emergency equipment as follows: Stationary fire pumps.
 - (v) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. [326 IAC 6-3-2].
 - (w) Filter or coalescer media change out.
 - (x) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees Celsius).
 - (y) A laboratory as defined in 326 IAC 2-7-1(21)(D).
 - (z) Additional Insignificant Activities: blackening of metal parts; nitric acid passivation of metal parts; pretreatment of metal parts in the E-Coat process with aqueous cleaning, phosphate, and chrome sealing; rubber extrusion and curing; chlorination of rubber elements; rubber molding; plastic extrusion and injection molding; zinc die casting; graphite coating of rubber elements; latex dip operation (boot room); packaging operations; wastewater treatment operation; sludge drying; water to air stripper for soil remediation; and soil vapor extraction system. [326 IAC 6-3-2]
 - (aa) One (1) Laser Marking System for the rubber extruder, with a FUMEX fugitive fume exhaust system equipped with a bag filter and a carbon/HEPA filter, safety devices, and safety enclosure, exhausting indoors.

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

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

SECTION B GENERAL CONDITIONS

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

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

B.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

- (a) This permit, F091-24502-00091, is issued for a fixed term of ten (10) 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 and Northwest Regional Office, 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 [326 IAC 2-8-6]

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

B.5 Severability [326 IAC 2-8-4(4)]

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

B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by 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 [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an "authorized individual" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]

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

B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall 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) 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.12 Emergency Provisions [326 IAC 2-8-12]

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

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,
Compliance Section), or

Telephone Number: 317-233-0178 (ask for Compliance Section)

Facsimile Number: 317-233-6865

Northwest Regional Office phone: (219) 757-0265; fax: (219) 757-0267.

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
 - (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
 - (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
 - (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

- (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

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

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to F091-24502-00091 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.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]

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

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

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

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating

Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by 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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
 - (1) Submitted at least nine (9) months 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 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the

deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
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 may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

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

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

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

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

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

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

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

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

B.20 Source Modification Requirement [326 IAC 2-8-11.1]

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

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][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 FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:
- Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
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 administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.24 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) The potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period. This limitation shall make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 Opacity [326 IAC 5-1]

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

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

Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

C.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

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

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
MC 61-52 IGCN 1003
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.

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

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

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

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

by IDEM, OAQ if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

The notification 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).

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

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

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

C.13 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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

C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

C.15 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; and/or
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
 - (1) monitoring data;
 - (2) monitor performance data, if applicable; and
 - (3) corrective actions taken.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

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

C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) 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.

Stratospheric Ozone Protection

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

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

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

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(1)]: Surface Coating

- (a) One (1) metal wiper arm and blade surface coating operation, identified as E-Coat-2, consisting of the following:
- (1) One (1) paint booth, identified as E-Coat-2 (paint booth), equipped with electrostatic air atomized spray applicators and dry filters for PM overspray control, installed in 1990, exhausted through stack 153, capacity: 4.39 gallons paint per hour.
 - (2) One natural gas-fired dry off oven, exhausted through stack 147, rated at 0.50 million British thermal units per hour.
 - (3) One (1) natural gas-fired E-Coat- oven, exhausted through stacks 135 and 145, rated at 2.00 million British thermal units per hour.
 - (4) One (1) natural gas-fired hot water tank, exhausted through stack 148, rated at 8.00 million British thermal units per hour.
 - (5) One (1) dip tank, identified as E-Coat-2 (main tank), installed in 1990, exhausted through stack 139, capacity: 3,000 square feet of metal wiper arm and blade surfaces 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 [326 IAC 2-8-4(10)]

D.1.1 Hazardous Air Pollutants (HAPs) Limitations [326 IAC 2-8-4]

- (a) The worst-case single HAP delivered to the coating applicators in the one (1) metal wiper arm and blade surface coating operation, identified as E-Coat-2 (paint booth), including any clean-up solvents that may be used, shall not exceed a total of nine and nine-tenths (9.9) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Compliance with this limit will limit source-wide emissions of a single HAP to less than ten (10) tons per year and render 326 IAC 2-7 not applicable.
- (b) The combination of HAPs delivered to the coating applicators in the one (1) metal wiper arm and blade surface coating operation, identified as E-Coat-2 (paint booth), including any clean-up solvents that may be used, shall not exceed a total of twenty-four and four-tenths (24.4) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Compliance with this limit will limit source-wide emissions of combined HAPs to less than twenty-five (25) tons per year and render 326 IAC 2-7 not applicable.

D.1.2 Particulate Matter (PM) [326 IAC 6-3-2(d)]

The particulate matter (PM) from the paint booth, identified as E-Coat-2 (paint booth), shall be controlled by a dry particulate filter, a waterwash, or an equivalent control device and the control device shall be operated in accordance with manufacturer's specifications.

D.1.3 Volatile Organic Compound (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coatings applied to the metal windshield wiper parts at the one (1)

paint booth, identified as E-Coat-2 (paint booth) and one (1) natural gas-fired E-coat oven shall be limited to:

- (1) Three and five-tenths (3.5) pounds of VOCs per gallon of coating less water, for air dried or forced warm air dried coatings at temperatures up to 90°C, or for extreme performance coatings.
- (2) Four and three-tenths (4.3) pounds of VOC per gallon, excluding water, for clear coatings.
- (3) Three (3.0) pounds per gallon, excluding water, for all other coatings and coating application systems.

D.1.4 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 E-Coat-2 during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.1.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the one (1) metal wiper arm and blade surface coating operation, identified as E-Coat-2 and the associated control devices.

Compliance Determination Requirements

D.1.6 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 8-1-4(a)(3)(A)] [326 IAC 8-1-2(a)]

Compliance with the VOC and HAP content and usage limitations contained in Conditions D.1.1 and D.1.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) using formulation data supplied by the coating manufacturer. However, IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.1.7 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters for the one (1) paint booth, identified as E-Coat-2 (paint booth). To monitor the performance of the dry filters, weekly observations shall be made of the overspray while the spray booths are in operation. Section C-Response to Excursions or Exceedances shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the one (1) paint booth, identified as E-Coat-2 (paint booth), stack exhausts from stack 153, for the presence of overspray on the rooftops and the nearby ground. Section C-Response to Excursions or Exceedances for this unit shall contain troubleshooting contingency and response steps for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed. The Response to Excursions or Exceedances shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

These monitoring conditions are necessary to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes), and 326 IAC 2-8 (FESOP).

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

D.1.8 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.3, the Permittee shall maintain records in accordance with (1) through (8) below. Records maintained for (1) through (8) shall be taken as indicated below and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits and/or the VOC and HAP emission limits established in Conditions D.1.1 and D.1.3.
- (1) VOC and HAP content of each coating material and solvent used;
 - (2) The amount of coating material and solvent used less water on daily 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 and HAP usage for each month; and
 - (5) The weight of VOCs and HAPs (single and combined) emitted for each compliance period.
 - (6) The VOC and HAP content of each coating material and solvent used. 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;
 - (7) The cleanup solvent usage for each month;
 - (8) The single and combination of HAPs usage for each month; and
- (b) To document compliance with Condition D.1.9, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.9 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 the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2

FACILITY OPERATION CONDITIONS

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

- (a) One (1) natural gas-fired burn-off oven, identified as EU 33, installed in 1988, rated at 1.20 million British thermal units per hour, exhausted through stack 33.
- (b) Two (2) natural gas fired boilers, identified as boilers 1 and 2, installed in 1961, exhausted through stacks 121 and 122, respectively, rated at a total of 9.3 million British thermal units 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 [326 IAC 2-8-4(1)]

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

Pursuant to 326 IAC 6-2-3(d) (Particulate Emission Limitations for Sources of Indirect Heating), the particulate emissions from the two (2) natural gas-fired boilers, identified as boiler 1 and boiler 2, shall in no case exceed eight-tenths (0.8) lb/MMBtu heat input.

D.2.2 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 the two (2) boilers known as boiler 1 and boiler 2.

SECTION D.3 FACILITY OPERATION CONDITIONS

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

- (a) Three (3) belt blasters, identified as 2226, equipped with a baghouse, exhausted through stack 31, capacity: 1,000 parts per hour, each.
- (b) One (1) cabinet blaster, identified as 2562, equipped with a baghouse, exhausted through stack 30, capacity: 120,000 parts per hour.
- (c) One (1) cabinet blaster, identified as 2365, equipped with a baghouse, exhausted through stack 29, capacity: 20,571 parts per hour.
- (d) One (1) cabinet blaster, identified as 3343, equipped with a baghouse, exhausted through stack 177, capacity: 6 parts per hour.
- (e) Four (4) cabinet blasters, identified as 2193, 2298, 3201, and 2181, not vented to the atmosphere, capacity: 80 parts per hour, each.

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

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

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

- (a) The pounds per hour limitations in sections (b) through (e) were calculated using the equation below.

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

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

- (b) Pursuant to 326 IAC 6-3-2, the particulate emissions from the three (3) belt blasters, collectively identified as 2226 and exhausted through stack 31, shall be limited to 1.51 pounds per hour, when operating at a total process weight rate of 450 pounds per hour.
- (c) Pursuant to 326 IAC 6-3-2, the particulate from the one (1) cabinet blaster, identified as 2562 and exhausted through stack 30, shall be limited to 1.34 pounds per hour when operating at a process weight rate of 375 pounds per hour.
- (d) Pursuant to 326 IAC 6-3-2, the particulate from the one (1) cabinet blaster, identified as 2365 and exhausted through stack 29, shall be limited to 2.16 pounds per hour when operating at a process weight rate of 771 pounds per hour.
- (e) Pursuant to 326 IAC 6-3-2, the particulate from the one (1) cabinet blaster, identified as 3343 and exhausted through stack 177, shall be limited to 3.82 pounds per hour when operating at a process weight rate of 1,800 pounds per hour.
- (f) Pursuant to 326 IAC 6-3-2, the particulate from the four (4) cabinet blasters, identified as 2193, 2298, 3201, and 2181, each equipped with a baghouse and not exhausted to the atmosphere, shall be limited to 0.551 pounds per hour each, when operating at a process

weight rate of 36 pounds per hour.

