INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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Mitchell E. Daniels, Jr.
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Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: May 18, 2007

RE: Standard Motor Products, Inc. / 141-24631-00559

FROM: Nisha Sizemore
Chief, Permits Branch
Office of Air Quality

Notice of Decision – Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

(1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
(2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
(3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

(1) the name and address of the person making the request;
(2) the interest of the person making the request;
(3) identification of any persons represented by the person making the request;
(4) the reasons, with particularity, for the request;
(5) the issues, with particularity, proposed for considerations at any hearing; and
(6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER-AM.dot 03/23/06

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May 18, 2007

Mr. Terry Seeders
Standard Motor Products, Inc.
1718 North Home Street
Mishawaka, Indiana 46545

Re: 141-24631-00559
First Notice-Only Change to
R 141-22812-00559

Dear Mr. Seeders:

Standard Motor Products, Inc., was issued a registration on May 24, 2006, for the operation of an automotive ignition wire set manufacturing operation. An application from Standard Motor Products, Inc., received on April 17, 2007, has been reviewed. Based on the information provided by Standard Motor Products, Inc., and the provisions in 326 IAC 2-5.5, IDEM has determined that the following equipment, located at 1718 North Home Street, Mishawaka, Indiana, is classified as registered:

(a) One (1) natural gas fired boiler, identified as B1, for extruder autoclave curing, with a maximum operating capacity rating of 8.37 mmBtu/hr, and exhausting to one (1) stack, identified as B1. The boiler was installed in 1994.

(b) Eleven (11) forced air space heaters, identified as H1 through H11, with a maximum capacity of 0.125 mmBtu/hr each, and exhausting to eleven (11) stacks, identified as H1 through H11. All units were installed in 1994.

(c) Four (4) forced air space heaters, identified as H12 through H15, with a maximum capacity of 0.075 mmBtu/hr each, and exhausting to four (4) stacks, identified as H12 through H15. All units were installed in 1994.

(d) One (1) electric silicone rubber boot cure oven, identified as BCO-1, with a maximum capacity of 198 pounds per hour, and exhausting to one (1) stack, identified as BC0-1. The boot cure oven was installed in 1994.

(e) One (1) silicone mixer, identified as SCMX-1, one (1) silicone compound mill, identified as SCML-1, with particulate matter emissions from each emission unit controlled by a series of three (3) baghouses, identified as BH-1, BH-2, and BH-3, with a combined maximum flowrate of 10,000 acfm. Two (2) silicone compounding extruders, identified as SCEX-1 and SCEX-2. The maximum capacity of each emission unit is 800 pounds per hour and all units were installed in 1994.

(f) Fourteen (14) latex paraffin coating towers, identified as LCT-1 through LCT-14, with a combined maximum capacity of 65,100 feet per hour. All units were installed in 1994.

(g) One (1) EPDM rubber cold cure extruder, identified as CE-1, with a maximum capacity of 500 pounds per hour. CE-1 was installed in 1994.

(h) Two (2) EPDM rubber extrusion and autoclave cure machines, identified as CV-1 and CV-2, with a maximum capacity of 500 pounds per hour each. CV-1 and CV-2 were installed in 1994.

(i) One (1) silicone rubber extrusion and autoclave cure machine, identified as CV-3, with a maximum capacity of 500 pounds per hour. CV-3 was installed in 1994.

(j) One (1) silicone rubber direct air cure extrusion, identified as HAV-1, with a maximum capacity of 250 pounds per hour. HAV-1 was installed in 1994.

(k) Three (3) wire marking roll coat applicators for emission units CV-2, CV-3, and HAV-1. The roll coat applicators are identified as WM-1, WM-2, and WM-3, and have a maximum combined capacity of 39,700 feet per hour. WM-1, WM-2, and WM-3 were installed in 1994.

(l) Ink jet markers used for marking boxes used in assembly, identified as BMO-1, with a maximum capacity of 500 markers per hour. BMO-1 was installed in 1994.

