



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
MC 61-53 IGCN 1003
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

TO: Interested Parties / Applicant
DATE: October 5, 2007
RE: Dexter Axle Company / 113-24912-00008
FROM: Nisha Sizemore
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER.dot 03/23/06



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
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Mr. Larry Parks
Dexter Axle Company
P.O. Box 108
Albion, Indiana 46701

October 5, 2007

Re: 113-24912-00008
Second Significant Revision to
FESOP 113-17172-00008

Dear Mr. Parks:

Dexter Axle Company was issued a Federally Enforceable State Operating Permit (FESOP) No. 113-17172-00008 on March 23, 2004 for a brake and axle component manufacturing plant located at 500 South Seventh Street, Albion, Indiana 46701.

The Office of Air Quality (OAQ) received an application from the source on June 12, 2007 requesting the addition of new emission and pollution control units to produce brake shoes. The new emission units consist of one dry material handling conveyor, one mixer, one natural gas-fired cure oven, one adhesive application and curing process, one natural gas-fired boiler, and four natural gas-fired heaters. Additionally, the source requested the potential to emit calculations and any applicable emission limitations be revised for the existing surface coating operations. These changes will not cause the source's potential to emit to be greater than the Title V major threshold levels or PSD major threshold levels.

The attached Technical Support Document (TSD) provides additional explanation of the requested changes at the Dexter Axle Company brake and axle component manufacturing plant.

Pursuant to the provisions of 326 IAC 2-8-11.1, the changes to the permit are required to be reviewed in accordance with the Significant Permit Revision procedures of 326 IAC 2-8-11.1(f). Pursuant to the provisions of 326 IAC 2-8-11.1, a significant permit revision (SPR) No. 113-24912-00008 to the Dexter Axle Company FESOP is hereby approved as described in the attached Technical Support Document (TSD) and Addendum to the TSD.

The following construction conditions are applicable to the proposed project:

1. General Construction Conditions
The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Pursuant to 326 IAC 2-8-11.1, the Dexter Axle Company permit shall be revised by incorporating the associated significant permit revisions into their permit. All other conditions of the permits shall remain unchanged and in effect. Please find the enclosed copy of the revised entire permit for the Dexter Axle Company.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Brian Williams, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana, 46204-2251, at 317-234-5375 or at 1-800-451-6027 (ext 45375).

Sincerely,

Original signed by
Nisha Sizemore, Chief
Permits Branch
Office of Air Quality

bmw

Attachments: Technical Support Document (TSD), Addendum to the TSD, and revised permit

cc: File - Noble County
U.S. EPA, Region V
Noble County Health Department
IDEM Northern Regional Office
Compliance Data Section
Administrative and Development
Technical Support and Modeling
Billing, Licensing, and Training Section - Dan Stamatkin



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Federally Enforceable State Operating Permit OFFICE OF AIR QUALITY

**Dexter Axle Company
500 South Seventh Street
Albion, Indiana 46701**

(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.: F113-17172-00008	
Original Signed By: Paul Dubenetzky, Chief Permits Branch Office of Air Quality	Issuance Date: March 23, 2004 Expiration Date: March 23, 2009
First Minor Permit Revision No. 113-19334-00008, issued on June 25, 2004 Second Minor Permit Revision No. 113-19132-00008, issued on June 30, 2004 First Administrative Amendment No. 113-19295-00008, issued on July 27, 2004 First Significant Permit Revision No. 113-20098-00008, issued on June 16, 2005 Second Administrative Amendment No. 113-21461-00008, issued on June 30, 2005	
Second Significant Permit Revision No.: F113-24912-00008	
Issued by: <i>Original signed by</i> Nisha Sizemore, Chief Permits Branch Office of Air Quality	Pages Affected: Entire Permit Issuance Date: October 5, 2007 Expiration Date: March 23, 2009

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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 brake and axle component manufacturing operation.

Source Address:	500 South Seventh Street, Albion, Indiana 46701
Mailing Address:	PO Box 108, Albion, Indiana 46701
General Source Phone Number:	574-266-7356
SIC Code:	3714
County Location:	Noble
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) shoe dip tank constructed in 1974, identified as EU-06, exhausting to Stack 6, nominal capacity: 2,034 brake shoes per hour.
- (b) One (1) metal backing plate dip tank, identified as EU-07, constructed in 2000, exhausting to Stack 7, nominal capacity: 923 metal backing plates per hour.
- (c) One (1) spray paint booth constructed in 1969, identified as EU-11, equipped with five (5) high volume low pressure (HVLP) spray guns and dry filters to control particulate overspray, exhausting to Stack 11, nominal capacity: 429 metal brake parts per hour.
- (d) One (1) spray paint booth constructed in 1973, identified as EU-12, equipped with ten (10) high volume low pressure (HVLP) spray guns and dry filters to control particulate overspray, exhausting to Stack 12, nominal capacity: 429 metal brake parts per hour.
- (e) One (1) spray paint booth, identified as EU-15, equipped with eleven (11) high volume low pressure (HVLP) spray guns and dry filters to control particulate overspray, exhausting to Stack 15, nominal capacity: 429 metal brake parts per hour.
- (f) One (1) grinding system, constructed in 1975, identified as EU-14, equipped with six (6) grinders and dry filters for particulate control, exhausting inside, nominal capacity: 1,800 pounds of friction material per hour.
- (g) One (1) covered conveyor system, identified as EU-2, approved for construction in 2007, with particulate matter controlled by baghouse VFR-2 and exhausting to the indoors, which conveys dry frictional material to mixer (EU-1) at a nominal capacity of 535 pounds per hour and consisting of the following emission units:

- (1) Seven (7) frictional dry material feed bins, approved for construction in 2007, identified as HML-1, HML-2, HML-3, HML-4, HML-5, HML-6, and TS-1, with particulate matter controlled by cartridge dust filter RVF-1 and exhausting to the indoors, nominal capacity: 172 pounds per hour total;
- (2) Three (3) bulk bag feed bins, approved for construction in 2007, identified as BBS-1, BBS-2, and BBS-3, with particulate matter controlled by baghouse DCF-3 and exhausting to the indoors, nominal capacity: 253 pounds per hour total;
- (3) One (1) bag dump station, approved for construction in 2007, identified as BDS-1, with particulate matter controlled by cartridge dust filter BVF-4 and exhausting to the indoors, nominal capacity: 37 pounds per hour;
- (4) One (1) fiberglass blowing system, approved for construction in 2007, identified as RM-1, with particulate matter controlled by baghouse VFR-2 and exhausting to the indoors, nominal capacity: 73 pounds per hour;
- (h) One (1) mixer, approved for construction in 2007, identified as EU-1, with particulate matter controlled by baghouse VFR-2 and exhausting to the indoors, nominal capacity: 640 pounds per hour;
- (i) One (1) natural gas-fired cure oven, approved for construction in 2007, identified as CO-1, exhausting to Stack 16, nominal capacity: 1,580 brake linings per hour, nominal heat input capacity: 2 million British thermal units per hour;
- (j) One (1) adhesive application and curing process, approved for construction in 2007, identified as ACO-2, equipped with one (1) natural gas-fired adhesive oven, exhausting to Stack 17, nominal capacity: 1,580 brake linings per hour, nominal heat input capacity: 2 million British thermal units 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) Source-wide natural gas-fired combustion, nominally rated at 40.72 million British thermal units per hour total, consisting of the following:
 - (1) Three (3) air makeup units, nominal heat input capacity: 5.00 million British thermal units per hour each;
 - (2) Eight (8) heaters/air conditioners, nominal heat input capacity: 0.475 million British thermal units per hour each;
 - (3) Twenty-five (25) natural gas-fired space heaters, nominal heat input capacity: 0.150 million British thermal units per hour each;
 - (4) Three (3) bonders, nominal heat input capacity: 0.800 million British thermal units per hour each;
 - (5) Three (3) parts washers, nominal heat input capacity: 0.650 million British thermal units per hour each;
 - (6) One (1) parts washer, nominal heat input capacity: 0.880 million British thermal units per hour;

- (7) One (1) parts washer, nominal heat input capacity: 1.80 million British thermal units per hour;
 - (8) One (1) parts washer, nominal heat input capacity: 4.80 million British thermal units per hour;
 - (9) Three (3) office furnaces, nominal heat input capacity: 0.080 million British thermal units per hour each;
 - (10) One (1) natural gas-fired boiler, approved for construction in 2007, exhausting to Stack 18, nominal heat input capacity: 0.16 million British thermal units per hour; and
 - (11) Four (4) natural gas-fired heaters, approved for construction in 2007, nominal heat input capacity: 0.475 million British thermal units per hour each.
- (b) Three (3) metal inert gas (MIG) welding stations, using L50 welding wire, nominal capacity: 6.00 pounds of welding wire per hour each.
 - (c) Paved and unpaved roads and parking lots with public access.
 - (d) Grinding and machining operation 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, consisting of the following:
 - One (1) bullard system, consisting of eight (8) bullard machines, equipped with dry filters for particulate control, nominal capacity: 85 parts (3,443 pounds) per hour.
 - (e) One (1) natural gas-fired Building 1 parts washer, with a nominal heat input capacity of 0.8 million British thermal units per hour. This washer uses a non-VOC and a non-HAP spray cleaner.
 - (f) One (1) natural gas-fired Building 2 parts washer, with a nominal heat input capacity of 1.8 million British thermal units per hour. This washer uses a non-VOC and a non-HAP spray cleaner.
 - (g) Eight (8) natural gas-fired Building 2 heating and air conditioning units, each are nominally rated at 0.175 million British thermal units per hour for a nominal total of 1.4 million British thermal units per hour.

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) for 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, F113-17172-00008, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability [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. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent 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 prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:

- (1) Identification of the individual(s) (by job title(s) or classification(s)) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

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

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

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.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 Northern 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

Northern Regional Office phone: (574) 245-4870; fax: (574) 245-4877.

- (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 F113-17172-00008 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 does require 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]

- (a) 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 one hundred (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] [326 IAC 2-2]

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. This limitation shall make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable;
 - (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) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
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 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

- (b) These ERPs shall be submitted for approval to:

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

within ninety (90) days after the date of issuance of this permit.

