



# 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](http://www.idem.IN.gov)

TO: Interested Parties / Applicant

DATE: May 30, 2008

RE: Raybestos Powertrain / 153-25848-00015

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

## Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures  
FNPER.dot12/03/07



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Paul Fathauer, Director of Research and Development  
Raybestos Powertrain  
PO Box 267  
Sullivan, IN 47882-0267

May 30, 2008

Re: 153-25848-00015  
First Significant Revision to  
F153-20733-00015

Dear Paul Fathauer:

Raybestos Powertrain was issued a Federally Enforceable State Operating Permit (FESOP) Renewal No. F153-20733-00015 on July 5, 2005 for a stationary automotive clutch plate and transmission part manufacturing facility located at 609 East Chaney Street, Sullivan, IN 47882. On January 7, 2008, the Office of Air Quality (OAQ) received an application from the source requesting relating to the construction and operation of one (1) new adhesive coating line and one (1) new heavy duty friction line, and a revision to the existing adhesive coating operations. The attached Technical Support Document (TSD) and TSD Addendum: Calculations provide additional explanation of the changes to the source/permit. Pursuant to the provisions of 326 IAC 2-8-11.1, these changes to the permit are required to be reviewed in accordance with the Significant Permit Revision (SPR) procedures of 326 IAC 2-8-11.1(f). Pursuant to the provisions of 326 IAC 2-8-11.1, a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document (TSD).

The following construction conditions are applicable to the proposed project:

1. General Construction Conditions  
The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit  
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the significant permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Attached please find the entire revised permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Hannah Desrosiers, of my staff, at 317-234-5374 or 1-800-451-6027, and ask for extension 4-5374.

Sincerely,

Original Signed By:  
Iryn Calilung, Section Chief  
Permits Branch  
Office of Air Quality

Attachments: Technical Support Document and revised permit

MS/hd

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



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## Federally Enforceable State Operating Permit (FESOP) Renewal OFFICE OF AIR QUALITY

**Raybestos Powertrain  
609 East Chaney Street  
Sullivan, Indiana 47882**

(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.

This permit also addresses certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-8-11.1, applicable to those conditions

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.: F153-20733-00015	
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: July 05, 2005 Expiration Date: July 05, 2015
First Significant Permit Revision No.: F153-25848-00051	
Issued by: Original Signed By:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Affected Pages: Entire Permit  Issuance Date: May 30, 2008  Expiration Date: July 05, 2015

## TABLE OF CONTENTS

<b>A. SOURCE SUMMARY.....</b>	<b>5</b>
A.1 General Information [326 IAC 2-8-3(b)]	
A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]	
A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]	
A.4 FESOP Applicability [326 IAC 2-8-2]	
<b>B. GENERAL CONDITIONS .....</b>	<b>9</b>
B.1 Definitions [326 IAC 2-8-1]	
B.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]	
B.3 Term of Conditions [326 IAC 2-1.1-9.5]	
B.4 Enforceability [326 IAC 2-8-6]	
B.5 Severability [326 IAC 2-8-4(4)]	
B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]	
B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]	
B.8 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]	
B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]	
B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]	
B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]	
B.12 Emergency Provisions [326 IAC 2-8-12]	
B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]	
B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]	
B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]	
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]	
B.17 Permit Renewal [326 IAC 2-8-3(h)]	
B.18 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]	
B.19 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]	
B.20 Source Modification Requirement [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]	
B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]	
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]	
B.24 Advanced Source Modification Approval [326 IAC 2-8-4(11)] [326 IAC 2-1.1-9]	
B.25 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]	
<b>C. SOURCE OPERATION CONDITIONS .....</b>	<b>19</b>
<b>Emission Limitations and Standards [326 IAC 2-8-4(1)]</b>	
C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]	
C.2 Overall Source Limit [326 IAC 2-8]	
C.3 Opacity [326 IAC 5-1]	
C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]	
C.6 Fugitive Dust Emissions [326 IAC 6-4]	
C.7 Stack Height [326 IAC 1-7]	
C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
<b>Testing Requirements [326 IAC 2-8-4(3)]</b>	
C.9 Performance Testing [326 IAC 3-6]	

**Compliance Requirements [326 IAC 2-1.1-11]**

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

**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)]
- C.12 Maintenance of Continuous Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]
- C.13 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]
- C.14 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

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

- C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
- C.16 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]
- C.17 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]
- C.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

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

- C.19 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]
- C.20 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

**Stratospheric Ozone Protection**

- C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

**D.1. EMISSIONS UNIT OPERATION CONDITIONS..... 26**

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

- D.1.1 Miscellaneous Metal Coating Operations [326 IAC 8-2-9]
- D.1.2 VOC and HAP Emission Limitations [326 IAC 2-8]
- D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

**Compliance Determination Requirements**

- D.1.4 Compliance Methods
- D.1.5 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]
- D.1.6 Capture System

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

- D.1.7 Continuous Monitoring System Required
- D.1.8 Parametric Monitoring

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

- D.1.9 Record Keeping Requirements

**D.2. EMISSIONS UNIT OPERATION CONDITIONS..... 31**

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

- D.2.1 Particulate [326 IAC 6-3-2]
- D.2.2 PM, PM10 and HAP Emission Limitations [326 IAC 2-8] [326 IAC 2-2]
- D.2.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

**Compliance Determination Requirements**

- D.2.4 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

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

- D.2.5 Visible Emissions Notations
- D.2.6 Parametric Monitoring
- D.2.7 Broken or Failed Bag Detection

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

- D.2.8 Record Keeping Requirements

Certification Form .....	35
Emergency Occurrence Form .....	36
Quarterly Deviation and Compliance Monitoring Report Form .....	38

## 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)]

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The Permittee owns and operates a stationary automotive clutch plate and transmission part manufacturing facility.

Source Address:	609 East Chaney Street, Sullivan, Indiana 47882
Mailing Address:	PO Box 267, Sullivan, IN 47882
General Source Phone Number:	812-268-0322
SIC Code:	3714
County Location:	Sullivan
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD 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)]

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

- (a) One (1) adhesive coating line, identified as RM2002, capable of coating 625 torque rings per hour or 110 friction band pads per hour. The adhesive is applied through a curtain coater. VOC and HAP emissions are controlled by a natural gas fired catalytic oxidation unit rated at 1.0 million British thermal units per hour (MMBtu/hr), identified as RE6001, before exhausting through stack S10.
- (b) One (1) yarn saturation line, identified as RM5020. The adhesive is applied through a dip coater. VOC emissions from the yarn saturation line are controlled by catalytic oxidation unit RE6001 before exhausting through stack S10.
- (c) One (1) natural gas fired drying oven rated at 2.0 million Btu per hour. VOC and HAP emissions are controlled by catalytic oxidation unit RE6001 before exhausting through stack S10.
- (d) Two (2) adhesive coating lines, identified as M2003 and M2028, which are capable of coating a total of 10,200 steel friction cores per hour. The adhesive is applied through roll coater. VOC and HAP emissions are controlled by a natural gas fired catalytic oxidation unit rated at 1.5 million British thermal units per hour (MMBtu/hr), identified as E6003, before exhausting through stack S2.
- (e) One (1) adhesive coating line, identified as RM1200, approved for construction in 2008, capable of coating 36.0 steel friction cores per hour. The adhesive is applied through a roll coater and then dried in a natural gas fired drying oven, identified as RM1201, rated at 1.2 million British thermal units per hour (MMBtu/hr). VOC and HAP emissions are controlled by a natural gas fired catalytic oxidation unit rated at 1.0 million British thermal units per hour (MMBtu/hr), identified as E6022, before exhausting through stack S12.

- (f) Two (2) etching lines, identified as M2002 and M2027, capable of etching a total of 10,200 steel plates per hour, and having a maximum usage of 4 pounds of acid per hour. PM and PM10 emissions from these emission units are controlled by a packed tower scrubber before exhausting through stack S1.
- (g) Two (2) O.D. sanders, identified as M2010.1 and M2010.2, capable of sanding a total of 11,400 bonded assemblies per hour. PM and PM10 emissions from these emission units are controlled by baghouse M2024 before exhausting through stack S6.
- (h) Two (2) opposed disk grinders, identified as M2048 and M2049, capable of grinding a total of 19,000 friction assemblies per hour. PM and PM10 emissions from these emission units are controlled by baghouse M2024 before exhausting through stack S6.
- (i) One (1) heavy duty friction line, approved for construction in 2008, with a maximum capacity of 2,700.0 pounds per hour (lbs/hr), using one (1) fabric filter baghouse as control, identified as B1018, exhausting to stack S11 and consisting of the following:
  - (1) One (1) ID Grinder, identified as RM1210;
  - (2) One (1) OD Grinder, identified as RM1211;
  - (3) One (1) Blanchard Grinder, identified as RM1215;
  - (4) One (1) Mattison Grinder, identified as RM1216; and
  - (5) One (1) Mill Groover, identified as RM1220.

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) Various natural gas-fired heaters, burners, and ovens, including the incinerators with a total heat input capacity of 6.5 million Btu per hour.
- (b) Various natural gas-fired space heaters, identified as ID5, with a combined maximum heat input capacity of 16 million British thermal units per hour (MMBtu/hr).
- (c) Combustion source flame safety purging on startup.
- (d) A petroleum fuel dispensing facility, other than a gasoline dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (e) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughput less than 12,000 gallons.
- (f) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (g) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (h) Degreasing operations that do not exceed 145 gallons per 12 months, and are not subject to 326 IAC 20-6.

- (i) Cleaners and solvents characterized as follows:
  - (1) Having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38 degrees C (100 F) or;
  - (2) Having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20 degrees C (680 F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (j) The following equipment related to manufacturing activities not resulting in the emissions of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (k) Closed loop heating and cooling systems.
- (l) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.
- (m) Any operation using aqueous solutions containing less than 1% by weight of VOC excluding HAP.
- (n) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other filtration equipment.
- (o) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as bag filter or cyclone.
- (p) Paved and unpaved roads and parking lots with public access.
- (q) 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.
- (r) On-site fire and emergency response training approved by the department.
- (s) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying and woodworking operations.
- (t) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees C).
- (u) A laboratory, as defined in 326 IAC 2-7-1(20)(C).
- (v) Other activities, not previously identified, with emissions equal to or less than the insignificant thresholds:
  - (1) Three (3) induction bonders, identified as M2033, M2045 and M2046, with a total rate of 1,800 pounds of clutch per hour, venting to stack S3.
  - (2) Two (2) rotary bonders, identified as M2008, with a rate of 270 pounds per hour and M2009 with a rate of 230 pounds per hour, venting to stack S4 and stack S5, respectively.
  - (3) S-11 Bonding oven.

- (4) S-7 Electric batch oven.
- (5) One (1) degreaser, identified as RM6012, with two (2) compartments. One compartment has a capacity of 336 gallons of liquid wash and the other compartment has capacity of 336 gallons of liquid rinse. The degreaser has a 1.8 million Btu per hour liquid heater and 0.8 million Btu per hour dryer.
- (6) Fugitive - steel blanking (die lubricant, rust prevention application).
- (7) Two (2) paper blanking facilities, identified as M5001 and M5002, with a total capacity of 290 friction paper per hour, and 11,000 paper rings per hour. Particulate matter emissions are controlled by a cyclone before exhausting through stack S9.

#### 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) for 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, F153-20733-00015, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

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

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

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

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

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

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

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

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

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

---

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

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

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- (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. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent 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)]**

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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 prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, 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.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date 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

The PMP extension notification does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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]**

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- (a) All terms and conditions of permits established prior to F153-20733-00015 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

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

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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)]**

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- (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]

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- (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)]**

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- (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]**

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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]**

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

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

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

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

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

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

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

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

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

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

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

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

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

B.25 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

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

## SECTION C

## SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

(a) Pursuant to 326 IAC 2-8:

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

(b) The potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period. 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]**

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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]**

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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]**

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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]**

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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]**

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- (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 demolitions 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]**

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- (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 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

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Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval 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 ninety (90) days after the date of issuance of this permit.  
  
The ERP does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

### **C.15 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]**

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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.16 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]**

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- (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.17 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.18 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.19 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]**

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- (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) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. 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.20 Compliance with 40 CFR 82 and 326 IAC 22-1**

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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) adhesive coating line, identified as RM2002, capable of coating 625 torque rings per hour or 110 friction band pads per hour. The adhesive is applied through a curtain coater. VOC and HAP emissions are controlled by a natural gas fired catalytic oxidation unit rated at 1.0 million British thermal units per hour (MMBtu/hr), identified as RE6001, before exhausting through stack S10.
- (b) One (1) yarn saturation line, identified as RM5020. The adhesive is applied through a dip coater. VOC emissions from the yarn saturation line are controlled by catalytic oxidation unit RE6001 before exhausting through stack S10.
- (c) One (1) natural gas fired drying oven rated at 2.0 million Btu per hour. VOC and HAP emissions are controlled by catalytic oxidation unit RE6001 before exhausting through stack S10.
- (d) Two (2) adhesive coating lines, identified as M2003 and M2028, which are capable of coating a total of 10,200 steel friction cores per hour. The adhesive is applied through roll coater. VOC and HAP emissions are controlled by a natural gas fired catalytic oxidation unit rated at 1.5 million British thermal units per hour (MMBtu/hr), identified as E6003, before exhausting through stack S2.
- (e) One (1) adhesive coating line, identified as RM1200, approved for construction in 2008, capable of coating 36.0 steel friction cores per hour. The adhesive is applied through a roll coater and then dried in a natural gas fired drying oven, identified as RM1201, rated at 1.2 million British thermal units per hour (MMBtu/hr). VOC and HAP emissions are controlled by a natural gas fired catalytic oxidation unit rated at 1.0 million British thermal units per hour (MMBtu/hr), identified as E6022, before exhausting through stack S12.

(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 Miscellaneous Metal Coating Operations [326 IAC 8-2-9]

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), volatile organic compound (VOC) emissions from the coatings delivered to RM2002, RM5020, M2003 M2028 and RM1200 shall be limited to 3.5 pounds of VOC per gallon of coating, less water, for coatings that are air dried or forced warm air dried.
- (b) Pursuant to 326 IAC 8-1-2(b), the VOC emissions shall be limited to no greater than the equivalent emissions, expressed as pounds of VOC per gallon of coating solids, allowed in (a). This equivalency is determined by the following equation:

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

Where:

L = Applicable emission limit in pounds of VOC per gallon of coating.

