



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: November 17, 2008

RE: Transwheel Corporation / 069-25645-00056

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

Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures
FNPER.dot12/03/07



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Federally Enforceable State Operating Permit Renewal OFFICE OF AIR QUALITY

**Transwheel Corporation
3000 Yeoman Way
Huntington, Indiana 46750**

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

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

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

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

Operation Permit No.: F069-25645-00056	
Issued by: Original signed by Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: November 17, 2008 Expiration Date: November 17, 2018

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SECTION A

SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary aluminum wheel reprocessing plant.

Source Address:	3000 Yeoman Way, Huntington, Indiana 46750
Mailing Address:	3000 Yeoman Way, Huntington, Indiana 46750
General Source Phone Number:	(260) 358-8660
SIC Code:	3714
County Location:	Huntington
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) One (1) wheelabrator shot blast system, identified as WH1, constructed in 1997, with a maximum capacity of finishing 400 wheels per hour, utilizing a baghouse (DT3) for particulate control, and exhausting inside the plant.
- (b) Three (3) shotblasting cabinets, identified as SB1, SB2, and SB3, constructed in 1997, each with a maximum capacity of finishing 120 wheels per hour, each equipped with a cyclone, all utilizing a baghouse (DT2) for particulate control, and exhausting inside the plant.
- (c) Two (2) spray paint booths, identified as LB1 and LB2, constructed in 1997, each with a maximum capacity of coating 240 wheels per hour, each uses less than 5 gallons of coating material per day, each utilizing one (1) air atomization spray gun and one (1) HVLP spray gun, each equipped with dry filters for particulate control, and each exhausted through one (1) stack (S/V ID: S23 and S24) respectively.
- (d) Five (5) powder coating booths, identified as PB1 through PB5, constructed in 1997, each with a maximum capacity of coating 240 wheels per hour, each uses less than 5 gallons of coating material per day, each utilizing one (1) electrostatic air atomized application gun, all utilizing a baghouse (DT1) for particulate control, and exhausting generally inside the plant.
- (e) One (1) chemical dip tank, identified as PS1, constructed in 1997, with a maximum capacity of cleaning 350 wheels per hour, equipped with a hinged cover for vapor control, and exhausting inside the plant.
- (f) One (1) chemical dip tank, identified as PS2, constructed in 1997, with a maximum capacity of cleaning 350 wheels per hour, equipped with a hinged cover for vapor control, and exhausting inside the plant.

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

This stationary source also includes the following insignificant activities:

- (a) One (1) surface pretreatment system, identified as PT1, with a maximum capacity of treating 350 wheels per hour, consisting of an alkaline wash, a hydrofluoric acid etch, a chromic acid treatment, and rinsing operations. [326 IAC 2-7-1(21)(A)(iv)]
- (b) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour [326 IAC 2-7-1(21)(G)(i)(AA)(aa)]:
 - (1) Two (2) furnaces, each rated at 0.137 MMBtu/hr.
 - (2) One (1) furnace rated at 0.075 MMBtu/hr.
 - (3) One (1) furnace rated at 0.165 MMBtu/hr.
 - (4) Nine (9) space heaters, each rated at 0.150 MMBtu/hr.
 - (5) Six (6) space heaters, each rated at 0.140 MMBtu/hr.
 - (6) Four (4) tank heaters, each rated at 0.250 MMBtu/hr.
 - (7) One (1) tank heater rated at 0.100 MMBtu/hr.
 - (8) Two (2) 0.4 MMBtu/hr natural gas fired duct furnaces.
- (c) One (1) steam booth and steam cleaner with wastewater treated by a waste water treatment system. [326 IAC 2-7-1(40)(B)(ix)]:
- (d) Three (3) TIG welding units used for production welding equipped with a “smog hog” electrostatic precipitator for emissions control. [326 IAC 2-7-1(21)(G)(vi)(EE)(dd)]
- (e) Nine (9) electric curing ovens. [326 IAC 2-7-1(21)(A)]
- (f) Machining where an aqueous cutting coolant continuously floods the machining surface. [326 IAC 2-7-1(21)(G)(vi)(BB)]
- (g) Paint stripping water wash to wastewater treatment. [326 IAC 2-7-1(21)(G)(ix)(DD)]
- (h) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment. [326 IAC 2-7-1(21)(G)(x)(AA)]
- (i) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment. [326 IAC 2-7-1(21)(G)(xix)]
- (j) Paved and unpaved roads with public access. [326 IAC 2-7-1(21)(G)(xiii)]
- (k) One (1) enclosed Herkules paint gun washer using a maximum of 130 gallons of lacquer thinner per year. [326 IAC 2-7-1(40)(E)(ii)]
- (l) One (1) acrylic powder coating booth, identified as PB6, with a maximum capacity of coating 15 wheels per hour, using less than 5 gallons of coating material per day, utilizing one (1) electrostatic air atomized application gun, equipped with baghouse (DT1) for particulate control, and exhausting generally inside the plant. [326 IAC 2-7-1(21)(B)]
- (m) Shotblast system controlled with fabric filters with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute. [326 IAC 2-7-1(21)(G)(xxiii)]
- (n) One (1) Titan Air Handler, installed in 2006, natural gas-direct fired with a heat input capacity of 2.64 MMBtu/hr, and air flow rate 30,000 cfm.

- (o) Two (2) Denray downdraft tables, identified as DDT1 and DDT2, used for sanding and scraping of wheels, each equipped with 3 cartridge filters, and each has air flow rate 2800 cfm.

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

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

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, F069-25645-00056, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

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

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

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

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

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

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

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

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

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

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain

certification by an "authorized individual" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
- (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

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

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

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

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

- (a) All terms and conditions of permits established prior to F069-25645-00056 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

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

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

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

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

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

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

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

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

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

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of

planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

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

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

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
 - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the

deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

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

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

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

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

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

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

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

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

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

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

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

- (b) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

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

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

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

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

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

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

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

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

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

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.24 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

(a) Pursuant to 326 IAC 2-8:

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

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

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

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

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

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

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

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

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

All required notifications shall be submitted to:

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

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

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

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

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

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

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

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

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

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

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

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

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

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

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

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

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

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

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

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

SECTION D.1

FACILITY OPERATION CONDITIONS

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

- (a) One (1) wheelabrator shot blast system, identified as WH1, constructed in 1997, with a maximum capacity of finishing 400 wheels per hour, utilizing a baghouse (DT3) for particulate control, and exhausting inside the plant.
- (b) Three (3) shotblasting cabinets, identified as SB1, SB2, and SB3, constructed in 1997, each with a maximum capacity of finishing 120 wheels per hour, each equipped with a cyclone, all utilizing a baghouse (DT2) for particulate control, and exhausting inside the plant.

(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 Particulate [326 IAC 6-3-2] [326 IAC 2-8-4] [326 IAC 2-2]

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

- (a) The allowable particulate emission rate from the wheelabrator shot blast system, identified as WH1 shall not exceed 9.67 pounds per hour when operating at a process weight rate of 7,200 pounds per hour.
- (b) The allowable particulate emission rate from the shotblasting cabinets, identified as SB1, SB2, and SB3 shall each not exceed 4.31 pounds per hour when operating at a process weight rate of 2,160 pounds of aluminum wheels per hour.

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

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

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

Compliance with the above limits in (a) and (b) in conjunction with PM PTE of all other emission units at the source will also limit total source-wide PM PTE to less than 100 tons per year and therefore, render the requirements of 326 IAC 2-7 and 326 IAC 2-2 not applicable.

D.1.2 PM10 and PM2.5 [326 IAC 2-8-4] [326 IAC 2-2]

(a) Pursuant to 326 IAC 2-8-4, PM10 emissions from:

- (1) The wheelabrator shot blast system, identified as WH1, shall not exceed 9.67 pounds per hour.
- (2) The shotblasting cabinets, identified as SB1, SB2, and SB3, shall each not exceed 4.31 pounds per hour.

Compliance with these limits in conjunction with PM10 PTE of all other emission units at the source will limit total source-wide PM10 PTE to less than 100 tons per year and therefore, render the requirements of 326 IAC 2-7 and 326 IAC 2-2 not applicable.

(b) Pursuant to 326 IAC 2-2, PM2.5 emissions from:

- (1) The wheelabrator shot blast system, identified as WH1, shall not exceed 9.67

pounds per hour.