D.3.2 PM₁₀ Emissions [326 IAC 2-8]

PM₁₀ emissions from shot blasting operations shall be limited to less than forty-nine (49) tons per twelve (12) consecutive month period. This will limit source-wide PM₁₀ emissions to less than one hundred (100) tons per twelve (12) consecutive month period, and render 326 IAC 2-7 not applicable.

D.3.3 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 the shot blasting operations.

Compliance Determination Requirements

D.3.4 Testing Requirements

To demonstrate compliance with Conditions D.3.1 and D.3.2, the Permittee shall perform PM and PM₁₀ testing on the shot blasters as follows:

- (a) Stack test for the shot blast unit 3343 exhausting to stack 177, before controls. Testing shall be performed within one hundred eighty (180) days of permit issuance. Testing shall be conducted in accordance with Section C - Performance Testing.
- (b) Stack test for the shot blast unit 2365 exhausting to stack 29, before controls. Testing shall be performed within one hundred eighty (180) days of permit issuance. Testing shall be conducted in accordance with Section C - Performance Testing.
- (c) Stack test for the shot blast unit 2226 exhausting to stack 31, after controls. Testing shall be performed within one hundred eighty (180) days of permit issuance. Testing shall be conducted in accordance with Section C - Performance Testing. These tests shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration.
- (d) Stack test for the shot blast unit 2562 exhausting to stack 30, after controls. Testing shall be performed within one hundred eighty (180) days of permit issuance. Testing shall be conducted in accordance with Section C - Performance Testing. These tests shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration.

D.3.5 Particulate (PM)

In order to comply with Condition D.3.1, the baghouses for particulate control shall control emissions from the seven (7) cabinet blasters, identified as 2562, 2193, 2298, 3201, 2365, 3343 and 2181, and the three (3) belt blasters, collectively identified as 2226, at all times while these shot blasting units are in operation.

SECTION D.4

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-1(21)]: Insignificant Activities

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6, including:
 - (1) Five (5) maintenance and tools degreasers, installed in 1985, capacity: 0.30 gallons of solvent per day, each. [326 IAC 8-3-3]

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

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

D.4.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-3]

Pursuant to 326 IAC 8-3-3 (Open Top Vapor Degreasing Operations), the owner or operator of the five (5) maintenance and tools degreasers shall:

- (a) equip the open top vapor degreaser with a cover that can be opened and closed easily without disturbing the vapor zone;
- (b) keep the cover closed at all times except when processing workloads through the degreaser;
- (c) minimize solvent carry-out by:
 - (1) Racking parts to allow complete drainage;
 - (2) Moving parts in and out of the degreaser at less than eleven (11) feet per minute;
 - (3) Degreasing the workload in the vapor zone at least thirty (30) seconds or until condensation ceases;
 - (4) Tipping out any pools of solvent on the cleaned parts before removal;
 - (5) Allowing parts to dry within the degreaser for at least fifteen (15) seconds or until visually dry;
- (d) not degreaser porous or absorbent materials, such as cloth, leather, wood or rope;
- (e) not occupy more than half of the degreaser's open top area with the workload;
- (f) not load the degreaser such that the vapor level drops more than fifty percent (50%) of the vapor depth when the workload is removed;
- (g) never spray above the vapor level;
- (h) repair solvent leaks immediately, or shut down the degreaser;
- (i) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, such that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere;

- (j) not use workplace fans near the degreaser opening;
- (k) not allow visually detectable water in the solvent exiting the water separator; and
- (l) provide a permanent, conspicuous label summarizing the operating requirements.

D.4.2 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 the degreasing operations.

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Federal-Mogul Corporation
Source Address: 402 Royal Road, Michigan City, Indiana 46360
Mailing Address: 402 Royal Road, Michigan City, Indiana 46360
FESOP No.: F091-24502-00091

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865**

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

Source Name: Federal-Mogul Corporation
Source Address: 402 Royal Road, Michigan City, Indiana 46360
Mailing Address: 402 Royal Road, Michigan City, Indiana 46360
FESOP No.: F091-24502-00091

This form consists of 2 pages

Page 1 of 2

<input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) <ul style="list-style-type: none">•The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and•The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

FESOP Quarterly Report

Source Name: Federal-Mogul Corporation
 Source Address: 402 Royal Road, Michigan City, Indiana 46360
 Mailing Address: 402 Royal Road, Michigan City, Indiana 46360
 FESOP No.: F091-24502-00091
 Facilities: One (1) metal wiper arm and blade surface coating operation, identified as E-Coat-2 (paint booth) including any clean-up solvents that may be used
 Parameter: Single HAP usage
 Limit: Total less than nine and nine-tenths (9.9) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR:

Month	Single HAP (tons)	Single HAP (tons)	Single HAP (tons)
	This Month	Previous 11 Months	12 Month Total

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Federal-Mogul Corporation
 Source Address: 402 Royal Road, Michigan City, Indiana 46360
 Mailing Address: 402 Royal Road, Michigan City, Indiana 46360
 FESOP No.: F 091-24502-00091
 Facilities: One (1) metal wiper arm and blade surface coating operation, identified as E-Coat-2 (paint booth) including any clean-up solvents that may be used
 Parameter: Combined HAPs usage
 Limit: Total less than twenty-four and four-tenths (24.4) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR:

Month	Combination HAPs (tons)	Combination HAPs (tons)	Combination HAPs (tons)
	This Month	Previous 11 Months	12 Month Total

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

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

Source Name: Federal-Mogul Corporation
Source Address: 402 Royal Road, Michigan City, Indiana 46360
Mailing Address: 402 Royal Road, Michigan City, Indiana 46360
FESOP No.: F091-24502-00091

Months: _____ to _____ Year: _____

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

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

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

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

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

Source Name:	Federal-Mogul Corporation
Source Location:	402 Royal Road, Michigan City, Indiana 46360
County:	LaPorte
SIC Code:	3714
Operation Permit No.:	F091-24502-00091
Permit Reviewer:	APT

On November 27, 2007, the Office of Air Quality (OAQ) had a notice published in The News Dispatch in Michigan City, Indiana stating that Federal-Mogul Corporation, had applied for a Federally Enforceable State Operating Permit (FESOP) Renewal for a stationary windshield wiper manufacturing plant. The notice also stated that OAQ proposed to issue a permit renewal for this operation and provided information on how the public could review the proposed permit renewal and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit renewal should be issued as proposed.

Changes to the permit are noted as follows: ~~struck~~ language has been deleted; **bold** language has been added. If necessary, the Table of Contents will be modified to reflect these changes.

Necessary changes will be noted in this addendum only, as no changes will be made to the TSD.

Permit F091-24502-00091

OAQ Change #1

The following changes have been made to Section D.1.1 (a) and (b):

D.1.1 Hazardous Air Pollutants (HAPs) Limitations [326 IAC 2-8-4]

- (a) The worst-case single HAP delivered to the coating applicators in the one (1) metal wiper arm and blade surface coating operation, identified as E-Coat-2 (paint booth), **including any clean-up solvents that may be used**, shall not exceed a total of nine and nine-tenths (9.9) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Compliance with this limit will limit source-wide emissions of a single HAP to less than ten (10) tons per year and render 326 IAC 2-7 not applicable.
- (b) The combination of HAPs delivered to the coating applicators in the one (1) metal wiper arm and blade surface coating operation, identified as E-Coat-2 (paint booth), **including any clean-up solvents that may be used**, shall not exceed a total of twenty-four and four-tenths (24.4) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Compliance with this limit will limit source-wide emissions of combined HAPs to less than twenty-five (25) tons per year and render 326 IAC 2-7 not applicable.

OAQ Change #2

The following changes have been made to the FESOP Quarterly Report on page 37 of the permit:

FESOP Quarterly Report

Source Name: Federal-Mogul Corporation
Source Address: 402 Royal Road, Michigan City, Indiana 46360
Mailing Address: 402 Royal Road, Michigan City, Indiana 46360
FESOP No.: F091-24502-00091
Facilities: One (1) metal wiper arm and blade surface coating operation, identified as E-Coat-2 (paint booth) **including any clean-up solvents that may be used**
Parameter: Single HAP usage
Limit: Total less than nine and nine-tenths (9.9) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

OAQ Change #3

The following changes have been made to the FESOP Quarterly Report on page 38 of the permit:

FESOP Quarterly Report

Source Name: Federal-Mogul Corporation
Source Address: 402 Royal Road, Michigan City, Indiana 46360
Mailing Address: 402 Royal Road, Michigan City, Indiana 46360
FESOP No.: F 091-24502-00091
Facilities: One (1) metal wiper arm and blade surface coating operation, identified as E-Coat-2 (paint booth) **including any clean-up solvents that may be used**
Parameter: Combined HAPs usage
Limit: Total less than twenty-four and four-tenths (24.4) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

OAQ Change #4

On December 16, 2007, rule revisions to 326 IAC 2-1.1-9 and 326 IAC 2-8-4 were finalized allowing for ten (10) year permit terms on FESOP renewals. Condition B.2 has been revised to reflect the ten (10) year permit term.

