



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant
DATE: November 16, 2007
RE: Arvin Sango, Inc / 077-25397-00023
FROM: Nisha Sizemore
Chief, Permits Branch
Office of Air Quality

Notice of Decision – Approval

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 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER-AM.dot 03/23/06



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
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Julie Branaman
Arvin Sango, Inc.
2905 Wilson Avenue
Madison, Indiana 47250

November 16, 2007

Re: F077-25397-00023
First Administrative Amendment to
F077-21616-00023

Dear Julie Branaman:

Arvin Sango, Inc. was issued a FESOP No. F077-21616-00023 on April 4, 2006 for a stationary automobile exhaust systems manufacturing source located at 2905 Wilson Avenue, Madison, Indiana 47250. On October 11, 2007, the Office of Air Quality (OAQ) received a letter from the source relating to construction and operation of seven (7) natural gas-fired space heaters of the same type that are already permitted and will comply with the same applicable requirements and permit terms and conditions as the existing one (1) natural gas-fired paint dry-off oven, one (1) natural gas-fired bake oven, one (1) natural gas-fired washer, and twenty eight (28) natural gas-fired space heaters.

Table with 9 columns: PM, PM10, SO2, NOx, VOC, CO, Single HAP, Total HAPS. Rows include Existing Units, New Units, Unlimited PTE, and Limited PTE.

The addition of these units to the permit is considered an administrative amendment pursuant to 326 IAC 2-8-10(a)(14). The entire source will continue to limit emissions to the spray booth of any single HAP to less than ten (10) tons per twelve (12) consecutive month period, rendering the requirements of 326 IAC 2-7 not applicable. The addition of the seven (7) natural gas-fired space heaters will not cause the source's potential to emit to be greater than the threshold levels specified in 326 IAC 2-2 or 326 IAC 2-3. The source also requests that the permit be updated to indicate that the existing welding operations will be moved from their current location in Building 1 to a proposed Building 2. This change at the source is considered a "minor physical change" as defined in 326 IAC 2-1.1-1(6). Pursuant to 326 IAC 2-1.1-3(h)(2), minor physical changes to a source do not require a permit revision under 326 IAC 2-8-11.1 or an administrative amendment under 326 IAC 2-8-10, if the minor physical change does not increase potential emissions from the source. This change to the permit is considered an administrative amendment pursuant to 326 IAC 2-8-10(a)(2). Pursuant to the provisions of 326 IAC 2-8-10, the permit is hereby administratively amended as follows with the deleted language as ~~strikeouts~~ and new language **bolded**.

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

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour (mmBtu/hr):
...
(6) Nine (9) natural gas-fired space heaters, each with a heat input capacity of 3.6 mmBtu/hr;
and
(7) Eleven (11) natural gas-fired space heaters, each with a heat input capacity of 3.5

mmBtu/hr-;

- (8) **Four (4) natural gas-fired space heaters, each with a heat input capacity of 1.8 mmBtu/hr; and**
- (9) **Three (3) natural gas-fired space heaters, each with a heat input capacity of 4.5 mmBtu/hr;**

IDEM, OAQ has decided to make additional revisions to the permit as described below. The permit is revised as follows with deleted language as ~~strikeouts~~ and new language **bolded**:

- (a) All occurrences of IDEM's mailing addresses have been updated in the permit. Any occurrences of the zip code 46204 have been revised to **46204-2251**, and all addresses have been revised to include a mail code (MC) as follows:

| | |
|---|---------------------------|
| Asbestos Section: | MC 61-52 IGCN 1003 |
| Compliance Branch: | MC 61-53 IGCN 1003 |
| Permits Branch: | MC 61-53 IGCN 1003 |
| Technical Support and Modeling Section: | MC 61-50 IGCN 1003 |

- (b) IDEM has begun implementing a new procedure and will no longer list the name or title of the Authorized Individual (A.I.) in the permit document. Section A.1 is updated as follows:

~~Authorized individual: _____ Scott Hubbard, Director of Operations~~

- (c) All occurrences of the Compliance Data Branch telephone and facsimile numbers have been revised to 317-233-~~5674~~ **0178** and 317-233-~~5967~~ **6865**, respectively.

- (d) For clarification, the most current operating permit number has been added to Section B.3 Permit Term as follows:

B.3 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5]

- (a) This permit, **F077-21616-00023**, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

- (e) In order to correct a typographical error, Condition B.8 is revised such that a period has been added after the State Rule citation 326 IAC 17.1 and the word "when" has been capitalized as follows:

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

...

- (b) For information furnished by the Permittee to IDEM, OAQ and GDEA the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. ~~when~~ **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.

