



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: September 9, 2008

RE: Tenneco Automotive / 151-25140-00015

FROM: Matthew Stuckey, Branch Chief
Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

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

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER.dot12/03/07



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September 9, 2008

Mr. Jeff Perkins
Tenneco Automotive
503 Weatherhead Street
Angola, IN 46703

Re: 151-25140-00015
Significant Permit Revision combined into
Second Renewal
F151-15838-00015

Dear Mr. Perkins:

Tenneco Automotive was issued a Federally Enforceable State Operating Permit (FESOP) Renewal No. F151-15838-00036 on June 20, 2003 for a stationary rubber and miscellaneous plastics products manufacturing plant located at 503 Weatherhead Street, Angola, IN 46703. On August 15, 2007, the Office of Air Quality (OAQ) received an application from the source requesting the addition of one wheelabrator grit blast unit (EU-003C) and the addition of an automated paint dip assembly (EU-004). The addition of the wheelabrator grit blast unit falls under an administrative amendment; however, the automated paint dip assembly is required to be reviewed under a significant permit revision pursuant to 326 IAC 2-8-11.1(g)(3). The attached Technical Support Document (TSD) provides additional explanation of the changes to the source/permit. Pursuant to the provisions of 326 IAC 2-8-11.1, these changes to the permit are required to be reviewed in accordance with the Significant Permit Revision (SPR) procedures of 326 IAC 2-8-11.1(f). Pursuant to the provisions of 326 IAC 2-8-11.1, a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document (TSD).

IDEM is aware that the Automated Paint Dip Assembly (EU-004) has been constructed prior to approval.

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, this permit shall be revised by incorporating the significant permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Attached please find the entire revised permit.

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 Jason R. Krawczyk, of my staff, at 317-234-5175 or 1-800-451-6027, and ask for extension 4-5175.

Sincerely,

Original document signed by

Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

Attachments: Technical Support Document and revised permit

IC/JRK

cc: File - Steuben County
Steuben County Health Department
U.S. EPA, Region V
Air Compliance Section
Compliance Data Section
Technical Support and Modeling
Permits Administrative and Development
Billing, Licensing and Training Section



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FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) Renewal and New Source Review OFFICE OF AIR QUALITY

**Tenneco Automotive
503 Weatherhead Street
Angola, Indiana 46703**

(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 provision of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; and 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.

Operation Permit No.: F151-25140-00015	
Issued by: <i>Original document signed by</i> Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: September 9, 2008 Expiration Date: September 9, 2018

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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 rubber and miscellaneous plastics products manufacturing plant.

Source Address:	503 Weatherhead Street, Angola, Indiana 46703
Mailing Address:	503 Weatherhead Street, Angola, IN 46703
General Source Phone Number:	(260) 667-2289
SIC Code:	3714, 3069
County Location:	Steuben
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) automatic turbo spray adhesives coating system, identified as EU-001, constructed in 2005, with all particulate overspray emissions controlled by two (2) dry filter systems, and all VOC and HAP emissions controlled by one (1) catalytic oxidizer, with all emissions exhausted through one (1) stack, identified as SV-1.
- (b) One (1) Automated Paint Dip Assembly, identified as EU-004, constructed in June 2008, with a maximum process rate of 260 units per hour, with no add on control device and emissions exhausting within the building.
- (c) Three (3) Wheelabrator Grit blast units, identified as EU-003A, EU-003B, and EU-003C, constructed in 1974, 1992, and 2008 respectively, each with a maximum throughput rate of 1,000 pounds of blast material per hour, with all utilizing a Pangborne dust collector for particulate control and exhausting through one (1) stack identified as DC-3.
- (d) Three (3) cold cleaners performing organic solvent degreasing operations:
 - (1) Rotary assembly unit cleaner, installed in 1993, with a maximum capacity of 77 gallons.
 - (2) Maintenance cleaner, installed in 1993, with a maximum capacity of 26 gallons.
 - (3) Service cleaner, installed in 1993, with a maximum capacity of 26 gallons.

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) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 including:
 - (1) Saw cold cleaner with maximum capacity of 1 gallon.
 - (2) Tool room cleaner with maximum capacity of 7 gallons.
- (b) Natural gas fired combustion sources with heat input equal to or less than 10 million British thermal units per hour consisting of:
 - (1) One (1) natural gas fired boiler, with a maximum rated heat input of 4.164 million MMBtu per hour, and exhausting through stack B-001 (constructed after 1983).
 - (2) Four (4) natural gas fired air makeup units, each rated 1.75 MMBtu/hr.
 - (3) One (1) natural gas fired heat treat furnace, rated at 0.1 MMBtu/hr.
 - (4) Eight (8) natural gas fired space heaters with combined rated capacity of 0.483 MMBtu/hr.
- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (d) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
- (e) Other categories with emissions below insignificant thresholds (i.e. less than 5 pounds per hour particulates).

One (1) welding operation consisting of the following:

 - (1) Three (3) flash butt welding stations, identified as ID 002A, constructed in 1995, with a maximum consumption rate of 38.25 pounds per hour, utilizing Torit cartridge dust collector for particulate control and exhausting through one (1) stack, identified as DC-1.
 - (2) Eight (8) metal inert gas (MIG), two (2) resistance and one (1) Upset resistance welding stations, and one (1) TIG welder, identified as 002B, constructed in 1995 (two of the MIG welders and one resistance welder were added in 1998), with a maximum wire consumption rate of 19.0 pounds per hour, utilizing Torit cartridge dust collector for particulate control and exhausting through one (1) stack, identified as DC-2.
- (f) Propane or liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour.
- (g) Combustion source flame safety purging on startup.
- (h) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
- (i) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

- (j) Filling drums, pails or other packaging containers with lubricating oils, waxes, and greases.
- (k) Application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings.
- (l) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (m) Cleaners and solvents characterized as follows:
 - (1) Having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100F) or;
 - (2) Having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20C (68F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (n) Closed loop heating and cooling systems.
- (o) Solvent recycling systems with batch capacity less than or equal to 100 gallons.
- (p) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.
- (q) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.
- (r) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.
- (s) Forced and induced draft cooling tower system not regulated under NESHAP.
- (t) Quenching operations used with heat treating processes.
- (u) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (v) Heat exchanger cleaning and repair.
- (w) Paved and unpaved roads and parking lots with public access.
- (x) Asbestos abatement projects regulated by 326 IAC 14-10.
- (y) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (z) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (aa) On-site fire and emergency response training approved by the department.
- (bb) Stationary fire pumps.
- (cc) Filter or coalescer media changeout.

- (dd) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees C).
- (ee) Activities or categories of activities with individual HAP emissions not previously identified. Following units emit greater than 1 pound per day but less than 5 pounds per day or 1 ton per year of a single HAP.
 - (1) Rust inhibitor tank (1% solution containing 10% Diethanolamine).
 - (2) Ethylene Glycol tanks for filling vibration control parts. (4 units)

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

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

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, F151-25140-00015, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability [326 IAC 2-8-6]

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

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

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

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

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

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

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]

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

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

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

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

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

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

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

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

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

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.12 Emergency Provisions [326 IAC 2-8-12]

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

- (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 F151-25140-00015 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]

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

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

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

(a) Pursuant to 326 IAC 2-8:

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

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

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

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

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

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

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

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

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
MC 61-52 IGCN 1003
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Licensed 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 Licensed 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 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

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

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

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

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

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

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

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

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

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

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

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

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

- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

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

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

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

SECTION D.1

FACILITY OPERATION CONDITIONS

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

- (a) One (1) automatic turbo spray adhesives coating system, identified as EU-001, constructed in 2005, with all particulate overspray emissions controlled by two (2) dry filter systems, and all VOC and HAP emissions controlled by one (1) catalytic oxidizer, with all emissions exhausted through one (1) stack, identified as SV-1.