B.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

- (a) This permit, F091-24502-00091, is issued for a fixed term of ~~five (5)~~ **ten (10)** 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 and **Northwest Regional Office**, 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.

Indiana Department of Environmental Management
Office of Air Quality

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

Source Background and Description

Source Name: Federal-Mogul Corporation
Source Location: 402 Royal Road, Michigan City, Indiana 46360
County: LaPorte
SIC Code: 3714
Operation Permit No.: F091-24502-00091
Permit Reviewer: APT

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from Federal-Mogul Corporation relating to the operation of a stationary windshield wiper manufacturing source. Cooper Automotive, ANCO Products, now Federal-Mogul Corporation, was issued a FESOP Renewal, F091-15098-00091, on November 20, 2002.

History

AA 091-10287-00091 issued on March 18, 1999, changed the name of the company to Federal-Mogul Corporation.

Permitted Emission Units and Pollution Control Equipment

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

- (a) One (1) metal wiper arm and blade surface coating operation, identified as E-Coat-2, consisting of the following:
 - (1) One (1) paint booth, identified as E-Coat-2 (paint booth), equipped with electrostatic air atomized spray applicators and dry filters for PM overspray control, installed in 1990, exhausted through stack 153, capacity: 4.39 gallons of paint per hour.
 - (2) One (1) natural gas-fired dry off oven, exhausted through stack 147, rated at 0.50 million British thermal units per hour.
 - (3) One (1) natural gas-fired E-coat oven, exhausted through stacks 135 and 145, rated at 2.00 million British thermal units per hour.
 - (4) One (1) natural gas-fired hot water tank, exhausted through stack 148, rated at 8.00 million British thermal units per hour.
 - (5) One (1) dip tank, identified as E-Coat-2 (main tank), installed in 1990, exhausted through stack 139, capacity: 3,000 square feet of metal wiper arm and blade surfaces per hour.
- (b) One (1) natural gas-fired burn-off oven, identified as EU 33, installed in 1988, rated at 1.20 million British thermal units per hour, exhausted through stack 33.

- (c) Two (2) natural gas-fired boilers, identified as boilers 1 and 2, installed in 1961, exhausted through stacks 121 and 122, respectively, rated at: 9.30 million British thermal units per hour, total.
- (d) Three (3) belt blasters, identified as 2226, equipped with a baghouse, exhausted through stack 31, capacity: 1,000 parts per hour, each.
- (e) One (1) cabinet blaster, identified as 2562, equipped with a baghouse, exhausted through stack 30, capacity: 120,000 parts per hour.
- (f) One (1) cabinet blaster, identified as 2365, equipped with a baghouse, exhausted through stack 29, capacity: 20,571 parts per hour.
- (g) One (1) cabinet blaster, identified as 3343, equipped with a baghouse, exhausted through stack 177, capacity: 6 parts per hour.
- (h) Four (4) cabinet blasters, identified as 2193, 2298, 3201, and 2181 each equipped with a baghouse, capacity: 80 parts per hour, each.

Emission Units and Pollution Control Equipment Removed From the Source

This stationary source has removed the following emission units and pollution control devices:

- (a) One (1) metal wiper arm and blade surface coating operation, identified as E-Coat-1 consisting of the following:
 - (1) One (1) paint booth, identified as E-Coat-1 (paint booth), equipped with electrostatic air atomized spray applicators and dry filters for PM overspray control, installed in 1986, exhausted through stack 46, capacity: 4.39 gallons of paint per hour.
 - (2) One (1) natural gas-fired dry off oven, exhausted through stack 44, rated at 0.50 million British thermal units per hour.
 - (3) One (1) natural gas-fired E-coat oven, exhausted through stack 52, rated at 2.00 million British thermal units per hour.
 - (4) One (1) top coat oven, exhausted through stack 50, rated at 1.50 million British thermal units per hour.
 - (5) One (1) dip tank, identified as E-Coat-1 (main tank), installed in 1986, exhausted through stack 39, capacity: 3,000 square feet of metal wiper arm and blade surfaces per hour.

Insignificant Activities

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, totaling 23.43 million British thermal units per hour, including:
 - (1) One (1) blackened line heater, exhausted to stack 27, rated at 0.244 million British

thermal units per hour.

- (2) One (1) burner associated with the main melting pot, exhausted to stack 212, rated at 1.29 million British thermal units per hour.
 - (3) One (1) rubber dryer, located in the rubber room, exhausted to stack 167, rated at 0.165 million British thermal units per hour.
 - (4) One (1) burner associated with the salt tanks, located in the rubber room, exhausted to stack 184, rated at 0.250 million British thermal units per hour.
 - (5) Two (2) compression line dryers, located in the rubber room, exhausted to stacks 199 and 200, respectively, rated at 0.740 million British thermal units per hour, total.
 - (6) Three (3) extrusion post bake off ovens, located in the rubber room, exhausted to stack 207, rated at 0.900 million British thermal units per hour, total.
 - (7) Two (2) dryers, located in the rubber department, identified as rubber graphite operation dryer #2 and extrusion slitter dryer #1. Dryer #2 is exhausted to stack 289, and dryer #1 is exhausted to stack 290. Each dryer is rated at 0.600 million British thermal units per hour.
 - (8) One (1) boot drying oven, located in the boot room, exhausted to stack 60, rated at 1.00 million British thermal units per hour.
 - (9) Thirteen (13) air make-up units, exhausted to stacks 7, 22, 48, 94, 152, 174, 201, 225, 226, 251, 255, 256, and 271 respectively, rated at 6.11 million British thermal units per hour, total.
 - (10) Seven (7) hot water heaters, exhausted to stacks 110, 143, 195, 206, 249, 250, and 291 respectively, rated at 1.72 million British thermal units per hour, total.
 - (11) One (1) sludge dryer, exhausted to stack 107, rated at 0.153 million British thermal units per hour.
 - (12) Three (3) burners for the insignificant degreasing operations, exhausted to stacks 12, 14, 15, and 263, rated at 1.98 million British thermal units per hour, total.
 - (13) One (1) pan washer, and one (1) chipper washer, exhausted to stacks 9 and 21, respectively, rated at 0.475 million British thermal units per hour, total.
 - (14) Six (6) Reznor Heaters, exhaust to stack 291-296 rated at 1.2 million British thermal units per hour.
- (b) Vessels storing lubricating oil, hydraulic oils, machining oils, and machining fluids.
 - (c) Filling drums, pails or other packaging containers with lubricating oils, waxes, and greases.
 - (d) Machining where an aqueous cutting coolant continuously floods the machining interface.
 - (e) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6, including:
 - (1) Five (5) maintenance and tools degreasers, installed in 1985, capacity: 0.30 gallons of solvent per day, each. [326 IAC 8-3-3]

- (2) Three (3) production parts degreasers, installed in 1985, capacity: 3.0 gallons of alkaline-based cleaner per day, each.
- (f) Cleaners and solvents characterized as follows: a) having a vapor pressure equal to or less than 2 kilopascals; 15 millimeters of mercury; or 0.3 pounds per square inch measured at 38 degrees Celsius (100 degrees Fahrenheit) or; b) having a vapor pressure equal to or less than 0.7 kilopascals; 5 millimeters of mercury; or 0.1 pounds per square inch measured at 20 degrees Celsius (68 degrees Fahrenheit); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (g) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches soldering equipment, welding equipment.
- (h) Closed loop heating and cooling systems.
- (i) Any operation using aqueous solutions containing less than 1 percent by weight of VOCs excluding HAPs.
- (j) Replacement or repair of electrostatic precipitators, bags in baghouse/s, and filters in other air filtration equipment.
- (k) Heat exchanger cleaning and repair.
- (l) Process vessel degassing and cleaning to prepare for internal repairs.
- (m) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone. [326 IAC 6-3-2]
- (n) Stockpiled soils from soil remediation activities that are covered and waiting transport for disposal.
- (o) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
- (p) Asbestos abatement projects regulated by 326 IAC 14-10.
- (q) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (r) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (s) On-site fire and emergency response training approved by the department.
- (t) Emergency generators as follows: Diesel generators not exceeding 1,600 horsepower, and natural gas turbines or reciprocating engines not exceeding 16,000 horsepower, including the following:
 - One (1) emergency diesel generator, installed in 1985, rated at 4.1 million British thermal units per hour.
- (u) Other emergency equipment as follows: Stationary fire pumps.
- (v) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors,

wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

- (w) Filter or coalescer media changeout.
- (x) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees Celsius).
- (y) A laboratory as defined in 326 IAC 2-7-1(21)(D).
- (z) Additional Insignificant Activities: blackening of metal parts; nitric acid passivation of metal parts; pretreatment of metal parts in the E-Coat process with aqueous cleaning, phosphate, and chrome sealing; rubber extrusion and curing; chlorination of rubber elements; rubber molding; plastic extrusion and injection molding; zinc die casting; graphite coating of rubber elements; latex dip operation (boot room); packaging operations; wastewater treatment operation; sludge drying; water to air stripper for soil remediation; and soil vapor extraction system. [326 IAC 6-3-2]
- (aa) One (1) Laser Marking System for the rubber extruder, with a FUMEX fugitive fume exhaust system equipped with a bag filter and a carbon/HEPA filter, safety devices, and safety enclosure, exhausting indoors.

Unpermitted Emission Units and Pollution Control Equipment

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

New Emission Units and Pollution Control Equipment Receiving New Source Review Approval

There are no new facilities proposed at this source during this review process.