D = Density of VOC in coating in pounds per gallon of VOC.

E = Equivalent limit in pounds of VOC per gallon of coating solids as applied.

A solvent density of 7.36 pounds of VOC per gallon shall be used to determine equivalent pounds of VOC per gallon of solids for the applicable emission limit. For an emission limit of 3.5 pounds of VOC per gallon of coating, this equation provides an equivalent emission limit of 6.67 pounds of VOC per gallon of solids.

- (c) Pursuant to 326 IAC 8-1-2(c), the overall efficiency of the capture systems and control devices shall be no less than the equivalent calculated by the following equation:

$$= (V - E) / V * 100$$

Where:

V = The actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content of all coatings, as applied to the subject coating line as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids as applied.

E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.

O = Equivalent overall efficiency of the capture system and control device as a percentage.

- (1) The overall efficiency of catalytic oxidation unit RE6001, to comply with 326 IAC 8-1-2(c), shall be as follows:
- (A) when controlling emissions from adhesive coating line RM2002:
- (i) for adhesive coating of Band Pads, shall be greater than or equal to 81.38%;
- (ii) for adhesive coating of Torque Rings, shall be greater than or equal to 81.35%; and
- (B) when controlling emissions from yarn saturation line RM5020, shall be greater than or equal to 32.28%.

However, this requirement is superseded by a more stringent requirement specified in D.1.2(a).

- (2) The overall efficiency of catalytic oxidation unit E6003, controlling emissions from adhesive coating lines M2003 and M2028, shall be greater than or equal to 80.15% to comply with 326 IAC 8-1-2(c). However, this requirement is superseded by a more stringent requirement specified in D.1.2(b).
- (3) The overall efficiency of catalytic oxidation unit E6022, controlling emissions from adhesive coating line RM1200, shall be greater than or equal to 84.84% to comply with 326 IAC 8-1-2(c). However, this requirement is superseded by a more stringent requirement specified in D.1.2(c).

#### D.1.2 VOC and HAP Emission Limitations [326 IAC 2-8]

- (a) The Permittee shall operate catalytic oxidation unit RE6001, to control emissions from adhesive coating line RM2002 and yarn saturation line RM5020, at 85% control efficiency, at a minimum.
- (b) The Permittee shall operate catalytic oxidation unit E6003, to control emissions from adhesive coating lines M2003 and M2028, at 85% control efficiency, at a minimum.
- (c) The Permittee shall operate catalytic oxidation unit E6022, to control emissions from adhesive coating line RM1200, at 85% control efficiency, at a minimum.

Compliance with these limits, combined with the potential to emit of VOCs and HAPs from all other emission units at this source, shall limit the source-wide total potential to emit of VOCs to less than 100 tons per 12 consecutive month period, any single HAP to less than ten (10) tons per 12 consecutive month period, and total HAPs to less than twenty-five (25) tons per 12 consecutive month period and shall render 326 IAC 2-7 (Part 70 Permits), 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP) not applicable.

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

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

### Compliance Determination Requirements

#### D.1.4 Compliance Methods

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Pursuant to 326 IAC 8-1-2(a), the Permittee shall comply with the requirements of 326 IAC 8-2-9 using catalytic incineration.

- (a) The Permittee shall vent emission units RM2002 and RM5020 and the drying oven to catalytic oxidation unit RE6001.
- (b) The Permittee shall vent emission units M2003 and M2028 to catalytic oxidation unit E6003.
- (c) The Permittee shall vent emissions from adhesive coating line RM1200 and drying oven RM1201 to catalytic oxidation unit E6022.

#### D.1.5 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

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- (a) Compliance stack tests shall be performed for each of the three (3) catalytic oxidation units at least once every five (5) years from the date of the previous valid compliance demonstration. The stack tests shall be performed utilizing Method 25 (40 CFR 60, Appendix A), or other methods as approved by the Commissioner.
- (b) In addition to the requirements stated above, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

#### D.1.6 Capture System

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The volatile organic compound (VOC) capture systems for each of the adhesive coating lines shall meet the criteria of a permanent total enclosure. Permanent total enclosure is defined as a permanently installed enclosure that completely surrounds a source of emissions such that all VOC emissions are captured and contained for discharge through a control device:

- (a) Natural Draft Opening (NDO) is defined as any permanent opening in the enclosure that remains open during operation of the facility and is not connected to a duct in which a fan is installed. Any NDO shall be at least four (4) equivalent opening diameters from each VOC emitting point.
- (b) The total area of all NDOs shall not exceed five (5) percent of the surface area of the enclosure's four walls, floor, and ceiling.
- (c) The average facial velocity (FV) of air through all NDOs shall be at least 3,600 m/hr (200 fpm). The direction of air through all NDOs shall be into the enclosure.
- (d) All access doors and windows whose areas are not included in condition (b) and are not included in the calculation in condition (c) shall be closed during routine operation of the process.

- (e) All VOC emissions must be captured and contained for discharge through a control device.

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

#### **D.1.7 Continuous Monitoring System Required**

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- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the catalytic oxidation units for measuring operating temperature. The output of this system shall be recorded as an hourly average. The Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the hourly average temperature is below the minimum. An hourly average temperature that is below the minimum is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.
- (b) The Permittee shall determine the hourly average temperature from the most recent valid stack test that demonstrates compliance with limits in Condition D.1.1, as approved by IDEM.
- (c) The Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the hourly average temperature is below the hourly average temperature as observed during the compliant stack test. An hourly average temperature that is below the hourly average temperature as observed during the compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

#### **D.1.8 Parametric Monitoring**

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

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

#### **D.1.9 Record Keeping Requirements**

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- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC and HAP emission limits:
  - (1) The amount, VOC content and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

- (2) The total VOC and HAP usage for each month.
  - (3) The weight of VOC and HAP emitted for each compliance period.
  - (4) The continuous temperature records for the catalytic oxidation units.
  - (5) Records of the duct pressure and fan amperage.
- (b) To document compliance with Condition D.1.5(a), the Permittee shall maintain a copy of the compliance stack test results which established the operating temperature, fan amperage, and duct velocity that correspond to the required minimum control efficiency.
- (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)]:

- (f) Two (2) etching lines, identified as M2002 and M2027, capable of etching a total of 10,200 steel plates per hour, and having a maximum usage of 4 pounds of acid per hour. PM and PM<sub>10</sub> emissions from these emission units are controlled by a packed tower scrubber before exhausting through stack S1.
- (g) Two (2) O.D. sanders, identified as M2010.1 and M2010.2, capable of sanding a total of 11,400 bonded assemblies per hour. PM and PM<sub>10</sub> emissions from these emission units are controlled by baghouse M2024 before exhausting through stack S6.
- (h) Two (2) opposed disk grinders, identified as M2048 and M2049, capable of grinding a total of 19,000 friction assemblies per hour. PM and PM<sub>10</sub> emissions from these emission units are controlled by baghouse M2024 before exhausting through stack S6.
- (i) One (1) heavy duty friction line, approved for construction in 2008, with a maximum capacity of 2,700.0 pounds per hour (lbs/hr), using one (1) fabric filter baghouse as control, identified as B1018, exhausting to stack S11 and consisting of the following;
  - (1) One (1) ID Grinder, identified as RM1210;
  - (2) One (1) OD Grinder, identified as RM1211;
  - (3) One (1) Blanchard Grinder, identified as RM1215;
  - (4) One (1) Mattison Grinder, identified as RM1216; and
  - (5) One (1) Mill Groover, identified as RM1220;

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

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

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate for process weight rates up to 60,000 pounds per hour shall be accomplished by use of the following equation:

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

- (a) For etching lines M2002 and M2027, with a process weight rate of 0.51 tons per hour, the equation provides an emission limit of 2.61 pounds per hour.
- (b) For O.D. sanders M2010.1 and M2010.2, with a process weight rate of 0.57 tons per hour, the equation provides an emission limit of 2.81 pounds per hour.
- (c) For opposed disk grinders M2048 and M2049, with a process weight rate of 0.95 tons per hour, the equation provides an emission limit of 3.96 pounds per hour.
- (d) For heavy duty friction line, including; RM1210, RM1211, RM1215, RM1216, and RM1220, with a process weight rate of 1.35 tons per hour, the equation provides an emission limit of 5.01 pounds per hour.

**D.2.2 PM, PM<sub>10</sub> and HAP Emission Limitations [326 IAC 2-8] [326 IAC 2-2]**

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- (a) Hydrochloric acid mist emissions from etching lines M2002 and M2027 shall not exceed 0.45 pounds per hour.
- (b) PM and PM<sub>10</sub> emissions from Baghouse M2024, controlling O.D. sanders M2010.1 and M2010.2 and opposed disk grinders M2048 and M2049, shall not exceed 6.77 pounds per hour.
- (c) PM and PM<sub>10</sub> emissions from Baghouse B1018, controlling the heavy duty friction line, including; RM1210, RM1211, RM1215, RM1216 and RM1220, shall not exceed 5.01 pounds per hour.

Compliance with the limitations established in this condition shall render 326 IAC 2-7 (Part 70) and 326 IAC 2-2 (PSD) as not applicable for PM, PM<sub>10</sub> and HAP emissions.

**D.2.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]**

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

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- (a) The Permittee shall perform PM<sub>10</sub> testing on each of the baghouses, M2024 and B1018, at least once every five (5) years from the date of the previous valid compliance demonstration, utilizing Methods 201 or 201A and 202 (40 CFR 51, Appendix M) or other methods as approved by the Commissioner. PM<sub>10</sub> includes filterable and condensable PM<sub>10</sub>.
- (b) In addition to the requirements stated above, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

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

**D.2.5 Visible Emissions Notations**

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- (a) Daily visible emission notations of each of the baghouses, M2024 and B1018, stack exhaust shall be performed 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) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

#### D.2.6 Parametric Monitoring

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- (a) The Permittee shall record the pressure drop across baghouse M2024 at least once per day when any of the disk grinders and sanders is in operation and venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the range of 0.4 to 3.5 inches of water, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.
  
- (b) The Permittee shall record the pressure drop across baghouse B1018 at least once per day when any of the heavy duty friction line equipment is in operation and venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the range of 2.0 to 6.0 inches of water, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

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

#### D.2.7 Broken or Failed Bag Detection

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In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 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.
  
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have 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).

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

#### D.2.8 Record Keeping Requirements

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- (a) To document compliance with Condition D.2.5, the Permittee shall maintain records of daily visible emission notations of each of the baghouses, M2024 and B1018. The

Permittee shall include in each daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).

- (b) To document compliance with Condition D.2.6, the Permittee shall maintain daily records of the pressure drop across each of the baghouses, M2024 and B1018. The Permittee shall include in each daily record when the pressure drop is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

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

Source Name: Raybestos Powertrain  
Source Address: 609 East Chaney Street, Sullivan, Indiana 47882  
Mailing Address: PO Box 267, Sullivan, IN 47882  
FESOP Permit No.: F153-20733-00015

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
100 North Senate Avenue  
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: Raybestos Powertrain  
Source Address: 609 East Chaney Street, Sullivan, Indiana 47882  
Mailing Address: PO Box 267, Sullivan, IN 47882  
FESOP Permit No.: F153-20733-00015

**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"><li>• 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</li><li>• 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</li></ul> |
|--|

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 <sub>2</sub> , VOC, NO <sub>x</sub> , 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  
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Raybestos Powertrain  
Source Address: 609 East Chaney Street, Sullivan, Indiana 47882  
Mailing Address: PO Box 267, Sullivan, IN 47882  
FESOP Permit No.: F153-20733-00015

**Months:** \_\_\_\_\_ **to** \_\_\_\_\_ **Year:** \_\_\_\_\_

Page 1 of 2

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. 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><b>Permit Requirement</b> (specify permit condition #)</p>	
<p><b>Date of Deviation:</b></p>	<p><b>Duration of Deviation:</b></p>
<p><b>Number of Deviations:</b></p>	
<p><b>Probable Cause of Deviation:</b></p>	
<p><b>Response Steps Taken:</b></p>	
<p><b>Permit Requirement</b> (specify permit condition #)</p>	
<p><b>Date of Deviation:</b></p>	<p><b>Duration of Deviation:</b></p>
<p><b>Number of Deviations:</b></p>	
<p><b>Probable Cause of Deviation:</b></p>	
<p><b>Response Steps Taken:</b></p>	

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

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 Significant Permit Revision (SPR)  
to a Federal Enforceable State Operating Permit (FESOP)

**Source Description and Location**

**Source Name:** Raybestos Powertrain  
**Source Location:** 609 East Chaney Street, Sullivan, IN 47882  
**County:** Sullivan  
**SIC Code:** 3714  
**Operation Permit No.:** F 153-20733-00015  
**Operation Permit Issuance Date:** July 5, 2005  
**Significant Permit Revision No.:** 153-25848-00015  
**Permit Reviewer:** Hannah L. Desrosiers

On January 7, 2008, the Office of Air Quality (OAQ) has received an application from Raybestos Powertrain related to a modification to an existing automotive clutch plate and transmission part manufacturing facility.

**Existing Approvals**

The source was issued FESOP Renewal No. 153-20733-00015 on July 5, 2005.

**County Attainment Status**

The source is located in Sullivan County.

The following attainment status designations are applicable to Sullivan County:

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard. <sup>1</sup>
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Not designated.
<sup>1</sup> 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 PM <sub>2.5</sub> .	

(a) Ozone Standards

- (1) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.
- (2) On September 6, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Allen, Clark, Elkhart, Floyd, LaPorte, St. Joseph as attainment for the 8-hour ozone standard.
- (3) On November 9, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Boone, Clark, Elkhart, Floyd, LaPorte, Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Morgan, Shelby, and St. Joseph as attainment for



Process/Emission Unit	Potential To Emit of the Entire Source (tons/year)							
	PM	PM10	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP
These emissions are based upon FESOP Renewal F153-20733-00015, issued July 05, 2005. (1) Methyl Ethyl Ketone (MEK) was delisted as a Hazardous Air Pollutant by both the US EPA., on December 19, 2005, and the Indiana Department of Environmental Management, on November 23, 2006. Therefore, as part of this revision, MEK will be removed from consideration when calculating and evaluating the source's unlimited potential to emit (PTE).								

