



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant
DATE: August 28, 2007
RE: Dexter Axle Company / 113-249121-00008
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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

August 28, 2007

Mr. Larry Parks
Dexter Axle Company
PO Box 108
Albion, IN 46701

Re: Interim Significant Permit Revision Petition
No. 113-24912I-00008

Dear Mr. Parks:

On August 8, 2007, the Office of Air Quality (OAQ), received an interim significant permit revision petition from Dexter Axle Company located at 500 South Seventh Street, Albion, Indiana 46701. Based on the data and supplemental information submitted in the interim petition and the provisions of 326 IAC 2-13-1, this interim petition to construct is hereby approved for 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.
- (5) 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;
- (6) Four (4) natural gas-fired heaters, approved for construction in 2007, nominal heat input capacity: 0.475 million British thermal units per hour each.

The public notice of the interim significant permit revision petition was published on August 8, 2007, in the Kendallville News-Sun, Kendallville, Indiana. The public comment period ended on August 22, 2007. There were no comments received during the public comment period.

The interim significant permit revision petition may be revoked after this effective date upon a written finding by the Indiana Department of Environmental Management (IDEM) that any of the reasons for denial in 326 IAC 2-13-1(h) exist or if the final significant permit revision is denied. The IDEM has reviewed this interim significant permit revision petition and has not found any such reason.

The interim significant permit revision petition is federally enforceable. Pursuant to 326 IAC 2-13-1(j)(1), this interim significant permit revision petition expires on the effective date of the final Significant Permit Revision No. 113-24912-00008. Detailed conditions will be specified in the final significant permit revision. The facilities subject to this approval may not operate until a final significant permit revision is issued by OAQ.

If you have any questions regarding this interim significant permit revision petition, please contact Brian Williams, at (317) 234-5375 or call (800) 451-6027, extension 4-5375

Sincerely,

Original document signed by

Nisha Sizemore, Chief
Permits Branch
Office of Air Quality

bmw

Enclosure: Interim Significant Permit Revision Petition Evaluation (3 pages)

cc: File - Noble County
Noble County Health Department
Air Compliance Section - Dave North
IDEM Northern Regional Office
Permit Tracking
Administrative and Development
Billing, Licensing, and Training Section - Dan Stamatkin

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

Interim Significant Permit Revision Evaluation Sheet

Company Name: Dexter Axle Company		
Location: 500 South Seventh Street, Albion, Indiana 46701	Permit No: 113-24912I-00008	
Permit Reviewer: Brian Williams	Date Receipt of Application: 08/08/2007	Date of review: 08/22/2007
Description of the interim construction: One mixer, one cure oven, one adhesive oven, one natural gas-fired boiler, four natural gas-fired heaters and one dry material handling conveyor consisting of seven frictional dry material feed bins, three bulk bag feed bins, one bag dump station, and one fiberglass blowing system.		
Public Notice Date + 17 days = 08/25/2007		
Date the Application was received + 19 days = 08/27/2007		

Interim Petition Applicability: 326 IAC 2-13-1

- (a) Existing Source with valid permit;

- (b) Exemptions:
 - (1) construction of a PSD source or PSD modification;
 - (2) construction or modification in nonattainment area that would emit those pollutants for which the nonattainment designation is based.
any modification subject to 326 IAC 2-4.1.

- (c) For a modification that requires a Significant Permit Revision or Significant Source Modification, a public notice comment period of 14 calendar days is required.

Instructions: Check () appropriate answers and make a recommendation.

1. Did the applicant submit a written petition for an interim significant permit revision or significant source modification?
 - Yes Go to question 2.
 - No Ignore verbal request.

2. Did the applicant pay the \$625 interim permit fee?
 - Yes Go to question 3.
 - No Deny the application, pursuant to 326 IAC 2-13-1(c)(1).

3. Did the applicant state acceptance of federal enforceability of an interim significant permit revision or significant source modification?
 - Yes Go to question 4.
 - No Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(D).

4. Did the applicant or its authorized agent sign the application?
 - Yes Go to question 5.
 - No Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(E).