(m) Two (2) parts washers used in the maintenance area, identified as MPW-1 and MPW-2, with a maximum capacity of 0.33 gallons per day each. MPW-1 and MPW-2 were installed in 1994.

(n) One (1) parts washer used in the extruder area, identified as EPW-1, with a maximum capacity of 0.33 gallons per day. EPW-1 was installed in 1994.

(o) One (1) parts washer used in the latex coating tower area, identified as TPW-1, with a maximum capacity of 0.33 gallons per day. TPW-1 was installed in 1994.

(p) Two (2) maintenance welders, identified as W1 and W2, with a maximum capacity of 1 pound of electrode per hour per unit. Two (2) oxyacetylene torches, identified as O1 and O2, with a maximum capacity of 6 inches per minute per unit. All units were installed in 1994.

(q) Three (3) direct exchange air makeup units, identified as A1, A2, and A3, with a maximum capacity of 1.1 mmBtu/hr each. All units were installed in 1994.

(r) Two (2) EPDM rubber extrusion and autoclave cure machines, identified as CV-4 and CV-5, each with a maximum capacity of 500 pounds per hour, and approved for construction in 2007. Each rubber extrusion and autoclave cure machine is equipped with a wire marking machine, which is used to apply a surface coating material to the rubber after it is extruded on to a wire. The two (2) wire marking machines have a combined potential throughput of 36,000 feet of rubber coated wire per hour, with coatings applied using roll coat applicators.

The following conditions shall be applicable:

(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:

(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.

(2) Pursuant to 326 IAC 6-2-4(a) (Particulate Emission Limitations for Sources of Indirect Heating), the particulate matter emissions from the 8.37 mmBtu per hour heat input boiler, identified as B1, which began operation in 1994 shall be limited to 0.6 pounds per mmBtu heat input.

(3) Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator shall operate the degreasers, identified as MPW-1, MPW-2, EPW-1, and TPW-1, with the following requirements:

(a) Equip the cleaner with a cover;

(b) Equip the cleaner with a facility for draining cleaned parts;

(c) Close the degreaser cover whenever parts are not being handled in the cleaner;

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) Provide a permanent, conspicuous label summarizing the operation requirements;

(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

(4) To ensure that each surface coating operation (LCT-1 through LCT-14, WM-1, WM-2, WM-3, BMO-1, and the wire marking machines on units CV-4 and CV-5) continues to emit less than fifteen (15) pounds of VOC per day and thus preclude applicability of 326 IAC 8-2-1(a), the Permittee shall maintain the records specified below. Records shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and/or VOC emission limits. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

(a) The VOC content of each coating material and solvent used.

(b) The amount of coating material and solvent less water used on a daily basis.

(1) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(2) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

(c) The volume weighted VOC content of the coatings used for each day;

(d) The cleanup solvent usage for each day; and

(e) The total VOC usage for each day.

This is a notice-only change issued to this source. The source may continue to operate according to 326 IAC 2-5.5.

An authorized individual shall provide an annual notice to the Office of Air Quality that the source is in operation and in compliance with this registration pursuant to 326 IAC 2-5.5-4(a)(3). The annual notice shall be submitted to:

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

no later than March 1 of each year, with the annual notice being submitted in the format attached.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Pursuant to Contract No. A305-5-65, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Stacie Enoch, ERG, 1600 Perimeter Park Drive, Morrisville, North Carolina 27560, or call (919) 468-7895 to speak directly to Ms. Enoch. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana, 46204-2251 or call (800) 451-6027, ask for Duane Van Laningham, or extension 3-6878, or dial (317) 233-6878.

Sincerely,

Original document signed by

Nisha Sizemore, Chief
Permits Branch
Office of Air Quality

ERG/SE

cc: File – St. Joseph County
St. Joseph County Health Department
Air Compliance – Rick Reynolds
IDEM Northern Regional Office
Permit Tracking
Compliance Data Section

Registration
Annual Notification

This form should be used to comply with the notification requirements under 326 IAC 2-5.5-4(a)(3)

Company Name:	Standard Motor Products, Inc.
Address:	1718 North Home Street, Mishawaka, Indiana 46545
City:	Mishawaka
Phone #:	(574) 259-6253
Registration #:	141-22812-00559

I hereby certify that Standard Motor Products, Inc. is still in operation and is in compliance with the requirements of Registration 141-22812-00559.

