



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
MC 61-53 IGCN 1003
(317) 232-8603
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TO: Interested Parties / Applicant

DATE: October 25, 2007

RE: Sullair Corporation, Subsidiary of Hamilton Sundst / 091-25145-00017

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

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this approval is effective immediately, unless a petition for stay of effectiveness is filed and granted, 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 4-21.5-3-7 and IC 13-15-7-3 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 Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER-MOD.dot 03/23/06



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Jeanie Downs, Environmental, Health & Safety Manager
Sullair Corporation, Subsidiary of Hamilton Sundstrand
3700 East Michigan Blvd.
Michigan City, IN 46360

Re: F091-25145-00017
First Minor Permit Revision to
FESOP No. F091-23224-00017

Dear Mr. Hauke:

Sullair Corporation, Subsidiary of Hamilton Sundstrand was issued a Federally Enforceable State Operating Permit (PESOP) on July 12, 2007, for a stationary industrial air and gas compressor manufacturing source, located at 3700 East Michigan Boulevard, Michigan City, Indiana, 46360. On July 20, 2007 the Office of Air Quality (OAQ) received an application from the source relating to the construction of a stationary diesel-fired electric generator, and several administrative corrections, including; a clarification of stack identification numbers in Building 2 and the Test Cell Area, a correction to Condition D.1.14(c) of the permit to reflect that applicable requirements should apply to Building 2 Paint Booth 2 only, and corrections to several non-regulated insignificant activity descriptions. The new stationary diesel-fired electric generator will not cause the source's potential to emit to be greater than the threshold levels specified in 326 IAC 2-2 or 326 IAC 2-7, since the Permittee has elected to limit annual hours of operation for the diesel-fired electrical generator to 1000 hours per year, and since the entire source (including the diesel-fired electric generator) will continue to be limited to less than the Part 70 and/or PSD major source threshold levels, respectively. These changes to the permit, F091-23224-00017, issued on July 12, 2007, are considered a change by Minor Permit Revision (MPR) pursuant to 326 IAC 2-8-11.1(d)(5)(B) and is hereby approved as described in the attached Technical Support Document (TSD).

The following 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 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 minor permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Attached is a copy of the 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 Hannah L. Desrosiers, of my staff, at 317-234-5374 or 1-800-451-6027, and ask for extension 4-5374.

Sincerely,

Nisha Sizemore, Chief
Permits Branch
Office of Air Quality

Attachments
NS/hld

cc: File – LaPorte County
LaPorte County Health Department
Air Compliance Section Inspector – Letty Zapeda
Compliance Data Section
Permits Administrative and Development
Technical Support and Modeling
Billing, Licensing, and Training Section - Dan Stamatkin
IDEM Northwest Regional Office
US EPA Region 5



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Federally Enforceable State Operating Permit OFFICE OF AIR QUALITY

**Sullair Corporation, Subsidiary of Hamilton Sundstrand
3700 East Michigan Blvd.
Michigan City, Indiana 46360**

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

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

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

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

Operation Permit No.: F091-23224-00017	
Original issued by: Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: July 12, 2007 Expiration Date: July 12, 2012
First Minor Permit Revision No. F091-25145-00017	Affected Pages: Entire permit.
Issued by: <i>Original signed by Iryn Calilung for</i> Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: October 25, 2007 Expiration Date: July 12, 2012

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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.4 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 industrial air and gas compressor manufacturing.

Source Address:	3700 E. Michigan Blvd., Michigan City, Indiana 46360
Mailing Address:	3700 E. Michigan Blvd., Michigan City, Indiana 46360
General Source Phone Number:	219-879-5461
SIC Code:	3563
County Location:	LaPorte
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) One (1) spray paint booth, identified as Large Paint Booth, constructed prior to 1975 with a maximum throughput of 10 metal compressor parts per hour, equipped with electrostatic air atomized spray equipment and dry filters for particulate matter overspray control and exhausting through stacks 67, 68, 69, and 70.
- (b) One (1) spray paint booth, identified as Building 2 Paint Booth, constructed in 2003, with a maximum throughput of 20 metal compressor parts per hour, equipped with air atomization spray equipment and dry filters for particulate matter overspray control and exhausting through stack 211.
- (c) One (1) cold solvent cleaning system, constructed after July 1, 1990, with a maximum solvent usage of 48,907 pounds per year.
- (d) One (1) test cell building, consisting of nine (9) test bays and two (2) outdoor concrete test pads, constructed in 1993, accommodating portable internal combustion diesel oil-fired machines, with nine (9) test bays exhausting through stacks 78, 79, 81, 82, 85, 86, 87, 89, 94, 95, 96, 97, 98, 99, 100, 103, 104, and 105, and two (2) concrete test pads exhausting directly outside with a maximum capacity of 16.0 MMBtu/hr, total.
- (e) One (1) final startup area, located within Building 1, accommodating finished portable internal combustion diesel oil-fired machines (product) during the final check before shipment, exhausting through stacks 101 and 102.
- (f) One (1) internal combustion diesel-fired electric generator, approved for construction in 2007, used to generate electric power, with a maximum power output rate of 740 horsepower, firing diesel fuel only, operating no more than 1000 hours per year using no control and exhausting to the atmosphere.

A.3 Specifically Regulated 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 which are specifically regulated, as defined in 326 IAC 2-7-1(21).

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, including, but not limited to four (4) boilers, identified as B-01 through B-04, constructed in 1993, with a maximum throughput of 0.175 MMBtu/hr, total. [326 IAC 6-2-4]
- (b) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
- (c) Brazing and welding operations. [326 IAC 6-3-2]
- (d) Air from test compressors, which are exhausted into the building and may contain trace levels of lubricating oil particulate. Particulate emissions are less than 0.1 pound per hour. [326 IAC 6-3-2]

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

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

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, F091-23224-00017, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. 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 F091-23224-00017 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.25 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] [326 IAC 2-2]

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

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period;
- (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 one hundred (100) tons per twelve (12) consecutive month period. This limitation shall make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) not applicable.

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

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

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

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

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

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

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

All required notifications shall be submitted to:

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

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

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

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

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

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

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

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

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

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

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

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

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

(a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.

(b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.
- (f) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

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 EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Spray paint booths and cold solvent cleaning system

- (a) One (1) spray paint booth, identified as Large Paint Booth, constructed prior to 1975 with a maximum throughput of 10 metal compressor parts per hour, equipped with electrostatic air atomized spray equipment and dry filters for particulate matter overspray control and exhausting through stacks 67, 68, 69, and 70.
- (b) One (1) spray paint booth, identified as Building 2 Paint Booth, constructed in 2003, with a maximum throughput of 20 metal compressor parts per hour, equipped with air atomization spray equipment and dry filters for particulate matter overspray control and exhausting through stack 211.
- (c) One (1) cold solvent cleaning system, constructed after July 1, 1990, with a maximum solvent usage of 48,907 pounds per year.

