INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: June 3, 2008

RE: Autoliv NA, Inc. / 183-25382-00029

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

Notice of Decision: Approval – Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted, 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 13-15-6-1(b) or IC 13-15-6-1(a) require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).

For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

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.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of an initial Title V operating permit, permit renewal, or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impractible to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

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
FNTVOP.dot 3/27/08

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Federally Enforceable State Operating Permit Renewal
OFFICE OF AIR QUALITY

Autoliv NA, Inc.
4868 East Park 30 Drive
Columbia City, Indiana 46725

(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.: F183-25382-00029	
Issued by/Original Signed By: Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: June 3, 2008 Expiration Date: June 3, 2018

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

The Permittee owns and operates a stationary automobile steering wheel manufacturing source.

Source Address:	4868 East Park 30 Drive, Columbia City, Indiana 46725
Mailing Address:	4868 East Park 30 Drive, Columbia City, Indiana 46725
General Source Phone Number:	(260) 244-2218
SIC Code:	3714
County Location:	Whitley
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) Two (2) urethane molding units, identified as UM-3 and UM-4, constructed in August 1998, each producing up to 96 rim shot type steering wheels per hour and consisting of:

(1) Twelve (12) air atomization spray guns, with six guns spraying a paint blend and six guns spraying mold release agent;

(2) Three (3) pairs of molds; and

(3) Three (3) pairs of exhaust cabinets,

Particulate emissions are controlled by dry filters exhausting to stacks V-2 and V-1 respectively;

(b) One (1) urethane molding unit, identified as UM-8, constructed in 2005, producing up to 128 rim shot type steering wheels per hour and consisting of eight (8) identical molding cells. Particulate emissions are controlled by dry filters, which exhaust to stack V-3.

(c) One (1) urethane molding unit, identified as UM-5, constructed in 2000, producing up to 32 rim shot type steering wheels per hour and consisting of two (2) identical molding cells. Particulate emissions are controlled by dry filters, which exhaust to stack V-11.

A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities:

(a) Paint mixing room, with emissions exhausted through stack V-9.

(b) Paint storage room, with emissions exhausted through stack V-10;

(c) One (1) 90-day storage room containing flammable drums, with emissions exhausted through stack V-16;

(d) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu (MMBtu) per hour, consisting of:

(1) Two (2) 0.1 MMBtu per hour space heaters.

(2) Four (4) process heaters, each rated at 6.1 million Btu per hour.

(e) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(f) Emissions from a laboratory, consisting of:

(1) One (1) urethane laboratory, with emissions exhausting to vent V-5; and

(2) One (1) quality assurance/quality control laboratory, with emissions exhausting to vents V-7 and V-8.

(g) Vessels storing hydraulic oils or machining fluids, consisting of:

(1) Two (2) 1000 gallon oil interceptor tanks; and

(2) Two (2) 55 gallon drums of hydraulic oils.

(h) Other categories with emissions below insignificant thresholds, consisting of three (3) pressure vented storage tanks, one (1) storing isocyanate and installed in April 2000, and two (2) storing polyol resin and installed in April 2000 and January 2001, respectively, with each tank having a capacity of 7,500 gallons, equipped with either nitrogen blanketing evaporation or compressed dry air control, and emitting less than one (1) ton per year of a single HAP and less than 15 pounds per day of VOC.

(i) The application of lubricants as temporary protective coatings.

(j) Degreasing operations that do not exceed 145 gallons per 12-months [326 IAC 8-3-2][326 IAC 8-3-5].

(k) Closed heating and cooling systems.

(l) Cleaning or repair of heat exchangers.

(m) Paved roads and parking lots with public access [326 IAC 6-4].

(n) Natural gas emergency generators, consisting of:

(1) One (1) 0.06 million Btu per hour natural gas-fired emergency generator; and

(2) One (1) 0.15 million Btu per hour natural gas-fired emergency generator.

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, F183-25382-00029, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

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

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

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

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

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

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

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

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

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

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

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

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

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

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

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an "authorized individual" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

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

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

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

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

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

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

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

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

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

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

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

(c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-0178 (ask for Compliance Section)
Facsimile Number: 317-233-6865

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

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

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

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

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

(h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

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

(a) All terms and conditions of permits established prior to F183-25382-00029 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised, or

(3) deleted.

(b) All previous registrations and permits are superseded by this permit.

B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

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

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

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

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

(b) A timely renewal application is one that is:

(1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) through (d) without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

(3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)

77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b) through (d). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

(b) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).

(c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.

(d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.20 Source Modification Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.24 Advanced Source Modification Approval [326 IAC 2-8-4(11)] [326 IAC 2-1.1-9]

(a) The requirements to obtain a permit modification under 326 IAC 2-8-11.1 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3.

(b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction, work is suspended for a continuous period of one (1) year or more.

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]

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

(a) Pursuant to 326 IAC 2-8:

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

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

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

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

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

C.3 Opacity [326 IAC 5-1]

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

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A,

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

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

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

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

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

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

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

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

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

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

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

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

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Licensed Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

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

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

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

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

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

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

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted

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

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

(2) review of operation and maintenance procedures and records; and/or

(3) inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall maintain the following records:

(1) monitoring data;

(2) monitor performance data, if applicable; and

(3) corrective actions taken.

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

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

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

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

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

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

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

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

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

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

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

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

Stratospheric Ozone Protection

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

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

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) Two (2) urethane molding units, identified as UM-3 and UM-4, constructed in August 1998, each producing up to 96 rim shot type steering wheels per hour and consisting of:

(1) Twelve (12) air atomization spray guns, with six guns spraying a paint blend and six guns spraying mold release agent;

(2) Three (3) pairs of molds; and

(3) Three (3) pairs of exhaust cabinets,

Particulate emissions are controlled by dry filters exhausting to stacks V-2 and V-1 respectively;

(b) One (1) urethane molding unit, identified as UM-8, constructed in 2005, producing up to 128 rim shot type steering wheels per hour and consisting of eight (8) identical molding cells. Particulate emissions are controlled by dry filters, which exhaust to stack V-3.