5. Did the applicant submit a notarized affidavit stating that the applicant will proceed at its own risk (if the interim significant permit revision or significant source modification is issued), including, but not limited to:
- (a) Financial risk,
 - (b) Risk that additional emission controls may be required,
 - (c) Risk that the final significant permit revision or significant source modification may be denied.
- Yes Go to question 6.
 No Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(F).
6. Did the applicant begin construction prior to submitting the interim significant permit revision or significant source modification application?
- Yes Deny the application, pursuant to 326 IAC 2-13-1(h)(6).
 No Go to question 7.
7. What is the type of the interim construction?
- New Source Deny the application, pursuant to 326 IAC 2-13-1(a)
 Modification to an existing source Go to question 8.
8. Did the applicant present data in the interim significant permit revision or significant source modification that is sufficient to determine PSD, NSPS, NESHAP, and state rule compliance?
- Yes Go to question 9.
 No Deny the application pursuant to:
326 IAC 2-13-1(c)(2)(B), for PSD;
326 IAC 2-13-1(c)(2)(C), for NSPS or NESHAP;
326 IAC 2-13-1(c)(2)(C), for state rules.
9. Is the proposed modification to be located in a nonattainment area?
- Yes Go to question 10.
 No Go to question 11.
- County: Noble County
10. Will the proposed modification emit the pollutant for which the area is nonattainment in quantities greater than the significant levels?
- Yes Deny the application, pursuant to 326 IAC 2-13-1(a)(2).
 No Go to question 11.
11. Did the petition include a complete description of the process?
- Yes Go to question 12.
 No Deny the petition, pursuant to 326 IAC 2-13-1(c)(2).
12. Did the interim significant permit revision or significant source modification petition contain conditions accepting either emission controls (baghouse, afterburners, scrubbers, etc.) or enforceable limits or other suitable restriction to avoid PSD applicability; as well as control parameters (incinerator operating temperature, baghouse pressure drop, etc.)? The specific limits must be explicitly spelled out (i.e.: The gas consumption of the boiler shall not exceed 29 million cubic feet per month.) A statement such as that the company agrees to conditions such that PSD rules are not applicable is not acceptable.
- Yes Go to question 13.

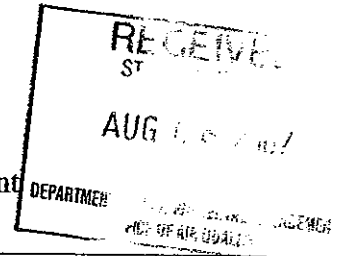
- No Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(B).
13. Do the emission controls and/or throughput limits prevent PSD applicability?
 Yes Go to question 14.
 No Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(B).
14. Will the modification, after application of all emission controls and/or throughput limitations comply with all applicable New Source Performance Standards (NSPS) (40 CFR 60)?
 Yes Go to question 15.
 No Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(C).
15. Will the modification, after application of all emission controls and/or throughput limitations comply with all applicable National Emission Standards for Hazardous Air Pollutants (NESHAP)?
 Yes Go to question 16.
 No Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(C).
16. Will the modification, after application of all emission controls and/or throughput limitations, comply with all applicable state rules?
 Yes Go to question 17.
 No Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(C).
17. Does the applicant dispute applicability of any applicable state or federal rule?
 Yes Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(C).
 No Go to question 18.
18. Is there good reason to believe that the applicant does not intend to construct in accordance with the interim significant permit revision or significant source modification petition?
 Yes Deny the application, pursuant to 326 IAC 2-13-1(h)(1).
 No Go to question 19.
19. Is there good reason to believe that information in the petition has been falsified?
 Yes Deny the application, pursuant to 326 IAC 2-13-1(h)(7).
 No Approve the interim significant permit revision or significant source modification petition.
20. Has the petition been adequately public noticed? A proof of publication copy is necessary.
 Yes Go to question 21.
 No Deny the application, pursuant to 326 IAC 2-13-1(e).
- Newspaper: Kendallville News-Sun
- Date of publication: 08/08/07
21. Were comments received within seventeen (17) days after the public notice of the interim significant permit revision or significant source modification?
(14 calendar days for comment period + 3 working days for mailing)
 Yes Evaluate the comments received, and make a recommendation.
 No Issue the final interim significant permit revision or significant source modification approval.