- (f) In order to correct a typographical error, Condition B.14 is revised such that the word "not" has been added to indicate that certain deviations require separate reporting protocols as follows:

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) ...

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.

...

- (g) In order to correct several typographical errors, Conditions B.17, B.18 and C.4 are revised for clarification purposes as follows:

B.17 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

...

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

B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

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

...

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

...

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

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

...

- (h) In order to correct a typographical error, Condition C.1(a)(2) is revised from the terminology "one-hundred and twenty" to "one hundred twenty" and Condition C.1(b) is revised from the terminology two-hundred and fifty to "two hundred fifty" as follows:

C.2 Overall Source Limit [326 IAC 2-8] **[326 IAC 2-2][326 IAC 2-3]**

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:

...

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

...

- (b) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration), potential to emit particulate matter (PM) from the entire source shall be limited to less than ~~two-hundred and fifty~~ **two hundred fifty** (250) tons per twelve (12) consecutive month period.

- ~~(b 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.

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

- (i) Condition C.8(g) is revised to remove the statement that the requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable, since all conditions and requirements in a FESOP are federally enforceable. Condition C.8(g) is revised as follows:

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

...

- (g) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a

renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. ~~The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.~~

- (j) In order to correct a typographical error, Condition C.15(b) is revised from the terminology "one-hundred and twenty" to "one hundred twenty" as follows:

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

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

All other conditions of the permit shall remain unchanged and in effect. Attached please find the entire revised permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Hannah Desrosiers, at (800) 451-6027, press 0 and ask for extension 4-5374, or dial (317) 234-5374.

Sincerely/Original Signed By:

Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

Attachments: Updated Permit

IC/hld

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



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FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) RENEWAL OFFICE OF AIR QUALITY

**Arvin Sango, Inc.
2905 Wilson Avenue
Madison, Indiana 47250**

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

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

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

| | |
|--|--|
| Operation Permit No.: F077-21616-00023 | |
| Issued by: Paul Dubenetzky, Assistant Commissioner Office of Air Quality | Issuance Date: April 4, 2006 Expiration Date: April 4, 2011 |

| | |
|---|--|
| First Administrative Amendment No.: F077-25397-00023 | |
| Issued by/Original Signed By: Nisha Sizemore, Chief Permits Branch Office of Air Quality | Issuance Date: November 16, 2007 Expiration Date: April 4, 2011 |

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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 source that manufactures automobile exhaust systems.

| | |
|-------------------------|--|
| Source Address: | 2905 Wilson Avenue, Madison, Indiana 47250 |
| Mailing Address: | 2905 Wilson Avenue, Madison, Indiana 47250 |
| General Source Phone: | (812) 265-2888 |
| SIC Code: | 3714 |
| Source Location Status: | Jefferson County Nonattainment for PM _{2.5} Attainment for all other criteria pollutants |
| Source Status: | Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD and Nonattainment NSR; Minor Source, Section 112 of the Clean Air Act |

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

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

- (a) One (1) spray booth, with a maximum capacity of 225 units per hour, using electrostatic spray system for the main painting operation and High Volume Low Pressure (HVLP) spray system for the touch-up operation. Both painting operations coat metal and are done in the same booth. PM overspray is controlled by dry filters; and
- (b) Welding operations used in the metal fabrication of the automobile exhaust system. The welding operations use different types of welding wire at a total maximum rate of 195.2 pounds per hour.

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

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour (mmBtu/hr):
 - (1) One (1) natural gas-fired paint dry-off oven, with a heat input capacity of 1.0 mmBtu/hr;
 - (2) One (1) natural gas-fired bake oven, with a heat input capacity of 2.0 mmBtu/hr;
 - (3) One (1) natural gas-fired washer, with a heat input capacity of 0.72 mmBtu/hr;
 - (4) Six (6) natural gas-fired space heaters, each with a heat input capacity of 3.2 mmBtu/hr;
 - (5) Two (2) natural gas-fired space heater, with a heat input capacity of 3.0 mmBtu/hr;

- (6) Nine (9) natural gas-fired space heaters, each with a heat input capacity of 3.6 mmBtu/hr;
 - (7) Eleven (11) natural gas-fired space heaters, each with a heat input capacity of 3.5 mmBtu/hr;
 - (8) Four (4) natural gas-fired space heaters, each with a heat input capacity of 1.8 mmBtu/hr; and
 - (9) Three (3) natural gas-fired space heaters, each with a heat input capacity of 4.5 mmBtu/hr.
- (b) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
 - (c) Application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings.
 - (d) Cleaners and solvents characterized as follows:
 - (1) Having a vapor pressure equal to or less than 2kPa; 15 mm Hg; or 0.3 psi measured at 38°C (100°F); or
 - (2) Having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
 - (e) The following equipment related to manufacturing activities not resulting in the emission of HAP: brazing equipment, cutting torches, soldering equipment, welding equipment.
 - (f) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.
 - (g) Forced and induced draft cooling tower systems not regulated under a NESHAP.
 - (h) Paved and unpaved roads and parking lots with public access.
 - (i) A laboratory as defined in 326 IAC 2-7-1(20)(C).