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

- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.15 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.16 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.17 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.18 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.19 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) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.20 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 EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Surface Coating Operations

- (a) One (1) shoe dip tank constructed in 1974, identified as EU-06, exhausting to Stack 6, nominal capacity: 2,034 brake shoes per hour.
- (b) One (1) metal backing plate dip tank, identified as EU-07, constructed in 2000, exhausting to Stack 7, nominal capacity: 923 metal backing plates per hour.
- (c) One (1) spray paint booth constructed in 1969, identified as EU-11, equipped with five (5) high volume low pressure (HVLP) spray guns and dry filters to control particulate overspray, exhausting to Stack 11, nominal capacity: 429 metal brake parts per hour.
- (d) One (1) spray paint booth constructed in 1973, identified as EU-12, equipped with ten (10) high volume low pressure (HVLP) spray guns and dry filters to control particulate overspray, exhausting to Stack 12, nominal capacity: 429 metal brake parts per hour.
- (e) One (1) spray paint booth, identified as EU-15, equipped with eleven (11) high volume low pressure (HVLP) spray guns and dry filters to control particulate overspray, exhausting to Stack 15, nominal capacity: 429 metal brake parts per hour.

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

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

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-8-4] [326 IAC 2-2]

The total VOC usage for the one (1) shoe dip tank (EU-06), one (1) metal backing plate dip tank (EU-07), three (3) spray paint booths (EU-11, EU-12, and EU-15), and one adhesive application and curing process (ACO-2), shall not exceed 62.65 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with this limit, combined with the potential emissions of VOC from all other emission units as this source, will limit the source-wide total potential to emit VOC to less than 100 tons per 12 consecutive month period and render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (PSD) not applicable.

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

Pursuant to 326 IAC 8-2-9, the owner or operator shall not allow the discharge into the atmosphere VOC from the one (1) metal backing plate dip tank, identified as EU-07, and one (1) spray paint booth, identified as EU-15, in excess of three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, delivered to the applicator for air dried or forced warm air dried coatings.

D.1.3 Volatile Organic Compounds (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 EU-07 and EU-15 during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

D.1.4 Particulate Matter (PM) and Particulate Matter Less Than Ten Microns (PM₁₀) [326 IAC 2-8-11.1(d)(5)(E)] [326 IAC 2-8-4] [326 IAC 2-2]

Pursuant to 326 IAC 2-8-11.1(d)(5)(E), the input of solids to spray paint booth (EU-15) shall not exceed 99.6 tons per twelve (12) consecutive month period with compliance determined at the

end of each month, equivalent to 24.9 tons of PM and PM₁₀ per year each, based on a minimum transfer efficiency and minimum control efficiency of fifty percent (50%) each.

Compliance with these limits, combined with the potential PM and PM₁₀ emissions from all other emission units at this source, shall limit the source-wide potential to emit PM and PM₁₀ to less than two hundred fifty (250) tons per year and one hundred (100) tons per year, respectively, and render the requirements of 326 IAC 2-2 (PSD) and 326 IAC 2-7 (Part 70 Permits) not applicable.

D.1.5 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the PM from the three (3) spray paint booths (EU-11, EU-12, and EU-15) shall not exceed the pound per hour emission rate established as E in the following formula:

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:

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

or

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

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.1.6 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the three (3) spray paint booths (EU-11, EU-12, and EU-15) shall be controlled by dry filters, and the Permittee shall operate the control device in accordance with manufacturer (s) specifications.

D.1.7 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 EU-11, EU-12, and EU-15 as well as any control devices.

Compliance Determination Requirements

D.1.8 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]

- (a) Compliance with the VOC requirements for all surface coating operations as well as the content limitation for EU-07 and EU-15 contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.1.9 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (Stacks 11, 12, and 15) while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. 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 stack and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

D.1.10 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC requirement and content limits established in Conditions D.1.1 and D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) The VOC content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on a monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOC emitted for each compliance period.
- (b) To document compliance with Condition D.1.4, the Permittee shall maintain records of the input of solids to EU-15 each month.
- (c) To document compliance with Condition D.1.9, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.11 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.4 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does

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

SECTION D.2

FACILITY OPERATION CONDITIONS

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

- (f) One (1) grinding system, constructed in 1975, identified as EU-14, equipped with six (6) grinders and dry filters for particulate control, exhausting inside, nominal capacity: 1,800 pounds of friction material 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 Matter (PM) and Particulate Matter Less Than Ten Microns (PM₁₀) [326 IAC 2-8-4] [326 IAC 2-2]

The PM and PM₁₀ emission rates from the one (1) grinding system, identified as EU-14, shall not exceed 12.0 pounds per hour each. Compliance with these limits, combined with the potential PM and PM₁₀ emissions from all other emission units at this source, shall limit the source-wide potential to emit PM and PM₁₀ to less than two hundred fifty (250) tons per year and one hundred (100) tons per year, respectively, and render the requirements of 326 IAC 2-2 (PSD) and 326 IAC 2-7 (Part 70 Permits) not applicable.

D.2.2 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate from the one (1) grinding system, identified as EU-14, shall not exceed 3.82 pounds per hour when operating at a process weight rate of 0.900 tons per hour.

The pounds per hour limitation was calculated with the following equation:

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

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

D.2.3 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 one (1) grinding system, identified as EU-14 and its control device.

Compliance Determination Requirements

D.2.4 Particulate Control

In order to comply with Conditions D.2.1 and D.2.2, the dry filters for particulate control shall be in operation and control emissions from the one (1) grinding system, identified as EU-14, at all times that the one (1) grinding system, identified as EU-14, is in operation.

D.2.5 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

For any change or modification that causes the exhaust from the one (1) grinding system, identified as EU-14 to vent to the outside atmosphere, within one hundred eighty (180) days after the change or modification, to demonstrate compliance with Condition D.2.1, the Permittee shall perform PM and PM₁₀ testing on the exhaust for EU-14, utilizing methods as approved by the Commissioner. When venting to the outside atmosphere, the test shall be repeated at least once every five (5) years from the date of the valid compliance demonstration. Testing when venting to the outside atmosphere, shall be conducted in accordance with Section C - Performance Testing.

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

D.2.6 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the dry filters. To monitor the performance of the dry filters, weekly observations shall be made of the visible emissions from the one (1) grinding system, identified as EU-14, when exhausting to the outside atmosphere. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (b) The Permittee shall implement an operator-training program.
 - (1) All operators that perform grinding operations using grinding equipment shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained upon issuance of SPR 113-20098-00008 if training was not completed within the last twelve (12) months. All new operators shall be trained within thirty (30) days of hiring or transfer.
 - (2) Training shall include proper filter alignment, filter inspection on a daily basis, maintenance, and trouble shooting practices. The training program shall be written and include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within one (1) hour for inspection by IDEM, OAQ.
 - (3) All operators shall be given refresher training annually.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

D.2.7 Record Keeping Requirements

- (a) To document compliance with Condition D.2.6(a), the Permittee shall maintain records of the results of the inspections required under Condition D.2.6(a).
- (b) To document compliance with Condition D.2.6(c), the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3

FACILITY OPERATION CONDITIONS

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

- (a) Source-wide natural gas-fired combustion, nominally rated at 40.72 million British thermal units per hour total, consisting of the following:
- (1) Three (3) air makeup units, nominal heat input capacity: 5.00 million British thermal units per hour each;
 - (2) Eight (8) heaters/air conditioners, nominal heat input capacity: 0.475 million British thermal units per hour each;
 - (3) Twenty-five (25) natural gas-fired space heaters, nominal heat input capacity: 0.150 million British thermal units per hour each;
 - (4) Three (3) bonders, nominal heat input capacity: 0.800 million British thermal units per hour each;
 - (5) Three (3) parts washers, nominal heat input capacity: 0.650 million British thermal units per hour each;
 - (6) One (1) parts washer, nominal heat input capacity: 0.880 million British thermal units per hour;
 - (7) One (1) parts washer, nominal heat input capacity: 1.80 million British thermal units per hour;
 - (8) One (1) parts washer, nominal heat input capacity: 4.80 million British thermal units per hour;
 - (9) Three (3) office furnaces, nominal heat input capacity: 0.080 million British thermal units per hour each;
 - (10) One (1) natural gas-fired boiler, approved for construction in 2007, exhausting to Stack 18, nominal heat input capacity: 0.16 million British thermal units per hour; and
 - (11) Four (4) natural gas-fired heaters, approved for construction in 2007, nominal heat input capacity: 0.475 million British thermal units per hour each.
- (b) Three (3) metal inert gas (MIG) welding stations, using L50 welding wire, nominal capacity: 6.00 pounds of welding wire per hour each.
- (c) Paved and unpaved roads and parking lots with public access.
- (d) Grinding and machining operation 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, consisting of the following:
- One (1) bullard system, consisting of eight (8) bullard machines, equipped with dry filters for particulate control, nominal capacity: 85 parts (3,443 pounds) 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.3.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate from the insignificant bullard system, shall not exceed 5.90 pounds per hour when operating at a process weight rate of 1.72 tons per hour.

The pounds per hour limitation was calculated with the following equation:

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

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

Compliance Determination Requirements

D.3.2 Particulate Control

In order to comply with Condition D.3.1, the dry filters for particulate control shall be in operation and control emissions from the insignificant bullard system at all times that the insignificant bullard system is in operation.

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

There are no specific Compliance Monitoring Requirements applicable to these insignificant activities.