113-24912I-00008



Memorandum

HSE Department



Date: August 7, 2007

To: Indiana Department of Environmental Management, Interim Permit Reviewer

From: Michael Furfaro, Dexter HSE Manager MAF

Subject: Interim Construction Permit Application for Dexter Axle, Albion, Indiana

Attached is the application for an interim construction permit for our Albion plant. The application for a significant modification is currently under review by Brian Williams of OAQ (Permit #113-24912-00008). We will attach this application package to the documentation for the referenced significant permit modification to meet the requirement for a detailed description of the proposed construction at the Noble County Library and request you do the same. Please contact me at 574-296-7382 (mfurfaro@dexteraxle.com) or Larry Parks, the plant technical contact at 260-636-5297 (lparks@dexteraxle.com) if you have any questions on the attached. Thank you for your prompt attention to this matter.

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

Interim Petition Checklist

Instructions: (a) Please answer yes or no.

(b) Enclose this checklist with the completed interim petition package.

Company Name: Dexter Axle Company

Location: Albion, Indiana

Yes	1.	Is the written interim petition prepared?
Yes	2.	Is the written petition signed and dated?
Yes	3.	Is the public notice drafted?
Yes	4.	Is the \$500 filing and review fee enclosed?
Yes	5.	Is the account number written on the check or money order?
Yes	6.	Is the Affidavit of Construction signed, dated, and notarized?
Yes	7.	Is the proposed modification/revision described in detail?
Yes	8.	Is the proposed modification/revision a modification or addition to an existing source?
Yes	9.	Is the proposed modification/revision located in an attainment area for all the criteria pollutants?
No	10.	Is the proposed modification/revision located in a nonattainment area? If yes, answer No. 11.
	11.	Is the pollutant, which the nonattainment designation is based on, going to be emitted in this proposed modification/revision?
Yes	12.	Are potential emissions calculated?
Yes	13.	Is federal enforceability consent specifically indicated?
Yes	14.	Are specific conditions, limitations, and/or restrictions included that preclude applicability of PSD?
Yes	15.	Are specific conditions, limitations, and/or restrictions included that preclude applicability of NSPS?
Yes	16.	Are specific conditions, limitations, and/or restrictions included that preclude applicability of NESHAP?
Yes	17.	Are specific conditions, limitations, and/or restrictions included that assure compliance with all applicable state air pollution rules?
Yes	18.	Has a regular modification/revision permit application been submitted to OAQ? See comment
N/A	19.	Is a regular modification/revision permit application going to be submitted to OAQ? If yes, indicate approximate date of submission:
No	20.	Has the proposed modification/revision commenced prior to the submission of the interim permit petition?
Yes	21.	The interim petition comment period has been decided to be: _____ 14 calendar days

Additional Comments: Permit is being reviewed by Brian Williams, Environmental Manager 2 at 234-5375

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

**PETITION FOR INTERIM SIGNIFICANT PERMIT REVISION
FESOP PERMIT #113-24912-00008**

Source Name: Dexter Axle Company
Source Address: 500 South Seventh Street, Albion, Indiana 46701
Mailing Address: 500 South Seventh Street, Albion, Indiana 46701
SIC Code: 3714

Description of the Operation or Equipment:

Dexter Axle Company has requested approval to construct new emission units and pollution control devices for the production of 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.

For this process, brake lining (friction material) material will be manufactured by mixing dry particulate materials with liquid resin. The material will be cut to length and passed into a curing oven. The cured friction material will then be sent through a backing process in which adhesive will be applied to the friction material and the friction material will be attached to a metal brake shoe. The material will then be passed through an oven to set the adhesive. The process is designed to produce a maximum of 640 lbs per hour of friction material. The solids handling portion of this process will be controlled by four baghouses with a minimum of 92% particulate removal efficiency. This petition will be attached to the permit modification documentation at the Noble County Library to allow for a detailed review by the public of the proposed construction.