(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) [326 IAC 2-8-4] [326 IAC 8-6-2(a)]

The total volatile organic compound (VOC) delivered to the coating applicators in the two (2) spray paint booths (Large Paint Booth and Building 2 Paint Booth), and the VOCs used in the one (1) cold solvent cleaning system shall be limited to less than 95.5 tons per twelve (12) consecutive month period. This limit in combination with Condition D.2.1 will limit the VOC emissions from the entire source to less than one hundred (100) tons per year. Therefore, the requirements of 326 IAC 2-7 do not apply. This limit will also satisfy the requirements of 326 IAC 8-6-2(a).

D.1.2 Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4]

- (a) The amount of any single HAP delivered to the coating applicators in the two (2) spray paint booths (Large Paint Booth and Building 2 Paint Booth), and used at the one (1) cold solvent cleaning system shall be limited to less than 9.9 tons per twelve (12) consecutive month period. This will limit the individual HAP emissions from the entire source to less than ten (10) tons per year.
- (b) The combination of HAPs delivered to the coating applicators in the two (2) spray paint booths (Large Paint Booth and Building 2 Paint Booth), and the total HAPs used in the one (1) cold solvent cleaning system shall be less than 24.8 tons per twelve (12) consecutive month period. This in combination with Condition D.2.1 will limit the total HAP emissions from the entire source to less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 2-7 do not apply.

D.1.3 Particulate Matter [326 IAC 2-8-4]

- (a) The coatings applied by the two (2) spray paint booths (Large Paint Booth and Building 2 Paint Booth) shall be limited such that total PM emissions shall not exceed 95.5 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) The coatings applied by the two (2) spray paint booths (Large Paint Booth and Building 2 Paint Booth) shall be limited such that the total PM₁₀ emissions shall not exceed 95.5 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with these limits, in combination with Condition D.2.1, D.3.1 and potential PM/PM₁₀ emissions from insignificant activities shall limit source-wide PM/PM₁₀ emission to less than one-hundred (100) tons per year and will render the requirements of 326 IAC 2-7 not applicable with respect to PM and PM₁₀.

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

- (a) Pursuant to 326 IAC 8-2-9, the owner or operator of the one (1) spray paint booth, identified as Building 2 Paint Booth, shall not allow the discharge into the atmosphere of VOC in excess of three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the applicators, for air dried, forced warm air dried or extreme performance coatings.
- (b) Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment of the one (1) spray paint booth, identified as Building 2 Paint Booth, 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.1.5 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating manufacturing processes shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.1.6 Volatile Organic Compounds (VOC) [326 IAC 8-3-2] [326 IAC 8-3-5]

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of the cold solvent cleaning system shall ensure that the following requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38° C) (one hundred degrees Fahrenheit (100° F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38° C) (one hundred degree Fahrenheit (100° F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

- (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury of six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38° C) (one hundred degrees Fahrenheit (100° F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9° C) (one hundred twenty degrees Fahrenheit (120° F)):
- (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon absorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of the cold solvent cleaning system shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.
- (c) Compliance with these conditions shall also ensure compliance with 326 IAC 8-3-2.

D.1.7 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

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

-
- (a) Compliance with the VOC usage limitation contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating and solvent manufacturers.
- (b) Compliance with the VOC content limit in Conditions D.1.4(a) shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis. This volume weighted average shall be determined by the following equation:

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

Where: A is the volume weighted average in pounds VOC per gallon less water as applied;
C is the VOC content of the coating in pounds VOC per gallon less water as applied; and
U is the usage rate of the coating in gallons per day.

D.1.9 VOC Emissions

- (a) Compliance with Condition D.1.1 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the twelve (12) month period.
- (b) Compliance with Condition D.1.4(a) shall be demonstrated within 30 days of the end of each day based on the total volatile organic compound usage for the day.

D.1.10 Hazardous Air Pollutants (HAPs)

Compliance with the HAPs usage limitations contained in Condition D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating and solvent manufacturers. Compliance with Condition D.1.2 shall be demonstrated within 30 days of the end of each month based on the total single and total combination of HAPs usage for the twelve (12) month period.

D.1.11 Particulate Matter (PM/PM₁₀) Emissions Determination

Compliance with Conditions D.1.3 (a) and D.1.3 (b) shall be determined by calculating the PM/PM₁₀ emissions associated with each coating applied by the two spray paint booths (Large Paint Booth and Building 2 Paint Booth) using the following equation:

$$PM/PM_{10} = CU \times D \times W\%S \times (1-TE/100) \times (1-CE/100) \times 1/2000$$

Where:

- PM/PM₁₀ = The total PM/PM₁₀ emissions (ton/month) for a given coating.
- CU = The total coating used (gal coating/month) of a given coating.
- D = The density (lb coating/gal coating) of a given coating.
- W%S = The weight percent solids (lb solids/lb coating) of a given coating.
- TE = The transfer efficiency (%) of the spray applicators. This value shall equal 50% or a value determined from the most recent valid compliance demonstration.
- CE = The control efficiency (%) of the dry filters. This value shall equal 98% or a value determined from the most recent valid compliance demonstration.

The total PM/PM₁₀ emissions (ton/month) from spray paint booths (Large Paint Booth and Building 2 Paint Booth) is equal to the sum of the PM/PM₁₀ emissions associated with each coating applied by those booths.

D.1.12 Testing Requirements [326 IAC 2-1.1-11]

- (a) The Permittee shall conduct performance tests to verify the transfer efficiency and particulate matter control efficiency requirements in Condition D.1.3(c) and (d).
- (b) No later than 180 days after issuance of F091-23224-00017, the Permittee shall conduct transfer efficiency testing on one (1) of the booths subject to Condition D.1.3. The testing shall be done on a booth that has not been tested in the past ten (10) years. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted using methods approved by the Commissioner and in accordance with 326 IAC 3-6-3 and Section C - Performance Testing.

- (c) No later than 180 days after issuance of F091-23224-00017, the Permittee shall conduct control efficiency testing on the dry filters used by one (1) of the booths subject to Condition D.1.3. The testing shall be done on filters that have not been tested in the past ten (10) years. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted using methods approved by the Commissioner and in accordance with 326 IAC 3-6-3 and Section C - Performance Testing.

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

D.1.13 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particulate loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (64, 65, 67, 68, 69, 70 and 2 through 11) while one or more of the booths exhausting to that stack are in operations. 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)]

D.1.14 Record Keeping Requirement

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Condition D.1.1, the HAP usage limits and the HAP emission limits established in Condition D.1.2.
- (1) The VOC and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup and degreasing solvents;
 - (2) The cleanup solvent usage for each month;
 - (3) The degreasing solvent usage for each month;
 - (4) The total VOC, total individual HAP and total combination of HAPs usage for each month, and
 - (5) The weight of VOCs and total HAPs emitted for each compliance period.