Existing Approvals

The source has been operating under the following previous approvals:

- (a) FESOP Renewal F091-15098-00091, issued on November 20, 2002; and
- (b) AA 091-18448-00091, issued on February 01, 2004

The following terms and conditions from previous approvals have been revised in this FESOP Renewal:

The VOC limit in permit number F091-15098-00091 was based on two (2) metal wiper arm surface coating operations. The removal of one (1) of these surface coating operations reduced the source-wide potential to emit VOCs to below the FESOP threshold of one hundred (100) tons per year. Therefore, the previously established VOC limit of ninety-three (93) tons per year and the quarterly reporting for the one (1) metal wiper arm surface coating operation, identified as E-Coat-2 (paint booth), is no longer necessary.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

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

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

An administratively complete FESOP Renewal application for the purposes of this review was received on March 3, 2007.

Emission Calculations

See pages 1 through 14 of Appendix A of this document for detailed emissions calculations.

County Attainment Status

The source is located in LaPorte County.

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

Note: On September 6, 2007 the Indiana Air Pollution Control Board finalized a temporary emergency rule to redesignate Allen, Clark, Elkhart, Floyd, LaPorte, and St. Joseph Counties as attainment for the 8-hour ozone standard.

- (a) LaPorte County has been classified as attainment for PM_{2.5}. The U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM_{2.5} emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM_{2.5} emissions, it has directed states to regulate PM₁₀ emissions as a surrogate for PM_{2.5} emissions. See the State Rule Applicability – Entire Source section.
- (b) 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 emissions and NO_x emissions are considered when evaluating the rule applicability relating to ozone. LaPorte County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.

- (c) LaPorte 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. See the State Rule Applicability – Entire Source section.
- (d) 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 emissions are not counted toward determination of PSD.

Potential to Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit (PTE) is defined as “the maximum capacity of a stationary source 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.”

Table 1.1, reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Table 1.1 Potential to Emit Before Controls

Pollutant	Unrestricted Potential Emissions (tons/year)
PM	118.04
PM ₁₀	119.12
SO ₂	0.17
VOC	75.95
CO	17.19
NO _x	22.76

Note: For the purpose of determining Title V applicability for particulates, PM₁₀, not PM, is the regulated pollutant in consideration.

Table 1.1 Potential to Emit HAPs Before Controls

HAPs	Unrestricted Potential Emissions (tons/year)
Xylene	27.9
Glycol Ethers	9.3
Combined HAPs	37.57
TOTAL HAPS	single greater than 10, combined greater than 25

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM₁₀ is equal to or greater than one hundred (100) tons per year. The source is subject to the provisions of 326 IAC 2-7. This source, otherwise required to obtain a Title V permit, has agreed to accept a permit with federally enforceable limits that restrict its PTE of PM₁₀ to below the Title V emission levels. Therefore, this source will be issued a Federally Enforceable State Operating Permit (FESOP), pursuant to 326 IAC 2-8.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-1.1-1(16)) of a combination of HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7. This source, otherwise required to obtain a Title V permit, has agreed to accept a permit with federally enforceable limits that restrict its PTE of any single HAP to less than ten (10) tons per twelve (12) consecutive month period and the potential to emit any combination of HAPs to less than twenty-five (25) tons per twelve (12) consecutive month period. Therefore, this source will be issued a Federally Enforceable State Operating Permit (FESOP), pursuant to 326 IAC 2-8.
- (c) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of all other criteria pollutants are less than one hundred (100) tons per year.

Potential to Emit After Issuance

The source, issued a FESOP Renewal on November 20, 2002 has opted to remain a FESOP source, rather than apply for a Part 70 Operating Permit. Table 1.2, summarizes the potential to emit, reflecting all limits of the significant emission units. The control equipment is considered federally enforceable only after issuance of this Federally Enforceable State Operating Permit.

Table 1.2 Potential to Emit After Issuance

Process/emission unit	Limited Potential to Emit after Issuance (tons/year)						
	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
Surface Coating Operations, E-Coat-2 (paint booth) (rated at 90% control efficiency)	4.71	4.71	--	73.00	--	--	Single < 9.9 Combined < 24.4
E-Coat-2 Process, Combustion	0.10	0.40	0.03	0.28	4.30	5.12	Single = Hexane Combined = 0.19
Two (2) natural gas-fired boilers	0.08	0.31	0.02	0.22	3.40	4.10	Single = Hexane Combined = 0.08
Shot blasting (326 IAC 6-3)	49.00	49.00	--	--	--	--	--
Insignificant Activities	3.65	4.19	0.11	2.45	9.49	13.54	0.23
Total PTE After Issuance	57.54	58.61	0.17	75.95	17.19	22.76	Single < 10 Combined < 25
Threshold	< 250	< 100	< 100	< 100	< 100	< 100	Single < 10 Combined < 25

Federal Rule Applicability

- (a) The Two (2) natural gas fired boilers are not subject to 40 CFR Part 60.40, Subpart Dc (Standards of Performance for Small Industrial Commercial-Institutional Steam Generating Units) because the each of the boilers were constructed in 1961, before the rule applicability date of June 9, 1989, and both boilers are smaller than one hundred (100) MMBtu/hour. Therefore, these requirements are not included in this permit.
- (b) The insignificant degreasing activities are not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), Subpart T because these degreasing activities do not use any of the halogenated solvents listed in this subpart. Therefore, these requirements are not included in this permit.
- (c) The requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not included in this permit. These requirements apply to a Part 70 source that involves a pollutant-specific emissions unit (PSEU), as defined in 40 CFR 64.1, which meets the following criteria:
 - (1) The unit is subject to an emission limitation or standard for and applicable regulated air pollutant;
 - (2) The unit uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard; and
 - (3) The unit has a potential to emit before controls equal to or greater than the applicable Part 70 major source threshold for the regulated pollutant.

As a FESOP source, this source has accepted federally enforceable limits such that the requirements of 326 IAC 2-7 (Part 70) do not apply. Therefore, the requirements of 40 CFR 64, Compliance Assurance Monitoring, are not applicable to this source and not included in the permit.

- (d) The requirements of National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products, Subpart Mmmm are not included in this permit. Although this is an existing affected source, as defined in §63.3882, that uses 946 liters (250 gallons (gal)) per year, or more, of coatings that contain hazardous air pollutants (HAPs) in the surface coating of miscellaneous metal parts and products (specifically motor vehicle accessories), it is not a major source of HAPs emissions. A major source of HAPs emissions is any stationary source or group of stationary sources located within a contiguous area and under common control that emits or has the potential to emit any single HAP at a rate of 9.07 megagrams (Mg) (10 tons) or more per year or any combination of HAP at a rate of 22.68 Mg (25 tons) or more per year. As a FESOP source, this source has accepted federally enforceable limits such that the requirements of 40 CFR 63 do not apply. Therefore, the requirements of 40 CFR 63, NESHAPs Subpart Mmmm, are not applicable to this source and are not included in this permit.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

The potential to emit of all criteria pollutants from the entire source is less than two hundred fifty (250) tons per year and the source is not one of the twenty-eight (28) listed source categories. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration), are not applicable and are not included in this permit.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6-1(2) (Emission Reporting), because it has actual emissions equal to or greater than twenty-five (25) tons per year of VOCs in LaPorte County. Pursuant to this rule, the Permittee must submit an emission statement by July 1 following a calendar year when the source emits oxides of nitrogen (NO_x), or volatile organic compounds (VOCs) into the ambient air equal to or greater than twenty-five (25) tons. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-3(a)(1) (Compliance Schedule).

326 IAC 2-8-4 (FESOP)

The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of the source is equal to or greater than one hundred (100) tons per year for particulate matter less than ten (10) microns (PM₁₀). In addition, the potential to emit a single hazardous air pollutant (HAP) is equal to or greater than ten (10) tons per year, and the potential to emit a combination of HAPs is equal to or greater than twenty-five (25) tons per year. The source is subject to the provisions of 326 IAC 2-7; however, the source has agreed to limit their PM₁₀ and HAPs emissions to less than Title V levels, and will therefore, be issued a FESOP. The limits and conditions provided below serve to render the requirements of 326 IAC 2-7 (Part 70 Permit Program) not applicable to this source.

- (a) Pursuant to 326 IAC 2-8, the source-wide amount of PM₁₀ shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
 - (1) The paint booth identified as E-Coat-2 (paint booth) shall not be limited by 326 IAC 2-8, as the unlimited potential to emit from this facility is less than fifty (50) tons per year. Therefore, the source-wide amount of PM₁₀ shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period in order to comply with 326 IAC 2-8, by limiting the emissions from the shot blasting facilities.
 - (2) Pursuant to 326 IAC 2-8-4, the shot blasting operations identified as 2226, 2562, 2365, 3343, 2193, 2298, 3201, and 2181 shall be limited as follows:
 - (A) Combined emissions of PM₁₀ from the ten (10) shot blasting units (identified as 2226, 2562, 2365, 3343, 2193, 2298, 3201, and 2181) shall be limited to forty-nine (49) tons per twelve (12) consecutive month period. This requirement will limit source-wide PM₁₀ emissions to less than one hundred (100) tons per twelve (12) consecutive month period and satisfy the conditions of 326 IAC 2-8.
 - (B) The baghouses used to control emissions of PM₁₀ shall be in operation continuously to control emissions when operating the shot blasters identified as 2226, 2562, 2193, 2298, 3201, and 2181.
- (b) Pursuant to 326 IAC 2-8, the amount of a single HAP shall be limited to less than ten (10) tons per twelve (12) consecutive month period, and the combination of all HAPs shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
 - (1) Pursuant to 326 IAC 2-8-4, the paint booth identified as E-Coat-2 (paint booth) shall be limited as follows:
 - (A) The worst-case single HAP delivered to the coating applicators in the one (1) metal wiper arm and blade surface coating operation, identified as E-Coat-2 (paint booth), shall not exceed a total of nine and nine-tenths (9.9) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This requirement will limit source-wide single HAP emissions to less than ten (10) tons per twelve (12)

consecutive month period. This limit will satisfy the requirements of 326 IAC 2-8.