(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.1.1 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4(1)]

- (a) The combined total input volatile organic compounds (VOC) delivered to the turbo spray adhesives coating system (EU-001) shall be limited to less than or equal to 652.73 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) The combined total input hazardous air pollutants (HAP) delivered to the turbo spray adhesives coating system (EU-001) shall be limited such that the input of glycol ether shall not exceed 61.13 and the input of any other single HAP shall not exceed 66.40 tons per twelve (12) consecutive month period with compliance determined at the end of each month. The input of total HAPs shall not exceed 159.52 tons per twelve (12) consecutive month period with compliance determined at the end of each month, respectively.
- (c) The overall control efficiency of the catalytic oxidizer shall be no less than 85%.

Compliance with these limitations in conjunction with the PTE of the other emission units limits the VOC of the entire source to less than 100 tons per year, Single HAP emissions of the entire source to 10 tons per year, and Combined HAP emissions of the entire source to 25 tons per year, and shall make the requirements of 326 IAC 2-7 (Part 70) not applicable to the source.

D.1.2 Volatile Organic Compound (VOC) Limitations [326 IAC 8-2-9] [326 IAC 8-1-2]

- (a) Pursuant to 326 IAC 8-2-9, the Permittee shall not allow the discharge into the atmosphere of VOC in excess of three (3.0) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator.
- (b) Pursuant to 326 IAC 8-1-2 (b), the turbo spray adhesives coating system (EU-001) VOC emissions shall be limited to no greater than the equivalent emissions, expressed as pounds of VOC per gallon of coating solids, allowed in (a).

This equivalency was determined by the following equation:

$$E = L / (1 - (L/D))$$

Where:

- L = Applicable emission limit from 326 IAC 8 in pounds of VOC per gallon of coating;
D = Density of VOC in coating in pounds per gallon of VOC;
E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.

Actual solvent density shall be used to determine compliance of the surface coating operation using the compliance methods in 326 IAC 8-1-2 (a).

- (c) The pounds of VOC per gallon of coating solids shall be limited to less than or equal to 5.06 pounds of VOC per gallon coating solids as applied.
- (d) Pursuant to 326 IAC 8-1-2(c) the overall control efficiency of the catalytic oxidizer shall be no less than the equivalent overall efficiency calculated by the following equation:

$$O = \frac{V - E}{V} \times 100$$

Where:

- V = The actual VOC content of the coatings as applied to the subject coating line as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids as applied.
- E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.
- O = Equivalent overall efficiency of the capture system and control device as a percentage.

The overall control efficiency of the catalytic oxidizer shall be greater than or equal to 60%. This overall control efficiency of the catalytic oxidizer is in compliance since it satisfies the overall control efficiency of 85% required in Condition D.1.1 above.

- (e) To ensure compliance with the equivalent limit in paragraph (c) of this condition, the Permittee shall maintain the overall control efficiency in paragraph (d) and limit the VOC content of each coating to less than 33.73 pounds of VOC per gallon of coating solids as applied.

D.1.3 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the turbo spray adhesives coating system 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 [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the turbo spray adhesives coating system, shall be controlled by a dry particulate filter and the Permittee shall operate the dry filter in accordance with manufacturer's specifications.

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

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the turbo spray adhesives coating system and any control devices.

Compliance Determination Requirements

D.1.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

Pursuant to 326 IAC 8-1-2(a), the Permittee shall operate the thermal oxidizer at all times that emission units EU-001 are in operation to achieve compliance with Conditions D.1.1 and D.1.2(a).

D.1.7 Volatile Organic Compounds (VOC)

Compliance with the VOC and HAP usage limitations 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.

D.1.8 Testing Requirements [326 IAC 2-8-5(a)(1),(4)] [326 IAC 2-1.1-11]

The Permittee conducted a performance test to verify the VOC overall control efficiency and to establish the operating parameters as per Conditions D.1.1 and D.1.2 for the catalytic oxidizer using methods as approved by the Commissioner on March 17, 2006. This test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration. Testing 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.1.9 Catalytic Oxidizer Temperature

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the catalytic oxidizer for measuring the operating temperature at the inlet of the catalyst bed. The output of this system shall be recorded as a 3-hour average. For the purposes of this condition, continuous shall mean no less than once per minute.

From the date of issuance of this permit until the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the 3-hour average temperature of the catalytic oxidizer is below 700°F. A 3-hour average temperature that is below 700°F is not a deviation from this permit. 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 determine the 3-hour average temperature from the most recent valid stack test that demonstrates compliance with the limits in condition D.1.2, as approved by IDEM.
- (c) On and after the date the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the 3-hour average temperature of the catalytic oxidizer is below the 3-hour average temperature as observed during the compliant stack test.

A 3-hour average temperature that is below the 3-hour average temperature as observed during the compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.1.10 Parametric Monitoring

- (a) The Permittee shall determine fan amperage or duct pressure from the most recent valid stack test that demonstrates compliance with the limits in Conditions D.1.1 and D.1.2, as approved by IDEM.
- (b) The duct pressure or fan amperage shall be observed at least once per day when the catalytic oxidizer is in operation. When for any one reading, the duct pressure or fan amperage is outside the normal range as established in most recent compliant stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A reading that is outside the range as established in the most recent compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.1.11 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. 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 stacks 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.

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

D.1.12 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 and HAP usage limits and/or the VOC and HAP emission limits established in Conditions D.1.1 and D.1.2.
 - (1) The VOC and HAP content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on 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 VOC and HAP content of the coatings used for month;
 - (4) The cleanup solvent usage for each month;
 - (5) The total VOC and HAPs usage for each month;
 - (6) The weight of VOCs and HAPs emitted for each compliance period.
- (b) To document compliance with Conditions D.1.9 and D.1.10, the Permittee shall maintain a log of:
 - (1) The continuous temperature records (on 3-hour average basis) for the thermal oxidizer and the 3 hour average temperature used to demonstrate compliance during the most recent compliant stack test.
 - (2) Daily records of the duct pressure or fan amperage.
- (c) To document compliance with Condition D.1.11, the Permittee shall maintain a log of:
 - (1) daily inspections to document the placement, integrity, and particle loading of the filters.
 - (2) monthly inspections of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground.

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

D.1.13 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1(a) and (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 the authorized individual as defined by 326 IAC 2-1.1-1(1).

SECTION D.2

FACILITY OPERATION CONDITIONS

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

- (b) One (1) automated paint dip assembly, identified as EU-004, constructed in June 2008, with a maximum process rate of 260 units per hour, with no add on control device, and emissions exhausting within the building.

(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 Volatile Organic Compound (VOC) Limitations [326 IAC 8-2-9] [326 IAC 8-1-2]

Pursuant to 326 IAC 8-2-9, the Permittee shall not allow the discharge into the atmosphere of VOC in excess of three (3.0) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator.

Compliance Determination Requirements

D.2.2 Volatile Organic Compounds (VOC)

Compliance with the VOC usage limitations contained in Condition D.2.1 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.

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

D.2.3 Record Keeping Requirements

- (a) To document compliance with Condition D.2.1, the Permittee shall maintain records in accordance with (1) through (3). Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits and/or the VOC and HAP emission limits established in Condition D.2.1
- (1) The VOC and HAP content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on 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 VOC and HAP content of the coatings used for each month;
 - (4) The cleanup solvent usage for each month;
 - (5) The total VOC and HAPs usage for each month;
 - (6) The weight of VOCs and HAPs emitted for each compliance period-;
- (b) 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)]:

- (c) Three (3) Wheelabrator Grit blast units, identified as EU-003A, EU-003B, and EU-003C, constructed in 1974, 1992, and 2008 respectively, each with a maximum throughput rate of 1,000 pounds of blast material per hour, with all utilizing a Pangborne dust collector for particulate control and exhausting through one (1) stack identified as DC-3.

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

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

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from each Wheelabrator Grit blast unit shall not exceed 2.58 pounds per hour when operating at a process weight rate of 1,000 pounds 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.3.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the three (3) Wheelabrator Grit blast units and their control device.

Compliance Determination Requirements

D.3.3 Particulate Control

In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.3.4 Visible Emissions Notations

- (a) Visible emission notations of the DC-3 stack exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are 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.