See the attached Technical Support Document for additional details regarding the new equipment.

Potential To Emit:

Based upon the maximum production capacity of 640 lb/friction material per hour, this modification has a total unrestricted PTE of PM = 2.62 ton/yr, PM10 = 2.78 ton/yr, SO₂ = 0.02 ton/yr, VOC = 92.89 ton/yr, CO = 2.23 ton/yr, NO_x = 2.66 ton/yr, and Total HAPs = 4.09 ton/yr.

See the attached Technical Support Document and attached calculations for a detailed description of the processes and the calculations used to determine the potential emissions.

PSD Requirements:

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. In addition, the potential to emit PM will continue to be less than two hundred fifty (250) tons per year after controls. Therefore, the PSD rules and requirements do not apply. See the attached Technical Support Document for a complete analysis.

NSPS Requirements:

There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this petition for an interim revision. See the attached Technical Support Document for a complete analysis.

NESHAP Requirements:

There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this petition for an interim revision. See the attached Technical Support Document for a complete analysis.

State Rules & Requirements:

The dry material handling process units are exempt from the requirements of 326 IAC 6-3 (Particulate Control and Emission Limits for Manufacturing Processes), because each of the units has potential particulate emissions less than 0.551 pounds per hour. However, Dexter will be installing baghouses and cartridge dust filters to control the emission of particulate matter from the solids handling process units.

In order to render the requirements of 326 IAC 8-1-6 (New Facilities, General Reduction Requirements) not applicable to the cure oven, Dexter has accepted a limit of 25 tons/year VOCs for the cure oven.

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 3.5 pounds of VOCs per gallon of coating, excluding water, for extreme performance coatings, and 3.0 pounds of VOCs per gallon of coating, excluding water, for all other coatings or coating application systems.

A detailed description of these rules and the other state rule requirements for the source are contained in the attached Technical Support Document of this petition for an interim revision.

Federal Enforceability:

Dexter Axle Company consents to the federal enforceability of this interim petition and all of its' conditions.

Signature: _____

Printed Name: _____

Title or Position: _____

Phone No.: _____

Date: _____

**NOTICE OF 14-DAY PERIOD
FOR PUBLIC COMMENT**

Proposed Approval of Interim Significant Permit Revision/Significant Source Modification
for **Dexter Axle Company**
in **Noble County**


Notice is hereby given that the above company located at 500 South Seventh Street, Albion, Indiana, has made application to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for an interim permit to construct a brake lining production line with bag houses for air pollution control. Based on 8,760 hours per year of operation, the VOC emissions are 75 tons per year, respectively. This pollutant will be limited to 25 tons a year.

The company has submitted an application for a significant permit revision / significant source modification. The OAQ shall review the application in accordance with the Permit Review Rules. Operation of the source cannot commence until a valid operating permit is issued. The construction of the proposed project is entirely at the applicant's own risk.

Notice is hereby given that there will be a period of 14 days from the date of publication of this notice during which any interested person may comment on why this interim permit should or should not be issued. Appropriate comments should be related to air quality issues, interpretation of the applicable state and federal rules, calculations made, technical issues, or the effect that the operation of this facility would have on any aggrieved individuals. A copy of the application and staff review is available for examination at the **Noble County Public Library, 813 East Main Street, Albion, Indiana**. All comments, along with supporting documentation, should be submitted in writing to the IDEM, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana 46206-6015.

Persons not wishing to comment at this time, but wishing to receive notice of future proceedings conducted related to this action, must submit a written request to the Office of Air Quality (OAQ), at the above address. All interested parties of record will receive a notice of the decision on this matter and will then have 15 days after receipt of the Notice of Decision to file a petition for administrative review. Procedures for filing such a petition will be enclosed with the Notice.

Questions should be directed to OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or at 317/233-2882.