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).

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deletedby this permit.
- (b) All previous registrations and permits are superseded by this permit.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

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

B.2 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.3 Permit Term [326 IAC 2-8-4(2)] [326 IAC 2-1.1-9.5]

This permit, F077-21616-00023, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

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 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.6 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.7 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.8 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 the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) 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.9 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.10 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.11 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 in letter form 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, IDEM, OAQ may require to determine the compliance status of the source.

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

B.12 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 the "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.13 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 describes 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 No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,
Telephone No.: 317-233-0178 (ask for Compliance Section)
Facsimile No.: 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 the "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.14 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 Provision), 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
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 the “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.15 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 FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the “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.16 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 the "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, IN 46204-2251

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

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

- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

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

- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

B.17 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 the "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.18 Operational Flexibility [326 IAC 2-8-15] [326 IAC 2-8-11.1]

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

- (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.19 Permit Revision 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.20 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2] [IC 13-17-3-2] [IC13-30-3-1]

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.21 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 the "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.22 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 317-233-4320 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.23 Credible Evidence [326 IAC 2-8-4(3)] [326 IAC 2-8-5] [62 FR 8314]

Notwithstanding the conditions of this permit that state specific methods that may be used to demonstrate compliance with, or a violation of, applicable requirements, any person (including the Permittee) may also use other credible evidence to demonstrate compliance with, or a violation of, any term or condition of this permit.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Particulate Emission Limitations for Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

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

C.2 Overall Source Limit [326 IAC 2-8][326 IAC 2-2][326 IAC 2-3]

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) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

(c) 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(3)]

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

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

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

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

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

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
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 the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "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 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)]

- (a) Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.
- (b) Unless otherwise specified in the approval for the new emissions unit, 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.

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

C.13 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.14 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;
 - (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.15 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 the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

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

C.16 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.17 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 the "authorized individual" as defined by 326 IAC2-1.1-1(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
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 the "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.18 Compliance with 40 CFR 82 and 326 IAC 22-1

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

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

SECTION D.1

FACILITY OPERATION CONDITIONS

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

One (1) spray booth, with a maximum capacity of 225 units per hour, using electrostatic spray system for the main painting operation and High Volume Low Pressure (HVLV) spray system for the touch-up operation. Both painting operations coat metal and are done in the same booth. PM overspray is controlled by dry filters.

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

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

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the owner or operator shall not allow the discharge into the atmosphere VOC in excess of three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator.

D.1.2 Volatile Organic Compounds (VOC) Limitations, Clean-Up Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment of the spray booth during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

D.1.3 Single HAP Limitation [326 IAC 2-8-4] [326 IAC 2-4.1]

Pursuant to F077-13659-00023, issued on May 9, 2001 and 326 IAC 2-8-4 (FESOP; Permit Content), usage of any single HAP to the spray booth shall be limited to less than ten (10) tons per consecutive twelve (12) month period, with compliance determined at the end of each month. Compliance with this limit makes 326 IAC 2-7 (Part 70 Operating Permit Program) and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP)) not applicable.

D.1.4 Particulate [326 IAC 6-3-2(d)]

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

D.1.5 Preventive Maintenance Plan

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

Compliance Determination Requirements

D.1.6 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP) [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC content and HAP usage limitations contained in Conditions D.1.1 and D.1.3 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.1.7 Monitoring

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

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

D.1.8 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limit and/or the VOC emission limit established in Condition D.1.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) The VOC content of each coating material and solvent used less water
 - (2) The coatings and solvents applied during each month, purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the coating or solvent used.
- (b) To document compliance with D.1.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP usage limit and the HAP emission limit established in Condition D.1.3. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) The HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total HAP usage for each month; and
 - (5) The weight of HAP emitted for each compliance period.

- (c) To document compliance with Condition D.1.7, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections.
- (d) All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit.

D.1.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.3 shall be submitted to the address listed in Section C – General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by an “authorized individual” as defined by 326 IAC 2-1.1-1(1).

SECTION D.2

FACILITY OPERATION CONDITIONS

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

Welding operations used in the metal fabrication of the automobile exhaust system. The welding operations use different types of welding wire at a total maximum rate of 195.2 pounds per hour.