- (1) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).
- (2) This existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because the Permittee has accepted limits on HAPs emissions to less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

**Description of Proposed Revision**

The Office of Air Quality (OAQ) has reviewed an application, submitted by Raybestos Powertrain on January 07, 2008, relating to the construction and operation of one (1) new adhesive coating line and one (1) new heavy duty friction line, and a revision to the existing adhesive coating operations. The source has also requested that the FESOP Renewal be updated to indicate a change in ownership and that the permit term be extended to ten (10) years.

1. The following is a list of the new emission unit(s) and pollution control device(s):
  - (a) One (1) adhesive coating line, identified as RM1200, approved for construction in 2008, capable of coating 36.0 steel friction cores per hour. The adhesive is applied through a roll coater and then dried in a natural gas fired drying oven, identified as RM1201, rated at 1.2 million British thermal units per hour (MMBtu/hr). VOC and HAP emissions are controlled by a natural gas fired catalytic oxidation unit rated at 1.0 million British thermal units per hour (MMBtu/hr), identified as E6022, before exhausting through stack S12.
  - (b) One (1) heavy duty friction line, approved for construction in 2008, with a maximum capacity of 2,700.0 pounds per hour (lbs/hr), using one (1) fabric filter baghouse as control, identified as B1018, exhausting to stack S11 and consisting of the following:
    - (1) One (1) ID Grinder, identified as RM1210;
    - (2) One (1) OD Grinder, identified as RM1211;
    - (3) One (1) Blanchard Grinder, identified as RM1215;
    - (4) One (1) Mattison Grinder, identified as RM1216; and
    - (5) One (1) Mill Groover, identified as RM1220.
2. The source has requested the following additional changes be made to the permit.
  - (a) Raybestos has discontinued the use of the PL606M adhesive/toluene system used in adhesive coating line, identified as RM2002, and would like to revise the emission calculations to reflect this.

IDEM agrees with this change because the PL606M adhesive/toluene system is no longer in operation at the source. The emission calculations, Appendix A, have been updated to

reflect this.

- (b) Raybestos has increased their throughput and material usage rate for adhesive coating line RM2002 and would like to revise the emission calculations and emission limitations to reflect this.

IDEM agrees with this change in throughput and material usage rate. The emission calculations, Appendix A, have been updated to reflect this and the emission limitations that allow this source to maintain its FESOP have been revised accordingly.

- (c) Raybestos would like to request that the new catalytic oxidation unit, E6022, and the existing catalytic oxidation unit, RE6001, each be required to comply with a control efficiency of 85%. The control efficiency required for each unit per 326 IAC 8-2-9 is less than 85% and Raybestos will be able to stay well below 100 tons per year of VOC, 10 tons per year of a single HAP, and 25 tons per year of total HAPs with this efficiency.

IDEM agrees with this change because the requested control efficiencies will control emissions to less than the Title V thresholds of 100 tons per year of VOC, 10 tons per year of a single HAP, and 25 tons per year of total HAPs. According to the calculations contained in Attachment A, and the control efficiency predicted by the manufacturer, the source will be able to comply.

- (d) Methyl Ethyl Ketone (MEK) is no longer listed as a hazardous air pollutant (HAP) and, therefore, should be removed from the Attachment A: Calculations and the emission summary as a HAP.

IDEM agrees with this change because Methyl Ethyl Ketone (MEK) was delisted as a Hazardous Air Pollutant by both the US EPA, on December 19, 2005, and the Indiana Department of Environmental Management, on November 23, 2006. Therefore, MEK has been removed from consideration when calculating and evaluating the source's Hazardous Air Pollutants (HAPs) unlimited potential to emit (PTE).

- (e) Raybestos has requested that the operating pressure drop range for collector M2024 be revised from a range of 0.40 to 3.0 inches to a range of 0.40 to 3.5 inches of water.

IDEM agrees with this change because the requested revision adjusts the pressure drop range to allow for the equipment's normal working conditions and is well within standard allowable tolerances.

- (f) Raybestos has requested that condition D.2.7, of the permit, be removed because baghouse inspections should not be required by the permit, and the frequency of baghouse inspections should be determined by the permittee as part of their Preventative Maintenance Plan (PMP).

IDEM agrees with this change. IDEM no longer requires baghouse inspections as a permit condition, and instead requires that they be addressed in the PMP.

- (g) Raybestos has requested that the terminology "or less" be removed from condition D.2.2(c) of the permit, indicating that the emission limit shall be 5.01 pounds per hour, not less.

IDEM agrees with the need for a terminology revision to clarify the limitation. The phrase "shall not exceed" will be substituted.

- (h) All references to "Friction Pads" for RM2002 should be changed to "Band Pads". This is being modified for clarification in the permit.

IDEM agrees with the clarification of the emission unit identification as it is a revision to descriptive information where the revision will not trigger a new applicable requirement or

violate a permit term.

3. The source has requested that a change in company name, from Allomatic Products Company to Raybestos Powertrain, and a change in ownership, from Raytech Systems, Inc. to Sun Capital Partners, Inc., be noted.

IDEM agrees with this change and will update its records accordingly.

4. Raybestos has requested that the FESOP Renewal permit term be extended to ten (10) years.

IDEM agrees with this change because on December 16, 2007, rule revisions to 326 IAC 2-1.1-9 and 326 IAC 2-8-4 were finalized allowing for ten (10) year permit terms on FESOP renewals. The permit has been revised to reflect the new permit term.

**Enforcement Issues**

There are no pending enforcement actions related to this revision.

**Stack Summary**

Stack ID	Operation	Height (feet)	Dimensions/ Diameter (feet)	Roll Rate (acfm)	Temperature (°F)
S11	heavy duty friction line	10.00	1.75 x 2.42	12,000	ambient
S12	adhesive coating line, RM1200	24.00	1.33	2000	520

**Emission Calculations**

See Appendix A of this TSD for detailed emission calculations.

Methyl Ethyl Ketone (MEK) was delisted as a Hazardous Air Pollutant by both the US EPA., on December 19, 2005, and the Indiana Department of Environmental Management, on November 23, 2006. Therefore, MEK has been removed from consideration when calculating and evaluating the source's unlimited potential to emit (PTE).

**Permit Level Determination – FESOP Revision**

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

Process/Emission Unit	PTE of Proposed Revision (tons/year)							
	PM	PM10*	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP
Adhesive Coating Operations - revised units	0.00	0.00	0	0	339.67	0	20.83	14.66 Phenol
Adhesive Coating Operations - new	0.00	0.00	0	0	103.79	0	6.34	4.79 Methanol
Grinding and Sanding Operations - new	44.68	44.68	0	0	0	0	0	n/a
Natural Gas Combustion - new	0.02	0.07	0.01	0.96	0.05	0.81	0.010	0.010 Hexane
<b>Total PTE of Proposed Revision</b>	<b>44.70</b>	<b>44.75</b>	<b>0.01</b>	<b>0.96</b>	<b>443.51</b>	<b>0.81</b>	<b>27.18</b>	<b>16.04 Phenol</b>

\* US EPA has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions.  
 \*\*negl. = negligible

- (a) Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".

- (b) This FESOP is being revised through a FESOP Significant Permit Revision pursuant to 326 IAC 2-8-11.1(g)(2), because the revision involves an adjustment of existing emissions limits to accommodate the new adhesive coating line.

**PTE of the Entire Source After Issuance of the FESOP Revision**

- (a) The table below summarizes the potential to emit of the entire source (*reflecting adjustment of existing limits*), with updated emissions shown as **bold** values and previous emissions shown as ~~strikethrough~~ values.

Process/Emission Unit	Potential To Emit of the Entire Source to accommodate the Proposed Revision (tons/year)							
	PM	PM10*	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP
Adhesive Coating Operations, including;								
RM2002	0	0	0	0	<b>34.99</b> <del>42.0</del>	0	<b>2.46</b> <del>10.5</del>	<b>2.05 Phenol</b> <del>6.13 Toluene</del>
M2003 & M2028	0	0	0	0	<b>7.48</b> <del>2.5</del>	0	<b>0.46</b> <del>0.20</del>	<b>0.43 Methanol</b> <del>0.18 MEK<sup>(1)</sup></del>
RM1200	0	0	0	0	<b>15.57</b>	0	<b>0.95</b>	<b>0.72 Methanol</b>
Yarn Saturation (RM5020)	0	0	0	0	<b>1.00</b> <del>0.33</del>	0	<b>0.17</b> <del>0.23</del>	<b>0.15 Phenol</b> <del>0.18 MEK</del>
Grinding and Sanding Operations, including;								
O.D. sanders M2010.1 and M2010.2	<b>12.31</b> <del>9.5</del>	<b>12.31</b> <del>9.5</del>	0	0	0	0	0	***
Opposed disk grinders M2048 and M2049	<b>17.34</b> <del>11.8</del>	<b>17.34</b> <del>11.8</del>	0	0	0	0	0	***
Heavy duty friction line, including; RM1210, RM1211, RM1215, RM1216 and RM1220,	<b>21.94</b>	<b>21.94</b>	0	0	0	0	0	***
Etching Operations	<b>1.97</b> <del>0.25</del>	<b>1.97</b> <del>0.25</del>	0	0	0	0	<b>1.97</b> <del>0.25</del>	<b>1.97 0.25</b> HCL
Natural Gas Combustion	<b>0.22</b> <del>0.20</del>	<b>0.88</b> <del>0.84</del>	<b>0.07</b> <del>0.06</del>	<b>11.65</b> <del>10.68</del>	<b>0.64</b> <del>0.59</del>	<b>9.78</b> <del>8.97</del>	<b>0.16</b> <del>0.15</del>	<b>0.16 0.15</b> Hexane
Total PTE of Entire Source	<b>53.78</b> <del>21.8</del>	<b>54.44</b> <del>22.4</del>	<b>0.07</b> <del>0.06</del>	<b>11.65</b> <del>10.68</del>	<b>59.68</b> <del>45.4</del>	<b>9.78</b> <del>8.97</del>	<b>6.01</b> <del>11.9</del>	<b>2.05 Phenol</b> <del>6.13 Toluene</del>
Title V Major Source Thresholds	NA	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	NA	NA
* US EPA has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions.								
(1) Methyl Ethyl Ketone (MEK) was delisted as a Hazardous Air Pollutant by both the US EPA., on December 19, 2005, and the Indiana Department of Environmental Management, on November 23, 2006. Therefore, MEK has been removed from consideration when calculating and evaluating the source's unlimited potential to emit (PTE).								

(b) The table below summarizes the potential to emit of the entire source after issuance of this revision, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this FESOP permit revision, and only to the extent that the effect of the control equipment is made practically enforceable in the permit. (Note: the table below was generated from the above table, with bold text un-bolded and strikethrough text deleted)

Process/Emission Unit	Potential To Emit of the Entire Source After Issuance of Revision (tons/year)							
	PM	PM10*	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP
Adhesive Coating Operations, including;								
RM2002 <sup>(1)</sup>	0	0	0	0	34.99	0	2.46	2.05 Phenol
M2003 & M2028 <sup>(1)</sup>	0	0	0	0	7.48	0	0.46	0.43 Methanol
RM1200 <sup>(1)</sup>	0	0	0	0	15.57	0	0.95	0.72 Methanol
Yarn Saturation <sup>(1)</sup>	0	0	0	0	1.00	0	0.17	0.15 Phenol
Grinding and Sanding Operations, including;								
O.D. sanders M2010.1 and M2010.2 <sup>(2)</sup>	12.31	12.31	0	0	0	0	0	***
Opposed disk grinders M2048 and M2049 <sup>(2)</sup>	17.34	17.34	0	0	0	0	0	***
Heavy duty friction line, including; RM1210, RM1211, RM1215, RM1216 and RM1220 <sup>(2)</sup>	21.94	21.94	0	0	0	0	0	***
Etching Operations <sup>(1)</sup>	1.97	1.97	0	0	0	0	1.97	1.97 HCL
Natural Gas Combustion	0.22	0.88	0.07	11.65	0.64	9.78	0.16	0.16 Hexane
<b>Total PTE of Entire Source</b>	<b>53.78</b>	<b>54.44</b>	<b>0.07</b>	<b>11.65</b>	<b>59.68</b>	<b>9.78</b>	<b>6.01</b>	<b>2.05 Phenol</b>
Title V Major Source Thresholds	NA	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	NA	NA
<p>* US EPA has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions.'</p> <p>(1) FESOP limitation requiring use of control equipment with a control efficiency of no less than 85 percent. Compliance with this limitation will also satisfy 326 IAC 8-1-2 and 326 IAC 8-2-9 requirements. Additional information relating to these limitations can be found in the State Rule Applicability Determination section of the TSD and Appendix A: Calculations. Based on manufacturer specifications for each of the catalytic oxidation units, Raybestos Powertrain will be able to comply.</p> <p>(2) FESOP limitation requiring use of control equipment. TSD Appendix A: Calculations, page 2 of 12, shows the potential controlled emissions based on a rated capacity of 8,760 hours/year, and demonstrates that Raybestos Powertrain will be able to comply with the limitation. Additional information relating to these limitations can be found in the State Rule Applicability Determination section of this TSD</p>								

(a) FESOP Status

This revision to an existing Title V minor stationary source will not change the minor status, because the potential to emit criteria pollutants from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP).