Name:
Title:
Signature:
Date:

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May 18, 2007

Mr. Terry Seeders
Standard Motor Products, Inc.
1718 North Home Street
Mishawaka, Indiana 46545

Re: 141-24631-00559
First Notice-Only Change to R141-22812-00559

Dear Mr. Seeders:

Standard Motor Products, Inc., was issued a registration on May 24, 2006, for the operation of an automotive ignition wire set manufacturing operation. An application from Standard Motor Products, Inc., received on April 17, 2007, has been reviewed. Standard Motor Products, Inc., plans to add two (2) additional rubber extrusion machines, identified as CV-4 and CV-5. Each rubber extrusion machine is equipped with a wire marking machine, which is used to apply a surface coating material to the rubber coating of the wire. As shown in the table below, the source-wide potential to emit PM, PM10, SO_2, VOC, CO, and NOx will be less than twenty-five (25) tons per year, the potential to emit any single HAP will be less than ten (10) tons per year, and the potential to emit a combination of HAPs will be less than twenty-five (25) tons per year after the addition of these machines. Therefore, the source is still eligible to operate under a registration. Pursuant to 326 IAC 2-5.5-6(d)(10) and because the potential to emit of PM and all criteria pollutants are less than the levels listed in 326 IAC 2-1.1-3(e)(1), these emission units are being added as a notice-only change to Registration 141-22812-00559, issued May 24, 2006. A copy of the calculations is provided as Appendix A to this letter.

	Potential to Emit (tons/year)							
	PM	PM10	SO_2	NOx	VOC	CO	Single HAP[(1)]	Total HAPs
Existing Units	1.15	1.49	0.04	5.85	13.2	4.91	3.40	8.09
New Units	6.61E-05	6.61E-05	N/A	N/A	6.86	N/A	3.44	5.80
Revised Total	1.15	1.49	0.04	5.85	20.0	4.91	6.84	13.9

[(1)]The single HAP with the highest PTE for both the existing units and the new units is Toluene.

Pursuant to 326 IAC 6-3-1(b)(14), the new units (CV-4 and CV-5) are not subject to the requirements of 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) because they have potential particulate emissions that are less than five hundred fifty-one thousandths (0.551) pound per hour. The new units are not subject to the requirements of 326 IAC 8-1-6 (BACT), because they do not have the potential to emit twenty-five (25) tons per year of VOC. These units will be constructed in St. Joseph County after July 1, 1990, but each wire marking machine has actual VOC emissions that are less than fifteen (15) pounds per day. Therefore, the new units are not subject to 326 IAC 8-2 (Surface Coating Emission Limitations).

Based on the information provided by Standard Motor Products, Inc., and the provisions in 326 IAC 2-5.5, the following changes have been made to Registration 141-22812-00559. Deleted language is shown in ~~strikeout~~ and language added is shown in **bold**.

. . .

(r) Two (2) EPDM rubber extrusion and autoclave cure machines, identified as CV-4 and CV-5, each with a maximum capacity of 500 pounds per hour, and approved for construction in 2007. Each rubber extrusion and autoclave cure machine is equipped with a wire marking machine, which is used to apply a surface coating material to the rubber after it is extruded on to a wire. The two (2) wire marking machines have a combined potential throughput of 36,000 feet of rubber coated wire per hour, with coatings applied using roll coat applicators.

The following conditions shall be applicable:

. . .

To ensure that each surface coating operation (LCT-1 through LCT-14, WM-1, WM-2, WM-3, ~~and~~ BMO-1**, and the wire marking machines on units CV-4 and CV-5**) continues to emit less than fifteen (15) pounds of VOC per day and thus preclude applicability of 326 IAC 8-2-1(a), the Permittee shall maintain the records specified below. Records shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and/or VOC emission limits. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

Upon further review, the OAQ has decided to make the following revisions to the registration (deleted language is shown in ~~strikeout~~ and language added is shown in **bold**).