- (B) The combination of HAPs delivered to the coating applicators in the one (1) metal wiper arm and blade surface coating operation, identified as E-Coat-2 (paint booth), shall not exceed a total of twenty-four and four-tenths (24.4) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This requirement will limit source-wide combined HAP emissions to less than twenty-five (25) tons per twelve (12) consecutive month period. This limit will satisfy the requirements of 326 IAC 2-8.

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 this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) 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 Part 60, Appendix A, Method 9 or fifteen (15) one (1) minute non-overlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-4 (Fugitive Dust Emissions)

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

326 IAC 7-1.1-1 (Sulfur Dioxide Emission Limitations)

This source does not have the potential to emit sulfur dioxide at a rate of ten (10) pounds per hour or twenty-five (25) tons per year. Therefore, the source is not subject to the requirements of this rule these requirements will not be included in this permit.

326 IAC 7-4-5 (LaPorte County Sulfur Dioxide Emission Limitations)

This source is not one of the listed sources or facilities in 326 IAC 7-4-5, and therefore, is not subject to the requirements of this rule and these requirements will not be included in this permit.

State Rule Applicability - Individual Facilities

326 IAC 6-2-3 (Particulate Emissions Limitations for Facilities Constructed prior to September 21, 1983)

The two (2) natural gas-fired boilers, identified as boiler 1 and boiler 2, were installed in 1961 and have a total heat input capacity of 9.3 million British thermal units (MMBtu) per hour. These boilers are indirect heating sources that were constructed prior to June 8, 1972, and therefore, are subject to the requirements of 326 IAC 6-2-3. The boilers 1 and 2 shall have a particulate matter (PM) emission limitation based on the following equation as given in 326 IAC 6-2-3, where:

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}}$$

Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu) heat input limit. Pt shall in no case exceed 0.8 lb/MMBtu for the boilers 1 and 2.

Q = Total source maximum operating capacity rating in million British thermal units per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

C = Maximum ground level concentration with respect to distance from the point source at the "critical" wind speed for level terrain. This shall equal 50 micrograms per cubic meter for a period not to exceed a sixty (60) minute time period.

N = Number of stacks in fuel burning operation.

a = Plume rise factor which is used to make allowance for less than theoretical plume rise. The value 0.67 shall be used for Q less than or equal to 1,000 MMBtu/hr heat input. The value 0.8 shall be used for Q greater than 1,000 MMBtu/hr heat input.

h = Stack height in feet.

For the boilers identified as 1 and 2:

Q = 9.30 MMBtu/hr

C = 50 $\mu\text{g}/\text{m}^3$ (for a period not to exceed a sixty (60) minute time period)

N = 2

a = 0.67

h = 26 ft.

$$Pt = \frac{50 \times 0.67 \times 26}{76.5 \times (9.3^{0.75}) \times (2^{0.25})} = 1.80 \text{ lbs/MMBtu}$$

Particulate emissions from all facilities used for indirect heating purposes which were existing and in operation on or before June 8, 1972, shall in no case exceed 0.8 lb/MMBtu heat input. [326 IAC 6-2-3(d)]

COMPLIANCE

PM₁₀ Emission Factor for natural gas = 7.6 lb/MMCF

$$\frac{7.6 \text{ lb}}{1 \text{ MMcf}} \times \frac{1 \text{ MMcf}}{1000 \text{ MMBtu}} = \frac{0.0076 \text{ lbs}}{\text{MMBtu}}$$

The 0.0076 lbs/MMBtu emission rate estimated using the AP-42 emission factor is less than the 0.8 lb/MMBtu limit. Therefore, the two (2) boilers, identified as boiler 1 and boiler 2, are able to comply with 326 IAC 6-2-3.

326 IAC 6-3-2 (Particulate Emission Limitations, Work practices, and Control Technologies)

- (a) Pursuant to 326 IAC 6-3-2, the particulate emissions from the three (3) belt blasters, identified as 2226, equipped with a baghouse and exhausted through stack 31, shall be limited to 1.51 pounds per hour, at a total process weight rate of 450 pounds per hour, using the following equation (next page):

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:

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

The particulate emissions from the three (3) belt blasters, identified as 2226, are 1.78 pounds of particulate per hour, before controls. The 1.78 lb/hr emission rate is greater than the 1.51 lb/hour allowable emission limit. Therefore, the baghouse shall be in operation at all times when the three (3) belt blasters, identified as 2226, are in operation in order to comply with 326 IAC 6-3-2.

COMPLIANCE

Based on Appendix A of this document, the potential particulate emission rate after controls is:

$$0.078 \text{ ton/yr} \times (2000 \text{ lbs/ton} / 8760 \text{ hrs/yr}) = 0.018 \text{ lb/hr}$$

The 0.018 lb/hr emission rate is less than the 1.51 lb/hour emission limit, and therefore, these facilities identified collectively as 2226 are able to comply with 326 IAC 6-3-2.

- (b) Pursuant to 326 IAC 6-3-2, the particulate from the one (1) cabinet blaster, identified as 2562, equipped with a baghouse, exhausted through stack 30, shall be limited to 1.34 pounds per hour at a process weight rate of 375 pounds per hour using the following equation:

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:

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

The particulate emissions from the one (1) cabinet blaster, identified as 2562, are 4.8 pounds of particulate per hour, before controls. The 4.8 lb/hr emission rate is greater than the 1.34 lb/hour allowable emission limit. Therefore, the baghouse shall be in operation at all times when the one (1) cabinet blaster, identified as 2562, is in operation in order to comply with 326 IAC 6-3-2.

COMPLIANCE

Based on Appendix A of this document, the potential particulate emission rate after controls is:

$$0.210 \text{ ton/yr} \times (2000 \text{ lbs/ton} / 8760 \text{ hrs/yr}) = 0.048 \text{ lb/hr}$$

The 0.048 lb/hr emission rate is less than the 1.34 lb/hour emission limit, and therefore, these facility identified as 2562 is able to comply with 326 IAC 6-3-2.

- (c) Pursuant to 326 IAC 6-3-2, the particulate from the one (1) cabinet blaster, identified as 2365, equipped with a baghouse and exhausted through stack 29, shall be limited to 2.16 pounds per hour at a process weight rate of 771 pounds per hour using the following equation:

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:

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

The particulate emissions from the one (1) cabinet blaster, identified as 2365, are 1.29 pounds of particulate per hour, before controls. The 1.29 lb/hr emission rate is less than the 2.16 lb/hour allowable emission limit. Therefore, the baghouse does not have to be in operation at all times when the one (1) cabinet blaster, identified as 2365, is in operation in order to comply with 326 IAC 6-3-2.

- (d) Pursuant to 326 IAC 6-3-2, the particulate from the one (1) cabinet blaster, identified as 3343, equipped with a baghouse and exhausted through stack 177, shall be limited to 3.82 pounds per hour at a process weight rate of 1,800 pounds per hour using the following equation:

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:

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

The particulate emissions from the one (1) cabinet blaster, identified as 3343, are 0.6 pounds of particulate per hour before controls. The 0.6 lb/hr emission rate is less than the 3.82 lb/hour allowable emission limit. Therefore, the baghouse does not have to be in operation at all times when the one (1) cabinet blaster, identified as 3343, is in operation in order to comply with 326 IAC 6-3-2.

- (e) Pursuant to 326 IAC 6-3-2, the particulate from the four (4) cabinet blasters, identified as 2193, 2298, 3201, and 2181, each equipped with a baghouse and not exhausted to the atmosphere, shall be limited to 0.551 pounds per hour each, at a process weight rate of 36 pounds per hour using the following equation:

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:

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

The particulate emissions from the (4) cabinet blasters, identified as 2193, 2298, 3201, and 2181, are 1.7 pounds of particulate per hour (each blaster), before controls. The 1.7 lb/hr emission rate is greater than the 0.551 lb/hour emission limit. Therefore, the baghouses shall be in operation at all times when the (4) cabinet blasters, identified as 2193, 2298, 3201, and 2181, are in operation in order to comply with 326 IAC 6-3-2.

COMPLIANCE

Based on Appendix A of this document, the potential particulate emission rate after controls is:

$$0.075 \text{ ton/yr} \times (2000 \text{ lbs/ton} / 8760 \text{ hrs/yr}) = 0.017 \text{ lb/hr, (each blaster)}$$

The 0.017 lb/hr emission rate is less than the 0.551 lb/hour emission limit, and therefore, these facilities, identified as 2193, 2298, 3201, and 2181, are able to comply with 326 IAC 6-3-2.

326 IAC 6-3-2(d) (Particulate Emission Limitations, Work practices, and Control Technologies)

The surface coating process in the paint booth, identified as E-Coat-2 (paint booth), is a manufacturing process that utilizes more than five (5) gallons of coating per day. Therefore, E-Coat-2 (paint booth) is subject to the requirements of 326 IAC 6-3-2(d). The particulate from the

paint booth, identified as E-Coat-2 (paint booth), shall be controlled by; a dry particulate filter, a waterwash, or an equivalent control device and the control device shall be operated in accordance with manufacturer's specifications.

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

The surface coating facilities, one (1) paint booth, identified as E-Coat-2 (paint booth) and one (1) natural gas-fired E-coat oven, exhausted through stacks 135 and 145, rated at 2.00 million British thermal units per hour are considered a miscellaneous metal coating operation. Therefore, these facilities are regulated under 326 IAC 8-2-9, which renders 326 IAC 8-1-6 not applicable and the requirements of 326 IAC 8-1-6 will not be included in this permit.