(c) One (1) urethane molding unit, identified as UM-5, constructed in 2000, producing up to 32 rim shot type steering wheels per hour and consisting of two (2) identical molding cells. Particulate emissions are controlled by dry filters, which exhaust to stack V-11.

Insignificant Activities

(a) Paint mixing room, with emissions exhausted through stack V-9.

(b) Paint storage room, with emissions exhausted through stack V-10;

(c) One (1) 90-day storage room containing flammable drums, with emissions exhausted through stack V-16;

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

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

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to Significant Permit Revision No. 183-12082-00029, issued on June 27, 2000, the source shall comply with the following requirements for the three (3) urethane molding injection units (UM-3, UM-4 and UM-8):

(a) The VOC content of the mold cleaner used in the urethane injection molding units shall not exceed 8.30 pounds of VOC per gallon as applied and the VOC content of each ingredient used in the paint blend shall not exceed 7.78 pounds of VOC per gallon as applied.

(b) The following pollution prevention techniques shall be applied:

(1) the spray guns applying the mold release agent and paint blend are the type that can be cleaned without the need for spraying the solvent into the air;

(2) all solvent sprayed during cleanup or color changes shall be directed into containers, such containers shall be closed as soon as solvent spraying is complete and the waste solvent shall be disposed of in such a manner that evaporation is minimized;

(3) storage containers used to store VOC containing materials shall be kept covered when not in use;

(4) cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly;

(5) proper equipment clean-up and maintenance; and

(6) proper testing of spray guns prior to daily use.

(c) The VOC emissions from the urethane injection molding units shall be limited to 91.0 tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month. This is based on 100% volatilization of the mold release agent, mold cleaner, paint blend, and VOC solvents input to the units.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 (FESOP), the total VOC input to the four (4) urethane injection molding units (UM-3, UM-4, UM-5 and UM-8) and the paint storage and mixing facilities, including but not limited to the usage of mold release agents, mold cleaners, coatings and other solvents shall be limited to less than 98.0 tons per twelve (12) consecutive month period.

Compliance with this limit shall limit source-wide VOC emissions to less than 100 tons per year and render 326 IAC 2-7 (Part 70) not applicable.

D.1.3 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from each of the twelve (12) air atomization spray guns shall be controlled by a dry filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.1.4 Preventive Maintenance Plan

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the four (4) urethane injection molding units (UM-3, UM-4, UM-5 and UM-8) and their dry filters.

Compliance Determination Requirements

D.1.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

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

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

D.1.6 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the four (4) dry filters exhaust stacks (V-1, V-2, V-3, and V-11) while one or more of the spray guns are in operation. If a condition exists which

should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

D.1.7 Record Keeping Requirements

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

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

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

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

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

(3) The cleanup solvent usage for each month;

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

(6) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Condition D.1.6, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections.

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

D.1.8 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.2 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 “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Insignificant Activities

(j) Degreasing operations that do not exceed 145 gallons per 12-months [326 IAC 8-3-2][326 IAC 8-3-5].

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

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

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

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

(a) Equip the cleaner with a cover;

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

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

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

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

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

D.2.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following control equipment 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 (15) 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 degrees 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 or 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 of carbon adsorption. 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 Permittee 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.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Autoliv NA, Inc.
Source Address: 4868 East Park 30 Drive, Columbia City, Indiana 46725
Mailing Address: 4868 East Park 30 Drive, Columbia City, Indiana 46725
FESOP Permit No.: F183-25382-00029

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: Autoliv NA, Inc.
Source Address: 4868 East Park 30 Drive, Columbia City, Indiana 46725
Mailing Address: 4868 East Park 30 Drive, Columbia City, Indiana 46725
FESOP Permit No.: F183-25382-00029

This form consists of 2 pages **Page 1 of 2**

□ This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) 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: Autoliv NA, Inc.
Source Address: 4868 East Park 30 Drive, Columbia City, Indiana 46725
Mailing Address: 4868 East Park 30 Drive, Columbia City, Indiana 46725
FESOP Permit No.: F183-25382-00029
Facility: The three (3) urethane molding injection units (UM-3, UM-4 and UM-8)
Parameter: VOC emissions
Limit: The VOC emissions from the three (3) urethane molding injection units (UM-3, UM-4 and UM-8) shall be limited to 91.0 tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month. This is based on 100% volatilization of the mold release agent, mold cleaner, paint blend, and VOC solvents input to the units.

YEAR:_____

Month	Column 1	Column 2	Column 1 + Column 2
	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: Autoliv NA, Inc.
Source Address: 4868 East Park 30 Drive, Columbia City, Indiana 46725
Mailing Address: 4868 East Park 30 Drive, Columbia City, Indiana 46725
FESOP Permit No.: F183-25382-00029
Facility: The four (4) urethane injection molding units (UM-3, UM-4, UM-5 and UM-8) and the paint storage and mixing facilities.
Parameter: VOC input
Limit: The total VOC input to the four (4) urethane injection molding units (UM-3, UM-4, UM-5 and UM-8) and the paint storage and mixing facilities, including but not limited to the usage of mold release agents, mold cleaners, coatings and other solvents shall be limited to less than 98.0 tons per twelve (12) consecutive month period.

YEAR:_____

Month	Column 1	Column 2	Column 1 + Column 2
	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: Autoliv NA, Inc.
Source Address: 4868 East Park 30 Drive, Columbia City, Indiana 46725
Mailing Address: 4868 East Park 30 Drive, Columbia City, Indiana 46725
FESOP Permit No.: F183-25382-00029

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".

□ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

□ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

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

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

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

Form Completed by:_____

Title / Position:_____

Date:_____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the Technical Support Document
to a Federally Enforceable State Operating Permit (FESOP)

Source Background and Description

Source Name:	Autoliv NA, Inc.
Source Location:	4868 East Park 30 Drive, Columbia City, Indiana 46725
County:	Whitley
SIC Code:	3714
Permit Renewal No.:	183-25382-00029
Permit Reviewer:	ERG/BL

On April 24, 2008, the Office of Air Quality (OAQ) had a notice published in the Post and Mail, located in Columbia City, Indiana, stating that Autoliv NA, Inc., had applied for a Federally Enforceable State Operating Permit (FESOP) Renewal. The notice also stated that OAQ proposed to issue a permit modification for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On May 6, 2008, comments on the draft permit were submitted by Teresa Grant on behalf of Autoliv NA, Inc. The summary of the comments is as follows. New language is shown in **bold** and deleted language is shown in ~~strikeout~~. When conditions are added or deleted, remaining conditions and the Table of Contents are updated as necessary.

Autoliv NA, Inc. Comments

Comment 1, Degreasing:

State rule applicability discussions included in the Technical Support Document (TSD) for the degreasing operations are incorrectly stated. Autoliv NA, Inc. operates a cold cleaner degreaser without remote solvent reservoir; that was installed after January 1, 1980; and uses degreasing solvents that contain VOC. The following changes should be made to the TSD:

TSD page 9 of 10 – State Rule Applicability – Degreasing
~~The degreasing operation use cleaning solvents containing zero percent (0%) by weight of VOC. Therefore, the requirements of 326 IAC 8-3-2 and 326 IAC 8-3-5 do not apply.~~
Autoliv utilizes cleaning solvents that contain VOCs, therefore the requirements of 326 IAC 8-3-2 and 326 IAC 8-3-5 are applicable.

Response to Comment 1:

No changes have been made to the TSD because the OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the Technical Support Document that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Pursuant to 326 IAC 2-8-4 (FESOP), the four (4) urethane injection molding units (UM-3, UM-4, UM-5 and UM-8) and the paint storage and mixing facilities are limited to 98.0 tons per twelve (12) consecutive month period. The source-wide VOC emissions, including the degreasing operations, are less than 100 tons per year.

The state rule applicability, as shown in the permit for degreasing operations has been revised to reflect the cleaning solvents utilized by Autoliv NA, Inc. The following changes have been made to the permit as a result of this comment:

A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities:

. . .

(j) Degreasing operations that do not exceed 145 gallons per 12-months **[326 IAC 8-3-2][326 IAC 8-3-5]**.

. . .

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Insignificant Activities

(j) Degreasing operations that do not exceed 145 gallons per 12-months [326 IAC 8-3-2][326 IAC 8-3-5].

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

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

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

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

(a) Equip the cleaner with a cover;

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

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

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

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

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

D.2.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for

cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following control equipment 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 (15) 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 degrees 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 or 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 of carbon adsorption. 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 Permittee 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.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Federally Enforceable State Operating Permit Renewal

Source Background and Description

Source Name:	Autoliv NA, Inc.
Source Location:	4868 East Park 30 Drive, Columbia City, Indiana 46725
County:	Whitley
SIC Code:	3714
Permit Renewal No.:	183-25382-00029
Permit Reviewer:	ERG/BL

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Autoliv NA, Inc. relating to the operation of a stationary automobile steering wheel manufacturing source.

History

On October 10, 2007, Autoliv NA, Inc. submitted an application to the OAQ requesting to renew its operating permit. Autoliv NA, Inc. was issued a FESOP Renewal on June 23, 2003.

Permitted Emission Units and Pollution Control Equipment

(a) Two (2) urethane molding units, identified as UM-3 and UM-4, constructed in August 1998, each producing up to 96 rim shot type steering wheels per hour and consisting of:

(1) Twelve (12) air atomization spray guns, with six guns spraying a paint blend and six guns spraying mold release agent;

(2) Three (3) pairs of molds; and

(3) Three (3) pairs of exhaust cabinets,

Particulate emissions are controlled by dry filters exhausting to stacks V-2 and V-1 respectively;

(b) One (1) urethane molding unit, identified as UM-8, constructed in 2005, producing up to 128 rim shot type steering wheels per hour and consisting of eight (8) identical molding cells. Particulate emissions are controlled by dry filters, which exhaust to stack V-3.

(c) One (1) urethane molding unit, identified as UM-5, constructed in 2000, producing up to 32 rim shot type steering wheels per hour and consisting of two (2) identical molding cells. Particulate emissions are controlled by dry filters, which exhaust to stack V-11.

Emission Units and Pollution Control Equipment Removed From the Source

(a) Two (2) urethane molding units, identified as UM-6 and UM-7, constructed in April and July 2000, respectively, each producing up to 60 wheel air bag type or 96 rim shot type steering wheels per hour.

Insignificant Activities

(a) Paint mixing room, with emissions exhausted through stack V-9.

(b) Paint storage room, with emissions exhausted through stack V-10;

(c) One (1) 90-day storage room containing flammable drums, with emissions exhausted through stack V-16;

(d) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu (MMBtu) per hour, consisting of:

(1) Two (2) 0.1 MMBtu per hour space heaters.

(2) Four (4) process heaters, each rated at 6.1 million Btu per hour.

(e) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(f) Emissions from a laboratory, consisting of:

(1) One (1) urethane laboratory, with emissions exhausting to vent V-5; and

(2) One (1) quality assurance/quality control laboratory, with emissions exhausting to vents V-7 and V-8.

(g) Vessels storing hydraulic oils or machining fluids, consisting of:

(1) Two (2) 1000 gallon oil interceptor tanks; and

(2) Two (2) 55 gallon drums of hydraulic oils.

(h) Other categories with emissions below insignificant thresholds, consisting of three (3) pressure vented storage tanks, one (1) storing isocyanate and installed in April 2000, and two (2) storing polyol resin and installed in April 2000 and January 2001, respectively, with each tank having a capacity of 7,500 gallons, equipped with either nitrogen blanketing evaporation or compressed dry air control, and emitting less than one (1) ton per year of a single HAP and less than 15 pounds per day of VOC.