D.3.5 Parametric Monitoring

The Permittee shall record the pressure drop across the dust collector (DC-3) used in conjunction with three (3) Wheelabrator - Grit Blast units, at least once per day when the Wheelabrator - Grit Blast units are in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 0.75 and 4.50 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.3.6 Broken or Failed Bag Detection

- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emission unit will be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

Record Keeping and Reporting Requirement

D.3.7 Record Keeping Requirements

- (a) To document compliance with Condition D.3.4, the Permittee shall maintain records of visible emission notations of the three (3) Wheelabrator Grit blast units stack exhaust once per day. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).
- (b) To document compliance with Condition D.3.5, the Permittee shall maintain records once per day of the pressure drop. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).

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

SECTION D.4

FACILITY OPERATION CONDITIONS

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

- (d) Three (3) cold cleaners performing organic solvent degreasing operations:
- (1) Rotary assembly unit cleaner, installed in 1993, with a maximum capacity of 77 gallons.
 - (2) Maintenance cleaner, installed in 1993, with a maximum capacity of 26 gallons.
 - (3) Service cleaner, installed in 1993, with a maximum capacity of 26 gallons.

Insignificant Activities:

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 including:
- (1) Saw cold cleaner with maximum capacity of 1 gallon (installed in 1972).
 - (2) Tool room cleaner with maximum capacity of 7 gallons (installed in 2001).

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

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

D.4.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

SECTION D.5

FACILITY OPERATION CONDITIONS

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

Insignificant Activities:

- (b) Natural gas fired combustion sources with heat input equal to or less than 10 million British thermal units per hour consisting of:
 - (1) One (1) natural gas fired boiler, with a maximum rated heat input of 4.164 million MMBtu per hour, and exhausting through stack B-001 (constructed after 1983).
 - (2) Four (4) natural gas fired air makeup units, each rated 1.75 MMBtu/hr.
 - (3) One (1) natural gas fired heat treat furnace, rated at 0.1 MMBtu/hr.
 - (4) Eight (8) natural gas fired space heaters with combined rated capacity of 0.483 MMBtu/hr.
- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (d) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
- (e) Other categories with emissions below insignificant thresholds (i.e. less than 5 pounds per hour particulates).
 - One (1) welding operation consisting of the following:
 - (1) Three (3) flash butt welding stations, identified as ID 002A, constructed in 1995, with a maximum wire consumption rate of 38.25 pounds per hour, utilizing Torit cartridge dust collector for particulate control and exhausting through one (1) stack, identified as DC-1.
 - (2) Eight (8) metal inert gas (MIG), two (2) resistance, and one (1) Upset resistance welding stations, identified as 002B, constructed in 1995 (two of the MIG welders and one resistance welder were added in 1998), with a maximum wire consumption rate of 19.0 pounds per hour, utilizing Torit cartridge dust collector for particulate control and exhausting through one (1) stack, identified as DC-2.

(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.5.1 Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4(a) (Particulate Emission Limitations for Sources of Indirect Heating) the particulate emissions from the one (1) 4.164 MMBtu per hour heat input boiler shall be limited to 0.6 pounds per MMBtu heat input.

D.5.2 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2]

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

- (a) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
- (c) Other categories with emissions below insignificant thresholds (i.e. less than 5 pounds per hour particulates).

One (1) welding operation consisting of the following:

- (1) Three (3) flash butt welding stations, identified as ID 002A, constructed in 1995, with a maximum wire consumption rate of 38.25 pounds per hour, utilizing Torit cartridge dust collector for particulate control and exhausting through one (1) stack, identified as DC-1.
- (2) Eight (8) metal inert gas (MIG), two (2) resistance, and one (1) Upset resistance welding stations, identified as 002B, constructed in 1995 (two of the MIG welders and one resistance welder were added in 1998), with a maximum wire consumption rate of 19.0 pounds per hour, utilizing Torit cartridge dust collector for particulate control and exhausting through one (1) stack, identified as DC-2.

Compliance Determination Requirements

D.5.3 Particulate Control

In order to comply with Condition D.5.3, the Torit cartridge dust collectors (DC-1 and DC-2) for PM and PM10 control shall be in operation at all times that the each welding facility is in operation.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Tenneco Automotive
Source Address: 503 Weatherhead Street, Angola, Indiana 46703
Mailing Address: 503 Weatherhead Street, Angola, Indiana 46703
FESOP No.: F151-25140-00015

**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
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865**

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

Source Name: Tenneco Automotive
Source Address: 503 Weatherhead Street, Angola, Indiana 46703
Mailing Address: 503 Weatherhead Street, Angola, Indiana 46703
FESOP No.: F151-25140-00015

This form consists of 2 pages

Page 1 of 2

<input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) <ul style="list-style-type: none">• The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, 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

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: Tenneco Automotive
Source Address: 503 Weatherhead Street, Angola, Indiana 46703
Mailing Address: 503 Weatherhead Street, Angola, Indiana 46703
FESOP No.: F151-25140-00015
Facility: Turbo spray adhesives coating system (EU-001)
Parameter: VOC emissions
Limit: Total input VOC from the turbo spray adhesives coating system shall be limited to 652.73 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Emissions This Month	VOC Emissions Previous 11 Months	VOC Emissions 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: Tenneco Automotive
 Source Address: 503 Weatherhead Street, Angola, Indiana 46703
 Mailing Address: 503 Weatherhead Street, Angola, Indiana 46703
 FESOP No.: F151-25140-00015
 Facility: Turbo spray adhesives coating system (EU-001)
 Parameter: Input Single and Combined HAP
 Limit: EU-001 input glycol ether shall not exceed 61.13, input single HAP shall not exceed 66.40, and total input HAPs shall not exceed 159.52 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR:

Single HAP:

Month		(Column 1) Single HAP This Month	(Column 2) Single HAP From Previous 11 Months	(Column 1 + Column 2) Single HAP For 12 Month Period
1	Glycol Ether			
	Toluene			
	Xylene			
	MIBK			
	Formaldehyde			
	Tetrachloroethylene			
	Ethylbenzene			

Month		(Column 1) Single HAP This Month	(Column 2) Single HAP From Previous 11 Months	(Column 1 + Column 2) Single HAP For 12 Month Period
2	Glycol Ether			
	Toluene			
	Xylene			
	MIBK			
	Formaldehyde			
	Tetrachloroethylene			
	Ethylbenzene			

Month		(Column 1) Single HAP This Month	(Column 2) Single HAP From Previous 11 Months	(Column 1 + Column 2) Single HAP For 12 Month Period
3	Glycol Ether			
	Toluene			
	Xylene			
	MIBK			
	Formaldehyde			
	Tetrachloroethylene			
	Ethylbenzene			

Combined HAP:

Month	(Column 1) Combined HAP This Month	(Column 2) Combined HAP From Previous 11 Months	(Column 1 + Column 2) Combined HAP For 12 Month Period
1			
2			
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: Tenneco Automotive
Source Address: 503 Weatherhead Street, Angola, Indiana 46703
Mailing Address: 503 Weatherhead Street, Angola, Indiana 46703
FESOP No.: F151-25140-00015

Months: _____ to _____ Year: _____

Page 1 of 2

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

Technical Support Document (TSD) for a
Federally Enforceable State Operating Permit Renewal
with New Source Review

Source Description and Location
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Source Name:	Tenneco Automotive
Source Location:	503 Weatherhead Street, Angola, IN 46703
County:	Steuben
SIC Code:	3714/3069
Permit Renewal No.:	151-25140-00015
Permit Reviewer:	Jason R. Krawczyk

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Tenneco Automotive relating to the operation of a stationary rubber and miscellaneous plastics products manufacturing plant.

Background and Description of Permitted Emission Units and New Source Construction

On August 15, 2007 Tenneco Automotive submitted an application to the OAQ requesting to renew its operating permit. Tenneco Automotive was issued FESOP Renewal 151-15838-00015 on June 20, 2003. On February 25, 2008 Tenneco Automotive submitted an application to the OAQ to add a new low emission paint dip system for fluid bushings and a new Wheelabrator for maintenance and repair parts cleaning.