- (2) The shotblasting cabinets, identified as SB1, SB2, and SB3, shall each not exceed 4.31 pounds per hour.

Compliance with these limits in conjunction with PM2.5 PTE of all other emission units at the source will limit total source-wide PM2.5 PTE to less than 100 tons per year (which is also less than 250 tons per year) and therefore, render the requirements of 326 IAC 2-2 not applicable.

D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.1.4 PM, PM10 and PM2.5 Control

- (a) In order to comply with D.1.1 and D.1.2, the baghouses for particulate control shall be in operation and control emissions from the wheelabrator shot blast system (WH1) and shotblasting cabinets (SB1, SB2, and SB3) at all times that the units are in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

D.1.5 PM, PM10 and PM2.5 Testing Requirements [326 IAC 2-8-5(a)(1), (4)]

In order to demonstrate compliance with Conditions D.1.1(a), D.1.2(a)(1) and D.1.2(b)(1), the Permittee shall perform PM, PM10 and PM2.5 testing for the baghouse (DT3) within 180 days of publication of the new or revised condensable PM test method(s) referenced in the U. S. EPA's Final Rule for Implementation of the New Source Review (NSR) Program for Particulate Matter Less Than 2.5 Micrometers (PM2.5), signed on May 8th, 2008. This testing shall be conducted utilizing methods as approved by the Commissioner. These tests shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing. PM10 and PM2.5 includes filterable PM.

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

D.1.6 Visible Emissions Notations

- (a) Visible emission notations of the wheelabrator shot blast system (WH1) and shotblasting cabinets (SB1, SB2, and SB3) stacks exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions

for that specific process.

- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.1.7 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses used in conjunction with the wheelabrator shot blast system (WH1) and shotblasting cabinets (SB1, SB2, and SB3), at least once per shift when the units are in operation and exhausting to the atmosphere. When for any one reading, the pressure drop across the baghouses is outside the normal range of 0.5 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a violation of this permit.

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

D.1.8 Broken or Failed Bag Detection

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

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

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

D.1.9 Record Keeping Requirements

- (a) To document compliance with Condition D.1.6, the Permittee shall maintain records of visible emission notations of the wheelabrator shot blast system (WH1) and shotblasting cabinets (SB1, SB2, and SB3) stacks exhaust once per day. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notation, (i.e. the process did not operate that day).
- (b) To document compliance with Condition D.1.7, the Permittee shall maintain records once per day of the total static pressure drop when venting to the atmosphere. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading, (i.e. the process did not operate that day).
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2

FACILITY OPERATION CONDITIONS

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

- (c) Two (2) spray paint booths, identified as LB1 and LB2, constructed in 1997, each with a maximum capacity of coating 240 wheels per hour, each uses less than 5 gallons of coating material per day, each utilizing one (1) air atomization spray gun and one (1) HVLP spray gun, each equipped with dry filters for particulate control, and each exhausted through one (1) stack (S/V ID: S23 and S24) respectively.

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

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

D.2.1 Volatile Organic Compound Limitation [326 IAC 8-2-9]

Each of the two (2) spray paint booths (LB1 and LB2) shall use less than 15 pounds of VOC per day, including coatings, dilution solvents, and cleaning solvents. Compliance with this limit shall render 326 IAC 8-2-9 not applicable.

D.2.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.2.3 Volatile Organic Compounds (VOC)[326 IAC 8-1-2][326 IAC 8-1-4]

Compliance with the usage limitation contained in Condition D.2.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.2.4 Record Keeping Requirements

- (a) To document compliance with Condition D.2.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits established in Condition D.2.1. 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.
The amount of coating material and solvent less water used on daily basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (3) The cleanup solvent usage for each day.
 - (4) The total VOC usage for each day.

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

D.2.5 Reporting Requirements

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

SECTION D.3 FACILITY OPERATION CONDITIONS

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

- (e) One (1) chemical dip tank, identified as PS1, with a maximum capacity of cleaning 350 wheels per hour, equipped with a hinged cover for vapor control, and exhausting inside the plant.
- (f) One (1) chemical dip tank, identified as PS2, with a maximum capacity of cleaning 350 wheels per hour, equipped with a hinged cover for vapor control, and exhausting inside the plant.

Insignificant Activity:

- (k) One (1) enclosed Herkules paint gun washer using a maximum of 130 gallons of lacquer thinner per year.

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

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

D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

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

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

D.3.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements for chemical dip tanks PS1 and PS2, and the Herkules paint gun washer are met:

- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.

- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection D.3.2(b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption, or an oil cover when the solvent is miscible with water. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), for cold cleaning facility construction of which commenced after July 1, 1990, the Permittee shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Transwheel Corporation
Source Address: 3000 Yeoman Way, Huntington, Indiana 46750
Mailing Address: 3000 Yeoman Way, Huntington, Indiana 46750
FESOP Permit No.: F069-25645-00056

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: Transwheel Corporation
Source Address: 3000 Yeoman Way, Huntington, Indiana 46750
Mailing Address: 3000 Yeoman Way, Huntington, Indiana 46750
FESOP Permit No.: F069-25645-00056

This form consists of 2 pages

Page 1 of 2

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

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

FESOP Usage Report (Submit Report Quarterly)

Source Name: Transwheel Corporation
Source Address: 3000 Yeoman Way, Huntington, Indiana 46750
Mailing Address: 3000 Yeoman Way, Huntington, Indiana 46750
FESOP No.: F069-17145-00056
Facility: Two (2) Spray Paint Booths (LB1 and LB2)
Parameter: VOC
Limit: Less than 15 pounds of VOC per day, including coatings, dilution solvents, and cleaning solvents for each of the two booths.

Month: _____ Year: _____

Day	LB1	LB2	Day	LB1	LB2
1			17		
2			18		
3			19		
4			20		
5			21		
6			22		
7			23		
8			24		
9			25		
10			26		
11			27		
12			28		
13			29		
14			30		
15			31		
16					

- No deviation occurred in this month.
- Deviation/s occurred in this month.
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: Transwheel Corporation
Source Address: 3000 Yeoman Way, Huntington, Indiana 46750
Mailing Address: 3000 Yeoman Way, Huntington, Indiana 46750
FESOP Permit No.: F069-25645-00056

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>	
<p><input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.</p>	
<p><input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD</p>	
<p>Permit Requirement (specify permit condition #)</p>	
<p>Date of Deviation:</p>	<p>Duration of Deviation:</p>
<p>Number of Deviations:</p>	
<p>Probable Cause of Deviation:</p>	
<p>Response Steps Taken:</p>	
<p>Permit Requirement (specify permit condition #)</p>	
<p>Date of Deviation:</p>	<p>Duration of Deviation:</p>
<p>Number of Deviations:</p>	
<p>Probable Cause of Deviation:</p>	
<p>Response Steps Taken:</p>	

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

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

Source Background and Description

Source Name:	Transwheel Corporation
Source Location:	3000 Yeoman Way, Huntington, Indiana 46750
County:	Huntington
SIC Code:	3714
Operation Permit No.:	F069-25645-00056
Permit Reviewer:	Mehul Sura

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from Transwheel Corporation relating to the operation of an aluminum wheel reprocessing plant. Transwheel Corporation was issued FESOP 069-17145-00056 on September 9, 2003.

History

On December 12, 2007, Transwheel Corporation submitted an application to the OAQ requesting to renew its operating permit. Transwheel Corporation was issued a FESOP Renewal on September 9, 2003.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following emission units and pollution control:

- (a) One (1) wheelabrator shot blast system, identified as WH1, constructed in 1997, with a maximum capacity of finishing 400 wheels per hour, utilizing a baghouse (DT3) for particulate control, and exhausting inside the plant.
- (b) Three (3) shotblasting cabinets, identified as SB1, SB2, and SB3, constructed in 1997, each with a maximum capacity of finishing 120 wheels per hour, each equipped with a cyclone, all utilizing a baghouse (DT2) for particulate control, and exhausting inside the plant.
- (c) Two (2) spray paint booths, identified as LB1 and LB2, constructed in 1997, each with a maximum capacity of coating 240 wheels per hour, each uses less than 5 gallons of coating material per day, each utilizing one (1) air atomization spray gun and one (1) HVLP spray gun, each equipped with dry filters for particulate control, and each exhausted through one (1) stack (S/V ID: S23 and S24) respectively.
- (d) Five (5) powder coating booths, identified as PB1 through PB5, constructed in 1997, each with a maximum capacity of coating 240 wheels per hour, each uses less than 5 gallons of coating material per day, each utilizing one (1) electrostatic air atomized application gun, all utilizing a baghouse (DT1) for particulate control, and exhausting generally inside the plant.
- (e) One (1) chemical dip tank, identified as PS1, constructed in 1997, with a maximum capacity of cleaning 350 wheels per hour, equipped with a hinged cover for vapor control, and exhausting inside the plant.