(i) The application of lubricants as temporary protective coatings.

(j) Degreasing operations that do not exceed 145 gallons per 12-months.

(k) Closed heating and cooling systems.

(l) Cleaning or repair of heat exchangers.

(m) Paved roads and parking lots with public access [326 IAC 6-4].

(n) Natural gas emergency generators, consisting of:

(1) One (1) 0.06 million Btu per hour natural gas-fired emergency generator; and

(2) One (1) 0.15 million Btu per hour natural gas-fired emergency generator.

Existing Approvals

Since the issuance of the FESOP Renewal 183-16230-00029 on June 23, 2003, the source has constructed or has been operating under the following approvals:

(a) Administrative Amendment No. 183-20758-00029, issued on May 2, 2005; and

(b) Minor Permit Modification No. 183-21429-00029, issued on November 9, 2005.

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

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Whitley County

Pollutant	Designation
SO_2	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O_3	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard.[1]
PM_{10}	Unclassifiable effective November 15, 1990.
$PM_{2.5}$	Unclassifiable or attainment effective April 5, 2005.
NO_2	Cannot be classified or better than national standards.
Pb	Not designated.
[1]Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.	

(a) Ozone Standards

(1) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.

(2) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Whitley County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) PM2.5
Whitley County has been classified as attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM2.5 emissions. Therefore, until the U.S. EPA adopts specific provisions for

PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as a surrogate for PM2.5 emissions.

(c) Other Criteria Pollutants
Whitley County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

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

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	tons/year
PM	36.4
PM_{10}	37.0
SO_2	0.06
VOC	138
CO	8.86
NO_x	10.7

HAPs	tons/year
Hexane	0.19
Toluene	4.21
Total	**11.8**

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC is still greater than 100 tons per year. The source is subject to the provisions of 326 IAC 2-7. However, the source has agreed to continue to limit their VOC emissions to less than Title V levels; therefore the source will be issued a FESOP Renewal.

(b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all other criteria pollutants are less than 100 tons per year.

(c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year.

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

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.

	Limited Potential To Emit (tons/year)						
Process/ Emission Unit	**PM**	**PM_{10}[(a)]**	**SO_2**	**VOC**	**CO**	**NO_x**	**HAPs**
Urethane Molding (UM-3, UM-4, UM-5 and UM-8)	10.1[(b)]	10.1[(b)]	-	91[(c)]	-	-	11.6
Urethane Molding (UM-5)			-	<25[(e)] 98[(d)]	-	-	
Insignificant Paint Mixing and Storage Room			-	<25[(e)]	-	-	
External Combustion, Natural Gas	0.20	0.80	0.06	0.58	8.84	10.6	0.20
Internal Combustion, Natural Gas (emergency generators)	-	-	-	0.01	0.02	0.17	-
Insignificant Activities (storage tanks, degreasing operations)	-	-	-	<1.0	-	-	-
Total Emissions	**10.3**	**10.9**	**0.06**	**99.6**	**8.86**	**10.7**	**11.8**
PSD Significant Levels	**250**	**250**	**250**	**250**	**250**	**250**	**-**
Title V Threshold	**-**	**100**	**100**	**100**	**100**	**100**	**Single: <10 Total: <25**

(a) Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometer (PM10), not particulate matter (PM) is considered as a "regulated air pollutant". US EPA has directed states to regulated PM10 emissions as a surrogate for $PM_{2.5}$ emissions.
(b) Controlled / Limited PTE.
(c) Refer to State Rule Applicability portion of this TSD for details (326 IAC 8-1-6).
(d) Refer to State Rule Applicability portion of this TSD for details (326 IAC 2-8).
(e) Uncontrolled / Unlimited PTE.
"-" emissions are less than 0.01 tons per year.

(a) This existing stationary source is not major for PSD because the emissions of each criteria pollutant are less than two hundred fifty (<250) tons per year, and it is not one of the twenty-eight (28) listed source categories.

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

Federal Rule Applicability

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

(b) The requirements of the New Source Performance Standard (NSPS), 40 CFR 60.110a, Subpart Kb, Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) (326 IAC 12) are not included in the permit for the oil interceptor, hydraulic oil, isocyanate, or polyol resin tanks. This NSPS applies

to storage vessel with a capacity greater than 151,416 liters (40,000 gallons). Each storage tank has storage less than the minimum applicable threshold.

(c) The requirements of the New Source Performance Standard (NSPS), 40 CFR 60.40c, Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (326 IAC 12) are not included in the permit for the natural gas-fired space and process heaters. This NSPS applies to each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989 and that has a maximum design heat input capacity of 100 million Btu per hour (MMBtu/hr) or less, but greater than or equal to 10 MMBtu/hr. Each of the space and process heaters has a maximum design heat input capacity of less than 10 MMBtu/hr.

(d) The requirements of the New Source Performance Standard (NSPS) for Automobile and Light Duty Truck Surface Coating Operations, 40 CFR 60, Subpart MM (326 IAC 12) are not included in this permit. 40 CFR 60, Subpart MM applies to prime, guide, and topcoat painting operations located at an automobile or light duty truck assembly plant. This source does not operate an automobile or light duty trucks assembly plant.

(e) The requirements of the New Source Performance Standard (NSPS) for Stationary Compression Ignition Internal Combustion Engines, 40 CFR 60, Subpart IIII (326 IAC 12) are not included in this permit. The emergency generators are spark ignition.

(f) The requirements of the New Source Performance Standard (NSPS) for Stationary Spark Ignition Internal Combustion Engines, 40 CFR 60, Subpart JJJJ (326 IAC 12) are not included in this permit. The two emergency generators were installed in 1998 and 2003. Each emergency generator was manufactured and constructed prior to the applicable dates.

(k) (There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit renewal.

(l) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 63, Subpart T, Halogenated Solvent Cleaning Machines are not included in the permit for this source. The degreasing operation does not use halogenated HAP solvents.