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

There are no specific Record Keeping and Reporting Requirements applicable to these insignificant activities

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Brake Shoe Operations

- (g) One (1) covered conveyor system, identified as EU-2, approved for construction in 2007, with particulate matter controlled by baghouse VFR-2 and exhausting to the indoors, which conveys dry frictional material to mixer (EU-1) at a nominal capacity of 535 pounds per hour and consisting of the following emission units:
- (1) Seven (7) frictional dry material feed bins, approved for construction in 2007, identified as HML-1, HML-2, HML-3, HML-4, HML-5, HML-6, and TS-1, with particulate matter controlled by cartridge dust filter RVF-1 and exhausting to the indoors, nominal capacity: 172 pounds per hour total;
 - (2) Three (3) bulk bag feed bins, approved for construction in 2007, identified as BBS-1, BBS-2, and BBS-3, with particulate matter controlled by baghouse DCF-3 and exhausting to the indoors, nominal capacity: 253 pounds per hour total;
 - (3) One (1) bag dump station, approved for construction in 2007, identified as BDS-1, with particulate matter controlled by cartridge dust filter BVF-4 and exhausting to the indoors, nominal capacity: 37 pounds per hour;
 - (4) One (1) fiberglass blowing system, approved for construction in 2007, identified as RM-1, with particulate matter controlled by baghouse VFR-2 and exhausting to the indoors, nominal capacity: 73 pounds per hour;
- (h) One (1) mixer, approved for construction in 2007, identified as EU-1, with particulate matter controlled by baghouse VFR-2 and exhausting to the indoors, nominal capacity: 640 pounds per hour;
- (i) One (1) natural gas-fired cure oven, approved for construction in 2007, identified as CO-1, exhausting to Stack 16, nominal capacity: 1,580 brake linings per hour, nominal heat input capacity: 2 million British thermal units per hour;
- (j) One (1) adhesive application and curing process, approved for construction in 2007, identified as ACO-2, equipped with one (1) natural gas-fired adhesive oven, exhausting to Stack 17, nominal capacity: 1,580 brake linings per hour, nominal heat input capacity: 2 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.4.1 Volatile Organic Compounds (VOC) [326 IAC 2-8-4] [326 IAC 2-2]

The total VOC usage for the one (1) shoe dip tank (EU-06), one (1) metal backing plate dip tank (EU-07), three (3) spray paint booths (EU-11, EU-12, and EU-15), and one adhesive application and curing process (ACO-2), shall not exceed the limit contained in Condition D.1.1 of this permit.

D.4.2 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-1-6] [326 IAC 2-8-4]

- (a) The potential to emit VOC from the resin used in the cure oven process (emission unit CO-1) shall not exceed 440 pounds of VOC per ton of resin used.
- (b) The total resin usage for the cure oven process (emission unit CO-1) shall not exceed 113.2 tons of resin per twelve (12) consecutive month period with compliance determined

at the end of each month.

Compliance with these limits will limit the cure oven process (emission unit CO-1) to less than 24.9 tons per 12 consecutive month period and render the requirements of 326 IAC 8-1-6 (BACT) and 326 IAC 2-7 (Part 70 Permits) not applicable.

Compliance Determination Requirements

D.4.3 Testing Requirements

In order to demonstrate compliance with Condition D.4.2(a), the Permittee shall perform an initial performance test for the uncontrolled VOC emissions from the cure oven process (emission unit CO-1) within 180 days after initial startup of the cure oven, utilizing methods as approved by the Commissioner. Testing shall be conducted in accordance with Section C - Performance Testing.

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

D.4.4 Record Keeping Requirements

(a) To document compliance with Condition D.4.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC content and VOC emission limitations established in Condition D.4.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

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

(b) To document compliance with Condition D.4.2, the Permittee shall maintain records in accordance with (1) below. Records maintained for (1) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limitations established in Condition D.4.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

- (1) The total resin usage for each month.

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

D.4.5 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.4.1 and D.4.2(b) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within

thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Dexter Axle Company
Source Address: 500 South Seventh Street, Albion, Indiana 46701
Mailing Address: PO Box 108, Albion, Indiana 46701
FESOP Permit No.: F113-17172-00008

**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:

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: Dexter Axle Company
Source Address: 500 South Seventh Street, Albion, Indiana 46701
Mailing Address: PO Box 108, Albion, Indiana 46701
FESOP Permit No.: F113-17172-00008

This form consists of 2 pages

Page 1 of 2

- This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) daytime business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
 - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), 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

Page 2 of 2

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: Dexter Axle Company
Source Address: 500 South Seventh Street, Albion, Indiana 46701
Mailing Address: P.O. Box 108, Albion, Indiana 46701
FESOP No.: F 113-17172-00008
Facility: Spray Paint Booth (EU-15)
Parameter: Input of solids
Limit: Not to exceed 99.6 tons per twelve consecutive month period with compliance determined at the end of each month, equivalent to 24.9 tons of PM and PM₁₀ per year each.

YEAR: _____

Month	Input of Solids (tons)	Input of Solids (tons)	Input of Solids (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: Dexter Axle Company
Source Address: 500 South Seventh Street, Albion, Indiana 46701
Mailing Address: PO Box 108, Albion, Indiana 46701
FESOP Permit No.: F113-17172-00008
Facility: One (1) adhesive application and curing process (ACO-2), one (1) shoe dip tank (EU-06), one (1) metal backing plate dip tank (EU-07), and three (3) spray paint booths (EU-11, EU-12, and EU-15)
Parameter: VOC Usage
Limit: Less than 62.65 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

Month	VOC Usage (tons)	VOC Usage (tons)	VOC Usage (tons)
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- 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: Dexter Axle Company
Source Address: 500 South Seventh Street, Albion, Indiana 46701
Mailing Address: PO Box 108, Albion, Indiana 46701
FESOP Permit No.: F113-17172-00008
Facility: One (1) Natural Gas-Fired Cure Oven (CO-1)
Parameter: Resin Usage
Limit: Less than 113.2 tons of resin per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

Month	Resin Usage (tons)	Resin Usage (tons)	Resin Usage (tons)
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- 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: Dexter Axle Company
Source Address: 500 South Seventh Street, Albion, Indiana 46701
Mailing Address: PO Box 108, Albion, Indiana 46701
FESOP Permit No.: F113-17172-00008

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. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does 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."	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> 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:	

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 (TSD) for a
Significant Permit Revision (SPR) to a
Federally Enforceable State Operating Permit

Source Background and Description

Source Name:	Dexter Axle Company
Source Location:	500 South Seventh Street, Albion, Indiana 46701
County:	Noble
SIC Code:	3714
Operation Permit No.:	F113-17172-00008
Operation Permit Issuance Date:	March 23, 2004
Significant Permit Revision No.:	113-24912-00008
Permit Reviewer:	Brian M Williams

On August 1, 2007, the Office of Air Quality (OAQ) had a notice published in the Kendallville News-Sun newspaper in Noble County, Indiana, stating that Dexter Axle Company had applied for a Significant Permit Revision (SPR) to their Federally Enforceable State Operating Permit (FESOP) to construct and operate new equipment at their existing stationary brake and axle component manufacturing plant located at 500 South Seventh Street, Albion, Indiana 46701. The notice also stated that the OAQ proposed to issue a FESOP SPR for this operation and provided information on how the public could review the proposed permit 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 should be issued as proposed.

Comments and Responses

On August 28, 2007, Dexter Axle Company submitted comments to IDEM, OAQ on the draft FESOP SPR. On September 28, 2007, Dexter Axle Company and IDEM, OAQ discussed these comments and came to agreement on changes to be made to the permit.

The Technical Support Document (TSD) is used by IDEM, OAQ for historical purposes. IDEM, OAQ does not make any changes to the original TSD, but the Permit will have the updated changes. The comments and revised permit language are provided below with deleted language as ~~strikeouts~~ and new language **bolded**.

Comment 1:

In Condition D.1.4, please remove the word "proposed" from the description of the spray booth as this was approved in an earlier revision of this permit.

Response to Comment 1:

IDEM, OAQ agrees with this change to the permit. The permit has been revised as follows:

...

D.1.4 Particulate Matter (PM) and Particulate Matter Less Than Ten Microns (PM₁₀) [326 IAC 2-8-11.1(d)(5)(E)] [326 IAC 2-8-4] [326 IAC 2-2]

Pursuant to 326 IAC 2-8-11.1(d)(5)(E), the input of solids to ~~proposed~~ spray paint booth (EU-15) shall not exceed 99.6 tons per twelve (12) consecutive month period with compliance determined at the end of each month, equivalent to 24.9 tons of PM and PM₁₀ per year each, based on a minimum

transfer efficiency and minimum control efficiency of fifty percent (50%) each.

...

Comment 2:

Note that Condition D.1.1 and Condition D.4.1 contain the exact same conditions.

Response to Comment 2:

IDEM, OAQ agrees that Conditions D.1.1 and D.4.1 contain the exact same conditions. In order to provide clarification, the permit has been revised as follows:

...

D.4.1 Volatile Organic Compounds (VOC) [326 IAC 2-8-4] [326 IAC 2-2]

The total VOC usage for the one (1) shoe dip tank (EU-06), one (1) metal backing plate dip tank (EU-07), three (3) spray paint booths (EU-11, EU-12, and EU-15), and one adhesive application and curing process (ACO-2), shall not exceed **the limit contained in Condition D.1.1 of this permit.** ~~62.65 tons per twelve (12) consecutive month period with compliance determined at the end of each month.~~

~~Compliance with this limit, combined with the potential emissions of VOC from all other emission units as this source, will limit the source wide total potential to emit VOC to less than 100 tons per 12 consecutive month period and render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (PSD) not applicable.~~

Comment 3:

Condition D.4.3 indicates the adhesive application and curing process is covered under 326 IAC 8-2-9, "Miscellaneous Metal Coating Operations". This emission unit does not coat any metal, but applies a small amount of adhesive using a caulk-like applicator (100% transfer efficiency) to the cured brake lining. The lining and the adhesive are then moved into the adhesive cure oven to cure the adhesive. Since no metal is being coated, this Condition is non-applicable, along with Condition D.4.6. Both of these Conditions should be removed from the final permit document.

Response to Comment 3:

IDEM, OAQ agrees with these changes to the permit. The permit has been revised as follows:

...

D.4.3 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

~~Pursuant to 326 IAC 8-2-9, the owner or operator shall not allow the discharge into the atmosphere VOC from the adhesive application process, identified as ACO-2, in excess of three (3.0) pounds of VOC per gallon of coating, excluding water, delivered to the applicator for all other coatings or coating application systems.~~

D.4.4 Volatile Organic Compounds (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 ACO-2 during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.~~

D.4.35 Testing Requirements

...

D.4.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]

~~(a) Compliance with the VOC emission limitations contained in Conditions D.4.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM,~~

~~OAG reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.~~

~~(b) Compliance with the VOC content limit for ACO-2 contained in Condition D.4.3 shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis. This volume weighted average shall be determined by the following equation:~~

$$A = [\sum (C \times U) / \sum U]$$

~~Where: A = The volume weighted average in pounds VOC per gallon less water as applied;~~

~~C = VOC content of the coating in pounds VOC per gallon less water as applied; and~~

~~U = The usage rate of the coating in gallons less water per day.~~

D.4.47 Record Keeping Requirements

(a) To document compliance with Conditions D.4.1 ~~and D.4.3~~, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC content and VOC emission limitations established in Conditions D.4.1 ~~and D.4.3~~. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

...

D.4.58 Reporting Requirements

...