- (f) One (1) chemical dip tank, identified as PS2, constructed in 1997, with a maximum capacity of cleaning 350 wheels per hour, equipped with a hinged cover for vapor control, and exhausting inside the plant.

Insignificant and Trivial Activities

The source consists of the following insignificant and trivial activities, as defined in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40), respectively:

- (a) One (1) surface pretreatment system, identified as PT1, with a maximum capacity of treating 350 wheels per hour, consisting of an alkaline wash, a hydrofluoric acid etch, a chromic acid treatment, and rinsing operations. [326 IAC 2-7-1(21)(A)(iv)]
- (b) Following natural gas-fired combustion sources with total heat input capacity equal to or less than ten (10) million Btu per hour [326 IAC 2-7-1(21)(G)(i)(AA)(aa)]:
 - (1) Two (2) furnaces, each rated at 0.137 MMBtu/hr
 - (2) One (1) furnace rated at 0.075 MMBtu/hr
 - (3) One (1) furnace rated at 0.165 MMBtu/hr
 - (4) Nine (9) space heaters, each rated at 0.150 MMBtu/hr
 - (5) Six (6) space heaters, each rated at 0.140 MMBtu/hr
 - (6) Four (4) tank heaters, each rated at 0.250 MMBtu/hr
 - (7) One (1) tank heater rated at 0.100 MMBtu/hr
 - (8) Two (2) 0.4 MMBtu/hr natural gas fired duct furnaces
- (c) One (1) steam booth and steam cleaner with wastewater treated by a waste water treatment system. [326 IAC 2-7-1(40)(B)(ix)]
- (d) Three (3) TIG welding units used for production welding equipped with a “smog hog” electrostatic precipitator for emissions control. [326 IAC 2-7-1(21)(G)(vi)(EE)(dd)]
- (e) Nine (9) electric curing ovens. [326 IAC 2-7-1(21)(A)]
- (f) Machining where an aqueous cutting coolant continuously floods the machining surface. [326 IAC 2-7-1(21)(G)(vi)(BB)]
- (g) Paint stripping water wash to wastewater treatment. [326 IAC 2-7-1(21)(G)(ix)(DD)]
- (h) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment. [326 IAC 2-7-1(21)(G)(x)(AA)]
- (i) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment. [326 IAC 2-7-1(21)(G)(xix)]
- (j) Paved and unpaved roads with public access. [326 IAC 2-7-1(21)(G)(xiii)]
- (k) One (1) enclosed Herkules paint gun washer using a maximum of 130 gallons of lacquer thinner per year. [326 IAC 2-7-1(40)(E)(ii)]
- (l) One (1) acrylic powder coating booth, identified as PB6, with a maximum capacity of coating 15 wheels per hour, using less than 5 gallons of coating material per day, utilizing one (1) electrostatic air atomized application gun, equipped with baghouse (DT1) for particulate control, and exhausting generally inside the plant. [326 IAC 2-7-1(21)(B)]

- (m) Shotblast system controlled with fabric filters with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute. [326 IAC 2-7-1(21)(G)(xxiii)]

Insignificant Activities without a Permit

The source also consists of the following Insignificant Activities without a Permit:

- (a) One (1) Titan Air Handler, installed in 2006, natural gas-fired with a heat input capacity of 2.64 MMBtu/hr, and air flow rate 30,000 cfm. [326 IAC 2-7-1(21)(G)(i)(AA)(aa)]
- (b) Two (2) Denray downdraft tables, identified as DDT1 and DDT2, both installed in 2006, used for sanding and scraping of wheels, each equipped with 3 cartridge filters, and each has air flow rate 2800 cfm. [326 IAC 2-7-1(21)(B)]

Existing Approvals

Since the issuance of the FESOP (069-17145-00056) on September 9, 2003, the source has constructed or has been operating under the following approvals as well:

- (a) First Administrative Amendment No. 069-18198-00056 issued on December 15, 2003; and
- (b) Second Administrative Amendment No. 069-22682-00056 issued on February 28, 2008.

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

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Huntington County.

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

- (a) Ozone Standards

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

- (2) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Huntington County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM2.5**
Huntington County has been classified as attainment for PM2.5. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM2.5 emissions, and the effective date of these rules was July 15th, 2008. Indiana has three years from the publication of these rules to revise its PSD rules, 326 IAC 2-2, to include those requirements. The May 8, 2008 rule revisions require IDEM to regulate PM10 emissions as a surrogate for PM2.5 emissions until 326 IAC 2-2 is revised.
- (c) **Other Criteria Pollutants**
Huntington County has been classified as attainment or unclassifiable in Indiana for PM10, NO_x, CO, and SO₂. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (d) **Fugitive Emissions**
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

Unrestricted Potential Emissions

Appendix A of this TSD reflects the unrestricted potential emissions of the source. The source will be issued a FESOP Renewal due to all of the following reasons (since this source is not one of the twenty-eight (28) listed source categories under 326 IAC 2-7, fugitive emissions are not counted toward the determination of Part 70 applicability):

- (a) The potential emissions of PM10/PM2.5 are greater than 100 tons per year. However, the source has agreed to continue to limit the source-wide PM10 PTE to less than Title V major source threshold level for PM10.
- (b) The potential emissions of all other criteria pollutants are less than 100 tons per year.
- (c) The potential emissions of any single HAP is less than 10 tons per year and the potential emissions of a combination of HAPs is less than 25 tons per year.

Potential to Emit After Issuance

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

Process/ Emission Unit	Potential to Emit (tons/year)								
	PM	PM10	PM2.5	SO ₂	VOC	CO	NO _x	Single HAP	Combined HAPS
Natural Gas Combustion Units	0.07	0.26	0.26	0.02	0.19	2.91	3.47	0.06	0.07
Spray paint booths (LB1 and LB2)	0.03 ^(e)	0.03 ^(e)	0.03 ^(e)	0	5.48 ^(f)	0	0	0.57	1.29
Powder coating booths (PB1-PB5)	0.03 ^(e)	0.03 ^(e)	0.03 ^(e)	0	0.07	0	0	0	0
Powder coating booths (PB6)	0.004 ^(e)	0.004 ^(e)	0.004 ^(e)	0	0.0094	0	0	0	0
Chemical dip tanks (PS1, PS2 and PT1)	0	0	0	0	12.42	0	0	0	0
Shotblasting cabinet (SB1)	18.87 ^(a)	18.87 ^(b)	18.87 ^(c)	0	0	0	0	0	0
Shotblasting cabinet (SB2)	18.87 ^(a)	18.87 ^(b)	18.87 ^(c)	0	0	0	0	0	0
Shotblasting cabinet (SB3)	18.87 ^(a)	18.87 ^(b)	18.87 ^(c)	0	0	0	0	0	0
Wheelabrator shot blast system (WH1)	42.35 ^(d)	42.35 ^(b)	42.35 ^(c)	0	0	0	0	0	0
Downdraft tables (DDT1 and DDT2)	0.0004 ^(e)	0.0004 ^(e)	0.0004 ^(e)	0	0	0	0	0	0
Total Emissions	99.13	99.32	99.32	0.02	15.38	2.91	3.47	0.63	1.36
Title V Major Source Thresholds	NA	100	--	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	NA	250	250	250	250	NA	NA
Emission Offset Major Source Thresholds	NA	NA	NA	NA	NA	NA	NA	NA	NA

- (a) The PTE is based on applicable PM limit under 326 IAC 6-3 (for details, please refer 326 IAC 6-3 applicability in 'State Rule Applicability - Shotblasting cabinets (SB1, SB2 and SB3)' section of this TSD).
- (b) The PTE is based on applicable PM10 limit under 326 IAC 2-8 (for details, please refer 326 IAC 2-8 applicability in 'State Rule Applicability - State Rule Applicability - Entire Source' section of this TSD).
- (c) The PTE is based on applicable PM2.5 limit under 326 IAC 2-2 (for details, please refer 326 IAC 2-2 applicability in 'State Rule Applicability - Entire Source' section of this TSD).
- (d) The PTE is based on applicable PM limit under 326 IAC 6-3 (for details, please refer 326 IAC 6-3 applicability in 'State Rule Applicability - Wheelabrator shot blast system (WH1)' section of this TSD).
- (e) The PTE is after control.
- (f) The PTE is based on the VOC usage limit (15 pounds of VOC usage per day) for each of the spray paint booths, identified as LB1 and LB2 (for details, please refer 326 IAC 8-2-9 applicability in 'State Rule Applicability – Spray paint booths (LB1 and LB2)' section of this TSD).