(m) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 63, Subpart PPPP, National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products are not included in the permit for this source. This rule applies to facilities engaged in the surface coating of plastic parts and products that are a major source, are located at a major source, or are part of a major source of HAP emissions. This source has the potential to emit less than 10 tons per year for any single HAP and less than 25 tons per year of any combination of HAPs. Therefore the requirements of this rule are not included in this permit.

(n) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 63, Subpart WWWW, National Emission Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production are not included in the permit for this source. This rule applies to reinforced plastic composite manufacturing operations, which is limited to resins and gel coats that contain styrene by itself or in combination with other monomers or solvents, occurring at a major source of hazardous air pollutants as defined at 40 CFR Part 63.2. The requirements of this rule are not included in this permit because the source does not use styrene containing resins, and is not a major source of HAPs.

(o) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines 40 CFR 63, Subpart ZZZZ (326 IAC 20-82) are not included in the permit. This source has the potential to emit less than 10 tons per year for any single HAP and less than 25 tons per year of any combination of HAPs. Therefore the requirements of this rule are not included in this permit.

(p) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 63, Subpart IIII, National Emission Standards for Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks are not included in the permit for this source. This rule applies to facilities which apply topcoat to new automobile or new light-duty truck bodies or body parts for new automobiles or new light duty trucks, and that is a major source, is located at a major source, or is part of a major source of HAP emissions. This source does not coat automobile or light-duty truck bodies or body parts and is not a major source of HAPs. Therefore the requirements of this rule are not included in this permit.

State Rule Applicability - Entire Source

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

This stationary source is not one of the 28 listed source categories and there are no applicable New Source Performance Standards that were in effect on August 7, 1980. Therefore, fugitive emissions are not counted towards applicability of PSD.

The potential to emit of all regulated pollutants is less than 250 tons per year. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) are not applicable and this source is a minor source under 326 IAC 2-2.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The potential to emit a single HAP is less than ten (10) tons per year and the potential to emit total HAPs is less than twenty-five (25) tons per year. Therefore, 326 IAC 2-4.1 does not apply to this source.

326 IAC 2-6 (Emission Reporting)

This source is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, the regular reporting requirements of 326 IAC 2-6 do not apply. However, the source is subject to 326 IAC 2-6-5 (Additional Information Requests).

326 IAC 2-8 (Federally Enforceable State Operating Permit Program (FESOP))

The source has the unrestricted potential to emit (PTE) of VOC greater than 100 tons per year. The source has accepted the following limitations to ensure VOC emissions are less than 100 tons per year:

The total VOC input to the four (4) urethane injection molding units (UM-3, UM-4, UM-5 and UM-8) and the paint storage and mixing facilities, including but not limited to the usage of mold release agents, mold cleaners, coatings and other solvents shall be limited to less than 98.0 tons per twelve (12) consecutive month period.

Total VOC input from the mold release agent, mold cleaner, coatings and solvents to the injection molding units is equal to the VOC emissions released from the molding units.

Compliance with this limit will limit source-wide VOC emissions to less than 100 tons per year and render 326 IAC 2-7 (Part 70) not applicable.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary 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 fugutive 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).

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

This source is not located in any of the areas listed in 326 IAC 6-5-1. The fugitive particulate emissions are negligible. Pursuant to 326 IAC 6-5-7(d), this source is not subject to the requirements of 326 IAC 6-5.

State Rule Applicability – Injection Molding

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

Pursuant to 326 IAC 6-3-2(d), particulate from each of the twelve (12) air atomization spray guns shall be controlled by a dry particulate filter, water wash or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

326 IAC 8-1-6 (Best Available Control Technology (BACT))

Pursuant to Significant Permit Revision No. 183-12082-00029, issued on June 27, 2000, the source shall comply with the following for the three (3) urethane molding injection units (UM-3, UM-4 and UM-8):

(a) The VOC content of the mold cleaner used in the urethane injection molding units shall not exceed 8.30 pounds of VOC per gallon as applied and the VOC content of each ingredient used in the paint blend shall not exceed 7.78 pounds of VOC per gallon as applied.

(b) The following pollution prevention techniques shall be applied:

(1) the spray guns applying the mold release agent and paint blend are the type that can be cleaned without the need for spraying the solvent into the air;

(2) all solvent sprayed during cleanup or color changes shall be directed into containers, such containers shall be closed as soon as solvent spraying is complete and the waste solvent shall be disposed of in such a manner that evaporation is minimized;

(3) storage containers used to store VOC containing materials shall be kept covered when not in use;

(4) cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly;

(5) proper equipment clean-up and maintenance; and

(6) proper testing of spray guns prior to daily use.

(c) The VOC emissions from the urethane injection molding units shall be limited to 91.0 tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month. This is based on 100% volatilization of the mold release agent, mold cleaner, paint blend, and VOC solvents input to the units.

Although constructed after January 1, 1980, the urethane molding unit UM-5 is not subject to the provisions of 326 IAC 8-1-6 because the potential VOC emissions from this unit are less than 25 tons per year. Any change or modification that increases the potential VOC emissions from this unit to greater than or equal to 25 tons per year requires prior approval from IDEM, OAQ.

326 IAC 8-2-9 (Miscellaneous metal coating operations)

The twelve (12) air atomization spray guns are not subject to 326 IAC 8-2-9 because neither metal parts nor products are coated. The source uses a metal mold to produce urethane steering wheels. After approximately 90 seconds of cure time the mold opens and the now rigid product is removed.

State Rule Applicability – Natural Gas-Fired Heaters and Emergency Generators

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

The natural gas-fired space and process heaters and the emergency generators do not produce usable heat that is transferred through a heat conducting materials barrier or by a heat storage medium to a material to be heated. Therefore, these heaters and engines are not indirect heating units and 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating) does not apply.

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

This rule applies to emission units emitting more than 25 tons per year or 10 pounds per hour of sulfur dioxide. The potential to emit sulfur dioxide emissions from the natural gas-fired space and process heaters and engines are less than 25 tons per year and 10 pounds per hour. Therefore, the requirements of 326 IAC 7 do not apply.