1. Based on the calculations and information provided in the Technical Support Document (TSD) for Registration 141-22812-00559, issued on May 24, 2006, the potential to emit particulate matter from the emission units identified as SCMX-1, SCML-1, SCEX-2, and SCEX-2 is less than five hundred fifty-one thousandths (0.551) pound per hour. Pursuant to 326 IAC 6-3-1(b)(14), these units are not subject to the requirements of 326 IAC 6-3. The registration has been revised as follows:

   ~~Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emission rate from the silicone mixer, identified as SCMX-1, the silicone compound mill, identified as SCML-1, and the silicone compounding extruders, identified as SCEX-1 and SCEX-2, shall be limited to less than 5.62 pounds per hour when operating at a combined process weight rate of 1.6 tons per hour.~~

2. To minimize future changes to this Registration, the OAQ has deleted the name and/or title of the Authorized Individual from this Registration. This change is considered a notice-only change pursuant to 326 IAC 2-5.5-6(d).

This is a notice-only change issued to this source. The source may continue to operate according to 326 IAC 2-5.5. All other conditions of the registration shall remain unchanged and in effect. Please find enclosed the revised registration.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. Pursuant to Contract No. A305-5-65, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Stacie Enoch, ERG, 1600 Perimeter Park Drive, Morrisville, North Carolina 27560, or call (919) 468-7895 to speak directly to Ms. Enoch. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana, 46204-2251 or call (800) 451-6027, ask for Duane Van Laningham, or extension 3-6878, or dial (317) 233-6878.

Sincerely,

Original document signed by

Nisha Sizemore, Chief
Permits Branch
Office of Air Quality

ERG/SE

cc: File - St. Joseph County
St. Joseph County Health Department
Air Compliance - Rick Reynolds
IDEM Northern Regional Office
Permit Tracking
Compliance Data Section

Appendix A: Emissions Calculations
Emissions From CV-4 and CV-5 Rubber Extrusion and Curing

Company Name: **Standard Motor Products, Inc.**
Address: **1718 N. Home Street, Mishawaka, IN 46545**
Registration NOC: **141-24631-00559**
Reviewer: **ERG/SE**
Date: **May 15, 2007**

Pollutant	Extrusion Emission Factor* (lb/lb rubber)	Curing Emission Factor* (lb/lb rubber)	Combined Emission Factor (lb/lb rubber)	Total Rubber Throughput Capacity** (lbs/hr)	**Potential to Emit (tons/yr)**
VOC	3.51E-05	6.43E-04	6.78E-04	1,000	**2.97**
PM/PM10	1.51E-08	0.00E+00	1.51E-08	1,000	**6.61E-05**
Total HAPS	1.89E-05	4.70E-04	4.89E-04	1,000	**2.14**
Highest Single HAP (Acetophenone)	8.18E-06	4.19E-04	4.27E-04	1,000	**1.87**

* Emission factors are from draft AP-42, Chapter 4.12, Tables 4.12-6 and 4.12-9 (6/99) for Compound #9 (EPDM 2 (Peroxide Cure)).
** The source is constructing two (2) rubber extruder and autoclave cure machines, each with a maximum throughput capacity of 500 lbs of rubber per hour.

Methodology
Potential to Emit (tons/yr) = Combined Emission Factor (lb/lb rubber) x Total Rubber Throughput Capacity (lbs/hr) x 8,760 hrs/yr x 1 ton/2,000 lbs

Appendix A: Emissions Calculations
VOC, Particulate, and HAP Emissions from Wire Marking for CV-4 and CV-5

Company Name: Standard Motor Products, Inc.
Address: 1718 N. Home Street, Mishawaka, IN 46545
Registration NOC: 141-24631-00559
Reviewer: ERG/SE
Date: May 15, 2007