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP), the source shall comply with the following Particulate Matter (PM), Particulate Matter less than 10 micrometers (PM<sub>10</sub>), Volatile Organic Compound (VOC), and Hazardous Air Pollutant (HAP) Emission Limitations:

- (1) PM and PM<sub>10</sub> emissions from Baghouse B1018, controlling the heavy duty friction line, including; RM1210, RM1211, RM1215, RM1216 and RM1220, shall not exceed 5.01 pounds per hour.
- (2) The Permittee shall operate catalytic oxidation unit RE6001, to control emissions from adhesive coating line RM2002 and yarn saturation line RM5020, at 85% control efficiency, at a minimum.
  - (i) This is equivalent to 8.22 lbs/hr of VOCs.
  - (ii) This is equivalent to 0.60 lbs/hr of HAPs.
- (3) The Permittee shall operate catalytic oxidation unit E6003, to control emissions from adhesive coating lines M2003 and M2028, at 85% control efficiency, at a minimum.
  - (i) This is equivalent to 1.71 lbs/hr of VOCs.
  - (ii) This is equivalent to 0.11 lbs/hr of HAPs.
- (4) The Permittee shall operate catalytic oxidation unit E6022, to control emissions from adhesive coating line RM1200, at 85% control efficiency, at a minimum.
  - (i) This is equivalent to 3.55 lbs/hr of VOC.
  - (ii) This is equivalent to 0.22 lbs/hr of HAPs.
- (5) Hydrochloric acid mist emissions from etching lines M2002 and M2027 shall not exceed 0.45 pounds per hour.

Compliance with these limits, combined with the potential to emit of PM, PM<sub>10</sub>, VOCs and HAPs from all other emission units at this source, shall limit the source-wide total potential to emit of PM, PM<sub>10</sub>, and VOCs to less than 100 tons per 12 consecutive month period, any single HAP to less than ten (10) tons per 12 consecutive month period, and total HAPs to less than twenty-five (25) tons per 12 consecutive month period and shall render 326 IAC 2-7 (Part 70 Permits), 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP) not applicable.

(b) PSD Minor Source

This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit of all attainment regulated pollutants from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the source shall comply with the following:

- (1) PM and PM<sub>10</sub> emissions from Baghouse B1018, controlling the heavy duty friction line, including; RM1210, RM1211, RM1215, RM1216 and RM1220, shall not exceed 5.01 pounds per hour.

Compliance with these limits, combined with the potential to emit PM from all other emission units at this source, shall limit the source-wide total potential to emit of PM to less than 250 tons per 12 consecutive month period and shall render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

### **Federal Rule Applicability Determination**

#### New Source Performance Standards (NSPS)

- (a) There are no New Source Performance Standards (NSPS)(40 CFR Part 60) included for this revision.

#### National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (a) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Miscellaneous Metal Parts and Products Surface Coating, 40 CFR 63.2 Subpart M, are not included in this revision, because this source is not a major source of HAP emissions.
- (b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Automobile & Light Duty Truck Surface Coating, 40 CFR 63.2 Subpart III, are not included in this revision, because this source is not a major source of HAP emissions and does not apply topcoat to new automobile or new light-duty truck bodies or body parts for new automobiles or new light-duty trucks.
- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63, Subpart JJ, Wood Furniture Manufacturing (40 CFR Part 63.800 - 63.808) (326 IAC 20-14-1), are not included in this revision, because this source is not a major source of HAPs as defined in 40 CFR 63.2 and does not manufacture wood furniture or wood furniture components.
- (d) The requirements of 40 CFR 63, Subpart T (63.460 through 63.470), NESHAP for Halogenated Solvent Cleaning and 326 IAC 20-6, are not included in this revision because this operation does not use a cold solvent cleaning machine or any degreasing solvent that contains any of the halogenated compounds listed in 40 CFR 63.460(a).
- (e) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included for this revision.

#### Compliance Assurance Monitoring (CAM)

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

### **State Rule Applicability Determination**

The following state rules are applicable to the proposed revision:

- (a) 326 IAC 2-8-4 (FESOP)  
This revision to an existing Title V minor stationary source will not change the minor status, because the potential to emit criteria pollutants from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP). See PTE of the Entire Source After Issuance of the FESOP Revision Section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))  
This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit of all attainment regulated pollutants from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326

IAC 2-2, the PSD requirements do not apply. See PTE of the Entire Source After Issuance of the FESOP Revision Section above.

- (c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))  
The proposed revision is not subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs from the adhesive coating line, RM1200, and heavy duty friction line is less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.
- (d) 326 IAC 2-6 (Emission Reporting)  
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (e) 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 Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
- (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
  - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (f) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)  
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source 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.

#### Heavy Duty Friction Operation

- (g) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)  
Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate for process weight rates up to 60,000 pounds per hour shall be accomplished by use of the following equation:

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

- (1) For the heavy duty friction line, including RM1210, RM1211, RM1215, RM1216, and RM1220, with a process weight rate of 1.35 tons per hour, the equation provides an emission limit of 5.01 pounds per hour.

The Baghouse B1018 shall be in operation at all times the heavy duty friction line is in operation, in order to comply with this limit.

#### Adhesive Coating Line

- (h) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)  
This emission unit is not subject to 326 IAC 6-3. Surface coating using roll coating is expressly exempted under 326 IAC 6-3-1(b)(7).
- (i) 326 IAC 8-2-9 (Miscellaneous Metal Coating)  
This emission unit is subject to 326 IAC 8-2-9. Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) emissions from coating delivered to

the applicator shall be limited to 3.5 pounds of VOC per gallon of coating, less water, for coatings that are air dried or forced warm air dried at temperatures up to ninety degrees Celsius (90°C) (one hundred ninety-four degrees Fahrenheit (194°F)). The source will use catalytic oxidation unit E6022 to comply with this limitation, as show below under item (j) 326 IAC 8-1-2 (Compliance Methods).

326 IAC 8-2-9(f) is not applicable since there are no spray applicators. This coating line uses roll coating as the application method.

- (j) 326 IAC 8-1-2 (Compliance Methods)  
(1) Pursuant to 8-1-2(a)(2), the applicant shall comply with 326 IAC 8-2-9 by catalytic incineration.

- (2) Pursuant to 326 IAC 8-1-2(b), VOC emissions shall be limited to no greater than the equivalent emissions, expressed as pounds of VOC per gallon of coating solids, determined by the following equation:

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

Where:

L = Applicable emission limit in pounds of VOC per gallon of coating.

D = Density of VOC in coating in pounds per gallon of VOC.

E = Equivalent limit in pounds of VOC per gallon of coating solids as applied.

A solvent density of 7.36 pounds of VOC per gallon shall be used to determine equivalent pounds of VOC per gallon of solids for the applicable emission limit. For an emission limit of 3.5 pounds of VOC per gallon of coating, this equation provides an equivalent emission limit of 6.67 pounds of VOC per gallon of solids.

- (3) Pursuant to 326 IAC 8-1-2(c), the overall efficiency of the control device shall be no less than the equivalent calculated by the following equation:

$$O = (V - E) / V * 100$$

Where:

V = The actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content of all coatings, as applied to the subject coating line as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids as applied.

E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.

O = Equivalent overall efficiency of the capture system and control device as a percentage.

The overall efficiency of the capture system and control device, catalytic oxidation unit E6022, shall be greater than 84.84%. See Appendix A for detailed calculations.

Compliance with these limits shall limit the potential to emit VOC from adhesive coating line, RM1200, to less than twenty-five (25) tons per 12 consecutive month period and shall render 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities) not applicable.

- (k) There are no other 326 IAC 8 Rules that are applicable to adhesive coating line, RM1200.

<b>Compliance Determination, Monitoring and Testing Requirements</b>
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- (a) The compliance determination and monitoring requirements applicable to this proposed revision

are as follows:

Emission Unit/Control	Operating Parameters	Frequency
Catalytic Oxidation Unit, E6022	Temperature	Continuous
	Duct Pressure or Fan Amperage	Initial
		Once per day
Baghouse, B1018	Visible Emissions	Once per day
	Pressure Drop	Once per day
	Bags in Baghouse	Quarterly

Compliance Determination

- (1) Catalytic oxidation unit E6022 for VOC and HAPs control shall be in operation and control emissions at all times that adhesive coating line RM1200 is in operation; and
- (2) A continuous monitoring system, to measure and record the operating temperature, shall be installed and operated at all times when a catalytic oxidation unit is in operation; and
- (3) Baghouse B1018 for particulate control shall be in operation and control emissions at all times that the heavy duty friction line is in operation.

Compliance Monitoring

- (4) The Permittee shall record catalytic oxidation unit E6022's operating temperatures an hourly average, using the continuous monitoring system; and
- (5) The Permittee shall determine fan amperage or duct pressure from the most recent valid stack test that demonstrates compliance as approved by IDEM; and
- (6) The Permittee shall observe the duct pressure or fan amperage at least once per day when the catalytic oxidation units are operation; and
- (7) The Permittee shall perform daily visible emission notations of the baghouse B1018 stack exhaust; and
- (8) The Permittee shall record the total static pressure drop across baghouse B1018, at least once daily when heavy duty friction line is in operation when venting to the atmosphere; and

These monitoring conditions are necessary to ensure compliance with 326 IAC 2-8 and to render 326 IAC 2-7 (Part 70 Permits) as not applicable.

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

Testing Requirements				
Emission Unit	Control Device	Pollutant	Timeframe for Testing	Frequency of Testing
adhesive coating line, RM1200	Catalytic Oxidation Unit	VOCs, HAPs	5 yrs	once
heavy duty friction line	Baghouse	PM, PM10	5 yrs	once

- (1) Compliance stack testing shall be performed for the catalytic oxidation unit, E6022, at least once every five (5) years;
  - (A) Compliance stack tests shall establish the operating temperature, fan amperage, and duct velocity that will correspond to the required minimum control efficiency;

and

- (2) Compliance stack testing shall be performed for the baghouse, B1018, at least once every five (5) years.
- (c) The recordkeeping and reporting requirements applicable to this proposed revision are as follows:
- (1) The Permittee shall maintain records of VOC and HAP content, usage and emissions in order demonstrate compliance with the VOC emission limit; and
  - (2) The Permittee shall submit a quarterly summary of the VOC and HAP input into the adhesive coating line; and
  - (3) The Permittee shall maintain continuous temperature records for the catalytic oxidation unit, E6022; and
  - (4) The Permittee shall maintain records of the duct pressure and fan amperage for the catalytic oxidation unit, E6022; and
  - (5) The Permittee shall maintain records of daily visible emission notations of baghouse B1018 stack exhaust; and
  - (6) The Permittee shall maintain records once per day of the baghouse pressure drop during normal operation; and
  - (7) The Permittee shall maintain records of all Stack Testing for the catalytic oxidation unit, E6022 and baghouse B1018; and
  - (8) The Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.

The existing compliance requirements will not change as a result of this revision. The source shall continue to comply with the applicable requirements and permit conditions as contained in FESOP No: 153-20733-00015, issued on July 5, 2005.

<b>Proposed Changes</b>
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- (a) The following changes listed below are due to the proposed revision. Deleted language appears as ~~strikethrough~~ text and new language appears as **bold** text:

A.1 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

...

- ~~(d) Various natural gas fired space heaters, identified as ID5, with a combined maximum total heat input capacity of 16 million British thermal units per hour (MMBtu/hr).~~
- (df) Two (2) adhesive coating lines, identified as M2003 and M2028, which are capable of coating a total of 10,200 steel friction cores per hour. The adhesive is applied through roll coater. VOC and HAP emissions are controlled by a natural gas fired catalytic oxidation unit rated at 1.5 million British thermal units per hour (MMBtu/hr), identified as E6003, before exhausting through stack S2.
- (e) **One (1) adhesive coating line, identified as RM1200, approved for construction in 2008, capable of coating 36.0 steel friction cores per hour. The adhesive is applied through a roll coater and then dried in a natural gas fired drying oven, identified as RM1201, rated at 1.2 million British thermal units per hour (MMBtu/hr). VOC and HAP emissions are controlled by a natural gas fired catalytic oxidation unit rated at 1.0 million British thermal units per hour (MMBtu/hr), identified as E6022, before exhausting through stack S12.**

- (fe) Two (2) etching lines, identified as M2002 and M2027, capable of etching a total of 10,200 steel plates per hour, and having a maximum usage of 4 pounds of acid per hour. PM and PM10 emissions from these emission units are controlled by a packed tower scrubber before exhausting through stack S1.

...

- (i) **One (1) heavy duty friction line, approved for construction in 2008, with a maximum capacity of 2,700.0 pounds per hour (lbs/hr), using one (1) fabric filter baghouse as control, identified as B1018, exhausting to stack S11 and consisting of the following;**

- (1) **One (1) ID Grinder, identified as RM1210;**
- (2) **One (1) OD Grinder, identified as RM1211;**
- (3) **One (1) Blanchard Grinder, identified as RM1215;**
- (4) **One (1) Mattison Grinder, identified as RM1216;**
- (5) **One (1) Mill Groover, identified as RM1220; and**

...

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

This stationary source also includes the following insignificant activities:

- (a) Various natural gas-fired heaters, burners, and ovens, including the incinerators with a total heat input capacity of 6.5 million Btu per hour.
- (bd) **Various natural gas-fired space heaters, identified as ID5, with a combined maximum total heat input capacity of 16 million British thermal units per hour (MMBtu/hr).**
- (cb) Combustion source flame safety purging on startup.
- (de) A petroleum fuel dispensing facility, other than a gasoline dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (ed) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughput less than 12,000 gallons.
- (fe) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (gf) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (hg) Degreasing operations that do not exceed 145 gallons per 12 months, and are not subject to 326 IAC 20-6.
- (ih) Cleaners and solvents characterized as follows:  
...
- (ji) The following equipment related to manufacturing activities not resulting in the emissions of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (kj) Closed loop heating and cooling systems.
- (lk) Activities associated with the treatment of wastewater streams with an oil and greases content less than or equal to 1% by volume.

- (~~m~~) Any operation using aqueous solutions containing less than 1% by weight of VOC excluding HAP.
- (~~nm~~) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other filtration equipment.
- (~~oa~~) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as bag filter or cyclone.
- (~~pe~~) Paved and unpaved roads and parking lots with public access.
- (~~qp~~) 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.
- (~~rq~~) On-site fire and emergency response training approved by the department.
- (~~sf~~) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying and woodworking operations.
- (~~ts~~) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees C).
- (~~ut~~) A laboratory, as defined in 326 IAC 2-7-1(20)(C).
- (~~vt~~) Other activities, not previously identified, with emissions equal to or less than the insignificant thresholds:

...