- (b) To document compliance with Condition D.1.3, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken monthly and shall be complete and sufficient to demonstrate compliance with the PM/PM₁₀ emission limits established in Condition D.1.3.
 - (1) The amount of each coating material used (as applied). Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (2) The density and weight percent solids of each coating material used (as applied).
- (c) To document compliance with Conditions D.1.4 (a) and (b), the Permittee shall maintain records in accordance with (1) through (3) below for Building 2 Paint Booth. Records maintained for (1) through (3) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits established in Conditions D.1.4 (a) and (b).
 - (1) The VOC content of each coating material and solvent used less water.
 - (2) The amount of coating material and solvent used on daily basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvent.
 - (3) The volume weighted average VOC content of the coatings used for each day.
- (d) To document compliance with Conditions D.1.3 and D.1.5, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.15 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1, D.1.2, and D.1.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the report 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)]: Test Cells

- (d) One (1) test cell building, consisting of nine (9) test bays and two (2) outdoor concrete test pads, constructed in 1993, accommodating portable internal combustion diesel oil-fired machines, with nine (9) test bays exhausting through Stacks 78, 79, 81, 82, 85, 86, 87, 89, 94, 95, 96, 97, 98, 99, 100, 103, 104 and 105, and two (2) concrete test pads exhausting directly outside with a maximum capacity of 16.0 MMBtu/hr, total.
- (e) One (1) final startup area, located within Building 1, accommodating finished portable internal combustion diesel oil-fired machines (product) during the final check before shipment, exhausting through stacks 101 and 102.

(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 FESOP Limits and PSD Minor Source Status [326 IAC 2-2] [326 IAC 2-8-4]

Pursuant to F091-5794-00017, issued December 10, 1996, the throughput of diesel fuel at the source shall not exceed 100,000 gallons per twelve (12) consecutive month period, with compliance determined at the end of each month. The PM/PM₁₀ emissions from the test cell building shall not exceed 0.31 pound per MMBtu, the NO_x emissions shall not exceed 4.41 pounds per MMBtu and the VOC emissions shall not exceed 0.4 pound per MMBtu. These limits in combination with Conditions D.1.1, D.1.3 and D.3.1 shall limit the potential to emit of VOC, PM₁₀ and NO_x from the entire source to less than one-hundred (100) tons per year and shall make the requirements of 326 IAC 2-7, not applicable. Since this limits NO_x emissions to less than 250 tons per twelve (12) consecutive month period, the requirements for 326 IAC 2-2, Prevention of Significant Deterioration, is also not applicable.

D.2.2 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 this facility.

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

D.2.3 Visible Emissions Notations

- (a) Visible emission notations of the test bays stack exhausts shall be performed once per day during normal daylight operations. 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.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-26]

D.2.4 Record Keeping Requirements

- (a) To document compliance with Condition D.2.3, the Permittee shall maintain records of the amount of diesel fuel used each month and the monthly average heating value of the fuel.
- (b) To document compliance with Condition D.2.4, the Permittee shall maintain a daily record of visible emission notations of the test bays stacks exhausts. 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, (i.e. 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.

D.2.5 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Diesel-fired electric generator

- (f) One (1) internal combustion diesel-fired electric generator, approved for construction in 2007, used to generate electric power, with a maximum power output rate of 740 horsepower, firing diesel fuel only, operating no more than 1000 hours per year using no control and exhausting to the atmosphere.

(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 FESOP Limits [326 IAC 2-8-4] [326 IAC 2-4.1]

The operating hours for the diesel-fired electric generator shall not exceed 1000 hours per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with this limit will satisfy 326 IAC 2-8-4 and render the requirements of Part 70 (326 IAC 2-7) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

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

D.3.2 Record Keeping Requirements

- (a) To document compliance with Condition D.3.1, the Permittee shall maintain monthly records of the operating hours for the diesel-fired electric generator.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.3 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.3.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.4

FACILITY OPERATION CONDITIONS

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, including, but not limited to four (4) boilers, identified as B-01 through B-04, constructed in 1993, with a maximum throughput of 0.175 MMBtu/hr, total. [326 IAC 6-2-4]
- (c) Brazing and welding operations. [326 IAC 6-3-2]
- (d) Air from test compressors, which are exhausted into the building and may contain trace levels of lubricating oil particulate. Particulate emissions are less than 0.1 pound per hour. [326 IAC 6-3-2]

(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.4.1 Particulate Matter Limitation (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4(a), for indirect heating units constructed after September 1, 1983 and having a total source heat input capacity less than 10 million British thermal units per hour, the PM emission shall not exceed 0.6 pounds per million British thermal unit. Therefore, the PM from the four (4) insignificant boilers (B-1 through B-4) is limited to 0.6 pound per million British thermal units.

D.4.2 Particulate Matter (PM) [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2(e), the PM from the insignificant brazing and welding and coating with spray cans shall not exceed 0.551 pound per hour when operating at a process weight rate of less than 100 pounds per hour. When operating at a process weight rate of 100 pounds per hour or more, the PM shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for process weight rates up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

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

- (b) Pursuant to 326 IAC 6-3-2(e), the particulate matter from the test compressors shall not exceed 0.551 pounds per hour when operating at a process weight rate of less than 100 pounds per hour. When operating at a process weight rate of 100 pounds per hour or more, the particulate matter shall not exceed the pounds per hour emission rate established as E in the following formula:

Interpolation of the data for process weight rates up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

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

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Sullair Corporation, Subsidiary of Hamilton Sundstrand
Source Address: 3700 E. Michigan Blvd., Michigan City, Indiana 46360
Mailing Address: 3700 E. Michigan Blvd., Michigan City, Indiana 46360
FESOP Permit No.: F091-23224-00017

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

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

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

Source Name: Sullair Corporation, Subsidiary of Hamilton Sundstrand
Source Address: 3700 E. Michigan Blvd., Michigan City, Indiana 46360
Mailing Address: 3700 E. Michigan Blvd., Michigan City, Indiana 46360
FESOP Permit No.: F091-23224-00017

This form consists of 2 pages

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- | |
|--|
| <p><input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

FESOP Quarterly Report

Source Name: Sullair Corporation, Subsidiary of Hamilton Sundstrand
 Source Address: 3700 E. Michigan Blvd., Michigan City, Indiana 46360
 Mailing Address: 3700 E. Michigan Blvd., Michigan City, Indiana 46360
 FESOP Permit No.: F091-23224-00017
 Facility: Two (2) spray paint booths (Large Paint Booth and Building 2 Paint Booth and one (1) cold solvent cleaning system)
 Parameter: VOC delivered to the applicators at the two (2) paint booths plus VOC usage at the solvent cleaning system
 Limit: Less than 95.5 tons per twelve (12) consecutive month period, total