The source consists of the following permitted emission unit(s):

- (a) One (1) automatic turbo spray adhesives coating system, identified as EU-001, constructed in 2005, with all particulate overspray emissions controlled by two (2) dry filter systems, and all VOC and HAP emissions controlled by one (1) catalytic oxidizer, with all emissions exhausted through one (1) stack, identified as SV-1.
- (b) Three (3) Wheelabrator Grit blast units, identified as EU-003A, and EU-003B constructed in 1974 and 1992 respectively, both with a maximum capacity of 1,000 pounds per hour, with both utilizing a Pangborne dust collector for particulate control and exhausting through one (1) stack identified as DC-3.
- (c) Three (3) cold cleaners performing organic solvent degreasing operations:
 - (1) Rotary assembly unit cleaner, installed in 1993, with a maximum capacity of 77 gallons.
 - (2) Maintenance cleaner, installed in 1993, with a maximum capacity of 26 gallons.
 - (3) Service cleaner, installed in 1993, with a maximum capacity of 26 gallons.

Insignificant activities consisting of the following:

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 including:
 - (1) Saw cold cleaner with maximum capacity of 1 gallon.
 - (2) Tool room cleaner with maximum capacity of 7 gallons.
- (b) Natural gas fired combustion sources with heat input equal to or less than 10 million British thermal units per hour consisting of:
 - (1) One (1) natural gas fired boiler, with a maximum rated heat input of 4.164 million MMBtu per hour, and exhausting through stack B-001 (constructed after 1983).
 - (2) Four (4) natural gas fired air makeup units, each rated 1.75 MMBtu/hr.
 - (3) One (1) natural gas fired heat treat furnace, rated at 0.1 MMBtu/hr.
 - (4) Eight (8) natural gas fired space heaters with combined rated capacity of 0.483 MMBtu/hr.
- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (d) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
- (e) Other categories with emissions below insignificant thresholds (i.e. less than 5 pounds per hour particulates).

One (1) welding operation consisting of the following:

 - (1) Three (3) flash butt welding stations, identified as ID 002A, constructed in 1995, with a maximum consumption rate of 38.25 pounds per hour, utilizing Torit cartridge dust collector for particulate control and exhausting through one (1) stack, identified as DC-1.
 - (2) Eight (8) metal inert gas (MIG), two (2) resistance and one (1) Upset resistance welding stations, and one (1) TIG welder, identified as 002B, constructed in 1995 (two of the MIG welders and one resistance welder were added in 1998), with a maximum wire consumption rate of 19.0 pounds per hour, utilizing Torit cartridge dust collector for particulate control and exhausting through one (1) stack, identified as DC-2.
- (f) Propane or liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour.
- (g) Combustion source flame safety purging on startup.
- (h) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.

- (i) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (j) Filling drums, pails or other packaging containers with lubricating oils, waxes, and greases.
- (k) Application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings.
- (l) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (m) Cleaners and solvents characterized as follows:
 - (1) Having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100F) or;
 - (2) Having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20C (68F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (n) Closed loop heating and cooling systems.
- (o) Solvent recycling systems with batch capacity less than or equal to 100 gallons.
- (p) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.
- (q) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.
- (r) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.
- (s) Forced and induced draft cooling tower system not regulated under NESHAP.
- (t) Quenching operations used with heat treating processes.
- (u) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (v) Heat exchanger cleaning and repair.
- (w) Paved and unpaved roads and parking lots with public access.
- (x) Asbestos abatement projects regulated by 326 IAC 14-10.
- (y) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (z) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (aa) On-site fire and emergency response training approved by the department.
- (bb) Stationary fire pumps.

- (cc) Filter or coalescer media changeout.
- (dd) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees C).
- (ee) Activities or categories of activities with individual HAP emissions not previously identified. Following units emit greater than 1 pound per day but less than 5 pounds per day or 1 ton per year of a single HAP.
 - (1) Rust inhibitor tank (1% solution containing 10% Diethanolamine).
 - (2) Ethylene Glycol tanks for filling vibration control parts. (4 units)

During the review of the FESOP renewal, the source submitted an additional application for an administrative permit amendment on February 25, 2008 for the following new emission unit:

One (1) Wheelabrator Grit blast unit, identified as EU-003C constructed in May 2007, with a maximum throughput rate of 1,000 pounds of blast material per hour, utilizing a Pangborne dust collector for particulate control and exhausting through stack DC-3.

Unpermitted Emission Units and Pollution Control Equipment

During the review of the FESOP Second Renewal, the source submitted an additional application on February 25, 2008, for the following new emission unit and pollution control device:

- (a) One (1) Automated Paint Dip Assembly, identified as EU-004, constructed in June 2008, with a maximum process rate of 260 units per hour, with no add on control device and emissions exhausting within the building.

With the addition of the Automated Paint Dip Assembly (EU-004), Combined HAP input limit for the existing Automatic Turbo Spray Adhesives Coating System (EU-001) had to be modified to account for the increase in emissions and maintain the FESOP status.

Pursuant to 326 IAC 2-8-11.1(g)(2), any modifications that require an adjustment to the emissions cap limitations are required to be reviewed in accordance with the Significant Permit Revision procedures.

Pursuant to 326 IAC 2-8-11.1(g)(3), any modifications that change any existing requirements for the units or processes under the cap are required to be reviewed in accordance with the Significant Permit Revision procedures.

Even though the PTE of EU-004 are minimal, due to the need to adjust the limited PTE of the entire source, and since the source did not obtain prior approval before installing the emission units, a referral to enforcement is being included with this permit. See Appendix A, Page 6.

Emission Units and Pollution Control Equipment Removed From the Source

There have been no emission units or pollution control equipment removed from the source since the last approval.

Existing Approvals

Since the issuance of the FESOP Renewal No.: 151-15838-00015 on June 20, 2003, the source has constructed or has been operating under the following approvals as well:

- (a) First Administrative Amendment No.: 151-17913-00015, issued on August 5, 2003.

- (b) Second Administrative Amendment No.: 151-19144-00015, issued on June 23, 2004.
- (c) First Significant Permit Revision No.: 151-21089-00015, issued on September 1, 2005.
- (d) Second Significant Permit Revision No.: 151-21917-00015, issued on March 3, 2006.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

See Federal and State Rule Applicability for details.

Enforcement Issues

IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. IDEM is reviewing this matter and will take the appropriate action. This proposed approval is intended to satisfy the requirements of the construction permit rules.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Steuben County

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.
¹ Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for PM2.5.	

- (a) Ozone Standards
 - (1) 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.
 - (2) On September 6, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Allen, Clark, Elkhart, Floyd, LaPorte, St. Joseph as attainment for the 8-hour ozone standard.
 - (3) On November 9, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Boone, Clark, Elkhart, Floyd, LaPorte, Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Morgan, Shelby, and St. Joseph as attainment for the 8-hour ozone standard.
 - (4) 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 ozone. Steuben County has

been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (b) **PM2.5**
 Steuben County has been classified as attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM2.5 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 a surrogate for PM2.5 emissions.
- (c) **Other Criteria Pollutants**
 County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (d) **Fugitive Emissions**
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

Unrestricted Potential Emissions

The following table reflects the unlimited potential to emit (PTE) of the entire source (existing units and new units) before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	tons/year
PM	Less than 100
PM ₁₀	Less than 100
SO ₂	Less than 100
VOC	Greater than 100, Less than 250
CO	Less than 100
NO _x	Less than 100

(1) Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". US EPA has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions.

HAPs	tons/year
Single	Greater than 10
Combined	Greater than 25

Appendix A of this TSD reflects the unrestricted potential emissions of the source.

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC is still equal to or greater than 100 tons per year. The source is subject to the provisions of 326 IAC 2-7. However, the source has agreed to continue to limit their VOC emissions to less than Title V levels, therefore the source will be issued a FESOP Renewal.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all other criteria pollutants are less than 100 tons per year.
- (c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. However, the

source has agreed to limit their single HAP emissions and total HAP emissions below Title V limits. Therefore, the source will be issued a FESOP

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-7, fugitive emissions are not counted toward the determination of Part 70 applicability.