The following conclusions are made from the above table:

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

Federal Rule Applicability

New Source Performance Standards (NSPS)

- (a) **Subpart MM - Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations**
The source does not coat automobile and light duty truck. Therefore, this source is not subject to the requirements of this NSPS.
- (b) There are no other NSPS (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (a) **Subpart HHHHHH - National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources**
This source does not perform any paint stripping operation, which involves the use of chemical strippers that contain methylene chloride (MeCl). In addition, the source does not use any coating material, which contains target HAPs (compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd)). Therefore, the requirements of this NESHAP are not included in the permit.
- (b) There are no other NESHAP (326 IAC 20 and 40 CFR Part 63) included in the permit for this source, since this source is not a major source of HAPs.

Compliance Assurance Monitoring (CAM)

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

State Rule Applicability - Entire Source

326 IAC 1-5-2 (Emergency Reduction Plans)

The source is not subject to the requirements of 326 IAC 1-5-2, because the source-wide PTE of each of the pollutants is limited to less than 100 tons per year.

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

- (a) **PM**
The uncontrolled PM emissions from the source is greater than 250 tons per year. However, compliance with the 326 IAC 6-3 limits (which are specified under 326 IAC 6-3 rule applicability for these emission units in paragraphs 'State Rule Applicability - Wheelabrator shot blast system (WH1)' and 'State Rule Applicability - Shotblasting cabinets (SB1, SB2 and SB3)' sections of this TSD) in conjunction with PM PTE of all other emission units at the source will limit source-wide PM PTE to less than 100 (which is also less than 250) tons per year and therefore, render 326 IAC 2-2 (PSD) not applicable.

(b) **PM10**

The uncontrolled PM10 emissions from the source is greater than 250 tons per year. The Permittee will continue to comply with the FESOP PM10 limits for the shot blast (WH1) and shotblasting cabinets (SB1, SB2, and SB3) (which are specified under 326 IAC 2-8 rule applicability in 'State Rule Applicability - Entire Section' of this TSD).

Compliance with these FESOP PM10 limits for the shot blast (WH1) and shotblasting cabinets (SB1, SB2, and SB3) in conjunction with PM10 PTE of all other emission units at the source will limit source-wide PM10 PTE to less than 100 (which is also less than 250) tons per year and therefore, render 326 IAC 2-2 (PSD) not applicable.

(c) **PM2.5**

The potential emissions of PM2.5 from the source is greater than 250 tons per year. The Permittee will comply with the following PM2.5 limitations:

- (a) PM2.5 (for which PM10 is surrogate) emissions from the wheelabrator shot blast system, identified as WH1, shall not exceed 9.67 pounds per hour.
- (b) PM2.5 (for which PM10 is surrogate) emissions from each of the shotblasting cabinets, identified as SB1, SB2, and SB3, shall not exceed 4.31 pounds per hour.

Compliance with the above limits in conjunction with PM2.5 PTE of all other emission units at the source will limit total source-wide PM2.5 PTE to less than 250 tons per year and therefore, render the requirements of 326 IAC 2-2 not applicable.

326 IAC 2-4.1-1 (New Source Toxics Control)

This source is not subject to the requirements of 326 IAC 2-4.1-1 because the source-wide PTE of each single HAP and combined HAPs are less than 10 and 25 tons per year, respectively.

326 IAC 2-6 (Emission Reporting)

This source is located in Huntington County and the source-wide PTE of each criteria pollutant is less than 100 tons per year. Therefore, the requirements of 326 IAC 2-6 do not apply.

326 IAC 2-8 (FESOP)

The potential emissions of PM10 is greater than 100 tons per year. The Permittee will continue to comply with the following PM10 limitations:

PM10 Limitations

- (a) PM10 emissions from the wheelabrator shot blast system, identified as WH1, shall not exceed 9.67 pounds per hour.
- (b) PM10 emissions from the shotblasting cabinets, identified as SB1, SB2, and SB3, shall each not exceed 4.31 pounds per hour.

Compliance with the above limits in conjunction with PM10 PTE of all other emission units at the source will limit total source-wide PM10 PTE to less than 100 tons per year and therefore, render the requirements of 326 IAC 2-7 not applicable.

326 IAC 5-1 (Opacity Limitations)

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

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

326 IAC 6-4 (Fugitive Dust Emissions)

The requirements of 326 IAC 6-4 apply to all fugitive dust sources. Pursuant to 326 IAC 6-4-2(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.

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

This source is not subject to the requirements of 326 IAC 6-5 because the potential fugitive particulate emissions (after the effect of any controls) from the entire source is less than 25 tons per year.

State Rule Applicability – Spray paint booths (LB1 and LB2)

326 IAC 8-2-9 (Miscellaneous Metal Coating)

The spray paint booths (LB1 and LB2) are not subject to the requirements of 326 IAC 8-2-9 because the source has agreed that it will continue to limit the input of VOC at each of these booths to less than 15 pounds per day.

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

Most recent updates in IDEM guidance require that spray coating manufacturing processes shall be evaluated (for 326 IAC 6-3 applicability purpose) based on the threshold specified in 326 IAC 6-3-1(15) (5 gallons coating material per day) and not based on the threshold specified in 326 IAC 6-3-1(14) (0.551 pounds per hour uncontrolled emissions). Based on this guidance, the spray paint booths (LB1 and LB2) have been evaluated based on the threshold specified in 326 IAC 6-3-1(15). Each of the spray booths uses less than 5 gallons coating material per day, which is less than the threshold specified in 326 IAC 6-3-1(15), therefore these spray booths are not subject to the requirements of 326 IAC 6-3.

Since these spray booths are no longer subject to the requirements of 326 IAC 6-3, the particulate emission limit under 326 IAC 6-3, which was specified for these spray booths in Condition D.2.3 of the FESOP No. 069-17145-00056, has been removed .

State Rule Applicability –Powder coating booths (PB1 through PB6)

326 IAC 8 (Volatile Organic Compound Rules)

The powder coating booths (PB1 through PB6) are not subject to the requirements of 326 IAC 8 because each of these booths emits less than 15 pounds VOC per day.

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

Based on the explanation in 326 IAC 8-2-9 applicability in 'State Rule Applicability – Spray paint booths (LB1 and LB2)' section of this TSD, the powder coating booths (PB1 through PB6) are exempt from the requirements of 326 IAC 6-3 because each of these booths uses less than 5 gallons coating material per day.

Since these spray booths are no longer subject to the requirements of 326 IAC 6-3, the particulate emission limit under 326 IAC 6-3, which was specified for these spray booths in Condition D.2.3 of the FESOP No. 069-17145-00056, has been removed.

State Rule Applicability – Chemical dip tanks (PS1 and PS2) and Herkules paint gun washer

326 IAC 8-3-2 (Cold Cleaner Operation)

The chemical dip tanks (PS1 and PS2) and Herkules paint gun washer are subject to the requirements of 326 IAC 8-3-2 because each of these facilities emits more than 15 pounds VOC per day and constructed after January 1, 1980, and organic solvent degreasing operations are performed at these facilities. Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operation), the Permittee shall:

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

326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)

The chemical dip tanks (PS1 and PS2) and Herkules paint gun washer are subject to the requirements of 326 IAC 8-3-5 because each of these facilities emits more than 15 pounds VOC per day, does not have remote solvent reservoirs and constructed after January 1, 1990, and organic solvent degreasing operations are performed at these facilities.

- (a) Pursuant to 326 IAC 8-3-5(a), the Permittee shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38OC) (one hundred degrees Fahrenheit (100OF)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9OC) (one hundred twenty degrees Fahrenheit (120OF)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b), the Permittee shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

State Rule Applicability – Shotblasting cabinets (SB1, SB2 and SB3)

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

The shotblasting cabinets (SB1, SB2 and SB3) are subject to the requirements of 326 IAC 6-3, because the manufacturing processes at these facilities are not listed in 326 IAC 6-3-1(b) and a particulate matter emission limits for these facilities are not established under any other rules.