State Rule Applicability – Paint Mixing and Storage Room

326 IAC 8-1-6 (Best Available Control Technology (BACT))

The paint mixing and storage room do not have potential VOC emissions equal to or greater than twenty five (25) tons per year, therefore these facilities are not subject to the provisions of 326 IAC 8-1-6.

State Rule Applicability – Degreasing

326 IAC 8-3-2 and 326 IAC 8-3-5 (Cold Cleaner Operations)

The degreasing operation use cleaning solvents containing zero percent (0%) by weight of VOC. Therefore, the requirements of 326 IAC 8-3-2 and 326 IAC 8-3-5 do not apply.

Testing Requirements

Compliance testing is not required for injection molding operations at this source because the VOC FESOP limitations include record keeping requirements that will ensure compliance with VOC emission limitations.

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.

The compliance monitoring requirements applicable to this source are as follows:

Control	Parameter	Frequency	Range	Excursions and Exceedances
Dry filters exhaust stacks (V-1, V-2, V-3, and V-11)	Filter Inspection	Daily	Normal-Abnormal	Response Steps
	Overspray	Monthly	Normal-Abnormal	

These monitoring conditions are necessary because the dry filters for the urethane injection molding units (UM-3, UM-4, UM-5 and UM-8) must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-8 (Federally Enforceable State Operating Permit Program (FESOP)).

Recommendation

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

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

An application for the purposes of this review was received on October 10, 2007.

Conclusion

The operation of this stationary automobile steering wheel manufacturing source shall be subject to the conditions of the attached FESOP Renewal No. 183-25382-00029.

Appendix A: Emission Calculations

Company Name: Autoliv NA, Inc.
Address: 4868 East Park 30 Drive, Columbia City, IN 46725
FESOP Renewal No.: 183-25382-00029
Reviewer: ERG/BL
Date: March 18, 2008

	Potential To Emit (tons/year)								
Process/emission unit	PM	PM10	SO_2	VOC	CO	NOx	Hexane	Toluene	HAPs
External Combustion, Natural Gas	0.20	0.80	0.06	0.58	8.84	10.6	0.19	3.59E-04	0.20
Internal Combustion, Natural Gas (emergency generators)	2.54E-03	2.02E-03	3.09E-05	0.01	0.02	0.17	-	1.01E-07	8.04E-06
Surface Coating, Urethane Molding, Paint Preparation, Mixing, and Storage (UM-3, UM-4, UM-5 and UM-8)	36.2	36.2	-	137	-	-	-	4.21	11.6
Total	**36.4**	**37.0**	**0.06**	**138**	**8.86**	**10.7**	**0.19**	**4.21**	**11.8**

	Potential to Emit After Issuance (tons/year)								
Process/emission unit	PM	PM10	SO_2	VOC	CO	NOx	Hexane	Toluene	HAPs
External Combustion, Natural Gas	0.20	0.80	0.06	0.58	8.84	10.6	0.19	3.59E-04	0.20
Internal Combustion, Natural Gas (emergency generators)	2.54E-03	2.02E-03	3.09E-05	0.01	0.02	0.17	-	1.01E-07	8.04E-06
Surface Coating, Urethane Molding, Paint Preparation, Mixing, and Storage (UM-3, UM-4, UM-5 and UM-8)	10.1	10.1	-	98.0	-	-	-	4.21	11.6
Total	**10.3**	**10.9**	**0.06**	**98.6**	**8.86**	**10.7**	**0.19**	**4.21**	**11.8**

Appendix A: Emission Calculations
External Combustion, Natural Gas

Company Name: Autoliv NA, Inc.
Address: 4868 East Park 30 Drive, Columbia City, IN 46725
FESOP Renewal No.: 183-25382-00029
Reviewer: ERG/BL
Date: March 18, 2008

Combustion Unit Type	Total Capacity (MMBtu/hr)	Max. Throughput (MMCF/yr)	Emission Factor (lb/MMCF)					
			PM*	PM10*	SO2	NOx**	VOC	CO***
2 Space Heaters (each 0.1 MMBtu/hr)	0.20	1.72	1.9	7.6	0.6	94.0	5.50	40.0
4 Process Heaters (each 6.1 MMBtu/hr)	24.4	210	1.9	7.6	0.6	100	5.50	84.0

Combustion Unit Type	Total Capacity (MMBtu/hr)	Max. Throughput (MMCF/yr)	Potential to Emit (tons/yr)					
			PM	PM10	SO2	NOx	VOC	CO
2 Space Heaters (each 0.1 MMBtu/hr)	0.20	1.72	1.63E-03	6.53E-03	5.15E-04	0.08	4.72E-03	0.03
4 Process Heaters (each 6.1 MMBtu/hr)	24.4	210	0.20	0.80	0.06	10.5	0.58	8.80
Total		**211**	**0.20**	**0.80**	**0.06**	**10.6**	**0.58**	**8.84**

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 94 for heat input capacity < 0.3 MMBtu/hr; = 100 for heat input capacity =>0.3 MMBtu/hr
**Emission Factors for CO: Uncontrolled = 40 for heat input capacity < 0.3 MMBtu/hr; = 84 for heat input capacity =>0.3 MMBtu/hr

All emission factors are based on normal firing.
Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPL. D 7/98)

Methodology
Max. Throughput (MMCF) = Total Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu
Potential to Emit (tons/yr) = Max. Throughput (MMCF/yr) x Emission Factor (lb/MMCF) x 1 ton/2,000 lbs

	HAPs - Organics					HAPs - Metals				
	Benzene	Dichlorobenzene	Forma-ldehyde	Hexane	Toluene	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor (lb/MMCF)	0.0021	0.0012	0.075	1.8	0.0034	0.0005	0.0011	0.0014	0.00038	0.0021
Potential to Emit (tons per year)	2.22E-04	1.27E-04	0.01	0.19	3.59E-04	5.28E-05	1.16E-04	1.48E-04	4.01E-05	2.22E-04