1. VOC and Particulate Emissions from Wire Marking

Material	Density (lbs/gal)	Weight % Volatile (H_20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Material (gal/unit)	Maximum Throughput* (units/hr)	Pounds VOC per Gallon of Coating	PTE VOC (lbs/hr)	PTE VOC (lbs/day)	PTE VOC (tons/yr)	PTE PM/PM10 (tons/yr)	Transfer Efficiency** (%)
GEM Ink 1013	7.70	75.9%	0.00%	75.90%	0.00%	18.8%	3.75E-06	36,000	5.84	0.79	18.9	3.46	0.00	100%
Ink Extender 1072	7.26	100%	0.00%	100.00%	0.00%	0.00%	3.75E-07	36,000	7.26	0.10	2.35	0.43	0.00	100%
									Total	**0.89**	**21.3**	**3.89**	**0.00**	

The surface coating material is used to mark rubber coated wire. The surface coating material is applied to the rubber, and not to the metal.

* 1 unit = 1 ft wire produced

** Coating is applied by roll coater and source reports 100% transfer efficiency.

Methodology

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

PTE VOC (lbs/hr) = Pounds of VOC per Gallon of Coating (lbs/gal) * Gal of Material (gal/unit) * Maximum Throughput (units/hr)

PTE VOC (lbs/day) = PTE VOC (lbs/hr) * 24 hrs/day

PTE VOC (tons/yr) = PTE VOC (lbs/hr) * 8,760 hrs/yr * 1 ton/2,000 lbs

PTE PM/PM10 (tons/yr) = Maximum Throughput (units/hr) * Gal of Material (gal/unit) * Density (lbs/gal) * (1- Weight % Volatile) * (1-Transfer Efficiency %) * 8,760 hrs/yr * 1 ton/2,000 lbs

2. HAP Emissions from Wire Marking

Material	Density (lbs/gal)	Gal of Material (gal/unit)	Maximum Throughput* (units/hr)	Weight % Toluene	Weight % Xylene	PTE Toluene (tons/yr)	PTE Xylene (tons/yr)	Total PTE HAPs (tons/yr)
GEM Ink 1013	7.70	3.75E-06	36,000	66.1%	4.90%	3.01	0.22	3.23
Ink Extender 1072	7.26	3.75E-07	36,000	100%	0.00%	0.43	0.00	0.43
					Total	**3.44**	**0.22**	**3.66**

The surface coating material is used to mark rubber coated wire. The surface coating material is applied to the rubber, and not to the metal.

* 1 unit = 1 ft wire produced

Methodology

PTE HAPs (tons/yr) = Density (lbs/gal) * Gal of Material (gal/unit) * Maximum Throughput (units/hr) * Weight % HAP * 8,760 hrs/yr * 1 ton/2,000 lbs

Appendix A: Emissions Calculations
Emission Summary

Company Name: **Standard Motor Products, Inc.**
Address: **1718 N. Home Street, Mishawaka, IN 46545**
Registration NOC: **141-24631-00559**
Reviewer: **ERG/SE**
Date: **May 15, 2007**

Potential to Emit (tons/yr)

Emission Units	PM	PM10	SO_2	VOC	CO	NOx	Highest Single HAP*	Combined HAPs
CV-4 and CV-5 Extrusion and Curing	6.61E-05	6.61E-05	N/A	2.97	N/A	N/A	1.87	2.14
Wire Marking	0.00	0.00	N/A	3.89	N/A	N/A	3.44	3.66
Total PTE from New Equipment	**6.61E-05**	**6.61E-05**	**N/A**	**6.86**	**N/A**	**N/A**	**3.44**	**5.80**
Existing Operations (R141-22812-00559)	1.15	1.49	0.04	13.2	4.91	5.85	3.40	8.09
Revised PTE After New Equipment	**1.15**	**1.49**	**0.04**	**20.0**	**4.91**	**5.85**	**6.84**	**13.9**

*The single HAP with the highest PTE from the new units is Toluene from wire marking.
The single HAP with the highest PTE from the TSD for R141-22812-00559 is Toluene.
Therefore, the single HAP with the highest PTE after this revision is Toluene with a PTE of 6.84 tons/yr.