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

The surface coating facilities, one (1) paint booth, identified as E-Coat-2 (paint booth) and one (1) natural gas-fired E-coat oven, exhausted through stacks 135 and 145, rated at 2.00 million British thermal units per hour are considered a miscellaneous metal coating operation. Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coatings applied to the metal windshield wiper parts shall be limited to:

- (1) three and five tenths (3.5) pounds of VOCs per gallon of coating less water, for air dried or forced warm air dried coatings at temperatures up to 90°C, or for extreme performance coatings. Note that the paint supplier certifies that each batch of coatings applied to metal contains no greater than 3.5 pounds of VOCs per gallon of coating less water.
- (2) four and three tenths (4.3) pounds of VOC per gallon, excluding water, for clear coatings. Note that the paint supplier certifies that each batch of clear coatings applied to metal contains no greater than 4.3 pounds of VOCs per gallon of coating less water.
- (3) three (3.0) pounds per gallon, excluding water, for all other coatings and coating application systems. Note that the paint supplier certifies that each batch of miscellaneous coatings (e.g. primers, etc...) applied to metal contains no greater than 3.0 pounds of VOCs per gallon of coating less water.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

State Rule Applicability - Insignificant Activities

326 IAC 6-3-2 (Particulate Emission Limitations, Work Practices, and Control Technologies)

The brazing, cutting, soldering, welding, trimming, grinding, machining, and extruding facilities are exempt from 326 IAC 6-3-2 due to the following:

- (a) The welding operations consume less than six hundred twenty-five (625) pounds of rod or wire per day; and
- (b) The torch cutting operations cut less than three thousand four hundred (3,400) inches per hour of stock that is one (1) inch in thickness or less.

326 IAC 6-3-2 (Particulate Emission Limitations, Work Practices, and Control Technologies)

The grinding and machining operations with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute are exempt from 326 IAC 6-3-2 because the potential particulate emissions are less than

five hundred fifty-one thousandths (0.551) pound per hour.

326 IAC 8-3-3 (Open Top Vapor Degreasing Operations)

The five (5) maintenance and tools degreasers are subject to the provisions of 326 IAC 8-3-3 (Open Top Vapor Degreasing Operations) because they were constructed after the rule applicability date of January 1, 1980. The owner or operator shall:

- (a) equip the open top vapor degreaser with a cover that can be opened and closed easily without disturbing the vapor zone;
- (b) keep the cover closed at all times except when processing workloads through the degreaser;
- (c) minimize solvent carry-out by:
 - (1) Racking parts to allow complete drainage;
 - (2) Moving parts in and out of the degreaser at less than eleven (11) feet per minute;
 - (3) Degreasing the workload in the vapor zone at least thirty (30) seconds or until condensation ceases;
 - (4) Tipping out any pools of solvent on the cleaned parts before removal;
 - (5) Allowing parts to dry within the degreaser for at least fifteen (15) seconds or until visually dry;
- (d) not degrease porous or absorbent materials, such as cloth, leather, wood or rope;
- (e) not occupy more than half of the degreaser's open top area with the workload;
- (f) not load the degreaser such that the vapor level drops more than fifty percent (50%) of the vapor depth when the workload is removed;
- (g) never spray above the vapor level;
- (h) repair solvent leaks immediately, or shut down the degreaser;
- (i) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, such that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere;
- (j) not use workplace fans near the degreaser opening;
- (k) not allow visually detectable water in the solvent exiting the water separator; and
- (l) provide a permanent, conspicuous label summarizing the operating requirements.

326 IAC 8-3 (Organic Solvent Degreasing Operations)

The three (3) production parts degreasers are not subject to any of the provisions of 326 IAC 8-3 (Organic Solvent Degreasing Operations) because the solvent used is an alkaline based solvent which contains no volatile organic compounds (VOCs).

Testing Requirements

All testing requirements from previous approvals were incorporated into this FESOP. Stack test results for the shot blast units are as follows:

Shot blast unit 3343 exhausted to stack 177, stack test on August 13, 2002, in compliance.
Shot blast unit 2365 exhausted to stack 29, stack test on August 14, 2002, in compliance.
Shot blast unit 2226 exhausted to stack 31, stack test on August 13, 2002, in compliance.
Shot blast unit 2562 exhausted to stack 30, stack test on August 14, 2002, in compliance.

Each stack was in compliance with the allowable limits pursuant to 326 IAC 6-3-2 and 326 IAC 2-8.

- (a) In order to demonstrate compliance with Conditions 326 IAC 6-3-2 and 326 IAC 2-8, the Permittee shall conduct a PM and PM₁₀ stack test for the shot blast unit 3343 exhausting to stack 177. Testing shall be performed within one hundred eighty (180) days of permit issuance. Testing shall be conducted in accordance with Section C - Performance Testing.
- (b) In order to demonstrate compliance with Conditions 326 IAC 6-3-2 and 326 IAC 2-8, the Permittee shall conduct a PM and PM₁₀ stack test for the shot blast unit 2365 exhausting to stack 29. Testing shall be performed within one hundred eighty (180) days of permit issuance. Testing shall be conducted in accordance with Section C - Performance Testing.
- (c) In order to demonstrate compliance with Conditions 326 IAC 6-3-2 and 326 IAC 2-8, the Permittee shall conduct a PM and PM₁₀ stack test for the shot blast unit 2226 exhausting to stack 31. Testing shall be performed within one hundred eighty (180) days of permit issuance. Testing shall be conducted in accordance with Section C - Performance Testing. These tests shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration.
- (d) In order to demonstrate compliance with Conditions 326 IAC 6-3-2 and 326 IAC 2-8, the Permittee shall conduct a PM and PM₁₀ stack test for the shot blast unit 2562 exhausting to stack 30. Testing shall be performed within one hundred eighty (180) days of permit issuance. Testing shall be conducted in accordance with Section C - Performance Testing. These tests shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration.

Compliance Determination

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

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

Compliance Monitoring

The compliance monitoring requirements applicable to this source are as follows:

- (1) The one (1) paint booth, identified as E-Coat-2 (paint booth), has applicable compliance monitoring conditions as specified below:
 - (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters for the one (1) paint booth, identified as E-Coat-2 (paint booth). To monitor the performance of the dry filters, weekly observations shall be made of the overspray while the spray booths are in operation. Section C- Response to Excursions or Exceedances shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.
 - (b) Monthly inspections shall be performed of the coating emissions from the one (1) paint booth, identified as E-Coat-2 (paint booth), stack exhausts from stack 153, for the presence of overspray on the rooftops and the nearby ground. Section C- Response to Excursions or Exceedances for this unit shall contain troubleshooting contingency and response steps for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

These monitoring conditions are necessary to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes), and 326 IAC 2-8 (FESOP).

- (2) The ten shot blasters identified as 2193, 2298, 3201, 2181, 2226, 2562, 2365, and 3343, each equipped with a baghouse, do not have applicable compliance monitoring conditions, as the allowable PM and PM₁₀ emission rates are all less than ten (10) pounds per hour.

Conclusion

The operation of this stationary windshield wiper manufacturing source shall be subject to the conditions of the attached proposed FESOP No. F091-24502-00091.

**Appendix A: Emissions Calculations
From Surface Coating Operations
E-Coat-2 (paint booth) & E-Coat-2 (main tank)**

**Company Name: Federal-Mogul Corporation
Address City IN Zip: 402 Royal Road, Michigan City, IN 46306
FESOP: F091-24502-00091
Reviewer: APT
Date: June 15, 2007**

E-Coat Paint Booth, Identified as #2 E-Coat

Material	Density (Lb/Gal)	Weight % Volatile (H2O& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Maximum Coating Usage Rate* (gal/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
W49491	9.67	27.64%	0.00%	27.64%	0.00%	63.43%	4.39	2.67	2.67	11.73	281.60	51.4	47.1	4.21	65%
W49385	9.67	27.67%	0.00%	27.67%	0.00%	62.47%	4.39	2.68	2.68	11.75	281.91	51.4	47.1	4.28	65%
W49484	9.57	28.37%	0.00%	28.37%	0.00%	62.86%	4.39	2.72	2.72	11.92	286.05	52.2	46.1	4.32	65%
MHSW49409	8.59	31.99%	0.00%	31.99%	0.00%	58.69%	4.39	2.75	2.75	12.06	289.52	52.8	39.3	4.68	65%
W49436	9.61	27.98%	0.00%	27.98%	0.00%	63.47%	4.39	2.69	2.69	11.80	283.30	51.7	46.6	4.24	65%
worst case										12.06	289.52	52.84	47.09	4.68	

Potential Emissions	VOC	PM/PM ₁₀	Units
Uncontrolled	52.84	47.09	tons/yr

E-Coat Paint Booth, Identified as #2 (Dip Tank) AS APPLIED

Material	Density (Lb/Gal)	Weight % Volatile (H2O& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Maximum Coating Usage Rate* (gal/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
807 and 830	8.77	76.05%	52.19%	23.86%	0.00%	15.00%	2.20	2.09	2.09	4.60	110.49	20.16	0.00	13.95	100%

* Maximum usage rate expressed as gallons per hour, rather than units/hr x gallons/unit, due to the widely varying size and units per hour of pieces coated.