YEAR: _____

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

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

Submitted by: _____
 Title / Position: _____
 Signature: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Sullair Corporation, Subsidiary of Hamilton Sundstrand
 Source Address: 3700 E. Michigan Blvd., Michigan City, Indiana 46360
 Mailing Address: 3700 E. Michigan Blvd., Michigan City, Indiana 46360
 FESOP Permit No.: F091-23224-00017
 Facility: Two (2) spray paint booths (Large Paint Booth and Building 2 Paint Booth and one (1) cold solvent cleaning system
 Parameter: The worst case single HAP delivered to the coating applicators at the 2 spray paint booths and used at the solvent cleaning system
 Limit: Less than 9.9 tons per twelve (12) consecutive month period, total

YEAR: _____

Month	Worst Case Individual HAP (tons)	Worst Case Individual HAP (tons)	Worst Case Individual HAP (tons)
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

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

Submitted by: _____
 Title / Position: _____
 Signature: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Sullair Corporation, Subsidiary of Hamilton Sundstrand
 Source Address: 3700 E. Michigan Blvd., Michigan City, Indiana 46360
 Mailing Address: 3700 E. Michigan Blvd., Michigan City, Indiana 46360
 FESOP Permit No.: F091-23224-00017
 Facility: Two (2) spray paint booths (Large Paint Booth and Building 2 Paint Booth and one (1) cold solvent cleaning system)
 Parameter: The combination of HAPs delivered to the coating applicators in the two (2) spray paint booths and the total HAPs used a the one (1) cold solvent cleaning system
 Limit: Less than 24.8 tons per twelve (12) consecutive month period, total

YEAR: _____

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

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

Submitted by: _____
 Title / Position: _____
 Signature: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Sullair Corporation, Subsidiary of Hamilton Sundstrand
 Source Address: 3700 E. Michigan Blvd., Michigan City, Indiana 46360
 Mailing Address: 3700 E. Michigan Blvd., Michigan City, Indiana 46360
 FESOP Permit No.: F091-23224-00017
 Facility: Two (2) spray paint booths (Large Paint Booth and Building 2 Paint Booth and one (1) cold solvent cleaning system)
 Parameter: Total solids delivered to the applicators
 Limit: Less than 9,650 tons per twelve (12) consecutive month period

YEAR: _____

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

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

Submitted by: _____
 Title / Position: _____
 Signature: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Sullair Corporation, Subsidiary of Hamilton Sundstrand
 Source Address: 3700 E. Michigan Blvd., Michigan City, Indiana 46360
 Mailing Address: 3700 E. Michigan Blvd., Michigan City, Indiana 46360
 FESOP Permit No.: F091-23224-00017
 Facility: Test cell building and final start-up area
 Parameter: Diesel fuel throughput
 Limit: Less than 100,000 gallons per twelve (12) consecutive month period

YEAR: _____

Month	Fuel Throughput (gallons)	Fuel Throughput (gallons)	Fuel Throughput (gallons)
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

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

Submitted by: _____
 Title / Position: _____
 Signature: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Sullair Corporation, Subsidiary of Hamilton Sundstrand
Source Address: 3700 E. Michigan Blvd., Michigan City, Indiana 46360
Mailing Address: 3700 E. Michigan Blvd., Michigan City, Indiana 46360
FESOP Permit No.: F091-25145-00017
Facility: Diesel-fired electric generator
Parameter: Hours of Operation
Limit: Less than or equal to 1000 hours of operation per twelve (12) consecutive month period

YEAR: _____

Month	Hours of Operation	Hours of Operation	Hours of Operation
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

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

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION
 FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Sullair Corporation, Subsidiary of Hamilton Sundstrand
 Source Address: 3700 E. Michigan Blvd., Michigan City, Indiana 46360
 Mailing Address: 3700 E. Michigan Blvd., Michigan City, Indiana 46360
 FESOP Permit No.: F091-23224-00017

Months: _____ **to** _____ **Year:** _____

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Minor Permit Revision to a Federal Enforceable State Operating Permit (FESOP).

Source Description and Location

Source Name:	Sullair Corporation, Subsidiary of Hamilton Sundstrand
Source Location:	3700 East Michigan Blvd., Michigan City, IN 46360
County:	LaPorte
SIC Code:	3563
Operation Permit No.:	F091-23224-00017
Operation Permit Issuance Date:	July 12, 2007
Minor Permit Revision No.:	F091-25145-00017
Permit Reviewer:	Hannah L. Desrosiers

The OAQ has received an application from Sullair Corporation, Subsidiary of Hamilton Sundstrand, related to a modification to an existing stationary industrial air and gas compressor manufacturing source.

Existing Approvals

The source was issued FESOP No. F091-23224-00017 on July 12, 2007.

County Attainment Status

The source is located in LaPorte County.

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

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.

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC emissions and NO_x emissions are considered when evaluating the rule applicability relating to ozone. LaPorte County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.
- (b) LaPorte County has been classified as unclassifiable or attainment for PM_{2.5}. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM_{2.5} emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM_{2.5} emissions, it has directed states to regulate PM₁₀

emissions as a surrogate for PM2.5 emissions. See the State Rule Applicability – Entire Source section.

- (c) LaPorte 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. See the State Rule Applicability – Entire Source section.
- (d) Fugitive emissions are not counted toward determination of PSD or Emission Offset applicability 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, and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980.

Source Status

The table below summarizes the potential to emit of the entire source, prior to the proposed modification, after consideration of all enforceable limits established in the effective permits:

Pollutant	Emissions (tons/year)
PM	97.62
PM10	97.62
SO ₂	1.99
VOC	97.97
CO	6.61
NO _x	30.2
HAPs	9.93

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).
- (b) This existing source is not a major stationary source under Emission Offset (326 IAC 2-3) because no nonattainment regulated pollutant is emitted at a rate of 100 tons per year or more.
- (c) This existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because the Permittee has accepted limits on HAPs emissions to less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).
- (d) These emissions are based upon FESOP No. F091-23224-00017, issued July 12, 2007.

Existing Emission Units and Pollution Control Equipment Summary
--

- (a) This stationary source consists of the following emission units and pollution control devices:
 - (1) One (1) spray paint booth, identified as Large Paint Booth, constructed prior to 1975 with a maximum throughput of 10 metal compressor parts per hour, equipped with electrostatic air atomized spray equipment and dry filters for particulate matter overspray control and exhausting through stacks 67, 68, 69, and 70.
 - (2) One (1) spray paint booth, identified as Building 2 Paint Booth, constructed in 2003, with a maximum throughput of 20 metal compressor parts per hour, equipped with air atomization spray equipment and dry filters for particulate matter overspray control and exhausting through stack 211.