PTE of the Entire Source After Issuance

The source has opted to remain a FESOP source. The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this FESOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/ Emission Unit	Potential To Emit (tons/year)							
	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	Single HAP	Combined HAPs
Spray Coating	5.84	5.84	negl.	97.91	negl.	negl.	9.96 Xylene	23.93
Dip Coating	0.00	0.00	0.00	0.79	0.00	0.00	0.79 Glycol Ether	0.79
Shot Blasting	0.02	0.02	negl.	negl.	negl.	negl.	negl.	negl.
Cold Cleaning	negl.	negl.	negl.	0.67	negl.	negl.	negl.	negl.
Combustion	0.10	0.39	0.03	0.28	4.32	5.15	0.09 Hexane	0.10
Cooling Tower	0.19	0.19	negl.	negl.	negl.	negl.	negl.	negl.
Welding	0.40	0.40	negl.	negl.	negl.	negl.	0.07 Magnesium	0.16
Fugitive Emissions	negl.	negl.	negl.	0.70	negl.	negl.	0.09 Diethanolamine	0.09
Total Emissions	6.56	6.85	0.03	99.65	4.32	5.15	9.96	24.97
Title V Major Source Thresholds	NA	100	100	100	100	100	10	25
PSD Major Source Thresholds	250	250	250	250	250	250	NA	NA

- (a) This existing stationary source is not major for PSD because the emissions of each criteria pollutant are less than two hundred fifty (<250) tons per year, and it is not one of the twenty-eight (28) listed source categories.
- (b) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (b) 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 permit renewal.

Compliance Assurance Monitoring (CAM)

- (c) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the potential to emit of the source is limited to less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

State Rule Applicability Determination

The following state rules are applicable to the entire source:

- (a) 326 IAC 2-6 (Emission Reporting)
This source is located in Steuben County and the potential to emit of each criteria pollutant is less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.
- (b) 326 IAC 5-1 (Opacity Limitations)
Pursuant to 326 IAC 5-1-2, except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in the permit:
- (1) 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.
 - (2) 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) 326 IAC 6-4 (Fugitive Dust Emissions)
Pursuant to 326 IAC 6-4, fugitive dust shall not be visible crossing the boundary or property line of a source. Observances of visible emissions crossing property lines may be refuted by factual data expressed in 326 IAC 6-4-2(1), (2) or (3).

The following state rules are applicable to the individual facilities:

Turbo Spray Adhesives Coating System (EU-001)

- (d) 326 IAC 2-8-4(1) (Volatile Organic Compounds) (Hazardous Air Pollutants)
The existing FESOP Renewal limits the EU-001 to 652.73 ton/yr of VOC spray adhesives input, 166.24 tons/yr HAP total input, and 66.4 tons/yr HAP single input at an 85% overall control efficiency for the catalytic oxidizer.

Due to the addition of new emission units, this existing VOC and HAP limits are revised as follows:

- (1) The combined total input volatile organic compounds (VOC) delivered to the turbo spray adhesives coating system (EU-001) shall be limited to less than or equal to 652.73 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (2) The combined total input hazardous air pollutants (HAP) delivered to the turbo spray adhesives coating system (EU-001) shall be limited such that the input of glycol ether shall not exceed 61.13 and the input of any other single HAP shall not exceed 66.40 tons per twelve (12) consecutive month period with compliance determined at the end of each month. The input of total HAPs shall not exceed 159.52 tons per twelve (12) consecutive month period with compliance determined at the end of each month, respectively.
- (3) The overall control efficiency of the catalytic oxidizer shall be no less than 85%.

Compliance with these limitations in conjunction with the PTE of the other emission units limits the VOC of the entire source to less than 100 tons per year, Single HAP emissions of the entire source to 10 tons per year, and Combined HAP emissions of the entire source to 25 tons per year, and shall make the requirements of 326 IAC 2-7 (Part 70) not applicable to the source.

(e) 326 IAC 8-2-9 / 326 IAC 8-1-2 (Miscellaneous Metal Coating Operations)(Compliance Methods)
There is no change in the following requirement from the existing FESOP Renewal.

- (1) Pursuant to 326 IAC 8-2-9, the Permittee shall not allow the discharge into the atmosphere of VOC in excess of three (3.0) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator.
- (2) Pursuant to 326 IAC 8-1-2 (b), the turbo spray adhesives coating system (EU-001) VOC emissions shall be limited to no greater than the equivalent emissions, expressed as pounds of VOC per gallon of coating solids, allowed in (a).

This equivalency was determined by the following equation:

$$E = L / (1 - (L/D))$$

Where:

- L = Applicable emission limit from 326 IAC 8 in pounds of VOC per gallon of coating;
- D = Density of VOC in coating in pounds per gallon of VOC;
- E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.

Actual solvent density shall be used to determine compliance of the surface coating operation using the compliance methods in 326 IAC 8-1-2 (a).

- (3) The pounds of VOC per gallon of coating solids shall be limited to less than or equal to 5.06 pounds of VOC per gallon coating solids as applied.
- (4) Pursuant to 326 IAC 8-1-2(c) the overall control efficiency of the catalytic oxidizer shall be no less than the equivalent overall efficiency calculated by the following equation:

$$O = \frac{V - E}{V} \times 100$$

Where:

- V = The actual VOC content of the coatings as applied to the subject coating line as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids as applied.
- E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.
- O = Equivalent overall efficiency of the capture system and control device as a percentage.

The overall control efficiency of the catalytic oxidizer shall be greater than or equal to 60%. This overall control efficiency of the catalytic oxidizer is in compliance since it satisfies the overall control efficiency of 85%.

- (5) To ensure compliance with the equivalent limit in paragraph (c) of this condition, the Permittee shall maintain the overall control efficiency in paragraph (d) and limit the VOC content of each coating to less than 33.73 pounds of VOC per gallon of coating solids as applied.

- (f) 326 IAC 8-2-9(f) (Miscellaneous Metal Coating Operations)
Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the turbo spray adhesives coating system 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.
- (g) 326 IAC 6-3-2 (Particulate Emission Limitations, Work Practices, and Control Technologies)
Pursuant to 326 IAC 6-3-2(d), particulate from the turbo spray adhesives coating system, shall be controlled by a dry particulate filter and the Permittee shall operate the dry filter in accordance with manufacturer's specifications.

Automated Dip Assembly (EU-004)

- (h) 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations)
Pursuant to 326 IAC 8-2-9, the Permittee shall not allow the discharge into the atmosphere of VOC in excess of three (3.0) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator.

EU-004 is subject to 326 IAC 8-2-9 because the actual VOC emissions are greater than 15 lb/day. Based on the calculations, found on Page 6 of Appendix A, the coating used is in compliance.

Wheelabrator Grit Blast Units (EU-003A, EU-003B, EU-003C)

- (i) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from each Wheelabrator Grit blast unit shall not exceed 2.58 pounds per hour when operating at a process weight rate of 1,000 pounds per hour.

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

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

The dust collectors are not necessary to comply with this particulate emission limitation, because the PM PTE before control is 0.46 lb/hr. (See Page 9 of Appendix A.)

Cold Cleaners

- (j) 326 IAC 8-3-2 (Cold Cleaner Operations)
Pursuant to 326 IAC 8-3-2, for cold cleaning operations constructed after January 1, 1980, the Permittee shall:
 - (1) Equip the cleaner with a cover;
 - (2) Equip the cleaner with a facility for draining cleaned parts;
 - (3) Close the degreaser cover whenever parts are not being handled in the cleaner;
 - (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
 - (5) Provide a permanent, conspicuous label summarizing the operation requirements;

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

Insignificant Activities

- (k) 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)
Pursuant to 326 IAC 6-2-4(a) (Particulate Emission Limitations for Sources of Indirect Heating) the particulate emissions from the one (1) 4.164 MMBtu per hour heat input boiler shall be limited to 0.6 pounds per MMBtu heat input.
- (l) 326 IAC 8-3-2 (Cold Cleaner Operations)
Pursuant to 326 IAC 8-3-2, for cold cleaning operation (Tool room cleaner) constructed after January 1, 1980, the owner or operator shall:
 - (1) Equip the cleaner with a cover;
 - (2) Equip the cleaner with a facility for draining cleaned parts;
 - (3) Close the degreaser cover whenever parts are not being handled in the cleaner;
 - (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
 - (5) Provide a permanent, conspicuous label summarizing the operation requirements;
 - (6) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.
- (m) 326 IAC 6-3-2 (Particulate Emission Limitations, Work Practices, and Control Technologies)
Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour. This includes the following operations:
 - (1) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
 - (2) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
 - (3) Other categories with emissions below insignificant thresholds (i.e. less than 5 pounds per hour particulates).