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

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

D.2.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the welding operations shall not exceed 21.48 pounds per hour when operating at a process weight rate of 11.847 tons per hour.

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

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

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour;
and P = process weight rate in tons per hour

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Arvin Sango, Inc.
Source Address: 2905 Wilson Avenue, Madison, Indiana 47250
Mailing Address: 2905 Wilson Avenue, Madison, Indiana 47250
FESOP No.: F077-21616-00023

**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: Arvin Sango, Inc.
Source Address: 2905 Wilson Avenue, Madison, Indiana 47250
Mailing Address: 2905 Wilson Avenue, Madison, Indiana 47250
FESOP No.: F077-21616-00023

This form consists of 2 pages

Page 1 of 2

- | |
|---|
| <input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) <ul style="list-style-type: none">• The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16 |
|---|

If any of the following are not applicable, mark N/A

| |
|---|
| Facility/Equipment/Operation: |
| Control Equipment: |
| Permit Condition or Operation Limitation in Permit: |
| Description of the Emergency: |
| Describe the cause of the Emergency: |

If any of the following are not applicable, mark N/A

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: Arvin Sango, Inc.
Source Address: 2905 Wilson Avenue, Madison, Indiana 47250
Mailing Address: 2905 Wilson Avenue, Madison, Indiana 47250
FESOP No.: F077-21616-00023
Facility: Spray Booth
Parameter: Single HAP (Toluene) Usage
Limit: Less than ten (10) tons per consecutive 12 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: Arvin Sango, Inc.
Source Address: 2905 Wilson Avenue, Madison, Indiana 47250
Mailing Address: 2905 Wilson Avenue, Madison, Indiana 47250
FESOP No.: F077-21616-00023

Months: _____ to _____ Year: _____

Page 1 of 2

| | |
|---|-------------------------------|
| <p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. 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".</p> | |
| <input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD. | |
| <input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD | |
| Permit Requirement (specify permit condition #) | |
| Date of Deviation: | Duration of Deviation: |
| Number of Deviations: | |
| Probable Cause of Deviation: | |
| Response Steps Taken: | |
| Permit Requirement (specify permit condition #) | |
| Date of Deviation: | Duration of Deviation: |
| Number of Deviations: | |
| Probable Cause of Deviation: | |
| Response Steps Taken: | |

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

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Appendix A: Emissions Calculations Emission Summary

Company Name: Arvin Sango, Inc.
Address City IN Zip: 2905 Wilson Avenue, Madison, Indiana 47250
Permit Number: F077-21616-00023
FESOP Administrative Amendment No.: F077-25397-00023
Reviewer: Hannah L. Desrosiers
Date: October 17, 2007

| Uncontrolled Potential Emissions (tons/year) | | | | | | |
|--|-----------------|-------------------------------|------------------------------|---------------------------|--------------------------------------|--------------|
| Emissions Generating Activity | | | | | | |
| Category | Pollutant | Existing Emission Units | | | New Units | TOTAL |
| | | Surface Coating Spray Booth 1 | Natural Gas Combustion Mixed | Welding and Flame Cutting | Natural Gas Combustion Space Heaters | |
| Criteria Pollutants | PM | 38.63 | 0.83 | 7.78 | 0.17 | 47.41 |
| | PM10 | 38.63 | 3.32 | 7.78 | 0.69 | 50.42 |
| | SO2 | 0 | 0.26 | 0 | 0.05 | 0.32 |
| | NOx | 0 | 43.72 | 0 | 9.07 | 52.79 |
| | VOC | 31.13 | 2.40 | 0 | 0.50 | 34.04 |
| | CO | 0 | 36.73 | 0 | 7.62 | 44.34 |
| Hazardous Air Pollutants | Benzene | 0 | 9.18E-04 | 0 | 1.90E-04 | 1.11E-03 |
| | Dichlorobenzene | 0 | 5.25E-04 | 0 | 1.09E-04 | 6.33E-04 |
| | Formaldehyde | 0 | 0.03 | 0 | 6.80E-03 | 0.04 |
| | Hexane | 0 | 0.79 | 0 | 0.16 | 0.95 |
| | Toluene | 14.59 | 1.49E-03 | 0 | 3.08E-04 | 14.59 |
| | Cadmium | 0 | 4.81E-04 | 0 | 9.97E-05 | 5.81E-04 |
| | Chromium | 2.41 | 6.12E-04 | 6.39E-13 | 1.27E-04 | 2.41 |
| | Lead | 0 | 2.19E-04 | 0 | 4.53E-05 | 2.64E-04 |
| | Manganese | 2.44 | 1.66E-04 | 0.43 | 3.45E-05 | 2.87 |
| | Nickel | 0 | 9.18E-04 | 0 | 1.90E-04 | 1.11E-03 |
| | Totals | 19.44 | 0.83 | 0.43 | 0.17 | 20.86 |
| Worse Case HAP | | | | | 14.59 | |