The process weight rate for each of the shotblasting cabinets (SB1, SB2 and SB3) is 2,160 pounds (1.08 tons) per hour. The allowable particulate emission rate from each of the shotblasting cabinets (SB1, SB2 and SB3) shall each not exceed 4.31 pounds per hour when operating at a process weight rate of 1.08 tons of aluminum wheels per hour. The pounds per hour limitation was calculated using the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (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

$$E = 4.10 (1.08)^{0.67} = 4.31 \text{ pounds of PM per hour}$$

Each of the shotblasting cabinets (SB1, SB2 and SB3) can comply with the above PM emission limit (4.31 pounds per hour), because controlled PM emissions from each of these shotblasting cabinets is less than 4.31 pounds per hour.

In order to comply with the above limit, the cyclones and the baghouse (DT2) equipped on these shotblasting cabinets shall be in operation at all times when one or more shotblasting cabinets is in operation.

State Rule Applicability – Wheelabrator shot blast system (WH1)

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

The Wheelabrator shot blast system (WH1) is subject to the requirements of 326 IAC 6-3 because the manufacturing process at this facility is not listed in 326 IAC 6-3-1(b) and a particulate matter emission limit for this facility is not established under any other rules.

The process weight rate for each of the wheelabrator (WH1) is 7,200 pounds (1.08 tons) per hour. The allowable particulate emission rate from the wheelabrator shall not exceed 9.67 pounds per hour when operating at a process weight rate 7,200 pounds per hour. The pounds per hour limitation was calculated using the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (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

$$E = 4.10 (3.6)^{0.67} = 9.67 \text{ pounds of PM per hour}$$

The Wheelabrator shot blast system can comply with the above PM emission limit (9.67 pounds per hour) because the controlled PM emissions from this facility is less than 9.67 pounds per hour.

In order to comply with the above limit, the baghouse (DT3) equipped on the Wheelabrator shot blast system shall be in operation at all times the Wheelabrator shot blast system is in operation.

State Rule Applicability – Downdraft tables (DDT1 and DDT2)

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

The Downdraft tables (DDT1 and DDT2) are exempt from the requirements of 326 IAC 6-3 because the uncontrolled potential emissions from each of these emission units is less than 0.551 pounds per hour.

State Rule Applicability – All TIG welding units

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

Each of the TIG welding units uses less than 625 pounds of rod per day therefore, the TIG welding units are not subject to the requirements of 326 IAC 6-3.

State Rule Applicability – All Natural Gas Combustion Facilities at the Source

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

All natural gas combustion facilities at the source are exempt from the requirements of 326 IAC 6-2 because these facilities are not indirect heating sources.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

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

Compliance Determination Requirements

The Compliance Determination Requirement applicable to the source is as follows:

- (a) Emission Controls Operation
The control devices listed in the following table shall be in operation control PM, PM10 and PM2.5 emissions when one or more of their associated emission units listed in the same table are in operation.

Control Device	Associated Emission Unit/Units
Baghouse (DT3)	Wheelabrator shot blast system (WH1)
Baghouse (DT2)	Shotblasting cabinets (SB1, SB2, and SB3)
Dry filters equipped on spray paint booths (LB1 and LB2)	Spray paint booths (LB1 and LB2)
Baghouse (DT1)	Powder coating booths (PB1 through PB6)

This compliance determination condition is necessary because the above listed control devices must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-8 (FESOP) and to render 326 IAC 2-2 (PSD) not applicable.

Compliance Monitoring Requirements

The Compliance Monitoring Requirements applicable to the source is as follows:

- (a) Visible Emissions Notations
Once per day visible emissions notations of the wheelabrator shot blast system (WH1), and shotblasting cabinets (SB1, SB2, and SB3) stacks exhaust shall be performed during normal daylight operations when exhausting to the atmosphere.
- (b) Baghouse Parametric Monitoring
The Permittee shall record the total static pressure drop across the baghouse controlling the wheelabrator shot blast system (WH1) at least once per day when this emission unit is in operation.

The Permittee shall record the total static pressure drop across the baghouse controlling the shotblasting cabinets (SB1, SB2, and SB3) at least once per day when one or more of the shotblasting cabinets is in operation.

These monitoring conditions are necessary because the baghouses for wheelabrator shot blast system (WH1) and shotblasting cabinets (SB1, SB2, and SB3) must operate properly to ensure compliance with 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-8 (FESOP) and to render 326 IAC 2-2 (PSD) not applicable.

PM/PM10/PM2.5 Testing Requirement for Wheelberator (WH1)

The Wheelberator (WH1) has potential uncontrolled PM/PM10/PM2.5 emissions of 1433.92 tons per year. This value is 98.48 % of the total source-wide uncontrolled PM/PM10/PM2.5 emissions. In order to meet the PM/PM10/PM2.5 emission limits (as shown in the table below) of the Wheelberator (WH1), the baghouse (DT3) has to operate with 97.05% or more control efficiency. In order to verify that the baghouse (DT3) operates with 97.1% or more control efficiency, the testing requirement for the baghouse (DT3) has been included in the permit.

Pollutant	Emission Limit	Type of Limit
PM	9.67 pounds per hour	PSD
PM10	9.67 pounds per hour	FESOP
PM2.5	9.67 pounds per hour	PSD

In order to demonstrate compliance with the PM, PM10 and PM2.5 emission limits listed above, the Permittee shall perform PM, PM10 and PM2.5 testing for the baghouse (DT3) within 180 days of publication of the new or revised condensable PM test method(s) referenced in the U. S. EPA's Final Rule for Implementation of the New Source Review (NSR) Program for Particulate Matter Less Than 2.5 Micrometers (PM2.5), signed on May 8th, 2008. This testing shall be conducted utilizing methods as approved by the Commissioner. These tests shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing. PM10 and PM2.5 includes filterable PM.

Recommendation

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

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

An application for the purposes of this review was received on December 12, 2007. Additional information was received on June 19, 2008.

Conclusion

The operation of this aluminum wheel reprocessing plant shall be subject to the conditions of the attached FESOP Renewal No. 069-25645-00056.

IDEM Contact

- (a) Questions regarding this proposed FESOP Renewal can be directed to Mehul Sura at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5377 or toll free at 1-800-451-6027 extension 4-5377.

- (b) A copy of the findings is available on the Internet at:
<http://www.in.gov/ai/appfiles/idem-caats/>.
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov.

Source Emissions Summary

Appendix A: Emission Calculations
 Company Name: Transwheel Corporation
 Address City IN Zip: 3000 Yeoman Way, Huntington, Indiana 46750
 FESOP No.: 069-25645-00056
 Reviewer: Mehul Sura
 Date: July 18, 2008

Uncontrolled Potential Emissions (tons/year)

Pollutant	Wheelabrator shot blast system (WH1)	Shotblasting cabinet (SB1)	Shotblasting cabinet (SB2)	Shotblasting cabinet (SB3)	Chemical dip tanks (PS1 and PS2)*	Spray paint booths (LB1 and LB2)	Insignificant Activities				Other	TOTAL
							Powder coating booths (PB1-PB5)	Powder coating booths (PB6)	Natural Gas Combustion Units	Downdraft tables (DDT1 and DDT2)		
PM	1,433.92	8.79	4.76	4.76	0.00	0.43	2.87	0.41	0.07	0.04	negligible	1,456.05
PM10/PM2.5**	1,433.92	7.56	4.10	4.10	0.00	0.43	2.87	0.41	0.26	0.04	negligible	1,453.68
SO2	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.02	0.00	negligible	0.02
VOC	0.00	0.00	0.00	0.00	12.42	4.47	0.07	0.0094	0.19	0.00	negligible	17.16
CO	0.00	0.00	0.00	0.00	0.00	0.00	0.066	0.00	2.91	0.00	negligible	2.98
NOx	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	3.47	0.00	negligible	3.47
worst case single HAP	0.00	0.00	0.00	0.00	negl.	0.57	0.00	0.00	0.06	0.00	negligible	0.64
total HAPs	0.00	0.00	0.00	0.00	negl.	1.29	0.00	0.00	0.07	0.00	negligible	1.35