...

#### SECTION D.1 FACILITY OPERATION CONDITIONS

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

...

- (~~df~~) Two (2) adhesive coating lines, identified as M2003 and M2028, which are capable of coating a total of 10,200 steel friction cores per hour. The adhesive is applied through roll coater. VOC and HAP emissions are controlled by a natural gas fired catalytic oxidation unit rated at 1.5 million British thermal units per hour (MMBtu/hr), identified as E6003, before exhausting through stack S2.
- (**e**) **One (1) adhesive coating line, identified as RM1200, approved for construction in 2008, capable of coating 36.0 steel friction cores per hour. The adhesive is applied through a roll coater and then dried in a natural gas fired drying oven, identified as RM1201, rated at 1.2 million British thermal units per hour (MMBtu/hr). VOC and HAP emissions are controlled by a natural gas fired catalytic oxidation unit rated at 1.0 million British thermal units per hour (MMBtu/hr), identified as E6022, before exhausting through stack S12.**

(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 Miscellaneous Metal Coating Operations [326 IAC 8-2-9]

---

(a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), volatile organic compound (VOC) emissions from the coatings delivered to RM2002, RM5020, M2003 and M2028 **and RM1200** shall be limited to 3.5 pounds of VOC per gallon of coating, less water, for coatings that are air dried or forced warm air dried.

...

(c) Pursuant to 326 IAC 8-1-2(c), the overall efficiency of the capture systems and control devices shall be no less than the equivalent calculated by the following equation:

...

(1) The overall efficiency of catalytic oxidation unit RE6001, ~~shall be greater than 81.34% to comply with 326 IAC 8-1-2(c). However, this requirement is superseded by a more stringent requirement elsewhere in this permit,~~ **shall be as follows:**

**(A) when controlling emissions from adhesive coating line RM2002:**

**(i) for adhesive coating of Band Pads, shall be greater than 81.38%;**

**(ii) for adhesive coating of Torque Rings, shall be greater than 81.35%; and**

**(B) when controlling emissions from yarn saturation line RM5020, shall be greater than 32.28%.**

**However, this requirement is superseded by a more stringent requirement specified in D.1.2(a).**

(2) The overall efficiency of catalytic oxidation unit E6003, **controlling emissions from adhesive coating lines M2003 and M2028**, shall be greater than **80.15%** ~~75.95%~~ to comply with 326 IAC 8-1-2(c). However, this requirement is superseded by a more stringent requirement **specified in Section D.1.2(b)** elsewhere in this permit.

(3) **The overall efficiency of catalytic oxidation unit E6022, controlling emissions from adhesive coating line RM1200, shall be greater than 84.84% to comply with 326 IAC 8-1-2(c). However, this requirement is superseded by a more stringent requirement specified in Section D.1.2(b).**

For the detailed calculations, refer to page 10 of the TSD Appendix A.

D.1.2 VOC and HAP Emission Limitations [326 IAC 2-8]

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(a) The Permittee shall operate catalytic oxidation unit RE6001, **to control emissions from adhesive coating line RM2002 and yarn saturation line RM5020, at 85% 95% control efficiency, at a minimum.**

**(1) This is equivalent to 8.22 lbs/hr of VOCs.**

**(2) This is equivalent to 0.60 lbs/hr of HAPs.**

(b) The Permittee shall operate catalytic oxidation unit E6003, **to control emissions from adhesive coating lines M2003 and M2028, at 85% control efficiency, at a minimum.**

**(1) This is equivalent to 1.71 lbs/hr of VOCs.**

**(2) This is equivalent to 0.11 lbs/hr of HAPs.**

**(c) The Permittee shall operate catalytic oxidation unit E6022, to control emissions from adhesive coating line RM1200, at 85% control efficiency, at a minimum.**

**(1) This is equivalent to 3.55 lbs/hr of VOC.**

**(2) This is equivalent to 0.22 lbs/hr of HAPs.**

~~(c) Any change or modification which may increase potential VOC emissions to 100 tons per year or more from the equipment covered in this permit must be approved by the Office of Air Quality (OAQ) before such change may occur.~~

~~(d) Any change or modification which may increase potential emissions of any single HAP to 10 tons per year or more from the equipment covered in this permit must be approved by the Office of Air Quality (OAQ) before such change may occur.~~

~~(e) Any change or modification which may increase combined HAP potential emissions to 25 tons per year or more from the equipment covered in this permit must be approved by the Office of Air Quality (OAQ) before such change may occur.~~

~~Compliance with this condition and Condition D.1.6 will render 326 IAC 2-7 as not applicable for VOC and HAP emissions.~~

**Compliance with these limits, combined with the potential to emit of VOCs and HAPs from all other emission units at this source, shall limit the source-wide total potential to emit of VOCs to less than 100 tons per 12 consecutive month period, any single HAP to less than ten (10) tons per 12 consecutive month period, and total HAPs to less than twenty-five (25) tons per 12 consecutive month period and shall render 326 IAC 2-7 (Part 70 Permits), 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP) not applicable.**

...

#### D.1.4 Compliance Methods

---

Pursuant to 326 IAC 8-1-2(a), the Permittee shall comply with the requirements of 326 IAC 8-2-9 using catalytic incineration.

...

**(c) The Permittee shall vent emissions from adhesive coating line RM1200 and drying oven RM1201 to catalytic oxidation unit E6022.**

#### D.1.5 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

---

(a) Compliance stack tests shall be performed for each of the **three (3)** ~~two (2)~~ catalytic oxidation units at least once every five (5) years from the date of the previous valid compliance demonstration. The stack tests shall be performed utilizing Method 25 (40 CFR 60, Appendix A), or other methods as approved by the Commissioner.

#### D.1.6 Capture System

---

The volatile organic compound (VOC) capture systems for **each of** the adhesive **coating** lines shall meet the criteria of a permanent total enclosure. Permanent total enclosure is defined as a permanently installed enclosure that completely surrounds a source of emissions such that all VOC emissions are captured and contained for discharge through a control device:

...

#### D.1.9 Record Keeping Requirements

---

...

~~(b) To document compliance with Condition D.1.3, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.~~

- (be) To document compliance with Condition D.1.5(a), the Permittee shall maintain a copy of the compliance stack test results which established the operating temperature, fan amperage, and duct velocity that correspond to the required minimum control efficiency.
- (cd) 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)]:

...

- (fe) Two (2) etching lines, identified as M2002 and M2027, capable of etching a total of 10,200 steel plates per hour, and having a maximum usage of 4 pounds of acid per hour. PM and PM10 emissions from these emission units are controlled by a packed tower scrubber before exhausting through stack S1.

...

- (i) **One (1) heavy duty friction line, approved for construction in 2008, with a maximum capacity of 2,700.0 pounds per hour (lbs/hr), using one (1) fabric filter baghouse as control, identified as B1018, exhausting to stack S11 and consisting of the following;**

- (1) **One (1) ID Grinder, identified as RM1210;**
- (2) **One (1) OD Grinder, identified as RM1211;**
- (3) **One (1) Blanchard Grinder, identified as RM1215;**
- (4) **One (1) Mattison Grinder, identified as RM1216; and**
- (5) **One (1) Mill Groover, identified as RM1220;**

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

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

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate for process weight rates up to 60,000 pounds per hour shall be accomplished by use of the following equation:

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

...

- (d) **For heavy duty friction line, including; RM1210, RM1211, RM1215, RM1216, and RM1220, with a process weight rate of 1.35 tons per hour, the equation provides an emission limit of 5.01 pounds per hour.**

#### D.2.2 PM, PM<sub>10</sub> and HAP Emission Limitations [326 IAC 2-8] [326 IAC 2-2]

...

- (b) **PM and PM10 emissions from Baghouse M2024, controlling O.D. sanders M2010.1 and M2010.2 and opposed disk grinders M2048 and M2049, shall not exceed control PM and PM10 emissions to 6.77 pounds per hour or less.**
- (c) **PM and PM10 emissions from Baghouse B1018, controlling the heavy duty friction line, including; RM1210, RM1211, RM1215, RM1216 and RM1220, shall not exceed 5.01 pounds per hour.**

Compliance with the limitations established in this condition shall render 326 IAC 2-7 (**Part 70**) and 326 IAC 2-2 (**PSD**) as not applicable for PM, PM<sub>10</sub> and HAP emissions.

...

### Compliance Determination Requirements

#### D.2.4 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

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- (a) The Permittee shall perform PM<sub>10</sub> testing on **each of the** baghouses, M2024 and **B1018**, at least once every five (5) years from the date of the previous valid compliance demonstration, utilizing Methods 201 or 201A and 202 (40 CFR 51, Appendix M) or other methods as approved by the Commissioner. PM<sub>10</sub> includes filterable and condensable PM<sub>10</sub>.

...

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

#### D.2.5 Visible Emissions Notations

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- (a) Daily visible emission notations of **each of the** baghouses, M2024 and **B1018**, stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

...

#### D.2.6 Parametric Monitoring

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- (a) The Permittee shall record the total static pressure drop across baghouse M2024 at least once per day when any of the disk grinders and sanders is in operation and venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the range of 0.4 to ~~3.0~~ **3.5** inches of water, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. 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 - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (b) **The Permittee shall record the total static pressure drop across baghouse B1018 at least once per day when any of the heavy duty friction line equipment is in operation and venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the range of 2.0 to 6.0 inches of water, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. 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 - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.**

...

#### ~~D.2.7 Baghouse Inspections~~

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~~An inspection shall be performed each calendar quarter of all bags in baghouse M2024 when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.~~

...

#### D.2.78 Broken or Failed Bag Detection

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In the event that bag failure has been observed:

...

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

#### D.2.89 Record Keeping Requirements

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- (a) To document compliance with Condition D.2.5, the Permittee shall maintain records of daily visible emission notations of **each of the** baghouses, M2024 and **B1018**. **The**

**Permittee shall include in each daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).**

- (b) To document compliance with Condition D.2.6, the Permittee shall maintain the following:
- (1) Daily records of the total static pressure drop across **each of the baghouses, M2024 and B1018.**
- ...
- ~~(c) To document compliance with Condition D.2.7, the Permittee shall maintain records of the results of the inspections required under Condition D.2.7.~~
- ~~(d) To document compliance with Condition D.2.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.~~
- (ce) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

...

### D.3 FACILITY OPERATION CONDITIONS

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

- (bd) Various natural gas-fired space heaters, identified as ID5, with a maximum ~~total~~ **combined** heat input capacity of 16 million British thermal units per hour (MMBtu/hr).

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

...

- (b) The source has requested that a change in company name and ownership be noted.
- (1) IDEM has updated its records to indicate the change in company name, as follows:
- ~~Allomatic Products Company~~  
**Raybestos Powertrain**
- (2) IDEM has updated its records to indicate the change in ownership, as follows:
- ~~Raytech Systems, Inc.~~  
**Sun Capital Partners, Inc.**

No change has been made to the permit as a result of the change in company name and ownership.

- (c) The FESOP Renewal permit term has been extended to ten (10) years, as follows:
- (1) The expiration date on the cover page has been extended by five (5) years as follows:
- Issuance Date: July 05, 2005  
Expiration Date: July 05, ~~2010~~ **2015**
- (2) Condition B.3 has been revised to reflect the ten (10) year permit term.

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

- (a) This permit, **F153-20733-00015**, is issued for a fixed term of ~~five (5)~~ **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.

- (d) Upon further review, IDEM, OAQ has decided to make the following additional changes to the permit as described below. Deleted language appears as ~~strikethrough~~ text and new language appears as **bold** text:

## **SECTION B** ~~GENERAL CONDITIONS~~

### ~~B.1 Permit No Defense [IC 13]~~

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

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

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

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

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

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

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

### ~~B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]~~

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

### ~~B.6 Severability [326 IAC 2-8-4(4)]~~

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

### ~~B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]~~

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

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

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

### ~~B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]~~

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

~~B.10 — Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]~~

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

~~B.11 — Annual Compliance Certification [326 IAC 2-8-5(a)(1)]~~

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

~~Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, Room N1001  
Indianapolis, IN 46204-2222~~

- ~~(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, that IDEM, OAQ may require to determine the compliance status of the source.~~~~

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

~~B.12 — Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]~~

- ~~(a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs), including the following information on each facility:
  - ~~(1) — Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;~~~~

- ~~(2) — A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and~~
- ~~(3) — Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.~~
- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) 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 PMP does not require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

~~B.13 — Emergency Provisions [326 IAC 2-8-12]~~

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

~~Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,  
Telephone No.: 317-233-5674 (ask for Compliance Section)  
Facsimile No.: 317-233-5967~~
  - ~~(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, Room N1004

Indianapolis, IN 46204 2222

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

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

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

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

- ~~(6) — The Permittee immediately took all reasonable steps to correct the emergency.~~
- (c) ~~In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.~~
- (d) ~~This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.~~
- (e) ~~IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(e)(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.~~

- (a) ~~Deviations from any permit requirements (for emergencies see Section B—Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, Room N1004  
Indianapolis, IN 46204-2222~~

~~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 need to be included in this report.~~

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

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

~~B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination  
[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]~~

---

- (a) ~~This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)]~~

~~The notification by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).~~

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

~~B.16 Permit Renewal [326 IAC 2-8-3(h)]~~

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

~~Request for renewal shall be submitted to:~~

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, Room N1004  
Indianapolis, IN 46204-2222

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

(1) ~~— A timely renewal application is one that is:~~

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

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

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

(c) ~~Right to Operate After Application for Renewal [326 IAC 2-8-9]~~

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

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

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

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

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, Room N1004  
Indianapolis, IN 46204-2222

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

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

(d) ~~No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.~~

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

(a) ~~The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without 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 emissions allowable under 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, Room N1001  
Indianapolis, IN 46204-2222~~

~~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 which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to 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 increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).~~
- ~~(c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.~~
- ~~(d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.~~

~~B.19 Permit Revision Requirement [326 IAC 2-8-11.1]~~

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

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

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

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

B.21 — Transfer of Ownership or Operational Control [326 IAC 2-8-10]

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

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, Room N1001  
Indianapolis, IN 46204-2222

~~The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~
- (c) ~~The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]~~