Total emissions based on rated capacity at 8,760 hours/year.

| Controlled Potential Emissions (tons/year) | | | | | | |
|--|-----------------|-------------------------------|------------------------------|---------------------------|--------------------------------------|--------------|
| Emissions Generating Activity | | | | | | |
| Category | Pollutant | Existing Emission Units | | | New Units | TOTAL |
| | | Surface Coating Spray Booth 1 | Natural Gas Combustion Mixed | Welding and Flame Cutting | Natural Gas Combustion Space Heaters | |
| Criteria Pollutants | PM | 1.93 | 0.83 | 7.78 | 0.17 | 10.71 |
| | PM10 | 1.93 | 3.32 | 7.78 | 0.69 | 13.72 |
| | SO2 | 0 | 0.26 | 0.00 | 0.05 | 0.32 |
| | NOx | 0 | 43.72 | 0.00 | 9.07 | 52.79 |
| | VOC | 31.13 | 2.40 | 0.00 | 0.50 | 34.04 |
| | CO | 0 | 36.73 | 0.00 | 7.62 | 44.34 |
| Hazardous Air Pollutants | Benzene | 0 | 9.18E-04 | 0 | 1.90E-04 | 1.11E-03 |
| | Dichlorobenzene | 0 | 5.25E-04 | 0 | 1.09E-04 | 6.33E-04 |
| | Formaldehyde | 0 | 0.03 | 0 | 0.01 | 0.04 |
| | Hexane | 0 | 0.79 | 0 | 0.16 | 0.95 |
| | Toluene | 14.59 | 1.49E-03 | 0 | 3.08E-04 | 14.59 |
| | Cadmium | 0 | 4.81E-04 | 0 | 9.97E-05 | 5.81E-04 |
| | Chromium | 0.12 | 6.12E-04 | 6.39E-13 | 1.27E-04 | 0.12 |
| | Lead | 0 | 2.19E-04 | 0 | 4.53E-05 | 2.64E-04 |
| | Manganese | 0.12 | 1.66E-04 | 0.43 | 3.45E-05 | 0.55 |
| | Nickel | 0 | 9.18E-04 | 0 | 1.90E-04 | 1.11E-03 |
| | Totals | 14.83 | 0.83 | 0.43 | 0.17 | 16.25 |
| Worse Case HAP | | | | | 14.59 | |

Total emissions based on rated capacity at 8,760 hours/year.

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

Company Name: Arvin Sango, Inc.
Address City IN Zip: 2905 Wilson Avenue, Madison, Indiana 47250
Permit Number: F077-21616-00023
FESOP Administrative Amendment No.: F077-25397-00023
Reviewer: Hannah L. Desrosiers
Date: October 17, 2007

| Unit type | mmBtu/hr rating | Number added | total mmBtu/hr |
|---------------|-----------------|--------------|----------------|
| space heater | 4.5 | 3 | 13.5 |
| space heater | 1.8 | 4 | 7.2 |
| Totals | 6.3 | 7 | 20.7 |

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

20.7

181.3

| Emission Factor in lb/MMCF | Pollutant | | | | | |
|-------------------------------|-----------|-------|-----|-------------|-----|------|
| | PM* | PM10* | SO2 | NOx | VOC | CO |
| | 1.9 | 7.6 | 0.6 | 100.0 | 5.5 | 84.0 |
| | | | | **see below | | |
| Potential Emission in tons/yr | 0.2 | 0.7 | 0.1 | 9.1 | 0.5 | 7.6 |

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

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

| Emission Factor in lb/MMcf | HAP - Organics | | | | |
|-------------------------------|----------------|-----------------|--------------|-----------|-----------|
| | Benzene | Dichlorobenzene | Formaldehyde | Hexane | Toluene |
| | 2.1E-03 | 1.2E-03 | 7.5E-02 | 1.8E+00 | 3.4E-03 |
| Potential Emission in tons/yr | 1.904E-04 | 1.088E-04 | 6.800E-03 | 1.632E-01 | 3.083E-04 |

| Emission Factor in lb/MMcf | HAP - Metals | | | | |
|-------------------------------|--------------|-----------|-----------|-----------|-----------|
| | Lead | Cadmium | Chromium | Manganese | Nickel |
| | 5.0E-04 | 1.1E-03 | 1.4E-03 | 3.8E-04 | 2.1E-03 |
| Potential Emission in tons/yr | 4.533E-05 | 9.973E-05 | 1.269E-04 | 3.445E-05 | 1.904E-04 |