- (3) One (1) cold solvent cleaning system, constructed after July 1, 1990, with a maximum solvent usage of 48,907 pounds per year.
 - (4) One (1) test cell building, consisting of nine (9) test bays and two (2) outdoor concrete test pads, constructed in 1993, accommodating portable internal combustion diesel oil-fired machines, with nine (9) test bays exhausting through stacks 78, 79, 81, 82, 85, 86, 87, 89, 94, 95, 96, 97, 98, 99, 100, 103, 104 and 105, and two (2) concrete test pads exhausting directly outside with a maximum capacity of 16.0 MMBtu/hr, total.
- (b) This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21).
- (1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, including, but not limited to four (4) boilers, identified as B-01 through B-04, constructed in 1993, with a maximum throughput of 0.175 MMBtu/hr, total.
 - (2) Paved and unpaved roads and parking lots with public access.
 - (3) Brazing and welding operations.
 - (4) Air from test compressors, which are exhausted into the building and may contain trace levels of lubricating oil particulate. Particulate emissions are less than 0.1 pound per hour.
- (c) This stationary source also includes the following non-regulated insignificant activities, as defined in 326 IAC 2-7-1(21), with emission units removed from the source shown as ~~strikethroughs~~ and new emission units shown in **bold**:
- (1) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to ten thousand five hundred (10,500) gallons, and dispensing less than or equal to two hundred thirty thousand (230,000) gallons per month.
 - (2) Vessels storing lubricating oil, hydraulic oils, machining oils, and machining fluids.
 - (3) Equipment used exclusively for filling drums, pails or other packaging containers with lubricating oils, waxes, and greases.
 - (4) Machining where an aqueous cutting coolant continuously floods the machining interface.
 - (5) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to one percent (1%) by volume.
 - (6) Antifreeze AST and portable compressor radiator filling operation; ethylene glycol; may qualify as a trivial activity with emissions less than one (1) pound per day.
 - (7) **Twenty five (25)** ~~Ten (10)~~ metal grinding machines that use machining oil as a cutting fluid; a small amount of particulate matter (PM) may be emitted as oil mist.
 - (8) Coating with spray cans with VOC emissions less than 15.0 pounds per day.

- (9) High-pressure steam washers for cleaning metals, using only non-VOC, non-HAP materials.
- (10) One (1) potassium hydrate stripping operation, using only non-VOC, non-HAP materials.
- (11) Handheld orbital sanders which are used for fine sanding of slight imperfections in the product metal work that may be identified during the manufacturing stages. These sanders are exhausted through a manifold system to a small local filtration unit as a means of eliminating worker exposure to the sanding materials. The filtration unit, having negligible emissions, exhausts **to the outside of the building** ~~inside the workroom~~.

Description of Proposed Revision

The Office of Air Quality (OAQ) has reviewed a Minor Permit Revision (MPR) application, submitted by Sullair Corporation, Subsidiary of Hamilton Sundstrand, on August 15, 2007, relating to the construction of a stationary diesel-fired electric generator, and several administrative corrections, including; a clarification of stack identification numbers in Building 2 and the Test Cell Area, a correction to compliance condition D.1.14(c) to reflect that applicable requirements should apply to Building 2 Paint Booth 2 only, and corrections to several non-regulated insignificant activity descriptions.

The following is a list of the proposed emission unit(s):

- (a) One (1) internal combustion diesel-fired generator, approved for construction in 2007, used to generate electric power, with a maximum power output rate of 740 horsepower, firing diesel fuel only, operating no more than 1000 hours per year using no control and exhausting to the atmosphere.

The Source also requests that the following administrative changes be made to their FESOP:

- (a) In permit condition A.2. Stack Identification:
 - (1) The Building 2 Spray Booth stack is currently identified as multiple stacks 2-11. The Building 2 Spray Booth only exhausts through one (1) stack, identified as No. 211.
 - (2) Three stacks, identified as Stack No. 103, 104 and 105, present in the existing Test Cell configuration, will be added to the facility description.
 - (3) Two (2) stacks, identified as Stack No. 101 and 102, present in Building 1 and used for the final start-up testing of completed processors prior to shipment, will be added.
- (b) In permit condition D.1.14(c) Record Keeping Requirement:
 - (1) The maintenance of daily records required for compliance with condition D.1.4(a) apply to Building 2 Spray Booth only, therefore, Large Paint Booth shall be stricken from the requirement.
- (c) Insignificant Activities listed in the TSD shall be revised as follows:
 - (1) Item (i): the number of metal grinding machines shall be changed from ten (10) to twenty-five (25).

- (2) Item (o): the filtration unit that services the handheld orbital sanders shall be changed from exhausting to the inside of the workroom to exhausting to the outside of the building.

Enforcement Issues

There are no pending enforcement actions.

Stack Summary

Stack ID	Operation	Stack Type	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
211	Building 2 Paint Booth	Vertical	25	2.5	9,750	77°
101 and 102	Building 1 Final Start-up	Vertical	26	0.5	50	150°
103, 104 and 105	Test Cell Building	Horizontal	13.5	0.75	50	150°

Emission Calculations

See Appendix A of this document for detailed emission calculations.

Permit Level Determination – FESOP Revision

Pursuant to 326 IAC 2-7-1(29), Potential to Emit is defined as “the maximum capacity of a stationary source or emission unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, IDEM, or the appropriate local air pollution control agency.”

The following table is used to determine the appropriate permit level under 326 IAC 2-8.11.1. This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Process Description	Potential to Emit (PTE) (tons/year)						
	PM	PM10	SO ₂	NO _x	VOC	CO	Total HAPs
Limited PTE of Existing Units (Before Modification)	97.62	97.62	1.99	30.2	97.97	6.61	9.93
Limited PTE of Existing Units (After Modification)	97.62	97.62	1.99	30.2	97.97	6.61	9.93
Change in Limited PTE of Existing Units (Modification) ⁽¹⁾	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Unlimited PTE of New Units (Modification)	0.82	0.47	0.24	26.39	0.74	7.01	0.04
Total PTE of Modification ⁽²⁾	0.82	0.47	0.24	26.39	0.74	7.01	0.04

(1) Change in Limited PTE of Existing Units = Limited PTE after Modification - Limited PTE Before Modification. For permit level determination, any decrease in limited PTE is indicated as zero.

(2) Total PTE of Modification = Change in Limited PTE of Existing Units + Unlimited PTE of New Units

Justification for Revision

Pursuant to 326 IAC 2-8-11.1(d)(5)(B), the FESOP is being modified through a Minor Permit Revision since the Source is requesting that the annual hours of operation for the diesel-fired electrical generator be limited to 1000 hours per year, thereby limiting the potential to emit to less than 25 tons per year of any regulated pollutant other than Hazardous Air Pollutants which shall be limited to less than ten (10) tons per year of any single hazardous air pollutant as defined under Section 112(b) of the CAA, or twenty-five (25) tons per year of any combination of hazardous air pollutants.