B.22 — Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16] [326 IAC 2-1.1-7]

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

B.23 — Advanced Source Modification Approval [326 IAC 2-8-4(11)] [326 IAC 2-1.1-9]

- (a) ~~The requirements to obtain a permit revision under 326 IAC 2-8-11.1 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities listed in Section A of this permit.~~
- (b) ~~Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if~~

~~construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction work is suspended for a continuous period of one (1) year or more.~~

~~B.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
---------------

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

~~C.1 — Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [40 CFR 52 Subpart P][326 IAC 6-3-2]~~

- ~~(a) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.~~
- ~~(b) 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 from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period. This limitation shall also satisfy the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD));~~
  - ~~(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) 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 the source's potential to emit does not exceed the above specified limits.~~
- ~~(c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.~~

~~C.3 — Opacity [326 IAC 5-1]~~

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

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

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

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

~~C.5 — Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]~~

~~The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 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 — Operation of Equipment [326 IAC 2-8-5(a)(4)]~~

~~Except as otherwise provided by statute, rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that any emission unit vented to the control equipment is in operation.~~

~~C.8 — 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.9 — 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, Room N1001  
Indianapolis, IN 46204-2222~~

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

- ~~(e) Procedures for Asbestos Emission Control  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.~~
- ~~(f) Demolition and Renovation  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).~~
- ~~(g) Indiana Accredited Asbestos Inspector  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.~~

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

**C.10 — Performance Testing [326 IAC 3-6]**

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- (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, Room N1001  
Indianapolis, IN 46204-2222

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

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

### **~~Compliance Requirements [326 IAC 2-1.1-11]~~**

#### ~~C.11 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.12 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 upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.~~

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

#### ~~C.13 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.14 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]~~

- (a) ~~Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (2%) of full scale reading.~~
- (b) ~~Whenever a condition in this permit requires the measurement of a temperature, duct pressure, or fan amperage, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (2%) of full scale reading.~~
- (c) ~~The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.~~

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

#### ~~C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]~~

~~Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):~~

- (a) ~~The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.~~
- (b) ~~Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]~~

~~C.16 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.17 Compliance Response Plan – Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]~~

- (a) ~~The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and is comprised of:~~

- ~~(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and~~

- ~~(2) An expected time frame for taking reasonable response steps.~~

~~If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.~~

- (b) ~~For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:~~

- ~~(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or~~

- ~~(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.~~

- ~~(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.~~

- ~~(4) Failure to take reasonable response steps shall be considered a deviation from the permit.~~

- (c) ~~The Permittee is not required to take any further response steps for any of the following reasons:~~

- (1) ~~\_\_\_\_\_ A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment. \_\_\_\_\_~~
- (2) ~~\_\_\_\_\_ The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.~~
- (3) ~~\_\_\_\_\_ An automatic measurement was taken when the process was not operating.~~
- (4) ~~\_\_\_\_\_ The process has already returned or is returning to operating within "normal" parameters and no response steps are required.~~
- (d) ~~When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.~~
- (e) ~~The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.~~
- (f) ~~Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.~~

~~C.18 — 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 and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.~~
- (c) ~~IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.~~

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

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

~~C.19 — 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.20 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]~~

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- (a) ~~The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 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, Room N1001  
Indianapolis, IN 46204-2222~~
- (c) ~~Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.~~
- (d) ~~Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~
- (e) ~~Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.~~

**Stratospheric Ozone Protection**

~~C.21 Compliance with 40 CFR 82 and 326 IAC 22-1~~

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~~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 B**

**GENERAL CONDITIONS**

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

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**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)]**

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- (a) This permit, F153-20733-00015, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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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]**

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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)]**

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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)]**

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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)]**

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- (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. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent 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)]**

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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)]**

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, 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.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date 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

The PMP extension notification does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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]**

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- (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]**

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- (a) All terms and conditions of permits established prior to F153-25848-00015 and issued pursuant to permitting programs approved into the state implementation plan have been either:**
- (1) incorporated as originally stated,**
  - (2) revised, or**
  - (3) deleted.**
- (b) All previous registrations and permits are superseded by this permit.**

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

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**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)]**

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- (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]**

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- (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)]**

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- (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]**

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(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]**

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(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]**

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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]**

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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]**

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

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

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

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

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

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

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

- (a) **The requirements to obtain a permit modification under 326 IAC 2-8-11.1 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3.**
- (b) **Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction, work is suspended for a continuous period of one (1) year or more.**

**B.25 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]**

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

**SECTION C SOURCE OPERATION CONDITIONS**

**Entire Source**

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

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

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

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

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

**(a) Pursuant to 326 IAC 2-8:**

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

**(b) The potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period. 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]**

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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]**

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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]**

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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]**

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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]**

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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]**

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- (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 demolitions 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]]**

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- (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]]**

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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)]]**

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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]]**

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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)]]**

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- (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 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

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Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval 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 ninety (90) days after the date of issuance of this permit.

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

(c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

**C.15 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]**

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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.16 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]**

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(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.17 Actions Related to Noncompliance Demonstrated by a Stack Test**  
**[326 IAC 2-8-4][326 IAC 2-8-5]**

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

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

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- (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) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. 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.20 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.**

### **Conclusion and Recommendation**

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on January 7, 2008.

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed FESOP Significant Revision No. 153-25848-00015. The staff recommends to the Commissioner that this FESOP Significant Revision be approved.

### **IDEM Contact**

- (a) Questions regarding this proposed permit can be directed to Hannah Desrosiers 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) 234-5374 or toll free at 1-800-451-6027 extension 4-5374.**
- (b) A copy of the findings is available on the Internet at: [www.in.gov/idem/permits/air/pending.html](http://www.in.gov/idem/permits/air/pending.html).**
- (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.in.gov/idem/permits/guide/](http://www.in.gov/idem/permits/guide/).**

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

Addendum to the Technical Support Document (ATSD) for a  
Significant Permit Revision (SPR) to a  
Federal Enforceable State Operating Permit (FESOP)

**Source Background and Description**

<b>Source Name:</b>	Raybestos Powertrain
<b>Source Location:</b>	609 East Chaney Street, Sullivan, IN 47882
<b>County:</b>	Sullivan
<b>SIC Code:</b>	3714
<b>Operation Permit No.:</b>	F 153-20733-00015
<b>Operation Permit Issuance Date:</b>	July 5, 2005
<b>Significant Permit Revision No.:</b>	153-25848-00015
<b>Permit Reviewer:</b>	Hannah L. Desrosiers

On April 18, 2008, the Office of Air Quality (OAQ) had a notice published in the Sullivan Daily Times, Sullivan, Indiana, stating that Raybestos Powertrain had applied for a significant revision of their FESOP Renewal issued on July 5, 2005 to applied to construct and operate of one (1) new adhesive coating line and one (1) new heavy duty friction line, and modify their existing adhesive coating operations. The notice also stated that the OAQ proposed to issue a significant permit revision for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

**Comments and Responses**

No comments were received during the public notice period.

**Additional Changes**

IDEM, OAQ has decided to make additional revisions to the permit. Since the OAQ prefers that all Technical Support Documents (TSDs) reflect the permit that was on public notice, no change will be made to the TSD, or Appendix A of the TSD. This addendum is being used to document the indicated revisions as described below, with deleted language as ~~strikeouts~~ and new language **bolded**.

1. Upon further review, IDEM has determined that the following permit conditions be revised for clarification and to correctly limit the source's actual emissions, which will in turn limit their potential emissions and make their limitations practicably and federally enforceable, as follows:

D.1.1 Miscellaneous Metal Coating Operations [326 IAC 8-2-9]

...

- (1) The overall efficiency of catalytic oxidation unit RE6001, to comply with 326 IAC 8-1-2(c), shall be as follows:
  - (A) when controlling emissions from adhesive coating line RM2002:
    - (i) for adhesive coating of Band Pads, shall be greater than **or equal to** 81.38%;

- (ii) for adhesive coating of Torque Rings, shall be greater than **or equal to** 81.35%; and
- (B) when controlling emissions from yarn saturation line RM5020, shall be greater than **or equal to** 32.28%.

However, this requirement is superseded by a more stringent requirement specified in D.1.2(a).

- (2) The overall efficiency of catalytic oxidation unit E6003, controlling emissions from adhesive coating lines M2003 and M2028, shall be greater than **or equal to** 80.15% to comply with 326 IAC 8-1-2(c). However, this requirement is superseded by a more stringent requirement specified in D.1.2(b).
- (3) The overall efficiency of catalytic oxidation unit E6022, controlling emissions from adhesive coating line RM1200, shall be greater than **or equal to** 84.84% to comply with 326 IAC 8-1-2(c). However, this requirement is superseded by a more stringent requirement specified in D.1.2(c).

#### D.1.2 VOC and HAP Emission Limitations [326 IAC 2-8]

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- (a) The Permittee shall operate catalytic oxidation unit RE6001, to control emissions from adhesive coating line RM2002 and yarn saturation line RM5020, at 85% control efficiency, at a minimum.
  - (1) ~~This is equivalent to 8.22 lbs/hr of VOCs.~~
  - (2) ~~This is equivalent to 0.60 lbs/hr of HAPs.~~
- (b) The Permittee shall operate catalytic oxidation unit E6003, to control emissions from adhesive coating lines M2003 and M2028, at 85% control efficiency, at a minimum.
  - (1) ~~This is equivalent to 1.71 lbs/hr of VOCs.~~
  - (2) ~~This is equivalent to 0.11 lbs/hr of HAPs.~~
- (c) The Permittee shall operate catalytic oxidation unit E6022, to control emissions from adhesive coating line RM1200, at 85% control efficiency, at a minimum.
  - (1) ~~This is equivalent to 3.55 lbs/hr of VOC.~~
  - (2) ~~This is equivalent to 0.22 lbs/hr of HAPs.~~

...

- 2. IDEM has reconsidered the requirement to develop and follow a Compliance Response Plan. The Permittee will still be required to take reasonable response steps when a compliance monitoring parameter is determined to be out of range or abnormal. Replacing the requirement to develop and follow a Compliance Response Plan with a requirement to take reasonable response steps will ensure that the control equipment is returned to proper operation as soon as practicable, while still allowing the Permittee the flexibility to respond to situations that were not anticipated. The Section C condition was revised accordingly, prior to public notice. Several Section D conditions that refer to this condition were inadvertently overlooked and are consequently being corrected, as follows:
- 3. Upon further review, IDEM has determined that it is the Permittee's responsibility to include routine control device inspection requirements in the applicable preventive maintenance plan. Since the Permittee is in the best position to determine the appropriate frequency of control device inspections and the details regarding which components of the control device should be inspected, the conditions

requiring control device inspections have been removed from the permit. Therefore, the descriptive adjectives "total static" used to enumerate the pressure drop in relation to parametric monitoring of the baghouse have been removed, as follows:

#### D.1.8 Parametric Monitoring

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...

- (b) The duct pressure or fan amperage shall be observed at least once per day when the catalytic oxidation units are operation. When for any one reading, the duct pressure or fan amperage is outside the normal range as established in most recent compliant stack test, the Permittee shall take reasonable response steps in accordance with Section C - **Response to Excursions or Exceedances** ~~Compliance Response Plan - Preparation, Implementation, Records, and Reports~~. A reading that is outside the range as established in the most recent compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

...

#### D.2.6 Parametric Monitoring

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- (a) The Permittee shall record the ~~total static~~ pressure drop across baghouse M2024 at least once per day when any of the disk grinders and sanders is in operation and venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the range of 0.4 to 3.5 inches of water, the Permittee shall take reasonable response steps in accordance with Section C - **Response to Excursions or Exceedances** ~~Compliance Response Plan - Preparation, Implementation, Records, and Reports~~. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.
- (b) The Permittee shall record the ~~total static~~ pressure drop across baghouse B1018 at least once per day when any of the heavy duty friction line equipment is in operation and venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the range of 2.0 to 6.0 inches of water, the Permittee shall take reasonable response steps in accordance with Section C - **Response to Excursions or Exceedances** ~~Compliance Response Plan - Preparation, Implementation, Records, and Reports~~. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

...

#### D.2.8 Record Keeping Requirements

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...

- (b) To document compliance with Condition D.2.6, the Permittee shall maintain daily records of the ~~total static~~ pressure drop across each of the baghouses, M2024 and B1018. The Permittee shall include in each daily record when the ~~total static~~ pressure drop is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).

...