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

Appendix A: Emission Calculations
Internal Combustion, Natural Gas

Company Name: Autoliv NA, Inc.
Address: 4868 East Park 30 Drive, Columbia City, IN 46725
FESOP Renewal No.: 183-25382-00029
Reviewer: ERG/BL
Date: March 18, 2008

Combustion Unit Type	Total Capacity (MMBtu/hr)	Emission Factor (lb/MMBtu)					
		PM*	PM10*	SO2	NOx**	VOC	CO***
Emergency generator (0.06 MMBtu/hr)	0.06	0.05	3.84E-02	5.88E-04	3.17	0.12	0.386
Emergency generator (0.15 MMBtu/hr)	0.15	0.05	3.84E-02	5.88E-04	3.17	0.12	0.386

Combustion Unit Type	Total Capacity (MMBtu/hr)	Potential to Emit (tons/yr)					
		PM	PM10	SO2	NOx	VOC	CO
Emergency generator (0.06 MMBtu/hr)	0.06	7.25E-04	5.76E-04	8.82E-06	0.05	1.80E-03	0.01
Emergency generator (0.15 MMBtu/hr)	0.15	1.81E-03	1.44E-03	2.21E-05	0.12	4.50E-03	0.01
Total	**0.21**	**2.54E-03**	**2.02E-03**	**3.09E-05**	**0.17**	**0.01**	**0.02**

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 94 for heat input capacity < 0.3 MMBtu/hr; = 100 for heat input capacity =>0.3 MMBtu/hr
**Emission Factors for CO: Uncontrolled = 40 for heat input capacity < 0.3 MMBtu/hr; = 84 for heat input capacity =>0.3 MMBtu/hr

All emission factors are based on normal firing.
PTE for emergency fire pump engines is based on 500 hours of operation.
Emission Factors from AP 42, Chapter 3.2, Table 3.2-1 (SUPPL. F 8/00)

Methodology
Potential to Emit (tons/yr) = Total Capacity (MMBtu/hr) x Emission Factor (lb/MMBtu) x 1 ton/2,000 lbs x 500 hrs/yr

	HAPs							
	Formaldehyde	Acrolein	Acetaldehyde	Methanol	Benzene	Toluene	Xylene	Methylene Chloride
Emission Factor (lb/MMCF)	0.06	7.78E-03	7.76E-03	2.48E-03	1.94E-03	9.63E-04	2.68E-04	1.47E-04
Potential to Emit (tons per year)	5.80E-06	8.17E-07	8.15E-07	2.60E-07	2.04E-07	1.01E-07	2.81E-08	1.54E-08

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

Appendix A: Emission Calculations
Surface Coating, Urethane Molding (UM-3, UM-4, UM-5 and UM-8)
Particulate, VOC, and HAP

Company Name: Autoliv NA, Inc.
Address: 4868 East Park 30 Drive, Columbia City, IN 46725
FESOP Renewal No.: 183-25382-00029
Reviewer: ERG/BL
Date: March 18, 2008

Component	Coating	Density (lb/gal)	Wt % VOC	Wt % Non Volatiles	Gal of Mat (gal/shot)	Max. Throughput (shots/hr)	VOC (lb/gal)	PTE of VOC (lb/hr)	PTE of VOC (ton/yr)	Transfer Efficiency *	Uncontrolled PTE of PM/PM10 (ton/yr)	Controlled PTE of PM/PM10 (ton/yr)
Paint Resin	United - NH-167L Graphite Black	8.20	71.0%	29.0%	6.77E-03	352	5.82	13.9	60.7	25.0%	18.6	4.65
Reducer	United - XT-0089	7.78	100%	0%	2.85E-03	352	7.78	7.81	34.2	25.0%	0	0
Catalyst	United - Ravifrex (IMC) Hardner no. 1	9.16	25.0%	75.0%	1.21E-03	352	2.29	0.98	4.28	25.0%	9.62	2.41
Mold Release	Huron 6839B2	6.58	69.0%	20.0%	4.35E-03	352	4.54	6.96	30.5	25.0%	6.63	1.66
Mold Cleaner	Mold Cleaner 540	8.08	100%	0%	1.85E-04	352	8.08	0.53	2.30	25.0%	0	0
Solvent Mold Rinse	LPS - LPS PreSolve	6.73	100%	0%	1.85E-04	352	6.73	0.44	1.92	25.0%	0	0
Total								30.6	134		34.9	8.71

Component	Coating	Wt % Toluene	Wt % Xylene	Wt % MIBK	PTE of Toluene (ton/yr)	PTE of Xylene (ton/yr)	PTE of MIBK (ton/yr)	PTE of HAPs (ton/yr)
Paint Resin	United - NH-167L Graphite Black	4.92%	4.16%	4.44%	4.21	3.56	3.80	11.6
Reducer	United - XT-0089	-	-	-	-	-	-	-
Catalyst	United - Ravifrex (IMC) Hardner no. 1	-	-	-	-	-	-	-
Mold Release	Huron 6839B2	-	-	-	-	-	-	-
Mold Cleaner	Mold Cleaner 540	-	-	-	-	-	-	-
Solvent Mold Rinse	LPS - LPS PreSolve	-	-	-	-	-	-	-

There are a total of 22 molding clamps. Molding units UM-3 and UM-4 consist of 6 clamp machines; molding unit UM-8 consists of 8 clamp machines; and molding unit UM-5 consists of 2 clamp machines. The source uses a metal mold to produces urethane steering wheels. After approximately 90 seconds of cure time the mold opens and the now rigid product is removed.

Although several suface coating senarios are possible, only the worst case combination is displayed above for purposes of the potential to emit calculations.
* Transfer efficiency was provided by the Permittee. Particulate emissions are controlled by dry filters with 75% control efficiency.