Limited PTE (tons/year)

Pollutant	Wheelabrator shot blast system (WH1)	Shotblasting cabinet (SB1)	Shotblasting cabinet (SB2)	Shotblasting cabinet (SB3)	Chemical dip tanks (PS1 and PS2)*	Spray paint booths (LB1 and LB2)	Insignificant Activities				Other	TOTAL
							Powder coating booths (PB1-PB5)	Powder coating booths (PB6)	Natural Gas Combustion Units	Downdraft tables (DDT1 and DDT2)		
PM	42.35	18.87	18.87	18.87	0.00	0.03	0.03	0.004	0.07	0.0004	negligible	99.09
PM10/PM2.5**	42.35	18.87	18.87	18.87	0.00	0.03	0.03	0.004	0.26	0.0004	negligible	99.29
SO2	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.02	0.00	negligible	0.02
VOC	0.00	0.00	0.00	0.00	12.42	2.74	0.07	0.0094	0.19	0.00	negligible	15.42
CO	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2.91	0.00	negligible	2.91
NOx	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	3.47	0.00	negligible	3.47
worst case single HAP	0.00	0.00	0.00	0.00	negl.	0.57	0.00	0.00	0.06	0.00	negligible	0.64
total HAPs	0.00	0.00	0.00	0.00	negl.	1.29	0.00	0.00	0.07	0.00	negligible	1.35

*The applicant states a 12.42 tons VOC per year potential emission loss from the two (2) paint stripping baths (PS1 and PS2), and a negligible loss of HF and Chromic acid from the pretreat unit PT1.

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

**Appendix A: Emission Calculations
VOC and Particulate
Spray paint booths (LB1 and LB2)**

Company Name: Transwheel Corporation
Address City IN Zip: 3000 Yeoman Way, Huntington, Indiana 46750
FESOP No.: 069-25645-00056
Reviewer: Mehul Sura
Date: 18-Jul-08

Potential Uncontrolled Emissions:																		
Coating Material (as applied)	Density (Lb/Gal)	Weight % Volatile (H2O& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency		
ALUMINUM WHEELS																		
Spray Paint Booth LB1:																		
LS1	8.65	80.5%	0%	80.5%	0%	18.0%	0.000078	240	6.96	6.96	0.13	3.13	0.57	0.07	38.68	50%		
LS10A	8.65	80.5%	0%	80.5%	0%	18.0%	0.000065	240	6.96	6.96	0.11	2.62	0.48	0.06	38.68	50%		
LS4	8.65	80.5%	0%	80.5%	0%	18.0%	0.000052	240	6.96	6.96	0.09	2.09	0.38	0.05	38.68	50%		
LS25A	8.65	80.5%	0%	80.5%	0%	18.0%	0.000039	240	6.96	6.96	0.07	1.56	0.29	0.03	38.68	50%		
LS17	8.65	80.5%	0%	80.5%	0%	18.0%	0.000026	240	6.96	6.96	0.04	1.04	0.19	0.02	38.68	50%		
Balance of paint	8.65	80.5%	0%	80.5%	0%	18.0%	0.000240	240	6.96	6.96	0.40	9.63	1.76	0.21	38.68	50%		
N-11 Wash Solvent	7.00	100.0%	0%	100.0%	0%	0.0%	0.000065	240	7.00	7.00	0.11	2.62	0.48	0.00	#DIV/0!	50%		
Spray Paint Booth LB2:																		
LS1	8.65	80.5%	0%	80.5%	0%	18.0%	0.000078	240	6.96	6.96	0.13	3.13	0.57	0.07	38.68	50%		
LS10A	8.65	80.5%	0%	80.5%	0%	18.0%	0.000065	240	6.96	6.96	0.11	2.62	0.48	0.06	38.68	50%		
LS4	8.65	80.5%	0%	80.5%	0%	18.0%	0.000052	240	6.96	6.96	0.09	2.09	0.38	0.05	38.68	50%		
LS25A	8.65	80.5%	0%	80.5%	0%	18.0%	0.000039	240	6.96	6.96	0.07	1.56	0.29	0.03	38.68	50%		
LS17	8.65	80.5%	0%	80.5%	0%	18.0%	0.000026	240	6.96	6.96	0.04	1.04	0.19	0.02	38.68	50%		
Balance of paint	8.65	80.5%	0%	80.5%	0%	18.0%	0.000240	240	6.96	6.96	0.40	9.63	1.76	0.21	38.68	50%		
N-11 Wash Solvent	7.00	100.0%	0%	100.0%	0%	0.0%	0.000065	240	7.00	7.00	0.11	2.62	0.48	0.00	#DIV/0!	50%		
Total Uncontrolled Potential Emissions:												24.49	4.47	0.43				
Limited PTE:												15.00	2.74	0.03				

The permittee will continue to limit VOC usage to 15 pounds per day to avoid 326 IAC 8-2-9 (Miscellaneous Metal Coatings).

Methodology:

PM control devices are dry particulate filters.

Dry particulate filters efficiency = 90%

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) * Transfer Efficiency

Total Uncontrolled Potential Emissions = Worst Case Coating Applied + Sum of all Solvents Used (Note: All coatings are applied on a mutually exclusive basis).

Limited VOC PTE (tons/year) = VOC Input Limitation (15 pounds/day)*365 (days/year) / (1 ton/2000 lbs)

Limited PM PTE (tons/year) = Uncontrolled PM Emission Rate (tons/year) * (1 - Control Efficiency)

HAP Emission Calculations
Spray paint booths (LB1 and LB2)

Company Name: Transwheel Corporation
Address City IN Zip: 3000 Yeoman Way, Huntington, Indiana 46750
FESOP No.: 069-25645-00056
Reviewer: Mehul Sura
Date: July 18, 2008

Material	Density (Lb/Gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Formaldehyde	Weight % Ethylbenzene	Weight % Aluminum Flake	Weight % Methanol	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Ethylbenzene (ton/yr)	Aluminum Flake (ton/yr)	Methanol Emissions (ton/yr)	Worst Case Coating (Total HAPs) (ton/yr)
Spray Paint Booth LB1:																
LS1	8.65	0.000078	240.000	5.95%	0.05%	0.05%	1.35%	3.30%	0.00%	0.04	0.00	0.00	0.01	0.02	0.00	0.08
LS10A	8.65	0.000065	240.000	5.95%	0.00%	0.05%	1.35%	3.30%	0.00%	0.04	0.00	0.00	0.01	0.02	0.00	0.06
LS4	8.65	0.000052	240.000	5.95%	0.05%	0.05%	1.35%	0.00%	0.00%	0.03	0.00	0.00	0.01	0.00	0.00	0.03
LS25A	8.65	0.000039	240.000	5.95%	0.05%	0.05%	1.35%	0.00%	0.00%	0.02	0.00	0.00	0.00	0.00	0.00	0.03
LS17	8.65	0.000026	240.000	5.95%	0.05%	0.05%	1.35%	3.30%	0.00%	0.01	0.00	0.00	0.00	0.01	0.00	0.03
Balance of paint	8.65	0.000240	240.000	5.95%	0.00%	0.00%	1.35%	0.00%	0.00%	0.13	0.00	0.00	0.03	0.00	0.00	0.16
N-11 Wash Solvent	7.00	0.000065	240.000	0.00%	60.00%	0.00%	1.35%	0.00%	40.00%	0.00	0.29	0.00	0.01	0.00	0.19	0.48
Spray Paint Booth LB2:																
LS1	8.65	0.000078	240.000	5.95%	0.05%	0.05%	1.35%	3.30%	0.00%	0.04	0.00	0.00	0.01	0.02	0.00	0.08
LS10A	8.65	0.000065	240.000	5.95%	0.00%	0.05%	1.35%	3.30%	0.00%	0.04	0.00	0.00	0.01	0.02	0.00	0.06
LS4	8.65	0.000052	240.000	5.95%	0.05%	0.05%	1.35%	0.00%	0.00%	0.03	0.00	0.00	0.01	0.00	0.00	0.03
LS25A	8.65	0.000039	240.000	5.95%	0.05%	0.05%	1.35%	0.00%	0.00%	0.02	0.00	0.00	0.00	0.00	0.00	0.03
LS17	8.65	0.000026	240.000	5.95%	0.05%	0.05%	1.35%	3.30%	0.00%	0.01	0.00	0.00	0.00	0.01	0.00	0.03
Balance of paint	8.65	0.000240	240.000	5.95%	0.00%	0.00%	1.35%	0.00%	0.00%	0.13	0.00	0.00	0.03	0.00	0.00	0.16
N-11 Wash Solvent	7.00	0.000065	240.000	0.00%	60.00%	0.00%	1.35%	0.00%	40.00%	0.00	0.29	0.00	0.01	0.00	0.19	0.48
Total State Potential Emissions										0.26	0.57	0.00	0.07	0.05	0.38	1.29