Total HAPs 1.711E-01 tpy

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

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

Appendix A: Emissions Calculations Emission Summary

Company Name: Arvin Sango, Inc.
Address City IN Zip: 2905 Wilson Avenue, Madison, Indiana 47250
Permit Number: F077-21616-00023
FESOP Administrative Amendment No.: F077-25397-00023
Reviewer: Hannah L. Desrosiers
Date: October 17, 2007

| Uncontrolled Potential Emissions (tons/year) | | | | | |
|---|-----------------|-------------------------------|------------------------------|---------------------------|--------------|
| Emissions Generating Activity | | | | | |
| Category | Pollutant | Surface Coating Spray Booth 1 | Natural Gas Combustion Mixed | Welding and Flame Cutting | TOTAL |
| Criteria Pollutants | PM | 38.63 | 0.83 | 7.78 | 47.24 |
| | PM10 | 38.63 | 3.32 | 7.78 | 49.73 |
| | SO2 | 0 | 0.26 | 0 | 0.26 |
| | NOx | 0 | 43.72 | 0 | 43.72 |
| | VOC | 31.13 | 2.40 | 0 | 33.54 |
| | CO | 0 | 36.73 | 0 | 36.73 |
| Hazardous Air Pollutants | Benzene | 0 | 9.18E-04 | 0 | 9.18E-04 |
| | Dichlorobenzene | 0 | 5.25E-04 | 0 | 5.25E-04 |
| | Formaldehyde | 0 | 0.03 | 0 | 0.03 |
| | Hexane | 0 | 0.79 | 0 | 0.79 |
| | Toluene | 14.59 | 1.49E-03 | 0 | 14.59 |
| | Cadmium | 0 | 4.81E-04 | 0 | 4.81E-04 |
| | Chromium | 2.41 | 6.12E-04 | 6.39E-13 | 2.41 |
| | Lead | 0 | 2.19E-04 | 0 | 2.19E-04 |
| | Manganese | 2.44 | 1.66E-04 | 0.43 | 2.87 |
| | Nickel | 0 | 9.18E-04 | 0 | 9.18E-04 |
| Totals | | 19.44 | 0.83 | 0.43 | 20.69 |
| Worse Case HAP | | | | | 14.59 |

Total emissions based on rated capacity at 8,760 hours/year.

| Controlled Potential Emissions (tons/year) | | | | | |
|---|-----------------|-------------------------------|------------------------------|---------------------------|--------------|
| Emissions Generating Activity | | | | | |
| Category | Pollutant | Surface Coating Spray Booth 1 | Natural Gas Combustion Mixed | Welding and Flame Cutting | TOTAL |
| Criteria Pollutants | PM | 1.93 | 0.83 | 7.78 | 10.54 |
| | PM10 | 1.93 | 3.32 | 7.78 | 13.03 |
| | SO2 | 0 | 0.26 | 0 | 0.26 |
| | NOx | 0 | 43.72 | 0 | 43.72 |
| | VOC | 31.13 | 2.40 | 0 | 33.54 |
| | CO | 0 | 36.73 | 0 | 36.73 |
| Hazardous Air Pollutants | Benzene | 0 | 9.18E-04 | 0 | 9.18E-04 |
| | Dichlorobenzene | 0 | 5.25E-04 | 0 | 5.25E-04 |
| | Formaldehyde | 0 | 0.03 | 0 | 0.03 |
| | Hexane | 0 | 0.79 | 0 | 0.79 |
| | Toluene | 14.59 | 1.49E-03 | 0 | 14.59 |
| | Cadmium | 0 | 4.81E-04 | 0 | 4.81E-04 |
| | Chromium | 0.12 | 6.12E-04 | 6.39E-13 | 0.12 |
| | Lead | 0 | 2.19E-04 | 0 | 2.19E-04 |
| | Manganese | 0.12 | 1.66E-04 | 0.43 | 0.55 |
| | Nickel | 0 | 9.18E-04 | 0 | 9.18E-04 |
| Totals | | 14.83 | 0.83 | 0.43 | 16.08 |
| Worse Case HAP | | | | | 14.59 |

Total emissions based on rated capacity at 8,760 hours/year.