Density for Dip Tank = 1.29 lbs/gallon material + 7.48 lbs/gallon water

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 of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)

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)

Total = Worst Coating + Sum of all solvents used

Potential Emissions	VOC	PM/PM ₁₀	Units
Uncontrolled	20.16	0.00	tons/yr

Total Emissions	VOC	PM/PM ₁₀	Units
Uncontrolled	73.00	47.09	tons/yr

Total Emissions	PM Control Efficiency	Units
Controlled	85%	7.06
	90%	4.71
	95%	2.35
	98%	0.94

Emission Units

One (1) paint booth, identified as E-Coat-2 (paint booth), equipped with electrostatic air atomized spray applicators and dry filters for PM overspray control, installed in 1990, exhausted through stack 153, capacity: 4.39 gallons of paint per hour.

One (1) dip tank, identified as E-Coat 2 (main tank), installed in 1990, exhausted through stack 139, capacity: 3,000 square feet of metal wiper arm and blade surfaces per hour.

**Appendix A: Emissions Calculations
HAP Emissions for Surface Coating
E-Coat-2 (paint booth)**

**Company Name: Federal-Mogul Corporation
Address City IN Zip: 402 Royal Road, Michigan City, IN 46306
FESOP: F091-24502-00091
Reviewer: APT
Date : June 15, 2007**

Material	Density (Lb/Gal)	Maximum Coating Usage Rate (gal/hour) *	Weight % Xylene	Weight % Glycol Ethers	Xylene Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Total Potential Emissions from Indiv. Facility, Combined (ton/yr)
W49491	9.67	4.39	15.00%	5.00%	27.9	9.30	37.2
W49385	9.67	4.39	5.00%	0.00%	9.30	0.00	9.30
W49484	9.57	4.39	15.00%	5.00%	27.6	9.20	36.8
MHSW49409	8.590	4.39	5.00%	0.00%	8.26	0.00	8.3
W49436	9.610	4.39	15.00%	0.00%	27.7	0.00	27.7

Maximum Annual HAP Emissions					27.9	9.30	37.2
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"Worst Case" Individual HAP	27.90
Max Annual HAP Combined	37.2

METHODOLOGY

* Maximum usage rate expressed as gallons per hour, rather than units/hr x gallons/unit, due to the widely varying size and units per hour of pieces coated.

HAPS emission rate (tons/yr) = Density (lb/gal) * Max Applied (gal/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 pounds

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
<100 MMBtu, Boilers 1 & 2**

**Company Name: Federal-Mogul Corporation
Address City IN Zip: 402 Royal Road, Michigan City, IN 46306
FESOP: F091-24502-00091
Reviewer: APT
Date: June 15, 2007**

Two Boilers installed in 1961

Heat Input Capacity	Potential Throughput
MMBtu/hr	MMCF/yr
9.3000	81.47

Pollutant

	PM*	PM ₁₀ *	SO ₂	NO _x	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.077	0.31	0.024	4.1	0.22	3.4

*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 4 for HAPs emissions calculations.

Emission Units

Two (2) natural gas-fired boilers, identified as boilers 1 and 2, installed in 1961, exhausted through stacks 121 and 122, respectively, rated at: 9.30 million British thermal units per hour, total.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
<100 MMBtu, Boilers 1 & 2
HAPS Emissions

Company Name: Federal-Mogul Corporation
Address City IN Zip: 402 Royal Road, Michigan City, IN 46306
FESOP: F091-24502-00091
Reviewer: APT
Date: June 15, 2007

Two Boilers installed in 1961

Heat Input Capacity
MMBtu/hr
9.3000

Potential Throughput
MMCF/yr
81.47

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	8.55E-05	4.89E-05	3.06E-03	7.33E-02	1.38E-04

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03	Total HAPs
Potential Emission in tons/yr	2.04E-05	4.48E-05	5.70E-05	1.55E-05	8.55E-05	0.077

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

Methodology

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

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

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
<100 MMBtu, Ovens (3) and Tanks (1)
Combustion Associated with E-coat 2**

**Company Name: Federal-Mogul Corporation
Address City IN Zip: 402 Royal Road, Michigan City, IN 46306
FESOP: F091-24502-00091
Reviewer: APT
Date: June 15, 2007**

Heat Input Capacity
MMBtu/hr
11.7

Potential Throughput
MMCF/yr
102.49

Pollutant

	PM*	PM ₁₀ *	SO ₂	NO _x	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.10	0.39	0.03	5.12	0.28	4.30

*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

Emission Units

One (1) natural gas-fired dry off oven, exhausted through stack 147, rated at 0.50 million British thermal units per hour.

One (1) natural gas-fired E-coat oven, exhausted through stacks 135 and 145, rated at 2.00 million British thermal units per hour.

One (1) natural gas-fired hot water tank, exhausted through stack 148, rated at 8.00 million British thermal units per hour.

One (1) natural gas-fired burn-off oven, identified as EU 33, installed in 1988, rated at 1.20 million British thermal units per hour, exhausted through stack 33.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
<100 MMBtu, Ovens (3) and Tanks (1)
Combustion Associated with E-coat 2
HAPs Emissions**

**Company Name: Federal-Mogul Corporation
Address City IN Zip: 402 Royal Road, Michigan City, IN 46306
FESOP: F091-24502-00091
Reviewer: APT
Date: June 15,2007**

Heat Input Capacity
MMBtu/hr
11.7

Potential Throughput
MMCF/yr
102.49

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	1.08E-04	6.15E-05	3.84E-03	9.22E-02	1.74E-04

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03	Total HAPs
Potential Emission in tons/yr	2.56E-05	5.64E-05	7.17E-05	1.95E-05	1.08E-04	0.097

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

Methodology

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

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

Appendix A: Emission Calculations
Ten (10) Shot blasters (Cabinet Blasters (7) & Belt Blasters (3))
Particulate Matter

Company Name: Federal-Mogul Corporation
Address City IN Zip: 402 Royal Road, Michigan City, IN 46306
FESOP: F091-24502-00091
Reviewer: APT
Date: June 15, 2007

en (10) Shotblasters

Unit ID	Control Efficiency (%)	Grain Loading per Actual Cubic foot of Outlet Air (grains/ft. ³)	Gas or Air Flow Rate (acfm)	Emission Rate before Controls (lb/hr)	Emission Rate before Controls (tons/yr)	Emission Rate after Controls (lb/hr)	Emission Rate after Controls (tons/yr)	Emission Rate after 326 IAC 6-3 Limits (lb/hr)	Emission Rate after 326 IAC 6-3 Limits (tons/yr)
2365	99%	0.001	1500.0	1.29	5.63	0.013	0.056	2.160	9.461
2562	99%	0.007	800.0	4.800	21.02	0.048	0.210	1.340	5.869
2226	99%	0.0013	1600.0	1.783	7.81	0.018	0.078	1.510	6.614
3343	99%	0.001	700.0	0.600	2.63	0.006	0.026	3.820	16.732
2193	99%	0.005	400.0	1.714	7.51	0.017	0.075	0.551	2.413
2298	99%	0.005	400.0	1.714	7.51	0.017	0.075	0.551	2.413
3201	99%	0.005	400.0	1.714	7.51	0.017	0.075	0.551	2.413
2181	99%	0.005	400.0	1.714	7.51	0.017	0.075	0.551	2.413
Total					67.13	0.14	0.67	10.48	48.33

Methodology

Emission Rate in lbs/hr (before controls) = Emission Rate (after controls): (lbs/hr)/(1-control efficiency)

Emission Rate in lbs/hr (after controls) = (grains/cub. ft.) (sq. ft.) ((cub. ft./min.)/sq. ft.) (60 min/hr) (lb/7000 grains)

Emission Rate in lbs/hr (after 326 IAC 6-3 limits) = 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 Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

Emission Units

Three (3) belt blasters, identified as 2226, equipped with a baghouse, exhausted through stack 31, capacity: 1,000 parts per hour, each.

One (1) cabinet blaster, identified as 2562, equipped with a baghouse, exhausted through stack 30, capacity: 120,000 parts per hour.

One (1) cabinet blaster, identified as 2365, equipped with a baghouse, exhausted through stack 29, capacity: 20,571 parts per hour.

One (1) cabinet blaster, identified as 3343, equipped with a baghouse, exhausted through stack 177, capacity: 6 parts per hour.

Four (4) cabinet blasters, identified as 2193, 2298, 3201, and 2181 each equipped with a baghouse, capacity: 80 parts per hour, each.

Emission Rate before Controls (tons/yr)	Emission Rate after 95% Control Efficiency (tons/yr)
5.63	0.28
21.02	1.05
7.81	0.39
2.63	0.13
7.51	0.38
7.51	0.38
7.51	0.38
7.51	0.38
67.13	3.36

Appendix A: Emissions Calculations

**Natural Gas Combustion Only
<100 MMBtu, 43 Miscellaneous Combustion Units
Insignificant Combustion**

**Company Name: Federal-Mogul Corporation
Address City IN Zip: 402 Royal Road, Michigan City, IN 46306
FESOP: F091-24502-00091
Reviewer: APT
Date : June 15, 2007**

Heat Input Capacity
MMBtu/hr
23.43

Potential Throughput
MMCF/yr
205.22

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM ₁₀ *	SO ₂	NO _x	VOC	CO
	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.195	0.780	0.062	10.26	0.564	8.62

*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 9 for HAPs emission calculations

Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, totaling 23.427 million British thermal units per hour, including:

One (1) blackened line heater, exhausted to stack 27, rated at 0.244 million British thermal units per hour.

One (1) burner associated with the main melting pot, exhausted to stack 212, rated at 1.29 million British thermal units per hour.

One (1) rubber dryer, located in the rubber room, exhausted to stack 167, rated at 0.165 million British thermal units per hour.

One (1) burner associated with the salt tanks, located in the rubber room, exhausted to stack 184, rated at 0.250 million British thermal units per hour.