Dwight Bushe, Sr., Plant Manager
Dexter Axle Company

To: KPC Media Group Inc.
P.O. Box 39, KENDALLVILLE, IN 46755
PUBLISHERS OF THE NEWS SUN

Private Legal Advertising
(Payment not from public treasury)

Advertiser: LARRY DEXTER AXLE (LEGAL) PUBLISHER'S CLAIM

COMPUTATION OF CHARGE

391 words, at 0.3000 cents per word (\$6.60 minimum charge).

(This charge is applied at the discretion of the publisher to all legal advertising copy which does not conform to the usual standards of size and space.) \$ 117.30

Charge for extra proofs of publication (\$1.00 for each proof in excess of 2) \$ 0.00

Data for computing cost:

Width of single column - 10.5 ems

Number of insertions - 1

1 insertion \$.30 per word, 2 insertions \$.40, 3 insertions \$.50

Total Amount of Claim \$ 117.30

"Pursuant to the provisions and penalties of Chapter 155, Act 1953, (s)he further says that the foregoing account is just and correct, that the amount claimed is legally due, after allowing all just credits, and that no part of the same has been paid"

Date: 8/8/07

Kelly Wallen

Ad #: 00084323

Legal Clerk

LARRY DEXTER AXLE (LEGAL)

PUBLISHER'S AFFIDAVIT

NOTICE OF 14-DAY PERIOD FOR PUBLIC COMMENT
Proposed Approval of Interim Significant Permit Revision/
Significant Source Modification for
Dexter Axle Company in Noble County

Notice is hereby given that the above

company located at 500 South Seventh Street, Albion, Indiana, has made application to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for an interim permit to construct a brake lining production line with bag houses for air pollution control. Based on 8,760 hours per year of operation, the VOC emissions are 75 tons per year, respectively. This pollutant will be limited to 25 tons a year.

The company has submitted an application for a significant permit revision / significant source modification. The OAQ shall review the application in accordance with the Permit Review Rules. Operation of the source cannot commence until a valid operating permit is issued. The construction of the proposed project is entirely at the applicant's own risk.

Notice is hereby given that there will be a period of 14 days from the date of publication of this notice during which any interested person may comment on why this interim permit should or should not be issued. Appropriate comments should be related to air quality issues, interpretation of the applicable state and federal rules, calculations made, technical issues, or the effect that the operation of this facility would have on any aggrieved individuals. A copy of the application and staff review is available for examination at the Noble County Public Library, 813 East Main Street, Albion, Indiana. All comments, along with supporting documentation, should be submitted in writing to the IDEM, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana 46206-6015.
Persons not wishing to comment at

Noble County) SS:
State of Indiana)

Personally appeared before me, a notary public in and for said county and state, the undersigned Kelly Wallen who being duly sworn said that (s)he is of competent age and is Legal Clerk of KPC Media Group Inc, publisher of a daily newspaper in Kendallville, county of Noble, State of Indiana, a weekly newspaper in Ligonier, county of Noble, State of Indiana, a daily newspaper in Auburn, county of DeKalb, State of Indiana, a daily newspaper in Angola, county of Steuben, State of Indiana, a weekly newspaper in Garrett, county of DeKalb, State of Indiana, Butler a weekly newspaper in Butler, county of DeKalb, State of Indiana, and which during that time have been newspapers of general circulation, having bona fide paid circulations, printed in the English language and entered, authorized and accepted by the post office department of the United States of America as mailable matter of the second-class as defined by the Act of Congress of the United States on March 3, 1879, and that the printed matter attached is a true copy, which was duly published in said newspaper 1 times, the dates of publication being as follows : 08/08/2007

Affiant

Kelly Wallen

Subscribed and sworn before me on this 8th day of August, 2007

Notary Public

Mary Jo Moncure

My commission expires May 21, 2010

Affidavit of Construction

I, Dwight Busche, Sr., being duly sworn upon my oath, depose and say:
(Name of the Authorized Representative)

1. I live in Noble County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of VP of Component Operations for Dexter Axle Company.
(Title) (Company Name)
3. By virtue of my position with Dexter Axle Company, I have personal
(Company Name) knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of Dexter Axle Company.
(Company Name)
4. I, the undersigned, have submitted an interim significant permit revision petition to the Office of Air Quality for the construction of a brake lining production line.
5. Dexter Axle Company recognizes the following risks:
(Company Name)
 - (a) own financial risk, (b) that IDEM may require additional or different control technology for the final approval, (c) that IDEM may deny issuance of the final approval, and
 - (d) any additional air permitting requirements.