Potential to Emit 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. Values shown as ~~strikethrough~~ represent the PTE before revision and values shown in **bold** represent the PTE after revision.

Process/ emission unit	Potential To Emit (tons/year)						
	PM	PM ₁₀	SO ₂	VOC	NO _x	CO	HAPs
Paint Booths (Large Paint Booth and Building 2 Paint Booth)	Less than 95.5	Less than 95.5	-	Less than 95.5	-	-	Less than 9.9
Degreasing			-		-		
Test Cells Building	Less than 2.12	Less than 2.12	1.99	2.47	30.2	6.51	0.026
Natural Gas Combustion	-	-	-	-	-	0.1	-
Internal Combustion Engines - Diesel Fuel (>600 HP) ⁽¹⁾	0.09	0.05	0.03	0.08	3.01	0.80	0.004
Total Emissions	Less than 100	Less than 100	1.99 2.02	Less than 100	30.2 33.21	6.61 7.41	Limited to less than 10 tons single HAP and less than 25 tons total HAPS

(1) Source voluntarily limits maximum usage to ≤ 1000 hrs/yr

This revision to an existing minor stationary source is not major because the emissions increase is less than the PSD major source thresholds. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Since the unrestricted potential to emit of this source is greater than one hundred (100) tons per year of PM₁₀, volatile organic compounds (VOC), and nitrogen oxide (NO_x), the Permittee has elected to limit the potential to emit of this source by limiting the annual hours of operation for the diesel-fired electrical generator to 1000 hours per year. All other limits, established in prior permits and permit revisions, remain the same and in force.

After this revision, this source is still a minor source under 326 IAC 2-7 (Part 70 Permit).

Federal Rule Applicability Determination

The following federal rules are applicable to the source due to this modification:

- (a) The stationary diesel-fired electric generator is not subject to the requirements of the New Source Performance Standards for Stationary Compression Ignition Internal Combustion Engines (NSPS) (326 IAC 12 and 40 CFR Part 60, Subpart IIII) because the model year of the generator is prior to April 1, 2006 (March 28, 2006), and it is being constructed for the first time (no reconstruction or modification after July 11, 2005). As such, the requirements of 40 CFR 60, Subpart IIII are not included in the permit for the stationary diesel-fired electric generator.
- (b) There are no other New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) included in this proposed revision.
- (c) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Stationary Reciprocating Internal Combustion Engines, Subpart ZZZZ as the source is not a major source of HAPs.
- (d) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this proposed revision.

The source shall continue to comply with all applicable federal rule requirements and permit conditions as contained in FESOP No. F091-23224-00017.

State Rule Applicability Determination

The following state rules are applicable to the source due to the modification:

State Rule Applicability – Entire Source

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

This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1). This source has opted to continue to operate under 326 IAC 2-8 (FESOP) rules. The source-wide potential VOC and NOx emissions will each continue to be limited to less than one hundred (100) tons per year as part of this FESOP Revision. Therefore, 326 IAC 2-2 (PSD) is not applicable.

326 IAC 2-6 (Emission Reporting)

This source is located in LaPorte County, is not required to operate under a Part 70 Permit because the Permittee has taken limits under 326 IAC 2-8 (FESOP), and does not emit lead into the ambient air at levels greater than or equal to 5 tons per year. Therefore, 326 IAC 2-6 is not applicable.

326 IAC 2-8-4 (FESOP)

Pursuant to this rule, PM₁₀, VOC, and NOx emissions shall continue to be limited to less than one (100) tons per year. In addition, the amount of any single HAP shall continue to be limited to less than ten (10) tons per year and the combination of HAPs shall continue to be limited to less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 2-7 are not applicable.

- (a) Pursuant to F091-5794-00017, issued December 10, 1996, the throughput of diesel fuel at the source shall not exceed 100,000 gallons per twelve (12) consecutive month period, with compliance determined at the end of each month. The PM/PM₁₀ emissions from the test cell building shall not exceed 0.31 pound per MMBtu, the NOx emissions shall not exceed 4.41 pounds per MMBtu and the VOC emissions shall not

exceed 0.4 pound per MMBtu.

- (b) The operating hours for the diesel-fired electric generator shall not exceed 1000 hours per twelve (12) consecutive month period with compliance determined at the end of each month.

326 IAC 5-1 (Opacity Limitations)

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

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

326 IAC 6-4 (Fugitive Dust Emissions)

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

State Rule Applicability – Diesel Fired Generator

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

The diesel-fired generator, identified as G1, is not subject to the requirements of 326 IAC 6-3-2, because pursuant to 326 IAC 1-2-59, liquid and gaseous fuels and combustion air are not considered as part of the process weight. In addition, pursuant to 326 IAC 6-3-1(b)(14), the diesel fired generator is not subject to the requirements of 326 IAC 6-3-2 because the particulate emissions from the unit is less than 0.551 pounds per hour.

326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)

The diesel-fired generator, identified as G1, is not subject to the provisions of 326 IAC 6-2-4 (Emission Limitations for Sources of Indirect Heating) because this unit is not a source of indirect heating.

The source shall continue to comply with all other applicable state rule requirements and permit conditions as contained in FESOP No. F091-23224-00017.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-8 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 2-8-4. 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.

There are no compliance monitoring requirements included in this revision. The compliance monitoring requirements applicable to this existing source are as described in FESOP No. F091-23224-00017, issued July 12, 2007.

Proposed Changes

Sections A.2, D.1, D.3 and D.4 have been updated to include the addition of a stationary diesel-fired electric generator, and several administrative corrections, including; a clarification of stack identification numbers in Building 2 and the Test Cell Area, a correction to compliance condition D.1.14(c) to reflect that applicable requirements should apply to Building 2 Paint Booth 2 only, and corrections to several insignificant activity descriptions.

The changes listed below have been made to the Federally Enforceable State Operating Permit, No. F091-23224-00017. Deleted language appears as ~~strike throughs~~ and new language appears in **bold**:

...

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

The Permittee owns and operates a stationary industrial air and gas compressor manufacturing.

...

Source Location Status: ~~Nonattainment for 8-hour ozone standard~~
 Attainment for all other criteria pollutants

...