Comment 4:

Dexter requests that Condition D.4.2(a) and D.4.2(b) be revised. The draft permit limits the amount of VOC in the resin contained in Condition D.4.2(a) based on the midpoint of the VOC content specifications provided by the manufacturer. This limit may not equal the VOC level determined under Condition D.4.5. Dexter is willing to initially limit the resin usage based upon a maximum VOC content specified from the manufacturer (440 lbs of VOC per ton of resin) to 113.8 tons per 12 month consecutive period until completion of the resin testing. The testing requirement contained in Condition D.4.5 will provide the required information to accurately limit the resin usage to assure the emission unit will not emit over 24.9 tons VOCs per 12 consecutive month period yet still be below BACT and Title V applicability.

Dexter requests the language of Condition D.4.2(a) be revised to indicate the maximum potential to emit of VOC from the resin used in the cure oven process not exceed 440 lbs per ton of resin until the pounds of VOC per ton of resin is determined following the testing requirements in Condition D.4.5. The potential to emit VOCs should then be limited to the level determined under Condition D.4.5.

In addition, the language of Condition D.4.2(b) should be revised to indicate an initial 12 month consecutive resin usage limit of 113.8 tons until the pound of VOC per ton of resin is determined by the testing requirements in Condition D.4.5. At that time, the total resin usage for the cure oven process will be limited using the following formula:

$$(24.9 \text{ tons VOC}) / (\text{lbs VOC per ton of resin obtained from testing from D.4.5})$$

Response to Comment 4:

IDEM, OAQ agrees to increase the VOC limit found in Condition D.4.2(a) to 440 pounds of VOC per ton of resin used and decrease the total resin usage to 113.2 tons of resin per twelve (12) consecutive month period with compliance determined at the end of each month . Once Dexter Axle Company has demonstrated compliance with Condition D.4.5, they may submit a permit revision request to IDEM to revise the VOC limitations found in Condition D.4.2 of the permit if necessary. The permit has been revised as follows:

D.4.2 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-1-6] [326 IAC 2-8-4]

- (a) The potential to emit VOC from the resin used in the cure oven process (emission unit CO-1) shall not exceed **440** ~~400~~ pounds of VOC per ton of resin used.
- (b) The total resin usage for the cure oven process (emission unit CO-1) shall not exceed **113.2** ~~124.5~~ tons of resin per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with these limits will limit the cure oven process (emission unit CO-1) to less than 24.9 tons per 12 consecutive month period and render the requirements of 326 IAC 8-1-6 (BACT) and 326 IAC 2-7 (Part 70 Permits) not applicable.

...
FESOP Quarterly Report

Source Name:	Dexter Axle Company
Source Address:	500 South Seventh Street, Albion, Indiana 46701
Mailing Address:	PO Box 108, Albion, Indiana 46701
FESOP Permit No.:	F113-17172-00008
Facility:	One (1) Natural Gas-Fired Cure Oven (CO-1)
Parameter:	Resin Usage
Limit:	Less than 113.2 124.5 tons of resin per twelve (12) consecutive month period, with compliance determined at the end of each month.

...

Comment 5:

Dexter intends to meet the requirements of Condition D.4.5, "Testing Requirements" using Method 24 from 40 CFR 60, Appendix A for testing of the VOC content of the resin. This method is specified in Condition C.9 as an applicable method for Performance Testing. It is Dexter's understanding that no stack testing will be required. We will submit the required documentation to meet the conditions stated in Condition C.9.

Response to Comment 5:

The testing requirements contained in Condition D.4.5 shall be conducted under the same operating conditions of the cure oven process (emission unit CO-1). This includes, but is not limited to, conducting the test under the same operating temperature and curing time as the cure oven process. Testing shall be conducted in accordance with Condition C.9 (Performance Testing) of this permit. Based on this comment there are no changes to the permit.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Significant Permit Revision to a Federally Enforceable State Operating Permit

Source Background and Description

Source Name:	Dexter Axle Company
Source Location:	500 South Seventh Street, Albion, Indiana 46701
County:	Noble
SIC Code:	3714
Operation Permit No.:	F113-17172-00008
Operation Permit Issuance Date:	March 23, 2004
Significant Permit Revision No.:	113-24912-00008
Permit Reviewer:	Brian M Williams

Dexter Axle Company was issued a Federally Enforceable State Operating Permit (FESOP) No. 113-17172-00008 on March 23, 2004 for a brake and axle component manufacturing plant located at 500 South Seventh Street, Albion, Indiana 46701. The Office of Air Quality (OAQ) received an application from the source on June 12, 2007 requesting the addition of new emission and pollution control units to produce brake shoes. The new emission units consist of one dry material handling conveyor, one mixer, one natural gas-fired cure oven, one adhesive application and curing process, one natural gas-fired boiler, and four natural gas-fired heaters. Additionally, the source requested the potential to emit calculations and any applicable emission limitations be revised for the existing surface coating operations. These changes will not cause the source's potential to emit to be greater than the Title V major threshold levels or PSD major threshold levels.

New Emission Units and Pollution Control Equipment

The application includes information relating to the construction and operation of the following:

- (1) One (1) covered conveyor system, identified as EU-2, approved for construction in 2007, with particulate matter controlled by baghouse VFR-2 and exhausting to the indoors, which conveys dry frictional material to mixer (EU-1) at a nominal capacity of 535 pounds per hour and consisting of the following emission units:
 - (a) Seven (7) frictional dry material feed bins, approved for construction in 2007, identified as HML-1, HML-2, HML-3, HML-4, HML-5, HML-6, and TS-1, with particulate matter controlled by cartridge dust filter RVF-1 and exhausting to the indoors, nominal capacity: 172 pounds per hour total;
 - (b) Three (3) bulk bag feed bins, approved for construction in 2007, identified as BBS-1, BBS-2, and BBS-3, with particulate matter controlled by baghouse DCF-3 and exhausting to the indoors, nominal capacity: 253 pounds per hour total;
 - (c) One (1) bag dump station, approved for construction in 2007, identified as BDS-1, with particulate matter controlled by cartridge dust filter BVF-4 and exhausting to the indoors, nominal capacity: 37 pounds per hour;
 - (d) One (1) fiberglass blowing system, approved for construction in 2007, identified

as RM-1, with particulate matter controlled by baghouse VFR-2 and exhausting to the indoors, nominal capacity: 73 pounds per hour;

- (2) One (1) mixer, approved for construction in 2007, identified as EU-1, with particulate matter controlled by baghouse VFR-2 and exhausting to the indoors, nominal capacity: 640 pounds per hour;
- (3) One (1) natural gas-fired cure oven, approved for construction in 2007, identified as CO-1, exhausting to Stack 16, nominal capacity: 1,580 brake linings per hour, nominal heat input capacity: 2 million British thermal units per hour;
- (4) One (1) adhesive application and curing process, approved for construction in 2007, identified as ACO-2, equipped with one (1) natural gas-fired adhesive oven, exhausting to Stack 17, nominal capacity: 1,580 brake linings per hour, nominal heat input capacity: 2 million British thermal units per hour.

Insignificant Activities

- (1) One (1) natural gas-fired boiler, approved for construction in 2007, exhausting to Stack 18, nominal heat input capacity: 0.16 million British thermal units per hour;
- (2) Four (4) natural gas-fired heaters, approved for construction in 2007, nominal heat input capacity: 0.475 million British thermal units per hour each.

Air Pollution Control Justification as an Integral Part of the Process

The company has submitted the following justification such that the baghouses identified as RVF-1, VFR-2, DCF-3, and BVF-4 be considered as an integral part of the material feed and covered conveyor systems:

- (a) due to the presence of an interlock device and
- (b) to protect the health of employees.

IDEM, OAQ has evaluated the justifications and determined that baghouses identified as RVF-1, VFR-2, DCF-3, and BVF-4 will not be considered as an integral part of the material feed and covered conveyor systems. This determination is based on the fact that the process can operate without the control equipment, the control equipment does not serve a primary purpose other than pollution control, and the control equipment is not used for product recovery. Therefore, the permitting level will be determined using the potential to emit before the air pollution control equipment.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
Stack 16	CO -1	25	1	1200	160
Stack 17	ACO - 2	25	1	600	160
Stack 18	Natural Gas Boiler	25	1	600	160

Recommendation

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

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

An application for the purposes of this review was received on June 12, 2007. Additional information was received on July 10, 2007 and July 16, 2007.

Emission Calculations

The revised emission calculations have been provided on Pages 1 through 7 in Appendix A of this document.

Unlimited Potential to Emit of Modification

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

This table reflects the unlimited potential to emit (PTE) of the new emission units.

Unlimited Potential to Emit of New Units (PTE) (tons/year)							
Process Description	PM	PM10	SO₂	VOC	CO	NOx	HAPs
Covered Conveyor System (EU-02)	1.17	1.17	0.00	0.00	0.00	0.00	0.00
Mixer (EU-1)	1.40	1.40	0.00	0.00	0.00	0.00	0.00
Cure Oven (CO-1)	0.00	0.00	0.00	76.24	0.00	0.00	3.05
Adhesive Application and Curing Process (ACO-2)	0.00	0.00	0.00	16.50	0.00	0.00	0.99
Insignificant Natural Gas Combustion	0.05	0.202	0.016	0.15	2.23	2.66	0.05
Total Unlimited PTE of New Units	2.62	2.78	0.016	92.89	2.23	2.66	4.09

Justification for Revision

Pursuant to 326 IAC 2-8-11.1(f)(1) and 326 IAC 2-8-11.1(g)(2), the FESOP is being modified through a Significant Permit Revision, since this modification is all of the following:

- (a) a modification with a potential to emit greater than or equal to twenty-five (25) tons per year of PM, PM10, SO₂, NOx, or VOC (326 IAC 2-8-11.1(f)(1)(E)). The unlimited potential to emit VOC for this modification is greater than 25 tons per year.
- (b) a modification that requires an adjustment to the emission cap limitations (326 IAC 2-8-11.1(g)(2)). As a result of this modification, the VOC emission cap limitation for this source is being modified to limit the total source-wide potential to emit to less than 100 tons per year.

County Attainment Status

The source is located in Noble County.