<b>IDEM Contact</b>
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- (a) Questions regarding this proposed FESOP SPR can be directed to Hannah Desrosiers 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) 234-5374 or toll free at 1-800-451-6027 extension 4-5374.
- (b) A copy of the permit 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](http://www.idem.in.gov)

**Appendix A: Emissions Calculations  
Entire Source Emission Summary**

**Company Name:** Raybestos Powertrain  
**Address City IN Zip:** 609 E. Chaney St., Sullivan, IN 47882  
**Permit No.:** 153-20733-00015  
**Permit Revision No.:** 153-25848-00015  
**Reviewer:** Hannah L. Desrosiers  
**Date Received:** 1/7/2008

Uncontrolled Potential Emissions (tons/year)												
Category	Pollutant	Emissions Generating Activity										TOTAL
		Existing Emissions Units					Revised Units <sup>(1)</sup>		New Emission Units			
		Adhesive Coating Operations* (RM2002, M2003/M2028)	Yarn Saturation* (RM5020)	Grinding & Sanding Operations	Etching Operations	Natural Gas Combustion	Adhesive Coating Operations (RM2002, M2003/M2028)	Yarn Saturation (RM5020)	Grinding Operations	Adhesive Coating (RM1200)	Natural Gas Combustion	
Criteria Pollutants	PM	#REF!	#REF!	#REF!	#REF!	#REF!	0.00	#REF!	44.68	0.00	0.02	#REF!
	PM10	#REF!	#REF!	#REF!	#REF!	#REF!	0.00	#REF!	44.68	0.00	0.07	#REF!
	SO2	#REF!	#REF!	0	#REF!	#REF!	0	0	0	0	0.01	#REF!
	NOx	#REF!	#REF!	0	#REF!	#REF!	0	0	0	0	0.96	#REF!
	VOC	#REF!	#REF!	0	#REF!	#REF!	333.00	6.67	0	103.79	0.05	#REF!
	CO	#REF!	#REF!	0	#REF!	#REF!	0	0	0	0	0.81	#REF!
Hazardous Air Pollutants	Benzene	#REF!	#REF!	0	0	#REF!	0	0	0	0	1.11E-05	#REF!
	Dichlorobenzene	#REF!	#REF!	0	0	#REF!	0	0	0	0	6.34E-06	#REF!
	Formaldehyde	#REF!	#REF!	0	0	#REF!	3.20	0.13	0	0.17	3.96E-04	#REF!
	Hexane	#REF!	#REF!	0	0	#REF!	0	0	0	0	0.01	#REF!
	Hydrochloric Acid (HCL)	#REF!	#REF!	0	#REF!	#REF!	0	0	0	0	0	#REF!
	Methanol	#REF!	#REF!	0	0	#REF!	2.83	0	0	4.79	0	#REF!
	Phenol	#REF!	#REF!	0	0	#REF!	13.66	1.00	0	1.39	0	#REF!
	Toluene	#REF!	#REF!	0	0	#REF!	0	0	0	0	1.80E-05	#REF!
	Cadmium	#REF!	#REF!	0	0	#REF!	0	0	0	0	5.81E-06	#REF!
	Chromium	#REF!	#REF!	0	0	#REF!	0	0	0	0	7.40E-06	#REF!
	Lead	#REF!	#REF!	0	0	#REF!	0	0	0	0	2.64E-06	#REF!
	Manganese	#REF!	#REF!	0	0	#REF!	0	0	0	0	2.01E-06	#REF!
	Nickel	#REF!	#REF!	0	0	#REF!	0	0	0	0	1.11E-05	#REF!
	<b>Totals</b>	#REF!	#REF!	0	#REF!	#REF!	19.69	1.13	0	6.34	0.01	#REF!
											<b>Worse Case HAP</b>	#REF!

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

<sup>(1)</sup> The corresponding emissions are the result of a revision to existing operations\*. The revised values supercede and replace the original values, which are no longer counted in the TOTAL emissions.

**Appendix A: Emissions Calculations  
Entire Source Emission Summary**

**Company Name:** Raybestos Powertrain  
**Address City IN Zip:** 609 E. Chaney St., Sullivan, IN 47882  
**Permit No.:** 153-20733-00015  
**Permit Revision No.:** 153-25848-00015  
**Reviewer:** Hannah L. Desrosiers  
**Date Received:** 1/7/2008

Controlled Potential Emissions (tons/year)												
Category	Pollutant	Emissions Generating Activity										
		Existing Emissions Units					Revised Units <sup>(1)</sup>		New Emission Units			TOTAL
		Adhesive Coating Operations* (RM2002, M2003/M2028)	Yarn Saturation* (RM5020)	Grinding & Sanding Operations	Etching Operations	Natural Gas Combustion	Adhesive Coating Operations (RM2002, M2003/M2028)	Yarn Saturation (RM5020)	Grinding Operations	Adhesive Coating (RM1200)	Natural Gas Combustion	
Criteria Pollutants	PM	#REF!	#REF!	#REF!	#REF!	#REF!	0.00	#REF!	2.23	0.00	0.02	#REF!
	PM10	#REF!	#REF!	#REF!	#REF!	#REF!	0.00	#REF!	2.23	0.00	0.07	#REF!
	SO2	#REF!	#REF!	0	#REF!	#REF!	0	0	0	0	0.01	#REF!
	NOx	#REF!	#REF!	0	#REF!	#REF!	0	0	0	0	0.96	#REF!
	VOC	#REF!	#REF!	0	#REF!	#REF!	42.47	1.00	0	15.57	0.05	#REF!
	CO	#REF!	#REF!	0	#REF!	#REF!	0	0	0	0	0.81	#REF!
Hazardous Air Pollutants	Benzene	#REF!	#REF!	0	0	#REF!	0	0	0	0	1.11E-05	#REF!
	Dichlorobenzene	#REF!	#REF!	0	0	#REF!	0	0	0	0	6.34E-06	#REF!
	Formaldehyde	#REF!	#REF!	0	0	#REF!	0.44	0.02	0	0.025	3.96E-04	#REF!
	Hexane	#REF!	#REF!	0	0	#REF!	0	0	0	0	0.01	#REF!
	Hydrochloric Acid (HCL)	#REF!	#REF!	0	#REF!	#REF!	0	0	0	0	0	#REF!
	Methanol	#REF!	#REF!	0	0	#REF!	0.43	0	0	0.72	0	#REF!
	Phenol	#REF!	#REF!	0	0	#REF!	2.05	0.15	0	0.21	0	#REF!
	Toluene	#REF!	#REF!	0	0	#REF!	0	0	0	0	1.80E-05	#REF!
	Cadmium	#REF!	#REF!	0	0	#REF!	0	0	0	0	5.81E-06	#REF!
	Chromium	#REF!	#REF!	0	0	#REF!	0	0	0	0	7.40E-06	#REF!
	Lead	#REF!	#REF!	0	0	#REF!	0	0	0	0	2.64E-06	#REF!
	Manganese	#REF!	#REF!	0	0	#REF!	0	0	0	0	2.01E-06	#REF!
	Nickel	#REF!	#REF!	0	0	#REF!	0	0	0	0	1.11E-05	#REF!
	<b>Totals</b>	#REF!	#REF!	<b>0</b>	#REF!	#REF!	<b>2.92</b>	<b>0.17</b>	<b>0</b>	<b>0.95</b>	<b>0.01</b>	#REF!
											<b>Worse Case HAP</b>	#REF!

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

<sup>(1)</sup> The corresponding emissions are the result of a revision to existing operations\*. The revised values supercede and replace the original values, which are no longer counted in the TOTAL emissions.

**Appendix A: Emissions Calculations**  
**Existing Emission Unit Summary Prior to Revision**

**Company Name:** Raybestos Powertrain  
**Address City IN Zip:** 609 E. Chaney St., Sullivan, IN 47882  
**Permit No.:** 153-20733-00015  
**Permit Revision No.:** 153-25848-00015  
**Reviewer:** Hannah L. Desrosiers  
**Date Received:** 1/7/2008

Category	Uncontrolled Potential Emissions (tons/year)						
	Pollutant	Emissions Generating Activity					TOTAL
		Adhesive Coating Operations <sup>(1)</sup> (RM2002, M2003/M2028)	Yarn Saturation <sup>(1)</sup> (RM5020)	Grinding & Sanding Operations	Etching Operations	Natural Gas Combustion	
Criteria Pollutants	PM	#REF!	#REF!	#REF!	#REF!	#REF!	#REF!
	PM10	#REF!	#REF!	#REF!	#REF!	#REF!	#REF!
	SO2	#REF!	#REF!	0	#REF!	#REF!	#REF!
	NOx	#REF!	#REF!	0	#REF!	#REF!	#REF!
	VOC	#REF!	#REF!	0	#REF!	#REF!	#REF!
	CO	#REF!	#REF!	0	#REF!	#REF!	#REF!
Hazardous Air Pollutants	Benzene	#REF!	#REF!	0	0	#REF!	#REF!
	Dichlorobenzene	#REF!	#REF!	0	0	#REF!	#REF!
	Formaldehyde	#REF!	#REF!	0	0	#REF!	#REF!
	Hexane	#REF!	#REF!	0	0	#REF!	#REF!
	Hydrochloric Acid (HCL)	#REF!	#REF!	0	#REF!	#REF!	#REF!
	Methyl Ethyl Ketone <sup>(2)</sup>	#REF!	#REF!	0	0	#REF!	#REF!
	Methanol	#REF!	#REF!	0	0	#REF!	#REF!
	Phenol	#REF!	#REF!	0	0	#REF!	#REF!
	Toluene	#REF!	#REF!	0	0	#REF!	#REF!
	Cadmium	#REF!	#REF!	0	0	#REF!	#REF!
	Chromium	#REF!	#REF!	0	0	#REF!	#REF!
	Lead	#REF!	#REF!	0	0	#REF!	#REF!
	Manganese	#REF!	#REF!	0	0	#REF!	#REF!
	Nickel	#REF!	#REF!	0	0	#REF!	#REF!
<b>Totals</b>	#REF!	#REF!	0	#REF!	#REF!	#REF!	

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

(1) These emissions are being revised in this modification and will no longer be used to determine total emissions.

(2) Methyl Ethyl Ketone (MEK) was delisted as a Hazardous Air Pollutant by both the US EPA., on December 19, 2005, and the Indiana Department of Environmental Management, on November 23, 2006. Therefore, as part of this modification, MEK will be removed from consideration when calculating and evaluating the source's unlimited potential to emit (PTE).

Category	Controlled Potential Emissions (tons/year)						
	Pollutant	Emissions Generating Activity					TOTAL
		Adhesive Coating Operations <sup>(1)</sup> (RM2002, M2003/M2028)	Yarn Saturation <sup>(1)</sup> (RM5020)	Grinding & Sanding Operations	Etching Operations	Natural Gas Combustion	
Criteria Pollutants	PM	#REF!	#REF!	#REF!	#REF!	#REF!	#REF!
	PM10	#REF!	#REF!	#REF!	#REF!	#REF!	#REF!
	SO2	#REF!	#REF!	0	#REF!	#REF!	#REF!
	NOx	#REF!	#REF!	0	#REF!	#REF!	#REF!
	VOC	#REF!	#REF!	0	#REF!	#REF!	#REF!
	CO	#REF!	#REF!	0	#REF!	#REF!	#REF!
Hazardous Air Pollutants	Benzene	#REF!	#REF!	0	0	#REF!	#REF!
	Dichlorobenzene	#REF!	#REF!	0	0	#REF!	#REF!
	Formaldehyde	#REF!	#REF!	0	0	#REF!	#REF!
	Hexane	#REF!	#REF!	0	0	#REF!	#REF!
	Hydrochloric Acid (HCL)	#REF!	#REF!	0	#REF!	#REF!	#REF!
	Methyl Ethyl Ketone <sup>(2)</sup>	#REF!	#REF!	0	0	#REF!	#REF!
	Methanol	#REF!	#REF!	0	0	#REF!	#REF!
	Phenol	#REF!	#REF!	0	0	#REF!	#REF!
	Toluene	#REF!	#REF!	0	0	#REF!	#REF!
	Cadmium	#REF!	#REF!	0	0	#REF!	#REF!
	Chromium	#REF!	#REF!	0	0	#REF!	#REF!
	Lead	#REF!	#REF!	0	0	#REF!	#REF!
	Manganese	#REF!	#REF!	0	0	#REF!	#REF!
	Nickel	#REF!	#REF!	0	0	#REF!	#REF!
<b>Totals</b>	#REF!	#REF!	0	#REF!	#REF!	#REF!	

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

(1) These emissions are being revised in this modification and will no longer be used to determine total emissions.

(2) Methyl Ethyl Ketone (MEK) was delisted as a Hazardous Air Pollutant by both the US EPA., on December 19, 2005, and the Indiana Department of Environmental Management, on November 23, 2006. Therefore, as part of this modification, MEK will be removed from consideration when calculating and evaluating the source's unlimited potential to emit (PTE).

### Appendix A: Emissions Calculations New and Revised Emission Units Only

**Company Name:** Raybestos Powertrain  
**Address City IN Zip:** 609 E. Chaney St., Sullivan, IN 47882  
**Permit No.:** 153-20733-00015  
**Permit Revision No.:** 153-25848-00015  
**Reviewer:** Hannah L. Desrosiers  
**Date Received:** 1/7/2008

Category	Pollutant	Uncontrolled Potential Emissions (tons/year)							TOTAL
		Emissions Generating Activity							
		Revised Emission Units			New Emissions Units				
		Adhesive Coating			Grinding Operations	Adhesive Coating	Natural Gas Combustion		
Torque Rings RM2002	Friction Line M2003/M2028	Yarn Saturation RM5020							
Criteria Pollutants	PM	0.00	0.00	#REF!	44.68	0.00	0.02	#REF!	
	PM10	0.00	0.00	#REF!	44.68	0.00	0.07	#REF!	
	SO2	0	0	0	0	0	0.01	0.01	
	NOx	0	0	0	0	0	0.96	0.96	
	VOC	283.15	49.86	6.67	0	103.79	0.05	443.51	
	CO	0	0	0	0	0	0.81	0.81	
Hazardous Air Pollutants	Benzene	0	0	0	0	0	1.11E-05	1.11E-05	
	Dichlorobenzene	0	0	0	0	0	6.34E-06	6.34E-06	
	Formaldehyde	2.97	0.23	0.13	0	0.166	3.96E-04	3.50	
	Hexane	0	0	0	0	0	0.01	0.01	
	Hydrochloric Acid (HCL)	0	0	0	0	0	0	0	
	Methyl Ethyl Ketone <sup>(1)</sup>	0	0	3.53	0	0	0	3.53	
	Methanol	0	2.83	0	0	4.79	0	7.63	
	Phenol	13.66	0	1.00	0	1.39	0	16.04	
	Toluene	0	0	0	0	0	1.80E-05	1.80E-05	
	Cadmium	0	0	0	0	0	5.81E-06	5.81E-06	
	Chromium	0	0	0	0	0	7.40E-06	7.40E-06	
	Lead	0	0	0	0	0	2.64E-06	2.64E-06	
	Manganese	0	0	0	0	0	2.01E-06	2.01E-06	
	Nickel	0	0	0	0	0	1.11E-05	1.11E-05	
<b>Totals</b>		<b>16.62</b>	<b>3.07</b>	<b>1.13</b>	<b>0</b>	<b>6.34</b>	<b>0.01</b>	<b>27.18</b>	
								<b>16.04</b>	

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

(1) Methyl Ethyl Ketone (MEK) was delisted as a Hazardous Air Pollutant by both the US EPA., on December 19, 2005, and the Indiana Department of Environmental Management, on November 23, 2006. Therefore, MEK has been removed from consideration when calculating and evaluating the source's unlimited potential to emit (PTE).