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature: *Dwight Busche Sr.*
 Printed Name: DWIGHT BOSCH Sr.
 Phone No.: 260-686-2195
 Date: 8-6-07

STATE OF INDIANA)
 COUNTY OF Noble

Subscribed and sworn to me, a notary public in and for Noble County and
 State of Indiana on this 6th day of August, 2007
 My Commission expires: 9-11-09

Signature: *Steve E. Schermerhorn*
 Printed Name: Steve E. Schermerhorn

RECEIVED

JUN 20 2007

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

State of Indiana
Department of Environmental Management
Office of Air Quality

Source Background and Description

Source Name: Dexter Axle Company
Source Location: 500 South Seventh Street, Albion, Indiana 46701
County: Noble
SIC Code: 3714
Interim Significant Permit Revision No.: 113-24912I-00008

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. On June 12, 2007, The Office of Air Quality (OAQ) received an application No. 113-24912-00008 for a Significant Permit Revision (SPR) to the FESOP. Dexter Axle Company has requested approval to construct new emission units and pollution control devices for the production of 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. In addition, Dexter Axle Company 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 Office of Air Quality (OAQ) is currently reviewing this application.

New Emission Units and Pollution Control Equipment

Dexter Axle Company is petitioning for an Interim Significant Permit Revision (SPR) to a Federally Enforceable State Operating Permit for construction of the following new emission units and pollution control devices:

- (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.

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

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	SO ₂	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

This petition is for a FESOP Significant Permit Revision, pursuant to 326 IAC 2-8-11.1(f)(1) and 326 IAC 2-8-11.1(g)(2), 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 (NOx) 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 NOx 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 NOx 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 PM2.5. 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 PM2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM2.5 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) after controls of the entire source, reflecting all limits of the emission units.

Limited Potential to Emit After Issuance for the Entire Source (tons/year)							
Process/Facility	PM	PM10	SO ₂	VOC	CO	NO _x	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	0.00	0.00	0.00	0.316
Spray Booth (EU-11)*	0.00	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	0.00
Spray Booth (EU-15)*	2.24	2.24	0.00	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	0.00
Cure Oven (CO-1) ¹	0.00	0.00	0.00	62.65	24.90	0.00	0.99
	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 24.90 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	SO ₂	VOC	CO	NO _x	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 petition for an interim SPR. 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 in this petition for an interim SPR. 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)

Dexter Axle Company 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 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 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. Dexter Axle Company 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, Dexter Axle Company 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;

Dexter Axle Company is requesting that the pending Significant Permit Revision (SPR) No. 113-24912-00008 incorporate the following changes to FESOP No. 113-17172-00008, with deleted language as ~~strikeouts~~ and new language in bold:

- (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 ~~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.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.

...

INDIANAPOLIS IN 46204-2273

following services:

- UPS Next Day Air[®]
- UPS Worldwide Express[™]
- UPS 2nd Day Air[®]

Call 1-800-742-5877 or visit UPS.com.

P:BRWN01 S:TYE I:C1

MKIN-8000

1Z4X88711351629404 1500

2007SG INT1612Z AIR OR 07/02/07 2007
1B 421 HIP 6.2.1 1W4420

Apply shipping documents on this side.

For UPS Next Day Air, UPS Next Day Air Saver, UPS 2nd Day Air, UPS 3 Day Select, UPS Worldwide Express, and UPS Worldwide Expedited, there is no weight limit for documents. For UPS Next Day Air Saver, UPS 3 Day Select, UPS Worldwide Express, and UPS Worldwide Expedited, there is a weight limit of 13 ounces for documents of no commercial value. There is no limit on the weight or number of pages you can enclose.