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) spray paint booth, identified as Large Paint Booth, constructed prior to 1975 with a maximum throughput of 10 metal compressor parts per hour, equipped with electrostatic air atomized spray equipment and dry filters for particulate matter overspray control and exhausting through stacks 67, 68, 69, and 70.
- (b) One (1) spray paint booth, identified as Building 2 Paint Booth, constructed in 2003, with a maximum throughput of 20 metal compressor parts per hour, equipped with air atomization spray equipment and dry filters for particulate matter overspray control and exhausting through **stack 211** ~~Stacks 2 through 14~~.
- (c) One (1) cold solvent cleaning system, constructed after July 1, 1990, with a maximum solvent usage of 48,907 pounds per year.
- (d) One (1) test cell building, consisting of nine (9) test bays and two (2) outdoor concrete test pads, constructed in 1993, accommodating portable internal combustion diesel oil-fired machines, with nine (9) test bays exhausting through ~~s~~Stacks 78, 79, 81, 82, 85, 86, 87, 89, 94, 95, 96, 97, 98, 99, ~~and~~ 100, **103, 104 and 105**, and two (2) concrete test pads exhausting directly outside with a maximum capacity of 16.0 MMBtu/hr, total.
- (e) **One (1) final startup area, located within Building 1, accommodating finished portable internal combustion diesel oil-fired machines (product) during the final check before shipment, exhausting through stacks 101 and 102.**
- (f) **One (1) internal combustion diesel-fired electric generator, approved for construction in 2007, used to generate electric power, with a maximum power output rate of 740 horsepower, firing diesel fuel only, operating no more than 1000 hours per year using no control and exhausting to the atmosphere.**

...

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

...

- (1) The potential to emit **any regulated pollutant, except particulate matter (PM), from** ~~of~~ the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period;

...

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

...

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

...

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Spray paint booths and cold solvent cleaning system

...

- (b) One (1) spray paint booth, identified as Building 2 Paint Booth, constructed in 2003, with a maximum throughput of 20 metal compressor parts per hour, equipped with air atomization spray equipment and dry filters for particulate matter overspray control and exhausting through stacks ~~2 through 14~~ **211**.

...

...

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

D.1.14 Record Keeping Requirement

...

- (c) To document compliance with Conditions D.1.4 (a) and (b), the Permittee shall maintain records in accordance with (1) through (3) below for ~~the two (2) spray paint booths, identified as Large Paint Booth and Building 2 Paint Booth.~~ Records maintained for (1) through (3) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits established in Conditions D.1.4 (a) and (b).

...

SECTION D.2 FACILITY OPERATION CONDITIONS

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

- (ed) One (1) test cell building, consisting of nine (9) test bays and two (2) outdoor concrete test pads, constructed in 1993, accommodating portable internal combustion diesel oil-fired machines, with nine (9) test bays exhausting through Stacks 78, 79, 81, 82, 85, 86, 87, 89, 94, 95, 96, 97, 98, 99, ~~and~~ 100, **103, 104 and 105**, and two (2) concrete test pads exhausting directly outside with a maximum capacity of 16.0 MMBtu/hr, total.

- (e) One (1) final startup area, located within Building 1, accommodating finished portable internal combustion diesel oil-fired machines (product) during the final check before shipment, exhausting through stacks 101 and 102.**

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

...

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Diesel-fired electric generator

- (f) One (1) internal combustion diesel-fired electric generator, approved for construction in 2007, used to generate electric power, with a maximum power output rate of 740 horsepower, firing diesel fuel only, operating no more than 1000 hours per year using no control and exhausting to the atmosphere.**

(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 FESOP Limits [326 IAC 2-8-4] [326 IAC 2-4.1]

The operating hours for the diesel-fired electric generator shall not exceed 1000 hours per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with this limit will satisfy 326 IAC 2-8-4 and render the requirements of Part 70 (326 IAC 2-7) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

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

D.3.2 Record Keeping Requirements

- (a) To document compliance with Condition D.3.1, the Permittee shall maintain monthly records of the operating hours for the diesel-fired electric generator.**
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.**

D.3.3 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.3.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

...

SECTION D.4 3 FACILITY OPERATION CONDITIONS

...

D.4 3.1 Particulate Matter Limitation (PM) [326 IAC 6-2-4]

...

D. 4 3.2 Particulate Matter (PM) [326 IAC 6-3-2]

...

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

FESOP Quarterly Report

Source Name: Sullair Corporation, Subsidiary of Hamilton Sundstrand
Source Address: 3700 E. Michigan Blvd., Michigan City, Indiana 46360
Mailing Address: 3700 E. Michigan Blvd., Michigan City, Indiana 46360
FESOP Permit No.: F091-23224-00017
Facility: Test cell building **and final start-up area**
Parameter: Diesel fuel throughput
Limit: Less than 100,000 gallons per twelve (12) consecutive month period

YEAR: _____

Month	Fuel Throughput (gallons)	Fuel Throughput (gallons)	Fuel Throughput (gallons)
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Sullair Corporation, Subsidiary of Hamilton Sundstrand
Source Address: 3700 E. Michigan Blvd., Michigan City, Indiana 46360
Mailing Address: 3700 E. Michigan Blvd., Michigan City, Indiana 46360
FESOP Permit No.: F091-25145-00017
Facility: Diesel-fired electric generator
Parameter: Hours of Operation
Limit: Less than or equal to 1000 hours of operation per twelve (12) consecutive month period

YEAR: _____

Month	Hours of Operation	Hours of Operation	Hours of Operation
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Conclusion and Recommendation

The construction of this proposed modification and the operation of the entire source shall be subject to the conditions of the attached proposed FESOP Minor Permit Revision No.: F091-25145-00017. The staff recommends to the Commissioner that the Minor Permit Revision be approved.

Unless otherwise stated, information used in this review was derived from the application and received by the Office of Air Quality (OAQ) on August 15, 2007. Additional information was received on September 21, 2007.

Copies of the preliminary findings have been provided to the Michigan City Library.

IDEM Contact

Questions regarding this proposed permit can be directed to Ms. Hannah Desrosiers at the Indiana Department Environmental Management, Office of Air Quality, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5374 or toll free at 1-800-451-6027 extension 4-5374.