One (1) welding operation consisting of the following:
 - (i) Three (3) flash butt welding stations, identified as ID 002A, constructed in 1995, with a maximum wire consumption rate of 38.25 pounds per hour, utilizing Torit cartridge dust collector for particulate control and exhausting through one (1) stack, identified as DC-1.
 - (ii) Eight (8) metal inert gas (MIG), two (2) resistance and one (1) Upset resistance welding stations, identified as 002B, constructed in 1995 (two of the MIG welders and one resistance welder were added in 1998), with a maximum wire

consumption rate of 19.0 pounds per hour, utilizing Torit cartridge dust collector for particulate control and exhausting through one (1) stack, identified as DC-2.

Compliance Determination, Monitoring and Testing Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

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

- (a) The compliance determination and monitoring requirements applicable to this source are as follows:

Emission Unit/ Control	Parameter	Frequency	Range	Excursions and Exceedances
EU-001	Operating Temperature	Continuous	3 Hr Avg. $\geq 700^{\circ} F$	Response Steps
	Duct/Fan Amperage	Daily	Normal - Abnormal	Response Steps
	Filter Particulate Loading	Daily		Response Steps
	Coating/Overspray Emissions	Monthly		Response Steps
EU-003A, EU-003B, EU-003C / DC-3	Visible Emissions	Daily	Normal - Abnormal	Response Steps
	Pressure Drop	Daily	0.75" - 4.5"	Response Steps

- (b) The testing requirements applicable to this source are as follows:

Testing Requirements				
Emission Unit	Control Device	Pollutant	Date of Last Test	Frequency of Testing
EU-001	Catalytic Oxidizer	VOC	March 17, 2006	Once every 5 years

Conclusion and Recommendation

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 August 15, 2007. Additional information was received on February 25, 2008.

The operation of this source shall be subject to the conditions of the attached proposed FESOP Renewal and New Source Review No. 151-25140-00015. The staff recommends to the Commissioner that this FESOP Renewal and New Source Review be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Jason R. Krawczyk at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5175 or toll free at 1-800-451-6027 extension 4-5175.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

SUMMARY OF EMISSIONS

Company Name: Tenneco Automotive
Address City IN Zip: 503 Weatherhead Street, Angola, IN 46703
Permit Number: 151-25140-00015
Pit ID: 151-00015
Reviewer: Jason R. Krawczyk
Date: July 31, 2008

Uncontrolled Emissions (Tons/Yr)									
Pollutant	Combustion	Spray Coating (EU-001)	Dip Coating (EU-004)	Welding	Shot Blasting (EU-003A, B, C)	Cooling Tower	Cold Cleaning	Fugitive Emissions	Total PTE
PM	0.10	5.84	0.00	40.38	2.03	0.19	-	-	48.55
PM10*	0.39	5.84	0.00	40.38	2.03	0.19	-	-	48.84
VOC	0.28	111.42	0.79	-	-	-	0.67	0.70	113.86
NOx	5.15	-	-	-	-	-	-	-	5.15
SO2	0.03	-	-	-	-	-	-	-	0.03
CO	4.32	-	-	-	-	-	-	-	4.32
Single HAP	-	50.60	-	-	-	-	-	-	50.60
Combined HAPs	0.10	90.46	0.79	0.16	-	-	-	0.09	91.60

Controlled Emissions (Tons/Yr)									
Pollutant	Combustion	Spray Coating (EU-001)	Dip Coating (EU-004)	Welding	Shot Blasting (EU-003A, B, C)	Cooling Tower	Cold Cleaning	Fugitive Emissions	Total PTE
PM	0.10	5.84	0.00	0.40	0.02	0.19	-	-	6.56
PM10*	0.39	5.84	0.00	0.40	0.02	0.19	-	-	6.85
VOC	0.28	16.71	0.79	-	-	-	0.67	0.70	18.45
NOx	5.15	-	-	-	-	-	-	-	5.15
SO2	0.03	-	-	-	-	-	-	-	0.03
CO	4.32	-	-	-	-	-	-	-	4.32
Single HAP	-	7.59	-	-	-	-	-	-	7.59
Combined HAPs	0.10	13.57	0.79	0.16	-	-	-	0.09	14.61

Controlled / Limited Emissions (Tons/Yr)									
Pollutant	Combustion	Spray Coating (EU-001)	Dip Coating (EU-004)	Welding	Shot Blasting (EU-003A, B, C)	Cooling Tower	Cold Cleaning	Fugitive Emissions	Total PTE
PM	0.10	5.84	0.00	0.40	0.02	0.19	-	-	6.56
PM10*	0.39	5.84	0.00	0.40	0.02	0.19	-	-	6.85
VOC	0.28	97.91	0.79	-	-	-	0.67	0.70	99.65
NOx	5.15	-	-	-	-	-	-	-	5.15
SO2	0.03	-	-	-	-	-	-	-	0.03
CO	4.32	-	-	-	-	-	-	-	4.32
Single HAP	-	9.96	0.00	-	-	-	-	-	9.96
Combined HAPs	0.10	23.93	0.79	0.16	-	-	-	0.09	24.97

Note:

*PM10 emissions are assumed to be equal to PM2.5

Fugitive Emissions are not counted toward the determination of Part 70 applicability.

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

**Company Name: Tenneco Automotive
Address City IN Zip: 503 Weatherhead Street, Angola, IN 46703
Permit Number: 151-25140-00015
Plt ID: 151-00015
Reviewer: Jason R. Krawczyk
Date: July 31, 2008**

	Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
One (1) hot water boiler	4.16	
Four (4) Air Makeup Units	7.00	
One (1) heat treat furnace	0.10	
Eight (8) Space Heaters	0.48	
	11.75	102.9

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	0.1	0.4	0.0	5.1	0.3	4.3

*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: Tenneco Automotive
Address City IN Zip: 503 Weatherhead Street, Angola, IN 46703
Permit Number: 151-25140-00015
Plt ID: 151-00015
Reviewer: Jason R. Krawczyk
Date: July 31, 2008

	HAPs - Organics				
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	1.080E-04	6.174E-05	3.859E-03	9.261E-02	1.749E-04

	HAPs - Metals				
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	2.573E-05	5.660E-05	7.203E-05	1.955E-05	1.080E-04

Methodology is the same as page 1.

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 Particulate
From Spray Adhesive Coating (EU-001)**

**Company Name: Tenneco Automotive
Address City IN Zip: 503 Weatherhead Street, Angola, IN 46703
Permit Number: 151-25140-00015
Plt ID: 151-00015
Reviewer: Jason R. Krawczyk
Date: July 31, 2008**

Uncontrolled Emissions

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	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Solvent Xylene	7.25	100.00%	0.0%	100.00%	0.0%	0.00%	0.000186	3600	7.25	7.25	4.86	116.58	21.28	0.00	0.00	75%
MEK	6.71	100.00%	0.0%	100.00%	0.0%	0.00%	0.000186	3600	6.71	6.71	4.50	107.90	19.69	0.00	0.00	75%
Chemlok205 (Primer)	7.85	75.00%	0.0%	75.00%	0.0%	24.99%	0.000369	3600	5.89	5.89	7.83	187.93	34.30	2.86	23.56	75%
Chemlok 6100*	8.01	77.48%	0.0%	77.48%	0.0%	22.51%	0.000369	3600	6.21	6.21	8.25	198.10	36.15	2.63	27.57	75%
Chemlok 6125*	8.20	75.00%	0.0%	75.00%	0.0%	24.99%	0.000369	3600	6.15	6.15	8.18	196.31	35.83	2.99	24.61	75%

Total State Potential Emissions: 25.44 610.51 111.42 5.84

Controlled Emissions

Material	Density (Lb/Gal)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	VOC Control Efficiency	PM Control Efficiency	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)
Solvent Xylene	7.25	0.000186	3600	0.00	3600.00	85%	98%	7.25	7.25	0.73	17.49	3.19	0.00
MEK	6.71	0.000186	3600	0.00	3600.00	85%	98%	7.25	7.25	0.67	16.18	2.95	0.00
Chemlok205 (Primer)	7.85	0.000369	3600	0.00	3600.00	85%	98%	5.89	5.89	1.17	28.19	5.14	0.06
Chemlok 6100*	8.01	0.000369	3600	0.00	3600.00	85%	98%	6.21	6.21	1.24	29.72	5.42	0.05
Chemlok 6125*	8.20	0.000369	3600	0.00	3600.00	85%	98%	6.15	6.15	1.23	29.45	5.37	0.06

Total State Potential Emissions: 3.82 91.58 16.71 0.12

Note:

* Either Chemlok 6100 or Chemlok 6125 is used at a time, the two are never used concurrently, therefore the worst case scenario between the two solvents is used to determine total emissions.