For UPS Next Day Air, UPS Next Day Air Saver, UPS 2nd Day Air, UPS 3 Day Select, UPS Worldwide Express, and UPS Worldwide Expedited, there is a weight limit of 13 ounces for documents of no commercial value. There is no limit on the weight or number of pages you can enclose.

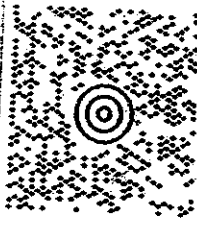
For UPS Next Day Air, UPS Next Day Air Saver, UPS 2nd Day Air, UPS 3 Day Select, UPS Worldwide Express, and UPS Worldwide Expedited, there is a weight limit of 13 ounces for documents of no commercial value. There is no limit on the weight or number of pages you can enclose.

SHIP TO:

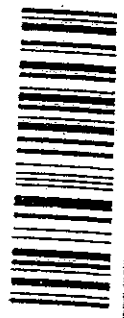
INCOMING APPLICATIONS
IDEM AIR PERMITS ADMINISTRATION
IGCN 1003
MC 61-53
100 NORTH SENATE AVENUE
INDIANAPOLIS IN 46204-2251

SHIP TO:

INCOMING APPLICATIONS
IDEM AIR PERMITS ADMINISTRATION
IGCN 1003
MC 61-53
100 NORTH SENATE AVENUE
INDIANAPOLIS IN 46204-2251

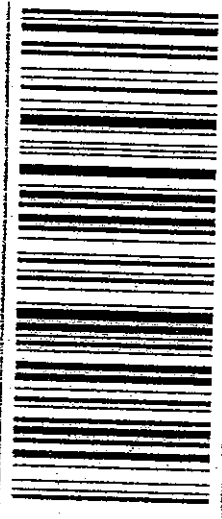


IN 461 9-01



UPS NEXT DAY AIR SAVER 1P

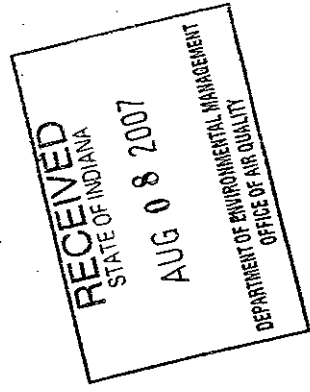
TRACKING #: 1Z 4X6 871 13 5162 9404



BILLING: P/P

Sender #: MIKE FURFARO
REF 2:P13 PERMIT MOD-----GR

LP2844 66.0R 04/2007



UPS is a registered service mark of United Parcel Service of America, Inc. © 2007 United Parcel Service of America, Inc. All rights reserved. UPS, the UPS logo, and the UPS brandmark are trademarks of United Parcel Service of America, Inc. or its affiliates. All other marks contained herein are the property of their respective owners. For more information, visit www.ups.com. For shipping restrictions, visit www.ups.com/shippingrestrictions. For international shipping restrictions, visit www.ups.com/international. For UPS Next Day Air Saver, UPS 2nd Day Air, UPS 3 Day Select, UPS Worldwide Express, and UPS Worldwide Expedited, there is a weight limit of 13 ounces for documents of no commercial value. There is no limit on the weight or number of pages you can enclose. For UPS Next Day Air, UPS Next Day Air Saver, UPS 2nd Day Air, UPS 3 Day Select, UPS Worldwide Express, and UPS Worldwide Expedited, there is a weight limit of 13 ounces for documents of no commercial value. There is no limit on the weight or number of pages you can enclose. For UPS Next Day Air, UPS Next Day Air Saver, UPS 2nd Day Air, UPS 3 Day Select, UPS Worldwide Express, and UPS Worldwide Expedited, there is a weight limit of 13 ounces for documents of no commercial value. There is no limit on the weight or number of pages you can enclose.