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: Emission Calculations
VOC and Particulate
From Powder Coating Operations**

**Company Name: Transwheel Corporation
Address City IN Zip: 3000 Yeoman Way, Huntington, Indiana 46750
FESOP No.: 069-25645-00056
Reviewer: Mehul Sura
Date: 18-Jul-08**

Powder coating booths (PB1-PB5)

Material (as applied)	Process	Density (Lb/Gal)	Weight % Volatile (H2O& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency	Controlled PM tons/yr													
Single Powder Paint Booth	aluminum wheels																														
clear TGIC		10.51	0.23%	0.00%	0.23%	0.00%	99.77%	0.000520	240.0	0.02	0.02	0.00	0.07	0.01	0.57	0.02	90%	0.0057													
Lim. Bright Silver TGIC		10.88	0.34%	0.00%	0.34%	0.00%	99.66%	0.000072	240.0	0.04	0.04	0.00	0.02	0.00	0.08	0.04	90%	0.0008													
Bright Argent Silver TGIC		10.43	1.00%	0.00%	1.00%	0.00%	99.00%	0.000035	240.0	0.10	0.10	0.00	0.02	0.00	0.04	0.11	90%	0.0004													
Clear Acrylic		10.63	0.00%	0.00%	0.00%	0.00%	100.00%	0.000073	240.0	0.00	0.00	0.00	0.00	0.00	0.08	0.00	90%	0.0008													
Silver Metallic		13.69	0.87%	0.00%	0.87%	0.00%	99.13%	0.000027	240.0	0.12	0.12	0.00	0.02	0.00	0.04	0.12	90%	0.0004													
Potential Emissions for Single Powder Paint Booth																															
															0.01	0.57															
Total Potential Emissions for all Powder Paint Booth (PB1-PB5):															0.07	2.87															
Total Controlled PM Emissions for all Powder Paint Booth (PB1-PB5)																0.03															

Powder coating booths (PB6)

Material (as applied)	Process	Density (Lb/Gal)	Weight % Volatile (H2O& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency	Controlled PM tons/yr											
Powder Paint Booth PB6	aluminum wheels																												
clear TGIC		10.51	0.23%	0.00%	0.23%	0.00%	99.77%	0.005947	15.0	0.02	0.02	0.00	0.05	0.01	0.41	0.02	90%	0.0041											
Lim. Bright Silver TGIC		10.88	0.34%	0.00%	0.34%	0.00%	99.66%	0.005744	15.0	0.04	0.04	0.00	0.08	0.01	0.41	0.04	90%	0.0041											
Bright Argent Silver TGIC		10.43	1.00%	0.00%	1.00%	0.00%	99.00%	0.005992	15.0	0.10	0.10	0.01	0.23	0.04	0.41	0.11	90%	0.0041											
Clear Acrylic		10.63	0.00%	0.00%	0.00%	0.00%	100.00%	0.005880	15.0	0.00	0.00	0.00	0.00	0.00	0.41	0.00	90%	0.0041											
Silver Metallic		13.69	0.87%	0.00%	0.87%	0.00%	99.13%	0.004565	15.0	0.12	0.12	0.01	0.20	0.04	0.41	0.12	90%	0.0041											
Total Potential Emissions (uncontrolled):																0.0094	0.41												
																Controlled PM Emissions:	0.0041												

Methodology:

Spray application method: Electrostatic air atomized
 PM control devices: Baghouse (DT1)
 Baghouse (DT1) efficiency = 90%
 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) * Transfer Efficiency
 Total = Worst Coating + Sum of all solvents used
 Controlled emission rate = uncontrolled emission rate * (1 - control efficiency)
 Controlled PM emissions (tons/year) = Uncontrolled PM Emission Rate (tons/year) * (1 - Control Efficiency)

Company Name: Transwheel Corporation
Address City IN Zip: 3000 Yeoman Way, Huntington, Indiana 46750
FESOP No.: 069-25645-00056
Reviewer: Mehul Sura
Date: 18-Jul-08

Table 1 - Emission Factors for Abrasives

Abrasive	Emission Factor	
	lb PM / lb abrasive	lb PM10 / lb PM
Sand	0.041	0.70
Grit	0.010	0.70
Steel Shot	0.004	0.86
Other	0.010	

Table 2 - Density of Abrasives (lb/ft3)

Abrasive	Density (lb/ft3)
Al oxides	160
Sand	99
Steel	487
Ceramic	144

Table 3 - Sand Flow Rate (FR1) Through Nozzle (lb/hr)

Flow rate of Sand Through a Blasting Nozzle as a Function of Nozzle pressure and Internal Diameter

Internal diameter, in	Nozzle Pressure (psig)							
	30	40	50	60	70	80	90	100
1/8	28	35	42	49	55	63	70	77
3/16	65	80	94	107	122	135	149	165
1/4	109	138	168	195	221	255	280	309
5/16	205	247	292	354	377	420	462	507
3/8	285	355	417	477	540	600	657	720
7/16	385	472	560	645	755	820	905	940
1/2	503	615	725	835	945	1050	1160	1265
5/8	820	990	1170	1336	1510	1680	1850	2030
3/4	1140	1420	1670	1915	2160	2400	2630	2880
1	2030	2460	2900	3340	3780	4200	4640	5060

Calculations

Adjusting Flow Rates for Different Abrasives and Nozzle Diameters

Flow Rate (FR) = Abrasive flow rate (lb/hr) with internal nozzle diameter (ID)
 FR1 = Sand flow rate (lb/hr) with internal nozzle diameter (ID1) From Table 3 =
 D = Density of abrasive (lb/ft3) From Table 2 =
 D1 = Density of sand (lb/ft3) =
 ID = Actual nozzle internal diameter (in) =
 ID1 = Nozzle internal diameter (in) from Table 3 =

138
144
99
0.25
0.25

Flow Rate (FR) (lb/hr) = 200.727 per nozzle

Uncontrolled Emissions (E, lb/hr)

EF = emission factor (lb PM / lb abrasive) From Table 1 =
 FR = Flow Rate (lb/hr) =
 w = fraction of time of wet blasting =
 N = number of nozzles =
 C = Control Efficiency

0.010
200.727
0 %
1
99.80%

Uncontrolled PM Emissions =	2.01	lb/hr
Uncontrolled PM Emissions =	8.79	ton/yr
Controlled PM Emissions =	0.004	lb/hr
Controlled PM Emissions =	0.02	ton/yr

Uncontrolled PM10 Emissions =	1.73	lb/hr
Uncontrolled PM10 Emissions =	7.56	ton/yr
Controlled PM10 Emissions =	0.003	lb/hr
Controlled PM10 Emissions =	0.02	ton/yr

METHODOLOGY

Control Efficiency of baghouse (DT2) = 99.8%
 Emission Factors from STAPPA/ALAPCO "Air Quality Permits", Vol. I, Section 3 "Abrasive Blasting" (1991 edition)
 Ton/yr = lb/hr X 8760 hr/yr X ton/2000 lbs
 Flow Rate (FR) (lb/hr) = FR1 x (ID/ID1)² x (D/D1)
 E = EF x FR x (1-w/200) x N
 Uncontrolled PM Emissions (lb/hr) = Emission Factor (lb PM / lb abrasive) x Abrasive Flow Rate (lb/hr-nozzle) x Number of Nozzle
 Uncontrolled PM Emissions (tons/year) = Uncontrolled PM Emissions (lb/hr) x 8760 (hrs/year) x 2000 (lbs/ton)
 Uncontrolled PM10 Emissions (lb/hr) = Uncontrolled PM Emissions (lb/hr) x 0.86 (lb PM10 / lb PM)
 Uncontrolled PM10 Emissions (tons/year) = Uncontrolled PM10 Emissions (lb/hr) x 8760 (hrs/year) x 2000 (lbs/ton)
 Controlled PM emissions (tons/year) = Uncontrolled PM Emissions (tons/year) x (1-Control Efficiency of Filter)
 Controlled PM10/PM2.5 emissions (tons/year) = Uncontrolled PM10/PM2.5 Emissions (tons/year) x (1-Control Efficiency of Filter)