METHODOLOGY:

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

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

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

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

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

Uncontrolled Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

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

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

Controlled Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs) * (1 - Control Efficiency)

**Appendix A: Emission Calculations
HAP Emissions
From Spray Adhesive Coating (EU-001)**

Company Name: Tenneco Automotive
Address City IN Zip: 503 Weatherhead Street, Angola, IN 46703
Permit Number: 151-25140-00015
Pit ID: 151-00015
Reviewer: Jason R. Krawczyk
Date: July 31, 2008

Uncontrolled Emissions

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Formaldehyde	Weight % Ethyl Benzene	Weight % Methyl Isobutyl	Weight % Glycol Ethers	Weight % Tetrachloroethylene	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Ehtyl Benzene Emissions (ton/yr)	Methyl Isobutyl Ketone (ton/yr)	Tetrachloroeth ylene Emissions (ton/yr)
Solvent Xylene	7.25	0.000186	3600	79.00%	0.00%	0.00%	21.00%	0.00%	0.00%	0.00%	16.81	0.00	0.00	4.47	0.00	0.00
Chemlok205 (Primer)	7.85	0.000369	3600	9.95%	0.21%	0.11%	2.33%	58.77%	0.93%	0.00%	4.55	0.10	0.05	1.07	26.88	0.00
Chemlok 6100*	8.01	0.000369	3600	62.67%	0.00%	0.00%	14.70%	0.00%	0.00%	0.00%	29.24	0.00	0.00	6.86	0.00	0.00
Chemlok 6125	8.20	0.000369	3600	59.97%	0.32%	0.00%	14.06%	0.00%	0.00%	0.62%	28.65	0.15	0.00	6.72	0.00	0.30

Total State Potential Emissions: 50.60 0.25 0.05 12.39 26.88 0.30

Total Combined HAPS: 90.46

Controlled Emissions

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Control Efficiency (%)	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)	Methyl Isobutyl Ketone Emissions (ton/yr)	Tetrachloroethyle ne Emissions (ton/yr)
Solvent Xylene	7.25	0.000186	3600	85%	2.52	0.00	0.00	0.67	0.00	0.00
Chemlok205 (Primer)	7.85	0.000369	3600	85%	0.68	0.01	0.01	0.16	4.03	0.00
Chemlok 6100*	8.01	0.000369	3600	85%	4.39	0.00	0.00	1.03	0.00	0.00
Chemlok 6125*	8.20	0.000369	3600	85%	4.30	0.02	0.00	1.01	0.00	0.04

Total State Potential Emissions: 7.59 0.04 0.01 1.86 4.03 0.04

Total Combined HAPS: 13.57

Note:

* Either Chemlok 6100 or Chemlok 6125 is used at a time, the two are never used concurrently, therefore the worst case scenario between the two solvents is used to determine total emissions.

METHODOLOGY:

Uncontrolled HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Controlled HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs * (1-control)

**Appendix A: Emissions Calculations
VOC and Particulate
From Dip Coating (EU-004)**

**Company Name: Tenneco Automotive
Address City IN Zip: 503 Weatherhead Street, Angola, IN 46703
Permit Number: 151-25140-00015
Pit ID: 151-00015
Reviewer: Jason R. Krawczyk
Date: July 31, 2008**

Uncontrolled Emissions

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	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Rust Inhib WD Blk	11.15	5.00%	0.0%	5.00%	0.0%	53.20%	0.00124	260	0.56	0.56	0.18	4.32	0.79	0.00	1.05	100%

Total State Potential Emissions: 0.18 4.32 0.79 0.00

Controlled Emissions

Material	Density (Lb/Gal)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	VOC Control Efficiency	PM Control Efficiency	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)
Rust Inhib WD Blk	11.15	0.001241	260	0.01	260.00	0%	98%	0.56	0.56	0.18	4.32	0.79	0.00

Total State Potential Emissions: 0.18 4.32 0.79 0.00

Note:

METHODOLOGY:

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Uncontrolled Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Uncontrolled Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Controlled Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs) * (1- Control Efficiency)
Controlled Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs) * (1 - Control Efficiency)

**Appendix A: Emission Calculations
HAP Emissions
From Dip Coating (EU-004)**

Company Name: Tenneco Automotive
Address City IN Zip: 503 Weatherhead Street, Angola, IN 46703
Permit Number: 151-25140-00015
Pit ID: 151-00015
Reviewer: Jason R. Krawczyk
Date: July 31, 2008

Uncontrolled Emissions

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Formaldehyde	Weight % Ethyl Benzene	Weight % Methyl Isobutyl	Weight % Glycol Ethers	Weight % Tetrachloroethylene	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Ehtyl Benzene Emissions (ton/yr)	Methyl Isobutyl Ketone (ton/yr)	Glycol Ethers Emissions (ton/yr)	Tetrachloroethylen e Emissions (ton/yr)
Rust Inhib WD Blk	11.15	0.001241	260	0.00%	0.00%	0.00%	0.00%	0.00%	5.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.79	0.00
Total State Potential Emissions:											0.00	0.00	0.00	0.00	0.00	0.79	0.00

Total Combined HAPS: 0.79

Controlled Emissions

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Control Efficiency (%)	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)	Methyl Isobutyl Ketone Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Tetrachloroethylen e Emissions (ton/yr)
Rust Inhib WD Blk	11.15	0.013835	260	0%	0.00	0.00	0.00	0.00	0.00	0.79	0.00
Total State Potential Emissions:					0.00	0.00	0.00	0.00	0.00	0.79	0.00

Total Combined HAPS: 0.79

Note:

METHODOLOGY:

Uncontrolled HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Controlled HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs * (1-control efficiency)

**Appendix A: Emissions Calculations
Welding and Thermal Cutting**

Company Name: Tenneco Automotive
Address City IN Zip: 503 Weatherhead Street, Angola, IN 46703
Permit Number: 151-25140-00015
Plt ID: 151-00015
Reviewer: Jason R. Krawczyk
Date: July 31, 2008

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)	
			PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr		
WELDING												
Flashbutt	3	12.75	0.2304	0.000318	1.00E-06	1.00E-06	8.813	0.012	0.000	0.0000	0.012	
Metal Inert Gas (MIG)(E70S-6)	2	10.84	0.0052	0.000318	1.00E-06	1.00E-06	0.113	0.007	0.000	0.0000	0.007	
Metal Inert Gas (MIG)(E70S-6)	6	8.2	0.0052	0.000318	1.00E-06	1.00E-06	0.256	0.016	0.000	0.0000	0.016	
Tungsten Inert Gas (TIG)	1	1	0.0384	0.0005	1.00E-06	1.00E-06	0.038	0.001	0.000	0.0000	0.001	
Resistance Welder	2	0	0	0	1.00E-06	1.00E-06	0.000	0.000	0.000	0.0000	0.000	
Upset Resistance Welder	1	0	0	0	1.00E-06	1.00E-06	0.000	0.000	0.000	0.0000	0.000	
EMISSION TOTALS												
Potential Emissions lbs/hr							9.22					0.04
Potential Emissions lbs/day							221.27					0.85
Uncontrolled Potential Emissions tons/year							40.38					0.16
Controlled Potential Emissions tons/year*							0.40					0.16

Note:

* Particulate is controlled by two torit dust collectors each with a 99.0% control efficiency. HAPs have no control device.