**Appendix A: Emission Units
Summary**

Company Name: Sullair Corporation, Subsidiary of Hamilton Sundstrand
Address City IN Zip: 3700 East Michigan Blvd., Michigan City, IN 46360
Permit Number: F091-23224-00017
Minor Permit Revision No.: F091-25145-00017
Plt ID: 091-00017
Reviewer: Hannah L. Desrosiers
Date: 10/3/2004

Uncontrolled/Unlimited Emissions

Emission Units	PM	PM ₁₀	SO ₂	NO _x	VOC	CO	Total HAPs	Worst single HAP
Paint Booths (Large Paint Booth and Building 2 Paint Booth)	103.95	103.95	0.00	0.00	136.95	0.00	83.24	24.87
Degreasing	0.00	0.00	0.00	0.00	24.50	0.00	0.73	0.25
Test Cells Building and Building 1 Final Start-up Area	21.72	21.72	20.32	309.05	25.23	66.58	0.281	0.09
Natural Gas Combustion Source	0.00	0.01	0.00	0.08	0.00	0.06	0.00	0.00
Diesel-Fired Electric Generator (>600 HP)	0.82	0.47	4.16	26.39	0.74	7.01	0.04	0.02
Totals	126.50	126.15	24.49	335.52	187.43	73.65	84.29	

Limited Emissions

Emission Units	PM	PM ₁₀	SO ₂	NO _x	VOC	CO	Total HAPs	Worst single HAP
Paint Booths (Large Paint Booth and Building 2 Paint Booth)	< 95.5	< 95.5	0.00	0.00	< 95.5	0.00	< 24.8	< 9.9
Degreasing	0.00	0.00	0.00	0.00		0.00		
Test Cells Building and Building 1 Final Start-up Area	< 2.12	< 2.12	1.99	< 30.2	< 2.47	6.51	0.03	0.03
Natural Gas Combustion Source	0.00	0.00	0.00	0.00	0.00	0.1	0.00	0.00
Diesel-Fired Electric Generator (>600 HP)	0.09	0.05	0.48	3.01	0.08	0.08	0.004	0.003
Totals	< 97.1	< 97.67	2.47	< 33.21	< 98.05	6.69	<24.83	< 9.93

Assuming PM Emissions = PM₁₀ Emissions

* Source self limits maximum usage to ≤ 1000 hrs/yr
 ** Xylene, MIBK, and Glycol Ethers from the surface coating operation have an unlimited potential to emit over 10 tons per year for a single HAP.

**Appendix A: Emission Calculations
Internal Combustion Engines - Diesel Fuel
Turbine (>600 HP)**

Company Name: Sullair Corporation, Subsidiary of Hamilton Sundstrand
 Address City IN Zip: 3700 East Michigan Blvd., Michigan City, IN 46360
 Permit Number: F091-23224-00017
 Minor Permit Revision No.: F091-25145-00017

Plt ID: 091-00017
 Reviewer: Hannah L. Desrosiers
 Date: 10/3/2004

Stationary Diesel-Fired Electric Generator

A. Emissions calculated based on heat input capacity (MMBtu/hr) with an unlimited usage rate of 8760 hrs/yr

Heat Input Capacity Horsepower (hp)	Heat Input Capacity MM Btu/hr	Potential Throughput hp-hr/yr	Potential Throughput MMBtu/yr	S =	0.5	= WEIGHT % SULFUR
740.0	1.9	6482400.0	16494.0			

Emission Factor in lb/MMBtu	Pollutant					
	PM*	PM10*	SO2 (1.01S)	NOx **see below	VOC	CO
	0.1	0.0573	0.505	3.2	0.09	0.85
Potential Emission in tons/yr	0.82	0.47	4.16	26.39	0.74	7.01

Emission Factor in lb/MMBtu	Hazardous Air Pollutant (HAP)							
	Benzene	Toluene	Xylenes	Propylene	Formaldehyde	Acetaldehyde	Acrolein	Naphthalene
	0.000776	0.000281	0.000193	0.002790	0.000079	0.000025	0.000008	0.000130
Potential Emission in tons/yr	6.40E-03	2.32E-03	1.59E-03	2.30E-02	6.51E-04	2.08E-04	6.50E-05	1.07E-03

Total HAPs	0.0353	tpy
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Methodology

Potential Throughput (hp-hr/yr) = hp * 8760hr/yr.

A conversion factor of 1 hp equal to 2544.424 Btu/hr used to convert from horsepower to Btu/hr. (AP-42, Appendix A)

Emission Factors are from AP42 (Supplement B 10/96), Table 3.4-1, 3.4-2, 3.4-3 and 3.4-4.

Emission (tons/yr) = [Heat input rate (MMBtu/hr) x Emission Factor (lb/MMBtu)] * 8760 hr/yr / (2,000 lb/ton)

Emission (tons/yr) = [Potential Throughput (hp-hr/yr) x Emission Factor (lb/hp-hr)] / (2,000 lb/ton)

*No information was given regarding which method was used to determine the PM emission factor or whether condensable PM is included. The PM10 emission factor is filterable and condensable PM10 combined.

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

**Appendix A: Emission Calculations
Internal Combustion Engines - Diesel Fuel
Turbine (>600 HP)**

Company Name: Sullair Corporation, Subsidiary of Hamilton Sundstrand
Address City IN Zip: 3700 East Michigan Blvd., Michigan City, IN 46360
Permit Number: F091-23224-00017
Minor Permit Revision No.: F091-25145-00017

Pit ID: 091-00017
Reviewer: Hannah L. Desrosiers
Date: 10/3/2004

Stationary Diesel-Fired Electric Generator

A. Emissions calculated based on heat input capacity (MMBtu/hr) with a limited usage rate of 1000hrs/yr

Heat Input Capacity Horsepower (hp)	Heat Input Capacity MM Btu/hr	Potential Throughput hp-hr/yr	Potential Throughput MMBtu/yr	S=	0.5	= WEIGHT % SULFUR
740.0	1.9	740000.0	1882.9			

Emission Factor in lb/MMBtu	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	0.1	0.0573	0.505 <i>(1.01S)</i>	3.2 **see below	0.09	0.85
Potential Emission in tons/yr	0.09	0.05	0.48	3.01	0.08	0.80

Emission Factor in lb/MMBtu	Hazardous Air Pollutant (HAP)							
	Benzene	Toluene	Xylenes	Propylene	Formaldehyde	Acetaldehyde	Acrolein	Naphthalene
	0.000776	0.000281	0.000193	0.002790	0.000079	0.000025	0.000008	0.000130
Potential Emission in tons/yr	7.31E-04	2.65E-04	1.82E-04	2.63E-03	7.43E-05	2.37E-05	7.42E-06	1.22E-04

Total HAPs	0.0040	tpy
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Methodology

Potential Throughput (hp-hr/yr) = hp * 1000 hr/yr (limit requested by source).

A conversion factor of 1 hp equal to 2544.424 Btu/hr used to convert from horsepower to Btu/hr. (AP-42, Appendix A)

Emission Factors are from AP42 (Supplement B 10/96), Table 3.4-1, 3.4-2, 3.4-3 and 3.4-4.

Emission (tons/yr) = [Heat input rate (MMBtu/hr) x Emission Factor (lb/MMBtu)] * 8760 hr/yr / (2,000 lb/ton)

Emission (tons/yr) = [Potential Throughput (hp-hr/yr) x Emission Factor (lb/hp-hr)] / (2,000 lb/ton)

*No information was given regarding which method was used to determine the PM emission factor or whether condensable PM is included. The PM10 emission factor is filterable and condensable PM10 combined.

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