Pollutant	Status
PM10	Attainment or Unclassifiable
PM2.5	Attainment or Unclassifiable
SO ₂	Attainment
NO ₂	Attainment or Unclassifiable
8-Hour Ozone	Attainment or Unclassifiable
CO	Attainment or Unclassifiable
Lead	Attainment or Unclassifiable

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standard. Noble County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NO_x were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (b) Noble County has been classified as unclassifiable or attainment for PM_{2.5}. U. S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM 2.5 emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM_{2.5} emissions, it has directed states to regulate PM₁₀ emissions as surrogate for PM_{2.5} emissions. See the State Rule Applicability – Entire Source section.
- (c) Noble County has been classified as attainment or unclassifiable for all the other 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 for the source section.
- (d) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 redesignating Delaware, Greene, Jackson, Vanderburgh, Vigo and Warrick Counties to attainment for the eight-hour ozone standard.
- (e) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.
- (f) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Potential to Emit of the Entire Source after Issuance

This table reflects the potential to emit (PTE), reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of the FESOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Limited Potential to Emit After Issuance for the Entire Source (tons/year)							
Process/Facility	PM	PM10	SO₂	VOC	CO	NOx	HAPs
Source-wide Insignificant Natural Gas Combustion	0.37	1.48	0.118	1.08	16.43	19.66	0.369
Insignificant MIG Welding Grinding (U-14)	1.9	1.9	0.00	0.00	0.00	0.00	0.004
Insignificant Bullard System	52.6	52.6	0.00	0.00	0.00	0.00	0.00
Mixer (EU-1)	12.8	1.28	0.00	0.00	0.00	0.00	0.00
Covered Conveyor System (EU-02)	1.40	1.40	0.00	0.00	0.00	0.00	0.00
Shoe Dip (EU-06)*	1.17	1.17	0.00	0.00	0.00	0.00	0.00
Backing Dip Tank (EU-07)*	0.00	0.00	0.00	62.65	0.00	0.00	0.316
Spray Booth (EU-11)*	0.00	0.00	0.00		0.00	0.00	0.00
Spray Booth (EU-12)*	2.24	2.24	0.00		0.00	0.00	0.00
Spray Booth (EU-15)*	2.24	2.24	0.00		0.00	0.00	0.00
Adhesive Application and Curing Process (ACO-2)*	24.90	24.90	0.00		0.00	0.00	0.00
Cure Oven (CO-1) ¹	0.00	0.00	0.00	24.90	0.00	0.00	0.99
Total	99.62	89.21	0.12	88.63	16.43	19.66	single < 10 total < 25
¹ Total VOC emissions from CO-1 shall not exceed 24.90 tons/yr. *Total VOC emissions from EU-06, EU-07, EU-11, EU-12, EU-15, and ACO-2 shall not exceed 62.65 tons per year.							
Fugitive Emissions							
Process/Facility	PM	PM10	SO₂	VOC	CO	NOx	HAPs
Unpaved Roads	10.83	4.73	0.00	0.00	0.00	0.00	0.00
Total	10.83	4.73	0.00	0.00	0.00	0.00	0.00

Federal Rule Applicability (Revision)

There are no new federal rules included in this revision. The source shall continue to comply with all other applicable federal rule requirements and permit conditions as contained in FESOP No. 113-17172-00008.

State Rule Applicability - Entire Source (Revision)

The below state rule requirements are included for this proposed revision. The source shall continue to comply with all other applicable state rule requirements and permit conditions as contained in FESOP No. 113-17172-00008.

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

This source is a minor PSD source because pursuant to 326 IAC 2-8-4 (FESOP), the potential to emit PM₁₀ and VOC will continue to be limited less than one hundred (100) tons per year for the entire source (see 326 IAC 2-8-4 (FESOP) section below). In addition, the potential to emit PM will continue to be less than two hundred fifty (250) tons per year after controls.

326 IAC 2-6 (Emission Reporting)

This source is not subject to 326 IAC 2-6 (Emission Reporting), because it is located in Noble County, does not emit five (5) tons per year or more of lead, and does not require a Part 70 Operating Permit.

326 IAC 2-8-4 (FESOP)

The potential to emit VOC before controls, for the entire source is greater than one hundred (100) tons/yr. Pursuant to 326 IAC 2-8-4 (FESOP); the source shall comply with the following:

- (a) The total VOC usage for the one (1) shoe dip tank (EU-06), one (1) metal backing plate dip tank (EU-07), three (3) spray paint booths (EU-11, EU-12, and EU-15), and one (1) adhesive application and curing process (ACO-2), shall not exceed 62.65 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) The potential to emit VOC from the resin used in the cure oven process (emission unit CO-1) shall not exceed 400 pounds of VOC per ton of resin used.
- (c) The total resin usage for the cure oven process (emission unit CO-1) shall not exceed 124.5 tons of resin per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with these limits, combined with the potential emissions of VOC from all other emission units as this source, will limit the source-wide total potential to emit VOC to less than 100 tons per 12 consecutive month period and render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (PSD) not applicable.

326 IAC 5-1 (Opacity Limitations)

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

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

326 IAC 6-4 (Fugitive Dust Emissions Limitations)

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).

State Rule Applicability - Individual Facilities (Revision)

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

Pursuant to 326 IAC 6-3-1(b)(14), the following proposed emission units are exempt from the requirements of 326 IAC 6-3. The one (1) bag dump system (BDS-1), the fiberglass blowing system (RM-1), the three (3) bulk bag feed bin (BBS-1, BBS-2, and BBS-3), and the seven (7) frictional dry material feed bins (HML-1 through HML-6 and TS-1) because each have potential particulate emissions less than 0.551 pounds per hour.

326 IAC 8-1-6 (New facilities; general reduction requirements)

Pursuant to 326 IAC 8-1-6, this rule applies to new facilities, which have potential VOC emissions of 25 tons or greater per year, located anywhere in the state, which are not otherwise regulated by other provisions of 326 IAC 8. The cure oven process (emission unit CO-1) has a potential to emit VOC greater than twenty-five (25) tons per year. However, the requirements of 326 IAC 8-1-6 are not applicable to CO-1, because the source has accepted the following limits:

- (a) The potential to emit VOC from the resin used in the cure oven process (emission unit CO-1) shall not exceed 400 pounds of VOC per ton of resin used.
- (b) The total resin usage for the cure oven process (emission unit CO-1) shall not exceed 124.5 tons of resin per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with these limits will limit the cure oven process (emission unit CO-1) to less than 24.9 tons per 12 consecutive month period and render the requirements of 326 IAC 8-1-6 (New facilities; general reduction requirements) not applicable.

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

The proposed adhesive application and curing process (ACO-2) will coat metal under the two (2) digit Standard Industrial Classification Code 37 and has a potential to emit greater than fifteen (15) pounds of VOC per day. The existing emission units identified as EU-07 and EU-15, will coat metal under the two (2) digit Standard Industrial Classification Code of 35 and have a potential to emit greater than fifteen (15) pounds of VOC per day. Therefore, the following requirements are applicable to these emission units:

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the proposed adhesive application and curing process, identified as ACO-2, shall be limited to 3.0 pounds of VOCs per gallon, for all other coatings or coating application systems.

The existing emission units, identified as EU-07 and EU-15, shall each be limited to 3.5 pounds of VOCs per gallon of coating less water, for air dried coatings. Based on the MSDS sheets submitted by the source and the VOC content calculations, the coatings used by emission units EU-07 and EU-15 are able to comply with this requirement. As a result, the requirement to calculate the daily volume weighted average of VOC content from EU-15 is no longer applicable.

Based on the MSDS sheets submitted by the source and the VOC content calculations, the adhesive used at the one (1) proposed adhesive application and curing process, identified as ACO-2, will not be able to comply with this requirement. The source will comply with this rule by calculating the daily volume weighted average of VOC content for the one (1) proposed adhesive application and curing process, identified as ACO-2, using the following equation:

$$A = [\sum C \times U] / \sum U$$

Where: A = The volume weighted average in pounds VOC per gallon less water as applied;

C = VOC content of the coating in pounds VOC per gallon less water as applied; and

U = The usage rate of the coating in gallons less water per day

- (b) 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.

Compliance Requirements (Revision)

For the existing units, the source shall continue to comply with all the applicable requirements and permit conditions as contained in FESOP No. 113-17172-00008. The Compliance Determination Requirements applicable to this revision are as follows:

- (a) Based on the MSDS sheets submitted by the source and the VOC content calculations, the coatings used by emission unit EU-15 are able to comply with this requirement. As a result, the requirement to calculate the daily volume weighted average of VOC content from EU-15 is no longer applicable. Therefore, compliance with the VOC requirements for EU-15 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.
- (b) In order to demonstrate compliance, the Permittee shall perform an initial performance test for the uncontrolled VOC emissions from the cure oven process (emission unit CO-1) within 180 days after initial startup of the cure oven, utilizing methods as approved by the Commissioner. Testing shall be conducted in accordance with Section C - Performance Testing.

Changes to the FESOP Due to this Revision;

The following changes made to the permit are described below:

- (1) Section A.2 (g through j) is updated to include descriptive information for seven (7) frictional dry material feed bins, three (3) bulk bag feed bins, one (1) bag dump station, one (1) fiberglass blowing system, one (1) mixer, one (1) covered conveyor system, one (1) natural gas-fired cure oven, and one (1) adhesive application and curing process;
- (2) Sections A.3 and D.3 (a)(10 and 11) are updated to include the new source-wide natural gas-fired combustion hourly total and descriptive information for one (1) natural gas-fired boiler and four (4) natural gas-fired heaters;
- (3) Section D.1.1 is revised to reflect the new VOC emission limitation for the entire source;
- (4) Sections D.1.4 and D.2.1 are revised to indicate that compliance with the conditions found in these sections will limit the source-wide potential to emit PM and PM10 to less than 250 tons per year and 100 tons per year respectively, which will render the requirements of 326 IAC 2-2 (PSD) and 326 IAC 2-7(Part 70 permits) not applicable.

- (5) Section D.1.5 is updated to indicate that 326 IAC 6-3-2 is now applicable;
- (6) Sections D.1.8 and D.1.10(a)(3 through 6) are revised to indicate that EU-15 complies with the VOC limits found in Section D.1.2;
- (7) Section D.1.11 is revised to indicate that a quarterly summary is required to document compliance with Condition D.1.1;
- (8) Sections D.3.1 through D.3.4 are revised and renumbered due to the removal of Condition D.3.1.
- (9) Section D.4 is created to include the proposed emission unit descriptions and any applicable requirements for the brake shoe operations;
- (10) The FESOP Quarterly Reports are revised to include the descriptive information of any new or modified emission units and any associated permit limitations.