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations**

Company Name: Arvin Sango, Inc.
Address City IN Zip: 2905 Wilson Avenue, Madison, Indiana 47250
Permit Number: F077-21616-00023
Pit ID: 077-00023
Reviewer: Chrystal Wagner
Date: February 7, 2006

| Material | Density (Lb/Gal) | Weight % Volatile (H2O & Organics) | Weight % Water | Weight % Organics | Volume % Water | Volume % Non-Volatiles (solids) | Gal of Mat. (gal/unit) | Maximum Throughput (unit/hour) | Pounds VOC per gallon of coating less water | Pounds VOC per gallon of coating | Potential VOC pounds per hour | Potential VOC pounds per day | Potential VOC tons per year | Particulate Potential (ton/yr) | lb VOC/gal solids | Transfer Efficiency |
|-----------------------------|------------------|------------------------------------|----------------|-------------------|----------------|---------------------------------|------------------------|--------------------------------|---|----------------------------------|-------------------------------|------------------------------|-----------------------------|--------------------------------|-------------------|---------------------|
| Spray Booth 1 | | | | | | | | | | | | | | | | |
| Black Heat Resistant 921-LV | 11.7 | 33.00% | 6.0% | 27.0% | 8.4% | 44.77% | 0.01000 | 225.000 | 3.45 | 3.16 | 7.11 | 170.59 | 31.13 | 38.63 | 7.06 | 50% |

Add worst case coating to all solvents

| | | | | | |
|--|---------------------|-------------|---------------|--------------|--------------|
| Total State Potential Emissions | Uncontrolled | 7.11 | 170.59 | 31.13 | 38.63 |
| | Controlled | 7.11 | 170.59 | 31.13 | 1.93 |

METHODOLOGY

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

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: Arvin Sango, Inc.
Address City IN Zip: 2905 Wilson Avenue, Madison, Indiana 47250
Permit Number: F077-21616-00023
Plt ID: 077-00023
Permit Reviewer: Chrystal Wagner
Date: February 7, 2006

| Material | Density (Lb/Gal) | Gallons of Material (gal/unit) | Maximum (unit/hour) | Weight % Manganese | Weight % Toluene | Weight % Chromium | Chromium Emissions (ton/yr) | Manganese Emissions (ton/yr) | Toluene Emissions (ton/yr) | | |
|--|------------------|--------------------------------|---------------------|--------------------|------------------|-------------------|--|------------------------------|----------------------------|-------------|--------------|
| Spray Booth 1 | | | | | | | | | | | |
| Black Heat Resistant 921-LV | 11.7 | 0.010000 | 225.00 | 2.12% | 12.65% | 2.09% | 2.41 | 2.44 | 14.59 | | |
| Total State Potential Emissions | | | | | | | Total Single HAP Uncontrolled Emissions | | 2.41 | 2.44 | 14.59 |
| | | | | | | | Combined HAPs Uncontrolled Emissions | | 19.44 | | |
| | | | | | | | Dry Filter PM Control Efficiency | | 95% | | |
| | | | | | | | Total Single HAP Controlled Emissions | | 0.12 | 0.12 | 14.59 |
| | | | | | | | Combined HAPs Controlled Emissions | | 14.83 | | |

METHODOLOGY

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

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

Company Name: Arvin Sango, Inc.
Address City IN Zip: 2905 Wilson Avenue, Madison, Indiana 47250
Permit Number: F077-21616-00023
Plt ID: 077-00023
Reviewer: Chrystal Wagner
Date: February 7, 2006

Units:

1 paint dry-off oven @ 1 mmBtu/hr
1 paint bake oven @ 2 mmBtu/hr
1 washer @ 0.72 mmBtu/hr
6 space heaters @ 3.2 (19.2) mmBtu/hr
2 space heaters @ 3.0 (6.0) mmBtu/hr
9 space heaters @ 3.6 (32.4) mmBtu/hr
11 space heaters @ 3.5 (38.5) mmBtu/hr

Heat Input Capacity
MMBtu/hr

99.8

Potential Throughput
MMCF/yr

874.4

| Emission Factor in lb/MMCF | Pollutant | | | | | |
|-------------------------------|-----------|-------|-----|-------------|-----|------|
| | PM* | PM10* | SO2 | NOx | VOC | CO |
| | 1.9 | 7.6 | 0.6 | 100.0 | 5.5 | 84.0 |
| | | | | **see below | | |
| Potential Emission in tons/yr | 0.8 | 3.3 | 0.3 | 43.7 | 2.4 | 36.7 |

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

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

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

See page 2 for HAP emissions calculations.