Methodology
Max. Throughput (shots/hr) = 16 shots/clamp/hr x 22 clamps
PTE of VOC (lbs/hr) = Density (lb/gal) x Wt % VOC x Gal of Mat (gal/shot) x Max. Throughput (shots/hr)
PTE of VOC (ton/yr) = Density (lb/gal) x Wt % x VOC Gal of Mat (gal/shot) x Max. Throughput (shots/hr) x 8,760 hrs/yr x 1 ton/2,000 lbs
Uncontrolled PTE of PM/PM10 (ton/yr) = Density (lb/gal) x Wt % Non-Volatiles x Gal of Mat (gal/shot) x Max. Throughput (shots/hr) x 8,760 hrs/yr x 1 ton/2,000 lbs x (1 - Transfer Efficiency)
Controlled PTE of PM/PM10 (ton/yr) = Density (lb/gal) x Wt % Non-Volatiles x Gal of Mat (gal/shot) x Max. Throughput (shots/hr) x 8,760 hrs/yr x 1 ton/2,000 lbs x (1 - Transfer Efficiency) x (1 - Control Efficiency)

Appendix A: Emission Calculations
Surface Coating, Urethane Molding (UM-5)
Particulate, VOC, and HAP *

Company Name: Autoliv NA, Inc.
Address: 4868 East Park 30 Drive, Columbia City, IN 46725
FESOP Renewal No.: 183-25382-00029
Reviewer: ERG/BL
Date: March 18, 2008

Component	Density (lb/gal)	Wt % VOC	Wt % Non Volatiles	Gal of Mat (gal/unit)	Max. Throughput (units/hr)	VOC (lb/gal)	PTE of VOC * (lb/hr)	PTE of VOC * (ton/yr)	Transfer Efficiency	Uncontrolled PTE of PM/PM10 * (ton/yr)	Controlled PTE of PM/PM10 * (ton/yr)
Rim Shot Type Steering Wheels Produced at Urethane Molding Unit UM-5											
Mold Release	6.58	69.0%	31.0%	4.35E-03	32	4.54	0.63	2.77	15.0%	1.06	0.26
Mold Cleaner	8.30	100%	0%	1.85E-04	32	8.30	0.05	0.22	50.0%	0	0
Mold Thinner (LPS PreSolve)	6.73	100%	0%	1.85E-04	32	6.73	0.04	0.17	50.0%	0	0
Paint Resin	8.41	69.3%	30.7%	5.39E-03	32	5.83	1.01	4.41	15.0%	1.66	0.41
Catalyst	9.16	25.0%	75.0%	9.91E-04	32	2.29	0.07	0.32	15.0%	0.81	0.20
Reducer	7.78	100%	0%	2.33E-03	32	7.78	0.58	2.54	15.0%	0	0
Total							2.38	10.4		3.53	0.88

Component	Wt % Toluene	Wt % Xylene	Wt % MIBK	PTE of Toluene * (ton/yr)	PTE of Xylene * (ton/yr)	PTE of MIBK * (ton/yr)	PTE of HAPs * (ton/yr)
Mold Release	-	-	-	-	-	-	-
Mold Cleaner	-	-	-	-	-	-	-
Mold Thinner (LPS PreSolve)	-	-	-	-	-	-	-
Paint Resin	5.11%	4.61%	3.71%	0.33	0.29	0.24	0.85
Catalyst	-	-	-	-	-	-	-
Reducer	-	-	-	-	-	-	-

* These emission calculations are not include in the source-wide emission totals presented on Page 1. Calculations have been included to demonstrate that the urethane molding unit UM-5 is not subject to the provisions of 326 IAC 8-1-6 and 326 IAC 2-4.1 does not apply to this emission unit because the potential to emit VOC, individual HAP, ant total HAP are below the 25, 10 and 25 ton per year thresholds.
These emissions are based upon the Technical Support Documents (TSD) for the Title V Significant Permit Revision No. 183-21429-00029

Methodology
PTE of VOC (lbs/hr) = Density (lb/gal) x Wt % VOC x Gal of Mat (gal/unit) x Max. Throughput (units/hr)
PTE of VOC (ton/yr) = Density (lb/gal) x Wt % x VOC x Gal of Mat (gal/unit) x Max. Throughput (units/hr) x 8,760 hrs/yr x 1 ton/2,000 lbs
Uncontrolled PTE of PM/PM10 (ton/yr) = Density (lb/gal) x Wt % Non-Volatiles x Gal of Mat (gal/unit) x Max. Throughput (units/hr) x 8,760 hrs/yr x 1 ton/2,000 lbs x (1 - Transfer Efficiency)
Controlled PTE of PM/PM10 (ton/yr) = Density (lb/gal) x Wt % Non-Volatiles x Gal of Mat (gal/unit) x Max. Throughput (units/hr) x 8,760 hrs/yr x 1 ton/2,000 lbs x (1 - Transfer Efficiency) x (1 - Control Efficiency)

Appendix A: Emissions Calculations
Paint Preparation, Mixing, and Storage

Company Name: Autoliv NA, Inc.
Address: 4868 East Park 30 Drive, Columbia City, IN 46725
FESOP Renewal No.: 183-25382-00029
Reviewer: ERG/BL
Date: March 18, 2008

	Material Usage (lbs/hr)	Material Usage (ton/yr)	PTE of VOC (ton/yr)	PTE of PM/PM10 (ton/yr)
Total Coating Usage (UM-3, UM-4, UM-5 and UM-8)	30.6	134	2.01	1.34
Paint Storage *	-	-	1.00	-
Total			**3.01**	**1.34**

Particulate and VOC emission factor are from AP-42, Chapter 6.4 - Organic Chemical Process Industry, Paint & Varnish, Table 6.4-1 (Publication date: May 1983).
According to AP-42 the VOC loss rate from paint products is 1.5% and the PM loss rate from pigment is 1.0%. Loss rates include emissions from the packaging and filling lines.

* IDEM has conservatively estimated VOC emissions from the paint storage room as 1.0 ton per year of VOC.