The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language appears in bold:

...

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:

- (g) **One (1) covered conveyor system, identified as EU-2, approved for construction in 2007, with particulate matter controlled by baghouse VFR-2 and exhausting to the indoors, which conveys dry frictional material to mixer (EU-1) at a nominal capacity of 535 pounds per hour and consisting of the following emission units:**
 - (1) **Seven (7) frictional dry material feed bins, approved for construction in 2007, identified as HML-1, HML-2, HML-3, HML-4, HML-5, HML-6, and TS-1, with particulate matter controlled by cartridge dust filter RVF-1 and exhausting to the indoors, nominal capacity: 172 pounds per hour total;**
 - (2) **Three (3) bulk bag feed bins, approved for construction in 2007, identified as BBS-1, BBS-2, and BBS-3, with particulate matter controlled by baghouse DCF-3 and exhausting to the indoors, nominal capacity: 253 pounds per hour total;**
 - (3) **One (1) bag dump station, approved for construction in 2007, identified as BDS-1, with particulate matter controlled by cartridge dust filter BVF-4 and exhausting to the indoors, nominal capacity: 37 pounds per hour;**
 - (4) **One (1) fiberglass blowing system, approved for construction in 2007, identified as RM-1, with particulate matter controlled by baghouse VFR-2 and exhausting to the indoors, nominal capacity: 73 pounds per hour;**
- (h) **One (1) mixer, approved for construction in 2007, identified as EU-1, with particulate matter controlled by baghouse VFR-2 and exhausting to the indoors, nominal capacity: 640 pounds per hour;**
- (i) **One (1) natural gas-fired cure oven, approved for construction in 2007, identified as CO-1, exhausting to Stack 16, nominal capacity: 1,580 brake linings per hour, nominal heat input capacity: 2 million British thermal units per hour;**
- (j) **One (1) adhesive application and curing process, approved for construction in**

2007, identified as ACO-2, equipped with one (1) natural gas-fired adhesive oven, exhausting to Stack 17, nominal capacity: 1,580 brake linings per hour, nominal heat input capacity: 2 million British thermal units 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) Source-wide natural gas-fired combustion, nominally rated at **40.72** ~~34.62~~ million British thermal units per hour total, consisting of the following:

...
(8) One (1) parts washer, nominal heat input capacity: 4.80 million British thermal units per hour; ~~and~~

(9) Three (3) office furnaces, nominal heat input capacity: 0.080 million British thermal units per hour each;-

(10) **One (1) natural gas-fired boiler, approved for construction in 2007, exhausting to Stack 18, nominal heat input capacity: 0.16 million British thermal units per hour; and**

(11) **Four (4) natural gas-fired heaters, approved for construction in 2007, nominal heat input capacity: 0.475 million British thermal units per hour each.**

...
D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-8-4] [326 IAC 2-2]

The total VOC usage for the one (1) shoe dip tank (EU-06), one (1) metal backing plate dip tank (EU-07), three (3) spray paint booths (EU-11, EU-12, and EU-15), and one adhesive application and curing process (ACO-2), shall not exceed 62.65 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Any change or modification that increases the potential to emit for EU-06, EU-07, EU-11, EU-12, and EU-15 to greater than a total of 99.0 tons of VOC per year may render the requirements of 326 IAC 2-7 applicable and shall require prior IDEM, OAQ approval.

Compliance with this limit, combined with the potential emissions of VOC from all other emission units as this source, will limit the source-wide total potential to emit VOC to less than 100 tons per 12 consecutive month period and render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (PSD) not applicable.

...
D.1.4 Particulate Matter (PM) and Particulate Matter Less Than Ten Microns (PM₁₀) [326 IAC 2-8-11.1(d)(5)(E)] [326 IAC 2-8-4] [326 IAC 2-2]

Pursuant to 326 IAC 2-8-11.1(d)(5)(E), the input of solids to proposed spray paint booth (EU-15) shall not exceed 99.6 tons per twelve (12) consecutive month period with compliance determined at the end of each month, equivalent to 24.9 tons of PM and PM₁₀ per year each, based on a minimum transfer efficiency and minimum control efficiency of fifty percent (50%) each.

Compliance with these limits, combined with the potential PM and PM₁₀ emissions from all other emission units at this source, shall limit the source-wide potential to emit PM and PM₁₀ to less than two hundred fifty (250) tons per year and one hundred (100) tons per year, respectively, and render the requirements of 326 IAC 2-2 (PSD) and 326 IAC 2-7 (Part 70 Permits) not applicable.

D.1.5 Particulate Matter (PM) [326 IAC 6-3-2] [40 CFR 52, Subpart P]

Pursuant to **326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)** ~~40 CFR 52 Subpart P~~, the PM from the three (3) spray paint booths (EU-11, EU-12, and EU-15) shall not exceed the pound per hour emission rate established as E in the following formula:

...
D.1.8 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]

- (a) Compliance with the VOC requirements for all surface coating operations as well as the content limitation for EU-07 **and EU-15** contained in Conditions D.1.1~~(e)~~ and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.
- ~~(b) Compliance with the VOC content limit for EU-15 contained in Condition D.1.2 shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis. This volume weighted average shall be determined by the following equation:~~

$$A = \frac{\sum (C \times U)}{\sum U}$$

Where: ~~A = The volume weighted average in pounds VOC per gallon less water as applied;~~

~~C = VOC content of the coating in pounds VOC per gallon less water as applied; and~~

~~U = The usage rate of the coating in gallons per day~~

...
D.1.10 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC requirement and content limits established in Conditions D.1.1 and D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

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

...
~~(3) The volume weighted average VOC content of the coatings used for each day at EU-15;~~

~~(3)(4) The cleanup solvent usage for each month;~~

~~(4)(5) The total VOC usage for each month; and~~

~~(5)(6) The weight of VOC emitted for each compliance period.~~

...
D.1.11 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions **D.1.1 and D.1.4** shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

...
D.2.1 Particulate Matter (PM) and Particulate Matter Less Than Ten Microns (PM₁₀) [326 IAC 2-8-4] [326 IAC 2-2]

The PM and PM₁₀ emission rates from the one (1) grinding system, identified as EU-14, shall not exceed 12.0 pounds per hour each, equivalent to 52.6 tons of PM and PM₁₀ per year. These limits shall limit the potential to emit PM from the entire source to less than two hundred fifty (250)

~~tons per year and the potential to emit PM₁₀ from the entire source to less than one hundred (100) tons per year.~~ Compliance with these limits, **combined with the potential PM and PM10 emissions from all other emission units at this source, shall limit the source-wide potential to emit PM and PM10 to less than two hundred fifty (250) tons per year and one hundred (100) tons per year, respectively, and shall render the requirements of 326 IAC 2-2 (PSD) and 326 IAC 2-7 (Part 70 Permits) not applicable.**

...
SECTION D.3 FACILITY OPERATION CONDITIONS

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

- (a) Source-wide natural gas-fired combustion, nominally rated at ~~34.62~~ **40.72** million British thermal units per hour total, consisting of the following:
- ...
- (8) One (1) parts washer, nominal heat input capacity: 4.80 million British thermal units per hour; ~~and~~
- (9) Three (3) office furnaces, nominal heat input capacity: 0.080 million British thermal units per hour each;-
- (10) **One (1) natural gas-fired boiler, approved for construction in 2007, exhausting to Stack 18, nominal heat input capacity: 0.16 million British thermal units per hour; and**
- (11) **Four (4) natural gas-fired heaters, approved for construction in 2007, nominal heat input capacity: 0.475 million British thermal units per hour each.**

...
~~D.3.1 Volatile Organic Compounds (VOC) [326 IAC 2-8-4]~~

~~Any change or modification that increases the potential to emit from insignificant activities to greater than 0.834 tons of VOC per year may render the requirements of 326 IAC 2-7 applicable and shall require prior IDEM, OAQ approval.~~

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

...
~~D.3.2 4 Particulate Control~~

~~In order to comply with Condition D.3.12, the dry filters for particulate control shall be in operation and control emissions from the insignificant bullard system at all times that the insignificant bullard system is in operation.~~

...
SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Brake Shoe Operations

- (g) **One (1) covered conveyor system, identified as EU-2, approved for construction in 2007, with particulate matter controlled by baghouse VFR-2 and exhausting to the indoors, which conveys dry frictional material to mixer (EU-1) at a nominal capacity of 535 pounds per hour and consisting of the following emission units:**
- (1) **Seven (7) frictional dry material feed bins, approved for construction in 2007, identified as HML-1, HML-2, HML-3, HML-4, HML-5, HML-6, and TS-1, with particulate matter controlled by cartridge dust filter RVF-1 and exhausting to the indoors, nominal capacity: 172 pounds per hour total;**
- (2) **Three (3) bulk bag feed bins, approved for construction in 2007, identified as BBS-1, BBS-2, and BBS-3, with particulate matter controlled by baghouse DCF-3 and**

- exhausting to the indoors, nominal capacity: 253 pounds per hour total;
- (3) One (1) bag dump station, approved for construction in 2007, identified as BDS-1, with particulate matter controlled by cartridge dust filter BVF-4 and exhausting to the indoors, nominal capacity: 37 pounds per hour;
 - (4) One (1) fiberglass blowing system, approved for construction in 2007, identified as RM-1, with particulate matter controlled by baghouse VFR-2 and exhausting to the indoors, nominal capacity: 73 pounds per hour;
- (h) One (1) mixer, approved for construction in 2007, identified as EU-1, with particulate matter controlled by baghouse VFR-2 and exhausting to the indoors, nominal capacity: 640 pounds per hour;
- (i) One (1) natural gas-fired cure oven, approved for construction in 2007, identified as CO-1, exhausting to Stack 16, nominal capacity: 1,580 brake linings per hour, nominal heat input capacity: 2 million British thermal units per hour;
- (j) One (1) adhesive application and curing process, approved for construction in 2007, identified as ACO-2, equipped with one (1) natural gas-fired adhesive oven, exhausting to Stack 17, nominal capacity: 1,580 brake linings per hour, nominal heat input capacity: 2 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.4.1 Volatile Organic Compounds (VOC) [326 IAC 2-8-4] [326 IAC 2-2]

The total VOC usage for the one (1) shoe dip tank (EU-06), one (1) metal backing plate dip tank (EU-07), three (3) spray paint booths (EU-11, EU-12, and EU-15), and one adhesive application and curing process (ACO-2), shall not exceed 62.65 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with this limit, combined with the potential emissions of VOC from all other emission units as this source, will limit the source-wide total potential to emit VOC to less than 100 tons per 12 consecutive month period and render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (PSD) not applicable.