**Appendix A: Emission Calculations
Shotblasters SB2 and SB3**

**Company Name: Transwheel Corporation
Address City IN Zip: 3000 Yeoman Way, Huntington, Indiana 46750
FESOP No.: 069-25645-00056
Plant ID: 069-00056
Reviewer: Mehul Sura
Date: 18-Jul-08**

Table 1 - Emission Factors for Abrasives

Abrasive	Emission Factor	
	lb PM / lb abrasive	lb PM10 / lb PM
Sand	0.041	0.70
Grit	0.010	0.70
Steel Shot	0.004	0.86
Other	0.010	

Table 2 - Density of Abrasives (lb/ft3)

Abrasive	Density (lb/ft3)
Al oxides	160
Sand	99
Steel	487
Plastic	78

Table 3 - Sand Flow Rate (FR1) Through Nozzle (lb/hr)

Flow rate of Sand Through a Blasting Nozzle as a Function of Nozzle pressure and Internal Diameter

Internal diameter, in	Nozzle Pressure (psig)							
	30	40	50	60	70	80	90	100
1/8	28	35	42	49	55	63	70	77
3/16	65	80	94	107	122	135	149	165
1/4	109	138	168	195	221	255	280	309
5/16	205	247	292	354	377	420	462	507
3/8	285	355	417	477	540	600	657	720
7/16	385	472	560	645	755	820	905	940
1/2	503	615	725	835	945	1050	1160	1265
5/8	820	990	1170	1336	1510	1680	1850	2030
3/4	1140	1420	1670	1915	2160	2400	2630	2880
1	2030	2460	2900	3340	3780	4200	4640	5060

Calculation for each shotblaster

Adjusting Flow Rates for Different Abrasives and Nozzle Diameters

Flow Rate (FR) = Abrasive flow rate (lb/hr) with internal nozzle diameter (ID)
 FR1 = Sand flow rate (lb/hr) with internal nozzle diameter (ID1) From Table 3 =
 D = Density of abrasive (lb/ft3) From Table 2 =
 D1 = Density of sand (lb/ft3) =
 ID = Actual nozzle internal diameter (in) =
 ID1 = Nozzle internal diameter (in) from Table 3 =

138
78
99
0.25
0.25

Flow Rate (FR) (lb/hr) = 108.727 per nozzle

Uncontrolled Emissions (E, lb/hr)

EF = emission factor (lb PM/ lb abrasive) From Table 1 =
 FR = Flow Rate (lb/hr) =
 w = fraction of time of wet blasting =
 N = number of nozzles =
 C = Control Efficiency

0.010
108.727
0 %
1
99.80%

Uncontrolled PM Emissions =	1.09	lb/hr
Uncontrolled PM Emissions =	4.76	ton/yr
Controlled PM Emissions =	0.00	lb/hr
Controlled PM Emissions =	0.01	ton/yr

Uncontrolled PM10 Emissions =	0.94	lb/hr
Uncontrolled PM10 Emissions =	4.10	ton/yr
Controlled PM10 Emissions =	0.002	lb/hr
Controlled PM10 Emissions =	0.01	ton/yr

METHODOLOGY

Control Efficiency of baghouse (DT2) = 99.8%
 Emission Factors from STAPPA/ALAPCO "Air Quality Permits", Vol. I, Section 3 "Abrasive Blasting" (1991 edition)
 Ton/yr = lb/hr X 8760 hr/yr X ton/2000 lbs
 Flow Rate (FR) (lb/hr) = FR1 x (ID/ID1)2 x (D/D1)
 E = EF x FR x (1-w/200) x N
 Uncontrolled PM Emissions (lb/hr) = Emission Factor (lb PM / lb abrasive) x Abrasive Flow Rate (lb/hr-nozzle) x Number of Nozzle
 Uncontrolled PM Emissions (tons/year) = Uncontrolled PM Emissions (lb/hr) x 8760 (hrs/year) x 2000 (lbs/ton)
 Uncontrolled PM10 Emissions (lb/hr) = Uncontrolled PM Emissions (lb/hr) x 0.86 (lb PM10 / lb PM)
 Uncontrolled PM10 Emissions (tons/year) = Uncontrolled PM10 Emissions (lb/hr) x 8760 (hrs/year) x 2000 (lbs/ton)
 Controlled PM emissions (tons/year) = Uncontrolled PM Emissions (tons/year) x (1-Control Efficiency of Filter)
 Controlled PM10/PM2.5 emissions (tons/year) = Uncontrolled PM10/PM2.5 Emissions (tons/year) x (1-Control Efficiency of Filter)

Natural Gas Combustion

Company Name: Transwheel Corporation
Address City IN Zip: 3000 Yeoman Way, Huntington, Indiana 46750
FESOP No.: 069-25645-00056
Reviewer: Mehul Sura
Date: 18-Jul-08

	Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
Six (6) space heaters - 140k Btu/hr each	0.84	7.36
Nine (9) space heaters - 150k Btu/hr each	1.35	11.83
One (1) furnace - 75k Btu/hr	0.75	6.57
Two (2) furnaces - 137k Btu/hr each	0.27	2.40
One (1) furnace - 165k Btu/hr	0.17	1.45
Four (4) bath heaters - 250k Btu/hr each	1.00	8.76
One (1) tank heater - 100k Btu/hr	0.10	0.88
Two (2) duct furnaces - 400k Btu/hr each	0.80	7.01
Air make-up unit - 2.64 Mmbtu/hr	2.64	23.13
Total	7.92	69.37

	Criteria Pollutant					
	PM*	PM10*	SO2	Nox**	VOC	CO
Emission Factor in lb/MMCF	1.90	7.60	0.600	100	5.50	84.0
Potential Emission in tons/yr	0.0659	0.2636	0.02081	3.469	0.1908	2.914

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	7.28E-05	4.16E-05	2.60E-03	6.24E-02	1.18E-04

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	Total
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	HAPs
Potential Emission in tons/yr	1.73E-05	3.82E-05	4.86E-05	1.32E-05	7.28E-05	0.0655

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

**Emission Factors for NOx: Uncontrolled = 100

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: Process Particulate Emissions
Downdraft tables (DDT1 and DDT2) and Wheelabrator shot blast system (WH1)**

**Company Name: Transwheel Corporation
Address City IN Zip: 3000 Yeoman Way, Huntington, Indiana 46750
FESOP No.: 069-25645-00056
Reviewer: Mehul Sura
Date: 18-Jul-08**

Process	Amount of PM/PM10 Collected in filter (grams/8-hour shift)	Amount of PM/PM10 Collected in filter (pounds/8-hour shift)	Amount of PM/PM10 Collected in filter (pounds/hour)	Filter Efficiency	Controlled Emissions (tons/yr)	Potential Emissions (tons/yr)
Downdraft table (DDT1)	75.0	0.2	0.021	99.0%	0.00021	0.021
Downdraft table (DDT2)	75.0	0.2	0.021	99.0%	0.00021	0.021
Total					0.00042	0.042

Methodology:

PM control devices are cartridge filters.

Controlled Emissions (tons/yr) = Amount of PM/PM10 Collected in filter (pounds/hour) * 8760 hrs/yr * 1 ton/2000 lb:

Potential Emissions (tons/yr) = Controlled Emissions (tons/yr) * [1/(1-control efficiency)]

Process	Grain Loading per Actual Cubic Foot of Outlet Air	Air to Cloth Ratio Air Flow (acfm/ft ²)	Total Filter Area (ft ²)	Control Efficiency	Controlled Emissions (tons/yr)	Potential Emissions (tons/yr)
Wheelabrator shot blast system (WH1)	0.02180	1.9	1,854	99.80%	2.87	1433.92

Methodology:

PM control devices is baghouse..

Controlled Potential Emissions (tons/yr) = Loading (grains/acf) * Air/Cloth Ratio (acfm/ft²) * Filter Area (ft²) * 1 lb/7,000 grains * 60 min/hr * 8760 hr/yr * 1 ton/2,000 lbs

Uncontrolled Potential Emissions (tons/yr) = Controlled Potential Emissions (tons/yr) * 1/(1-Control Efficiency)