Methodology:

Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.

Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(maximum time of welding, emission factor, lb. pollutant/lb. of electrode used)

Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day

Uncontrolled Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.

Controlled Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs x (1-control efficiency)

**Appendix A: Emission Calculations
PM/ PM 10 Emissions
From Wheelabrator Blasting**

**Company Name: Tenneco Automotive
Address City IN Zip: 503 Weatherhead Street, Angola, IN 46703
Permit Number: 151-25140-00015
Plt ID: 151-00015
Reviewer: Jason R. Krawczyk
Date: July 31, 2008**

Emission Unit Description	Outlet Grain Loading (gr/acf)	Control Device Fan Flow Rate (acfm)	Control Efficiency (%)	Potential PM/PM10 Emission Rate				Process Weight Rate (lb/hr)	326 IAC 6-3-2 PM Emission Rate (lb/hr)	326 IAC 6-3-2 PM Emission Rate (tons per year)
				Before Controls (lb/hr)	Before Controls (tons/yr)	After Controls (lb/hr)	After Controls (tons/yr)			
Wheelabrator Dust Collector ¹	0.015	3,600	99.00%	0.46	2.03	0.00	0.02	1,000	2.58	11.29
				(will be able to comply)						
Total Potential to Emit PM/PM10:				0.46	2.03	0.00	0.02			

Notes:

1. The Wheelabrator Dust Collector serves as a control for the wheelabrator tumble blasters EU-003A, EU-003B, and EU-003C.

Methodology:

Potential Uncontrolled Emissions (tons/yr) = Outlet Loading (grains/acf) * Fan Flow Rate (acfm) * 1 lb/7,000 grains * 60 min/hr * 8760 hr/yr * 1 ton/2,000 lbs
 Potential Controlled Emissions (tons/yr) = Outlet Loading (grains/acf) * Fan Flow Rate (acfm) * 1 lb/7,000 grains * 60 min/hr * 8760 hr/yr * 1 ton/2,000 lbs * (1 - Control Efficiency)

The allowable PM emission rate pursuant to 326 IAC 6-3-2(e), for weight rates up to 60,000 lb/hr is determined using the following formula:

$$E = 4.1 * P^{0.67} \quad \text{where:} \quad E = \text{allowable PM emission rate (lb/hr)}$$

$$P = \text{process weight rate (tons/hr)}$$

**Appendix A: Emission Calculations
PM/ PM 10 Emissions
From Cooling Towers**

Company Name: Tenneco Automotive
Address City IN Zip: 503 Weatherhead Street, Angola, IN 46703
Permit Number: 151-25140-00015
Plt ID: 151-00015
Reviewer: Jason R. Krawczyk
Date: July 31, 2008

A. Potential emissions for one Cooling Tower

COOLING TOWER EMISSIONS					
Operation	Maximum Capacity	Total Drift Loss	PM Emission Factor	PM/PM10 Emissions	PM/PM10 Emissions
	(gal/hr)	(%)	(lb/1000 gal)	(lb/hr)	(tons/yr)
Cooling Tower	23,400	0.00500%	0.019	0.022	0.097

B. Total Potential emissions from two Cooling Towers

Pollutant	Potential Emissions (lb/hr)	Potential Emissions (TPY)
PM	0.04	0.19

Note: Emission Factors for Cooling Towers are from AP-42, Chapter 13.4, Table 13.4-1

Methodology:

Potential Emissions, lbs/hr = Max. Rate (gal/hr) x Total Drift Loss (%) x Emission Factor (lb/gal)

Potential Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/day x 1ton/2,000 lbs.

Appendix A: Emission Calculations

**VOC Emissions
From Cold Cleaners**

Company Name: Tenneco Automotive
Address City IN Zip: 503 Weatherhead Street, Angola, IN 46703
Permit Number: 151-25140-00015
Plt ID: 151-00015
Reviewer: Jason R. Krawczyk
Date: July 31, 2008

(3) Cold Cleaner Degreasing Operations

Material	Process	Density (lb/gal)	Annual Usage (gal)*	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non Volatiles (Solids)	Gal of Mat (gal/day)	Potential VOC (lb/hr)	Potential VOC (lb/day)	Potential VOC (tons/yr)
Safety Clean 105	Degreaser	6.7	200	100.00%	0.00%	100.00%	0.00%	0.00%	0.55	0.15	3.67	0.67
Total:										0.15	3.67	0.67

Notes:

* Usage data back calculated from Compliance Consulting calculations which used Tanks 4.0 emission rates.
 Annual Usage = 1,340 pounds per year potential VOC / Density (lb/gal)

Methodology:

Gallons of Material (gal/day) = Annual emissions / 365

**Appendix A: Emission Calculations
VOC / HAP Emissions
From Insignificant Activities**

Company Name: Tenneco Automotive
Address City IN Zip: 503 Weatherhead Street, Angola, IN 46703
Permit Number: 151-25140-00015
Plt ID: 151-00015
Reviewer: Jason R. Krawczyk
Date: July 31, 2008

Process / Emission Units	Density (lb/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Annual Usage (gal/yr)	Pounds VOC per gallon of solvent less water	Pounds VOC per gallon of solvent	Potential VOC (lbs/hr)	Potential VOC (lbs/day)	Potential VOC (tons/yr)
Rust Inhibitor Exhaust Hood	8.50	70.00%	0.0%	70.00%	0.0%	30.00%	220	5.95	5.95	0.15	3.59	0.65

Note:

Information was derived from the CP 4275 solvent MSDS.

Methodology:

Potential VOC (lbs/hr) = Annual Usage (gal/yr) * Weight % Organics * Density (lb/gal) / 8760 hrs
 Potential VOC (lbs/day) = Potential VOC (lbs/hr) * 24 hrs
 Potential VOC (tons/yr) = Potential VOC (lbs/hr) * 8760 hrs / 2000lbs

Process / Emission Units	Density (lb/gal)	Annual Usage (gal)	Weight % Diethanalomine	Potential HAP (lbs/yr)	Potential HAP (tons/yr)
Phosphate Clean and Rust Inhibitor Exhaust Hood	8.5	220	10%	187	0.09

Note:

The MSDS for CP4275 states the percentage of Diethanalomine in the solvent ranges from 1% to 10%.

Methodology:

Potential HAP (lbs/yr) = Density (lb/gal) * Annual usage * Weight % HAP
 Potential HAP (tons/yr) = Density (lb/gal) * Annual usage * Weight % HAP / 2000 lbs

Process / Emission Units	No.Units	Surface Area (m ²)	Molecular Weight	Vapor pressure (Pascals)	Mass Transfer Rate	Universal Gas Constant	Temperature (K°)	Evaporation Rate (kg/sec)	Potential VOC (lb/yr)	Potential VOC (ton/yr)
Ethylene Glycol Tanks	4	1	62.07	10.67	0.002	8314	507	1.3E-06	87.35	0.04

Methodology:

Evaporation Rate = (No. Units * Surface Area (m2) * Vapor Pressure * Mass Transfer) / (Universal Gas * Temperature (K°))
 Potential VOC (lb/yr) = Evaporation Rate * (60 seconds / 1 minute) * (60 minutes / 1 hour) * (8760 hours / 1 year) * 2.2004622622
 Potential VOC (ton/yr) = Potential VOC (lb/yr) / (2000 lbs / 1 ton)

Process / Emissions Units	Density (lb/gal)	Annual Usage (gal)	Emission Factor (lb/lb)	Potential VOC (lb/hr)	Potential VOC (lb/yr)	Potential VOC (tons/yr)
Chlorinate Tanks	8.44	216	3.28E-03	0.001	5.98	0.003

Methodology:

Potential VOC (lb/hr) = Density (lb/gal) * Annual Usage (gal) * Emission Factor / (8760 hrs / 1 yr)
 Potential VOC (lb/yr) = Density (lb/gal) * Annual Usage (gal) * Emission Factor
 Potential VOC (ton/yr) = Potential VOC (lb/yr) / (2000 lbs / 1 ton)