D.4.2 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-1-6] [326 IAC 2-8-4]

- (a) The potential to emit VOC from the resin used in the cure oven process (emission unit CO-1) shall not exceed 400 pounds of VOC per ton of resin used.
- (b) The total resin usage for the cure oven process (emission unit CO-1) shall not exceed 124.5 tons of resin per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with these limits will limit the cure oven process (emission unit CO-1) to less than 24.9 tons per 12 consecutive month period and render the requirements of 326 IAC 8-1-6 (BACT) and 326 IAC 2-7 (Part 70 Permits) not applicable.

D.4.3 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9, the owner or operator shall not allow the discharge into the atmosphere VOC from the adhesive application process, identified as ACO-2, in excess of

three (3.0) pounds of VOC per gallon of coating, excluding water, delivered to the applicator for all other coatings or coating application systems.

D.4.4 Volatile Organic Compounds (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 ACO-2 during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

Compliance Determination Requirements

D.4.5 Testing Requirements

In order to demonstrate compliance with Condition D.4.2(a), the Permittee shall perform an initial performance test for the uncontrolled VOC emissions from the cure oven process (emission unit CO-1) within 180 days after initial startup of the cure oven, utilizing methods as approved by the Commissioner. Testing shall be conducted in accordance with Section C - Performance Testing.

D.4.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]

- (a) Compliance with the VOC emission limitations contained in Conditions D.4.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.
- (b) Compliance with the VOC content limit for ACO-2 contained in Condition D.4.3 shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis. This volume weighted average shall be determined by the following equation:

$$A = [\sum (C \times U) / \sum U]$$

Where: A = The volume weighted average in pounds VOC per gallon less water as applied;

C = VOC content of the coating in pounds VOC per gallon less water as applied; and

U = The usage rate of the coating in gallons less water per day.

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

D.4.7 Record Keeping Requirements

- (a) To document compliance with Conditions D.4.1 and D.4.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC content and VOC emission limitations established in Conditions D.4.1 and D.4.3. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The VOC content of each coating material and solvent used.
- (2) The amount of coating material and solvent less water used on a monthly basis.

- (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
- (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
- (3) The cleanup solvent usage for each month;
- (4) The total VOC usage for each month; and
- (5) The weight of VOC emitted for each compliance period.
- (b) To document compliance with Condition D.4.2, the Permittee shall maintain records in accordance with (1) below. Records maintained for (1) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limitations established in Condition D.4.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) The total resin usage for each month.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.4.8 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.4.1 and D.4.2(b) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

...

FESOP Quarterly Report

Source Name: Dexter Axle Company
Source Address: 500 South Seventh Street, Albion, Indiana 46701
Mailing Address: PO Box 108, Albion, Indiana 46701
FESOP Permit No.: F113-17172-00008
Facility: One (1) adhesive application and curing process (ACO-2), one (1) shoe dip tank (EU-06), one (1) metal backing plate dip tank (EU-07), and three (3) spray paint booths (EU-11, EU-12, and EU-15)
Parameter: VOC Usage
Limit: Less than 62.65 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

...

FESOP Quarterly Report

Source Name: Dexter Axle Company
Source Address: 500 South Seventh Street, Albion, Indiana 46701
Mailing Address: PO Box 108, Albion, Indiana 46701
FESOP Permit No.: F113-17172-00008

Facility: One (1) Natural Gas-Fired Cure Oven (CO-1)
Parameter: Resin Usage
Limit: Less than 124.5 tons of resin per twelve (12) consecutive month period,
with compliance determined at the end of each month.

...

Additional Changes:

Upon further review of the permit, OAQ determined that FESOP 113-17172-00008 required revising for the following reasons:

- (1) All occurrences of IDEM mailing addresses have been revised to include a mail code (MC) as follows:

Asbestos Section:	MC 61-52 IGCN 1003
Compliance Branch:	MC 61-53 IGCN 1003
Permits Branch:	MC 61-53 IGCN 1003
Technical Support and Modeling Section:	MC 61-50 IGCN 1003
- (2) IDEM has begun implementing a new procedure and will no longer list the name or title of the Authorized Individual (A.I.) in the permit;
- (3) IDEM has decided to include updates to further address and clarify the permit term and the term of the conditions. This includes the addition of the condition: Term of Conditions [326 IAC 2-1.1-9.5] and changes to the following conditions: Permit Term, Prior Permits Superseded, Termination of Right to Operate, and Permit Renewal. Please note that some of the conditions have been renumbered and some have been added.
- (4) In Nonrule Policy Document No. AIR 007 NPD, revised September 6, 2002, a table is given as an example for how sources can submit annual compliance certifications. Condition B.9 (previously B.11) Annual Compliance Certification is being revised to remove "in letter form" so that it does not contradict the guidance.
- (5) Condition B.20 (previously B.19) is renamed from "Permit Revision Requirement" to "Source Modification Requirement", which is a more appropriate condition title.
- (6) Clarification of applicable requirements and permit language, correction of typographical errors, and renumbering of conditions as necessary;
- (7) Section C.8 is updated to include a more detailed description of the asbestos abatement project conditions;
- (8) In order to correct a typographical error, Condition C.16(b) is revised from the terminology "one-hundred and twenty" to "one hundred twenty;"
- (9) A new Condition C.13 (Instrument Specifications) is added pursuant to 326 IAC 2-1.1-11, 326 IAC 2-8-4(3), and 326 IAC 2-8-5(1);
- (10) A new Condition C.16 (Response to Excursions and Exceedances) is added pursuant to 326 IAC 2-8-4 and 326 IAC 2-8-5;
- (11) Sections D.1.9 and D.2.6 are updated to include references to Condition C.16 (Response to Excursions and Exceedances).

The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language appears in bold:

...

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

The Permittee owns and operates a stationary motor vehicle parts and accessories manufacturing source.

Authorized Individual: ~~Facility Manager~~

...
B.1 ~~Permit No Defense [IC 13]~~

~~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.~~

B.12 Definitions [326 IAC 2-8-1]

...
B.23 Permit Term [326 IAC 2-8-4(2)] [326 IAC 2-1.1-9.5] **[IC 13-15-3-6(a)]**

(a) This permit, **F113-17172-00008**, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date **of this permit**.

(b) **If IDEM, OAQ upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.**

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

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

(a) **the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or**

(b) **the emission unit to which the condition pertains permanently ceases operation.**

...
B.5 ~~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.56 Severability [326 IAC 2-8-4(4)]

...
B.67 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

...
B.78 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~~ the "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.840 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]

...

B.941 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. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted ~~in letter form~~ no later than July 1 of each year to:

...

(c) The annual compliance certification report shall include the following:

...

(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** notification which shall be submitted by the Permittee does require the certification by **an** ~~the~~ "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.109 Compliance Order Issuance [326 IAC 2-8-5(b)]

...

B.1142 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

...

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

(b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by **an** ~~the~~ "authorized individual" as defined by 326 IAC 2-1.1-1(1).

...

B.1243 Emergency Provisions [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** ~~describes~~ the following:

...

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ 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** ~~No.:~~ 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or,
Telephone **Number** ~~No.:~~ 317-233-5674-**0178** (ask for Compliance Section)
Facsimile **Number** ~~No.:~~ 317-233-5967-**6865**

(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:

...

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

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

- (a) **All terms and conditions of permits established prior to 113-17172-00008 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.1544 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:

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

...
B.1645 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 FESOP** 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 the~~ "authorized individual" as defined by 326 IAC 2-1.1-1(1).

...
B.1746 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 the~~ "authorized individual" as defined by 326 IAC 2-1.1-1(1).

...
(b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

(1) — A timely renewal application is one that is:

- (1A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (2B) 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.

~~(2) If IDEM, OAQ upon receiving a timely and complete 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.~~

- (c) ~~Right to Operate After Application for Renewal [326 IAC 2-8-9]~~
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.1817 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- ...
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- ...
- Any such application shall be certified by ~~an~~ the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement ~~the~~ administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]
- ~~(d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.~~

B.1918 Operational Flexibility [326 IAC 2-8-15] [326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at ~~the~~ **this** 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:

...

B.2019 ~~Source Modification Permit Revision Requirement~~ [326 IAC 2-8-11.1]

...

B.2120 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2] [IC 13-17-3-2] [IC13-30-3-1]

...

B.2224 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

...

B.2322 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]

...

B.2423 Credible Evidence [326 IAC 2-8-4(3)] [326 IAC 2-8-5] [62 FR 8314] [326 IAC 1-1-6]

...

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour ~~[40 CFR 52, Subpart P]~~ [326 IAC 6-3-2]

- ~~(a) Pursuant to 40 CFR 52, Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than one hundred (100) pounds per hour shall not exceed 0.551 pounds per hour.~~
- (ab) 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 one

hundred (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] **[326 IAC 2-2]**

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. This limitation shall **make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable** also satisfy the requirements of ~~326 IAC 2-3 (Emission Offset)~~;

...

(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.** Pursuant to ~~326 IAC 2-2 (Prevention of Significant Deterioration (PSD))~~, 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.

...

C.5 Incineration [326 IAC 4-2] ~~[326 IAC 9-1-2(3)]~~

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

...

~~C.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]~~

~~Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.~~

C.78 Stack Height [326 IAC 1-7]

...

C.89 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

The Permittee shall comply with the applicable requirements of 326 IAC 14-10, 326 IAC 18, and 40 CFR 61.140.

(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.