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

Company Name: Arvin Sango, Inc.
Address City IN Zip: 2905 Wilson Avenue, Madison, Indiana 47250
Permit Number: F077-21616-00023
Plt ID: 077-00023
Reviewer: Chrystal Wagner
Date: February 7, 2006

| Emission Factor in lb/MMcf | HAP - Organics | | | | |
|-------------------------------|----------------|-----------------|--------------|-----------|-----------|
| | Benzene | Dichlorobenzene | Formaldehyde | Hexane | Toluene |
| | 2.1E-03 | 1.2E-03 | 7.5E-02 | 1.8E+00 | 3.4E-03 |
| Potential Emission in tons/yr | 9.181E-04 | 5.247E-04 | 3.279E-02 | 7.870E-01 | 1.487E-03 |

| Emission Factor in lb/MMcf | HAP - Metals | | | | |
|-------------------------------|--------------|-----------|-----------|-----------|-----------|
| | Lead | Cadmium | Chromium | Manganese | Nickel |
| | 5.0E-04 | 1.1E-03 | 1.4E-03 | 3.8E-04 | 2.1E-03 |
| Potential Emission in tons/yr | 2.186E-04 | 4.809E-04 | 6.121E-04 | 1.661E-04 | 9.181E-04 |

Methodology is the same as page 1

| | | |
|-------------------|------------------|------------|
| Total HAPs | 8.251E-01 | tpy |
|-------------------|------------------|------------|

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

Appendix A: Emissions Calculations Welding and Thermal Cutting

Company Name: Arvin Sango, Inc.
Address City IN Zip: 2905 Wilson Avenue, Madison, Indiana 47250
Permit Number: F077-21616-00023
Plt ID: 077-00023
Reviewer: Chrystal Wagner
Date: February 7, 2006

| PROCESS | Number of Stations | Max. electrode consumption per station (lbs/hr) | EMISSION FACTORS* (lb pollutant/lb electrode) | | | | EMISSIONS (lbs/hr) | | | | HAP (lbs/hr) | |
|--|--------------------|---|--|---|--------|--------|-----------------------|-----------------------|------------|----------|-----------------|------------------|
| | | | PM = PM10 | Mn | Ni | Cr | PM = PM10 | Mn | Ni | Cr | | |
| WELDING | | | | | | | | | | | | |
| Submerged Arc | 0 | 0 | 0.036 | 0.011 | | | 0 | 0 | 0 | 0 | 0 | |
| Metal Inert Gas (MIG)(carbon steel) | 1 | 195.2 | 0.0055 | 0.0005 | | | 1.074 | 0.098 | 0 | 0 | 0.098 | |
| Metal Inert Gas (MIG)(stainless steel) | 1 | 195.2 | 0.0091 | | | | 1.776 | 0 | 0 | 0 | 0 | |
| Tungsten Inert Gas (TIG)(carbon steel) | 0 | 0 | 0.0055 | 0.0005 | | | 0 | 0 | 0 | 0 | 0 | |
| Oxyacetylene(carbon steel) | 0 | 0 | 0.0055 | 0.0005 | | | 0 | 0 | 0 | 0 | 0 | |
| | | | | | | | | | | | | |
| | | | | | | | | | | | | |
| FLAME CUTTING | Number of Stations | Max. Metal Thickness Cut (in.) | Max. Metal Cutting Rate (in./minute) | EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)** | | | | EMISSIONS (lbs/hr) | | | | HAPS (lbs/hr) |
| | | | | PM = PM10 | Mn | Ni | Cr | PM = PM10 | Mn | Ni | Cr | |
| Oxyacetylene | 0 | 0 | 0 | 0.1622 | 0.0005 | 0.0001 | 0.0003 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 1.46E-13 | 1.46E-13 |
| Oxymethane | 0 | | | 0.0815 | 0.0002 | | 0.0002 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 |
| Plasma** | 0 | 0 | 0 | 0.0039 | | | | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 |
| | | | | | | | | | | | | |
| | | | | | | | | | | | | |
| EMISSION TOTALS | | | | | | | | | | | | |
| | | | | | | | | carbon: | stainless: | Mn | Cr | carbon HAP: |
| Potential Emissions lbs/hr | | | | | | | | 1.07 | 1.78 | | | 0.10 |
| Potential Emissions lbs/day | | | | | | | | 25.77 | 42.63 | | | 2.34 |
| Potential Emissions tons/year | | | | | | | | 4.70 | 7.78 | 4.27E-01 | 6.39E-13 | 0.43 |

METHODOLOGY

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

**Emission Factor for plasma cutting from American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted). Therefore, the emission factor for plasma cutting is for 8 mm thick r

Using AWS average values: (0.25 g/min)/(3.6 m/min) x (0.0022 lb/g)/(39.37 in./m) x (1,000 in.) = 0.0039 lb/1,000 in. cut, 8 mm thick

Plasma cutting emissions, lb/hr: (# of stations)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 8 mm thick)

Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)

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

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

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