Two (2) compression line dryers, located in the rubber room, exhausted to stacks 199 and 200, respectively, rated at 0.740 million British thermal units per hour, total.

Three (3) extrusion post bake off ovens, located in the rubber room, exhausted to stack 207, rated at 0.900 million British thermal units per hour, total.

Two (2) dryers, located in the rubber department, identified as rubber graphite operation dryer #2 and extrusion slitter dryer #1. Dryer #2 is exhausted to stack 289, and dryer #1 is exhausted to stack 290. Each dryer is rated at 0.600 million British thermal units per hour.

One (1) boot drying oven, located in the boot room, exhausted to stack 60, rated at 1.00 million British thermal units per hour.

Thirteen (13) air make-up units, exhausted to stacks 7, 22, 48, 94, 152, 174, 201, 225, 226, 251, 255, 256, and 271 respectively, rated at 6.11 million British thermal units per hour, total.

Seven (7) hot water heaters, exhausted to stacks 110, 143, 195, 206, 249 and 250, respectively, rated at 1.72 million British thermal units per hour, total.

One (1) sludge dryer, exhausted to stack 107, rated at 0.153 million British thermal units per hour.

Three (3) burners for the insignificant degreasing operations, exhausted to stacks 12, 14, 15, and 263, rated at 1.98 million British thermal units per hour, total.

One (1) pan washer, and one (1) chipper washer, exhausted to stacks 9 and 21, respectively, rated at 0.475 million British thermal units per hour, total.

Six (6) Reznor Heaters, exhaust to stack 291-296 rated at 1.2 million British thermal units per hour.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
<100 MMBtu, 43 Miscellaneous Combustion Units
HAPs Emissions
Insignificant Combustion

Company Name: Federal-Mogul Corporation
Address City IN Zip: 402 Royal Road, Michigan City, IN 46306
FESOP: F091-24502-00091
Reviewer: APT
Date : June 15, 2007

Heat Input Capacity
MMBtu/hr
23.43

Potential Throughput
MMCF/yr
205.22

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	2.15E-04	1.23E-04	7.70E-03	1.85E-01	3.49E-04

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03	Total HAPs
Potential Emission in tons/yr	5.13E-05	1.13E-04	1.44E-04	3.90E-05	2.15E-04	0.194

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

Methodology

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

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

**Appendix A: Emissions Calculations
Insignificant Degreasing**

Company Name: Federal-Mogul Corporation
Address City IN Zip: 402 Royal Road, Michigan City, IN 46306
FESOP: F091-24502-00091
Reviewer: APT
Date: June 15, 2007

Five Maintenance and Tool Degreasers

Material	Density (lb/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Gal of Mat (gal/day)	Potential VOC (lb/day)	Potential VOC (ton/yr)
CC-100+	6.54	100.00%	0.0%	100.0%	1.5	9.81	1.79
Potential Emissions						9.81	1.79

METHODOLOGY

Potential VOC Pounds per Day = Solvent Density (lbs/gallon) * weight % volatiles * solvent consumption (gallons/day)

Potential VOC Tons per Year = Potential VOC Pounds per Day * (365 days/yr) * (1 ton/2000 lbs)

Appendix A: Emission Calculations
Insignificant Activities: Extrusion

Company Name: Federal-Mogul Corporation
Address City IN Zip: 402 Royal Road, Michigan City, IN 46306
FESOP: F091-24502-00091
Reviewer: APT
Date: June 15, 2007

Insignificant Activities
Extrusion

Unit ID	Control Efficiency (%)	Grain Loading per Actual Cubic foot of Outlet Air (grains/cub. ft.)	Gas or Air Flow Rate (acfm.)	Emission Rate before Controls (lb/hr)	Emission Rate before Controls (tons/yr)	Emission Rate after Controls (lb/hr)	Emission Rate after Controls (tons/yr)
Smog Hog	94.4%	0.001	5000.0	0.77	3.35	0.043	0.188

Methodology

Emission Rate in lbs/hr (after controls) = (grains/cub. ft.) (sq. ft.) ((cub. ft./min.)/sq. ft.) (60 min/hr) (lb/7000 grains)

Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

Emission Rate in lbs/hr (before controls) = Emission Rate (after controls): (lbs/hr)/(1-control efficiency)

Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

**Appendix A: Emission Calculations
One (1) Emergency Diesel Generator**

**Company Name: Federal-Mogul Corporation
Address City IN Zip: 402 Royal Road, Michigan City, IN 46306
FESOP: F091-24502-00091
Reviewer: APT
Date: June 15, 2007**

A. Emissions calculated based on heat input capacity (MMBtu/hr)

Heat Input Capacity
MMBtu/hr

S= 0.05 = WEIGHT % SULFUR

4.1

	Pollutant					
	PM*	PM ₁₀ *	SO ₂	NO _x	VOC	CO
Emission Factor in lb/MMBtu	0.1	0.0573	0.1 <i>(1.01S)</i>	3.2 **see below	0.1	0.85
Potential Emission in tons/yr	0.103	0.059	0.052	3.28	0.092	0.871

**NOx emissions: uncontrolled = 3.2 lb/MMBtu, controlled with ignition timing retard = 1.9 lb/MMBtu

Methodology

Emission Factors are from AP 42 (Supplement B 10/96) Table 3.4-1 and Table 3.4-2

Emission (tons/yr) = [Heat input rate (MMBtu/hr) x Emission Factor (lb/MMBtu)] * 500 hr/yr / (2,000 lb/ton)

**Appendix A: Emissions Calculations
One (1) Emergency Diesel Generator
HAPS Emissions**

**Company Name: Federal-Mogul Corporation
Address City IN Zip: 402 Royal Road, Michigan City, IN 46306
FESOP: F091-24502-00091
Reviewer: APT
Date: June 15, 2007**

Heat Input Capacity
MMBtu/hr
4.1000

Potential Throughput
MMCF/yr
35.92

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	3.77E-05	2.15E-05	1.35E-03	3.23E-02	6.11E-05

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03	Total HAPs
Potential Emission in tons/yr	8.98E-06	1.98E-05	2.51E-05	6.82E-06	3.77E-05	0.034

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

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

Company Name: Federal-Mogul Corporation
Address City IN Zip: 402 Royal Road, Michigan City, IN 46306
FESOP: F091-24502-00091

Reviewer: APT

Date: June 15, 2007

Process/emission unit	Unlimited Potential to Emit (tons/year)						
	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
Surface Coating Operations, E-Coat-2 (paint booth)	47.09	47.09	--	73.00	--	--	S = 27.9, C = 37.2
E-Coat-2 Process, Combustion	0.10	0.40	0.03	0.28	4.30	5.12	S = Hexane C = 0.19
Two (2) natural gas-fired boilers	0.08	0.31	0.02	0.22	3.40	4.10	S = Hexane C = 0.08
Shotblasting	67.13	67.13	--	--	--	--	--
Insignificant Activities	3.65	4.19	0.11	2.45	9.49	13.54	S = Hexane C = 0.23
Insignificant Combustion	0.20	0.78	0.06	0.56	8.62	10.26	0.19
Emergency Generator	0.10	0.06	0.05	0.09	0.87	3.28	0.03
Degreasing	--	--	--	1.79	--	--	--
Extrusion	3.35	3.35	--	--	--	--	--
Total PTE	118.04	119.12	0.17	75.95	17.19	22.76	C = 37.7

Process/emission unit	Limited Potential to Emit after Controls (tons/year)						
	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
Surface Coating Operations, E-Coat-2 (paint booth)	0.94	0.94	--	73.00	--	--	S = 27.9, C = 37.2
E-Coat-2 Process, Combustion	0.10	0.40	0.03	0.28	4.30	5.12	S = Hexane C = 0.19
Two (2) natural gas-fired boilers	0.08	0.31	0.02	0.22	3.40	4.10	S = Hexane C = 0.08
Shotblasting	0.67	0.67	--	--	--	--	--
Insignificant Activities	0.49	1.03	0.11	2.45	9.49	13.54	S = Hexane C = 0.23
Insignificant Combustion	0.20	0.78	0.06	0.56	8.62	10.26	0.19
Emergency Generator	0.10	0.06	0.05	0.09	0.87	3.28	0.03
Degreasing	--	--	--	1.79	--	--	--
Extrusion	0.19	0.19	--	--	--	--	--
Total PTE After Controls	2.27	3.35	0.17	75.95	17.19	22.76	C = 37.7
Threshold	< 250	< 100	< 100	< 100	< 100	< 100	S < 10 C < 25

Process/emission unit	Limited Potential to Emit after Issuance (tons/year)						
	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
Surface Coating Operations, E-Coat-2 (paint booth) (rated at 90% control efficiency)	4.71	4.71	--	73.00	--	--	S < 9.9 C < 24.4
E-Coat-2 Process, Combustion	0.10	0.40	0.03	0.28	4.30	5.12	S = Hexane C = 0.19
Two (2) natural gas-fired boilers	0.08	0.31	0.02	0.22	3.40	4.10	S = Hexane C = 0.08
Shotblasting	49.00	49.00	--	--	--	--	--
Insignificant Activities	3.65	4.19	0.11	2.45	9.49	13.54	0.23
Insignificant Combustion	0.20	0.78	0.06	0.56	8.62	10.26	0.19
Emergency Generator	0.10	0.06	0.05	0.09	0.87	3.28	0.03
Degreasing	--	--	--	1.79	--	--	--
Extrusion	3.35	3.35	--	--	--	--	--
Total PTE After Issuance	57.54	58.61	0.17	75.95	17.19	22.76	S < 10 C < 25
Threshold	< 250	< 100	< 100	< 100	< 100	< 100	S < 10 C < 25