...
C.940 Performance Testing [326 IAC 3-6]

-
- (a) **Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.**

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

...
~~C.1044~~ Compliance Requirements [326 IAC 2-1.1-11]

...
~~C.1142~~ Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

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

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

~~C.1243~~ Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

...
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.**

C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- ...
The ERP does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) **If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.**
- (d) **These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.**
- (e) **Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.**
- (f) **Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]**

...
~~C.16~~ Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4]

~~{326 IAC 2-8-5}~~

-
- ~~(a) — The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and is comprised of:~~
- ~~(1) — Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.~~
 - ~~(2) — If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee=s current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.~~
- ~~(b) — For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:~~
- ~~(1) — Reasonable response steps shall be taken as set forth in the Permittee=s current Compliance Response Plan; or~~
 - ~~(2) — If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.~~
 - ~~(3) — If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be 10 days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.~~
 - ~~(4) — Failure to take reasonable response steps shall be considered a deviation from the permit.~~
- ~~(c) — The Permittee is not required to take any further response steps for any of the following reasons:~~
- ~~(1) — A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.~~
 - ~~(2) — The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.~~
 - ~~(3) — An automatic measurement was taken when the process was not operating.~~
 - ~~(4) — The process has already returned or is returning to operating within "normal" parameters and no response steps are required.~~

- ~~(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.~~
- ~~(e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.~~
- ~~(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.~~

C.16 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.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

- ... (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

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

...
C.19 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** ~~the~~ "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** Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

- (e) The first report **shall cover** ~~covered~~ the period commencing on the date of issuance of **this permit** ~~the original FESOP~~ and **ending** ~~ended~~ on the last day of the reporting period. **Reporting** ~~All subsequent reporting periods are~~ shall be 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.

...
D.1.9 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (Stacks 11, 12, and 15) while one or more of the booths are in operation. **If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.** ~~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 - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.~~
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. **When there is a noticeable**

change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit. ~~The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray 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 - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.~~

...

D.2.6 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the dry filters. To monitor the performance of the dry filters, weekly observations shall be made of the visible emissions from the one (1) grinding system, identified as EU-14, when exhausting to the outside atmosphere. **If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.** ~~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 - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.~~

...

The following language was added to the cover page of the permit:

...

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

...

Conclusion

This proposed revision shall be subject to the conditions of the attached proposed FESOP Significant Permit Revision No. 113-24912-00008.

**Appendix A: Emissions Calculations
Particulate Emissions from Material Handling Process**

**Company Name: Dexter Axle Company
Address City IN Zip: 500 South Seventh Street, Albion, Indiana 46701
Permit Number: 113-24912-00008
Plt ID: 113-00008
Reviewer: Brian Williams
Date: June 12, 2007**

Potential to Emit from Material Handling Process							
Facility/Operation	Throughput (lb/hr)	Emission Factor* (lb/ton)	PM Emissions (uncontrolled) (ton/yr)	PM10 Emissions (uncontrolled) (ton/yr)	Efficiency of Control Device	PM Emissions (controlled) (ton/yr)	PM10 Emissions (controlled) (ton/yr)
Frictional Dry Ingredient Feed Bins, HML-1 through HML-6 and TS-1 exhausting to RVF-1	172	PM = 1 PM10 = 1	0.37668	0.37668	99.98%	7.53E-05	7.53E-05
Bulk Bag Feed Bins, BBS-1 through BBS-3 exhausting to DCF-3	253	PM = 1 PM10 = 1	0.55407	0.55407	99.90%	5.54E-04	5.54E-04
Bag Dump Station, BDS-1 exhausting to BVF-4	37	PM = 1 PM10 = 1	0.08103	0.08103	99.90%	8.10E-05	8.10E-05
Fiberglass Blowing System, RM-1 exhausting to VFR-2	73	PM = 1 PM10 = 1	0.15987	0.15987	99.90%	1.60E-04	1.60E-04
Mixer, (EU-1) exhausting to VFR-2	640	PM = 1 PM10 = 1	1.4016	1.4016	99.90%	1.40E-03	1.40E-03
		Total	2.57	2.57		8.70E-04	8.70E-04

METHODOLOGY

PM/PM10 Uncontrolled Emissions (ton/yr) = Throughput (lb/hr) * 1/2000 (ton/lb) * Emission Factor (lb/ton) * 8760 hours * 1/2000 (ton/lb)

PM/PM10 Controlled Emissions (ton/yr) = PM/PM10 Uncontrolled Emissions (ton/yr) * (1-Efficiency of Control Device %)

*PM/PM10 emission factor provided by source and is greater than any similar emission factor found in AP-42 for the types of material handled during this process.

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

Company Name: Dexter Axle Company
Address City IN Zip: 500 South Seventh Street, Albion, IN 46701
Permit Number: 113-24912-00008
Reviewer: Brian M Williams
Date: June 12, 2007

Insignificant Natural Gas Combustion

One (1) Drying Oven @ 2 MMBtu/hr
 One (1) Adhesive Cure Oven @ 2 MMBtu/hr
 One (1) Water Heater @ 0.1636 MMBtu/hr
 Four (4) Heaters @ 0.475 MMBtu/hr

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

6.1

53.1

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.05	0.20	0.02	2.66	0.15	2.23

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 3 for HAPs emissions calculations.

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

**Company Name: Dexter Axle Company
 Address City IN Zip: 500 South Seventh Street, Albion, IN 46701
 Permit Number: 113-24912-00008
 Plt ID: 113-00008
 Reviewer: Brian M Williams
 Date: 6/12/2007**

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	5.577E-05	3.187E-05	1.992E-03	4.781E-02	9.030E-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
Potential Emission in tons/yr	1.328E-05	2.921E-05	3.718E-05	1.009E-05	5.577E-05

Methodology is the same as page 2.

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

**Appendix A: Emissions Calculations
VOC and HAPs
From Cure Oven (CO-1) and Adhesive Oven (ACO-2)**

**Company Name: Dexter Axle Company
Address City IN Zip: 500 South Seventh Street, Albion, Indiana 46701
Permit Number: 113-24912-00008
Plt ID: 113-00008
Reviewer: Brian Williams
Date: June 12, 2007**

Potential to Emit of New Units (Unlimited)												
Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year
Carbolite Resin	7.5	20.00%	0.0%	20.0%	0.0%	0.00%	0.007335	1580.000	1.502	17.41	417.77	76.24
Adhesive	8.1	52.00%	0.0%	52.0%	0.0%	0.00%	0.000565	1580.000	4.22	3.77	90.41	16.50
Total									21.17	508.18	92.74	

METHODOLOGY

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

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

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating less Water (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating less Water (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Potential to Emit of New Units (Unlimited)													
Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Ethyl Benzene*	Weight % Phenol	Weight % Xylene*	Weight % Toluene*	Weight % Formaldehyde	Ethyl Benzene Emissions (ton/yr)	Phenol Emissions (ton/yr)	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)
Carbolite Resin	7.5	0.007335	1580.00	2.00%	0.00%	1.00%	1.00%	0.00%	1.52	0.00	0.76	0.76	0.00
Adhesive	8.1	0.000565	1580.00	0.00%	5.00%	0.00%	0.00%	1.00%	0.00	0.83	0.00	0.00	0.17
Total									1.52	0.83	0.76	0.76	0.17
Total HAPs									4.04				

METHODOLOGY

Potential HAPs (Tons per Year) = Weight % HAPs * Potential Unlimited VOC tons per year

* Carbolite Resin contains Naptha (CAS # 8030-30-6). According to 40 CFR 63 aliphatic solvent types typically have an organic HAP composition (% by mass) of 1% Xylene, 1% Toluene, and 1% Ethylbenzene

**Appendix A: Emissions Calculations
Summary**

Company Name: Dexter Axle Company
Address City IN Zip: 500 South Seventh Street, Albion, Indiana 46701
Permit Number: 113-24912-00008
Plt ID: 113-00008
Reviewer: Brian Williams
Date: June 12, 2007

Unlimited Potential to Emit of New Units (PTE) (tons/year)							
Process Description	PM	PM10	SO₂	VOC	CO	NOx	HAPs
Covered Conveyor System (EU-02)	1.17	1.17	0.00	0.00	0.00	0.00	0.00
Mixer (EU-1)	1.40	1.40	0.00	0.00	0.00	0.00	0.00
Cure Oven (CO-1)	0.00	0.00	0.00	76.24	0.00	0.00	3.05
Adhesive Application and Curing Process (ACO-2)	0.00	0.00	0.00	16.50	0.00	0.00	0.99
Insignificant Natural Gas Combustion	0.05	0.202	0.016	0.15	2.23	2.66	0.05
Total Unlimited PTE of New Units	2.62	2.78	0.016	92.89	2.23	2.66	4.09

Appendix A: Emissions Calculations
Limited Potential to Emit After Issuance for the Entire Source

Company Name: Dexter Axle Company
Address City IN Zip: 500 South Seventh Street, Albion, Indiana 46701
Permit Number: 113-24912-00008
Plt ID: 113-00008
Reviewer: Brian Williams
Date: June 12, 2007

Limited Potential to Emit After Issuance for the Entire Source (tons/year)							
Process/Facility	PM	PM10	SO₂	VOC	CO	NOx	HAPs
Source-wide Insignificant Natural Gas Combustion	0.37	1.48	0.118	1.08	16.43	19.66	0.369
Insignificant MIG Welding	1.9	1.9	0.00	0.00	0.00	0.00	0.004
Grinding (U-14)	52.6	52.6	0.00	0.00	0.00	0.00	0.00
Insignificant Bullard System	12.8	1.28	0.00	0.00	0.00	0.00	0.00
Mixer (EU-1)	1.40	1.40	0.00	0.00	0.00	0.00	0.00
Covered Conveyor System (EU-02)	1.17	1.17	0.00	0.00	0.00	0.00	0.00
Shoe Dip (EU-06)*	0.00	0.00	0.00	62.65	0.00	0.00	0.316
Backing Dip Tank (EU-07)*	0.00	0.00	0.00		0.00	0.00	0.00
Spray Booth (EU-11)*	2.24	2.24	0.00		0.00	0.00	0.00
Spray Booth (EU-12)*	2.24	2.24	0.00		0.00	0.00	0.00
Spray Booth (EU-15)*	24.90	24.90	0.00		0.00	0.00	0.00
Adhesive Application and Curing Process (ACO-2)*	0.00	0.00	0.00	62.65	0.00	0.00	0.99
Cure Oven (CO-1) ¹	0.00	0.00	0.00	24.90	0.00	0.00	0.96
Total	99.62	89.21	0.12	88.63	16.43	19.66	single < 10 total < 25
¹ Total VOC emissions from CO-1 shall not exceed 24.9 tons/yr. *Total VOC emissions from EU-06, EU-07, EU-11, EU-12, EU-15, and ACO-2 shall not exceed 62.65 tons per year.							
Fugitive Emissions							
Process/Facility	PM	PM10	SO₂	VOC	CO	NOx	HAPs
Unpaved Roads	10.83	4.73	0.00	0.00	0.00	0.00	0.00
Total	10.83	4.73	0.00	0.00	0.00	0.00	0.00