Category	Pollutant	Controlled Potential Emissions (tons/year)							TOTAL
		Emissions Generating Activity							
		Revised Emission Units			New Emissions Units				
		Adhesive Coating			Grinding Operations	Adhesive Coating	Natural Gas Combustion		
Torque Rings RM2002	Friction Line M2003/M2028	Yarn Saturation RM5020							
Criteria Pollutants	PM	0.00	0.00	#REF!	2.23	0.00	0.02	#REF!	
	PM10	0.00	0.00	#REF!	2.23	0.00	0.07	#REF!	
	SO2	0	0	0	0	0	0.01	0.01	
	NOx	0	0	0	0	0	0.96	0.96	
	VOC	34.99	7.48	1.00	0	15.57	0.05	59.09	
	CO	0	0	0	0	0	0.81	0.81	
Hazardous Air Pollutants	Benzene	0	0	0	0	0	1.11E-05	1.11E-05	
	Dichlorobenzene	0	0	0	0	0	6.34E-06	6.34E-06	
	Formaldehyde	0.41	0.04	0.02	0	0.025	3.96E-04	0.49	
	Hexane	0	0	0	0	0	0.01	0.010	
	Hydrochloric Acid (HCL)	0	0	0	0	0	0	0	
	Methyl Ethyl Ketone <sup>(1)</sup>	0	0	0.53	0	0	0	0.53	
	Methanol	0	0.43	0	0	0.72	0	1.14	
	Phenol	2.05	0	0.15	0	0.21	0	2.41	
	Toluene	0	0	0	0	0	1.80E-05	1.80E-05	
	Cadmium	0	0	0	0	0	5.81E-06	5.81E-06	
	Chromium	0	0	0	0	0	7.40E-06	7.40E-06	
	Lead	0	0	0	0	0	2.64E-06	2.64E-06	
	Manganese	0	0	0	0	0	2.01E-06	2.01E-06	
	Nickel	0	0	0	0	0	1.11E-05	1.11E-05	
<b>Totals</b>		<b>2.46</b>	<b>0.46</b>	<b>0.17</b>	<b>0</b>	<b>0.95</b>	<b>0.01</b>	<b>4.05</b>	
								<b>2.41</b>	

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

(1) Methyl Ethyl Ketone (MEK) was delisted as a Hazardous Air Pollutant by both the US EPA., on December 19, 2005, and the Indiana Department of Environmental Management, on November 23, 2006. Therefore, MEK has been removed from consideration when calculating and evaluating the source's unlimited potential to emit (PTE).

**Appendix A: Emissions Calculations  
Revised Emission Units Only  
Adhesive Coating Operations - RM2002  
Catalytic Oxidizer RE6001**

**Company Name:** Raybestos Powertrain  
**Address City IN Zip:** 609 E. Chaney St., Sullivan, IN 47882  
**Permit No.:** 153-20733-00015  
**Permit Revision No.:** 153-25848-00015  
**Reviewer:** Hannah L. Desrosiers  
**Date Received:** 1/7/2008

Material	Density (Lb/Gal)	Weight % Volatile (H <sub>2</sub> O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency	
<b>Band Pads</b>																	
Adhesive: PL700	7.60	73.55%	0.00%	73.55%	0.00%	22.00%	0.07460	110	5.59	5.59	45.87	1100.88	200.91	0.00	25.41	100%	
Solvent: Methyl Ethyl Ketone	6.72	100.00%	0.00%	100.00%	0.00%	0.00%	0.01000	110	6.72	6.72	7.39	177.41	32.38	0.00	#DIV/0!	100%	
Total for Band Pads												53.26	1278.29	233.29	0.00		

<b>Torque Rings</b>																	
Adhesive: PL700	7.60	73.55%	0.00%	73.55%	0.00%	22.00%	0.00560	625	5.59	5.59	19.56	469.54	85.69	0.00	25.41	100%	
Solvent: Methyl Ethyl Ketone	6.72	100.00%	0.00%	100.00%	0.00%	0.00%	0.00190	625	6.72	6.72	7.98	191.52	34.95	0.00	#DIV/0!	100%	
Total for Torque Rings												27.54	661.06	120.64	0.00		

State VOC and PM Potential Emissions

"Worst Case" Uncontrolled Emissions = 53.26 1278.29 233.29 0.00  
 Catalytic Oxidizer RE6001 Control Efficiency = 85.0%

**Total "Worst Case" VOC Emissions after controls/limits (tons/yr) = 34.99**

**326 IAC 2-8 FESOP VOC Emission Limitation (lbs/hr) = 7.99**

**METHODOLOGY**

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water)  
 Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % Organics)  
 Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)  
 Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)  
 Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)  
 Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1- Weight % Volatiles) \* (1-Transfer efficiency) \* (8760 hrs/yr) \* (1 ton/2000 lbs)  
 Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids)  
 Total = Worst Coating + Sum of all solvents used  
 326 IAC 2-8 FESOP VOC Emission Limitation (lbs/hr) = "Worst Case" Uncontrolled VOC Emissions (lb/hr) \* 1 - Control Efficiency

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % HAP#1	Weight % HAP#2	Emissions HAP#1 (ton/yr)	Emissions HAP#2 (ton/yr)
<b>Band Pads</b>							
Adhesive: PL700	7.60	0.07460	110	1.00%	5.00%	2.73	13.66
Solvent: Methyl Ethyl Ketone	6.72	0.01000	110	0.00%	0.00%	0.00	0.00
Total for Band Pads						2.73	13.66

<b>Torque Rings</b>							
Adhesive: PL700	7.60	0.00560	625	1.00%	5.00%	1.17	5.83
Solvent: Methyl Ethyl Ketone	6.72	0.00190	625	0.00%	0.00%	0.00	0.00
Total for Torque Rings						1.17	5.83

Worst Case Uncontrolled HAP Emissions (ton/yr) =	2.73	13.66	Total	16.39
Catalytic Oxidizer Control Efficiency =	85.0%			

State HAP Potential Emissions

**"Worst Case" HAP Emissions after controls/limits (tons/yr) = 0.41 2.05 Total 2.46**

**326 IAC 2-8 FESOP VOC Emission Limitation (lbs/hr) = 0.56**

**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)  
 326 IAC 2-8 FESOP HAP Emissions (lbs/hr) = "Worst Case" HAP Emissions after controls/limits (tons/yr) \* (1 yr/8760 hrs) \* (2000lbs/1 ton)

**LEGEND**

HAP#1 = Formaldehyde  
 HAP#2 = Phenol

**Appendix A: Emissions Calculations  
Revised Emission Units Only  
Adhesive Coating Operations - M2003/M2028  
Catalytic Oxidizer E6003**

**Company Name:** Raybestos Powertrain  
**Address City IN Zip:** 609 E. Chaney St., Sullivan, IN 47882  
**Permit No.:** 153-20733-00015  
**Permit Revision No.:** 153-25848-00015  
**Reviewer:** Hannah L. Desrosiers  
**Date Received:** 1/7/2008

Material	Density (Lb/Gal)	Weight % Volatile (H <sub>2</sub> O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
R84048/Ethanol	7.5	76.00%	1.6%	74.4%	1.4%	16.60%	0.00020	10200.000	5.66	5.58	11.38	273.20	49.86	0.00	33.61	1.00

State VOC and PM Potential Emissions

"Worst Case" Uncontrolled Emissions = 11.38 273.20 49.86 0.00  
 Catalytic Oxidizer E6003 Control Efficiency = 85.0%

**Total VOC Emissions after controls/limits (tons/yr) = 7.48**

**326 IAC 2-8 FESOP VOC Emission Limitation (lbs/hr) = 1.71**

**METHODOLOGY**

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water)  
 Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % Organics)  
 Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)  
 Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)  
 Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)  
 Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1- Weight % Volatiles) \* (1-Transfer efficiency) \* (8760 hrs/yr) \* (1 ton/2000 lbs)  
 Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids)  
 326 IAC 2-8 FESOP VOC Emission Limitation (lbs/hr) = "Worst Case" Uncontrolled VOC Emissions (lb/hr) \* 1 - Control Efficiency

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % HAP#1	Weight % HAP#2	Emissions HAP#1 (ton/yr)	Emissions HAP#2 (ton/yr)
R84048/Ethanol	7.50	0.00020	10200	4.23%	0.35%	2.83	0.23

State HAP Potential Emissions

"Worst Case" Uncontrolled Emissions:	2.83	0.23	<b>Total</b>	<b>3.07</b>
Control Efficiency (ton/yr):	85.0%			
<b>"Worst Case" Controlled HAP Emissions:</b>	<b>0.43</b>	<b>0.04</b>	<b>Total</b>	<b>0.46</b>

**326 IAC 2-8 FESOP VOC Emission Limitation (lbs/hr) = 0.11**

**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  
 326 IAC 2-8 FESOP HAP Emissions (lbs/hr) = "Worst Case" Controlled HAP Emissions (tons/yr) \* (1 yr/8760 hrs) \* (2000lbs/1 ton)

**LEGEND**

HAP#1 = Methanol  
 HAP#2 = Formaldehyde

**Appendix A: Emissions Calculations**  
**Revised Emission Units Only**  
**Yarn Saturation Operations - RM5020**  
**Catalytic Oxidizer RE6001**

**Company Name:** Raybestos Powertrain  
**Address City IN Zip:** 609 E. Chaney St., Sullivan, IN 47882  
**Permit No.:** 153-20733-00015  
**Permit Revision No.:** 153-25848-00015  
**Reviewer:** Hannah L. Desrosiers  
**Date Received:** 1/7/2008

**Estimate of uncontrolled PTE:**

<b>VOC</b>	$\frac{0.04 \text{ ton/yr}}{(100\% - 99.40\%)}$	=	<b>6.67 ton/yr</b>
<b>HAP</b>	2% of VOC as Formaldehyde		0.13 ton/yr
	15% of VOC as Phenol		1.00 ton/yr
	53% of VOC as Methyl Ethyl Ketone <sup>(1)</sup>		3.53 ton/yr
		<b>Total:</b>	<b>1.13 ton/yr</b>

*To maintain confidentiality, the actual HAP concentrations were not used.  
The stated HAP concentrations should be considered as "worst-case" values.*

**Estimate of controlled PTE:**

<b>VOC</b>	$6.67 \text{ ton/yr} * (100\% - 85.00\%)$	=	<b>1.00 ton/yr</b>
<b>HAP</b>	2% of VOC as Formaldehyde		0.02 ton/yr
	15% of VOC as Phenol		0.15 ton/yr
	53% of VOC as Methyl Ethyl Ketone <sup>(1)</sup>		0.53 ton/yr
		<b>Total:</b>	<b>0.17 ton/yr</b>

**326 IAC 2-8 FESOP Emissions Limit**

<b>VOC</b>	$1.00 \text{ ton/yr} * (1 \text{ yr}/8760 \text{ hrs}) * (2000\text{lbs}/1 \text{ ton})$	=	<b>0.23 lbs/hr</b>
<b>HAP</b>	$0.17 \text{ ton/yr} * (1 \text{ yr}/8760 \text{ hrs}) * (2000\text{lbs}/1 \text{ ton})$	=	<b>0.04 lbs/hr</b>

*(1) Methyl Ethyl Ketone (MEK) was delisted as a Hazardous Air Pollutant by both the US EPA., on December 19, 2005, and the Indiana Department of Environmental Management, on November 23, 2006. Therefore, MEK has been removed from consideration when calculating and evaluating the source's unlimited potential to emit (PTE).*

**METHODOLOGY**

326 IAC 2-8 FESOP Emissions (lbs/hr) = Controlled Emissions (tons/yr) \* (1 yr/8760 hrs) \* (2000lbs/1 ton)

**Appendix A: Emissions Calculations  
New Emission Unit Summary  
Grinding Operations  
Baghouse B1018**

**Company Name:** Raybestos Powertrain  
**Address City IN Zip:** 609 E. Chaney St., Sullivan, IN 47882  
**Permit No.:** 153-20733-00015  
**Permit Revision No.:** 153-25848-00015  
**Reviewer:** Hannah L. Desrosiers  
**Date Received:** 1/7/2008

Units:	RM1220 Mill Groover	Note:	All of the listed units are controlled through baghouse B1018.
	RM1215 Blanchard Grinder		The baghouse operates at 12,000 scfm
	RM1211 OD Grinder		Design grain loading for the baghouse = 0.005 grains/min/dcfm
	RM1210 ID Grinder		Baghouse Control Efficiency = 95%
	RM1216 Mattison Grinder		Average weight of piece = 15lbs/pc

**PM Controlled Emissions**

PM Controlled Emissions (lbs/hr) = Design grain loading (grains/min/dcfm) \* Baghouse flow (scfm) \* (1 lb/7000 grains) \* (60 min/hr)  
 PM Controlled Emissions = (0.005 grains/min/dcfm)\*(12,000 scfm)\*(1/7000 lb/grains)\*(60 min/hr) = **0.51 lb/hr**

PM Controlled Emissions (lbs/yr) = PM Controlled Emissions (lb/hr)\*(8760 hr/yr)  
 PM Controlled Emissions (lbs/yr) = (0.51 lb/hr)\*(8760 hr/yr) = **4467.60 lb/yr**

PM Controlled Emissions (tons/yr) = PM Controlled Emissions (lb/yr)\*(1 ton/2000 lbs)  
 PM Controlled Emissions (tons/yr) = (45051 lb/yr)\*(1 ton/2000 lbs) = **2.23 tons/yr**

**PM Uncontrolled Emissions**

PM Uncontrolled Emissions = PM Controlled Emissions (0.51 lb/hr)/(1-Control Efficiency)  
 PM Uncontrolled Emissions = (0.51 lb/hr)/(1-0.95) = **10.20 lb/hr**

PM Uncontrolled Emissions (lbs/yr) = PM Uncontrolled Emissions (lb/hr)\*(8760 hr/yr)  
 PM Uncontrolled Emissions (lbs/yr) = (10.20 lb/hr)\*(8760 hr/yr) = **89,352 lb/yr**

PM Uncontrolled Emissions (tons/yr) = PM Uncontrolled Emissions (lb/yr)\*(1 ton/2000 lbs)  
 PM Uncontrolled Emissions (tons/yr) = (89,352 lb/yr)\*(1 ton/2000 lbs) = **44.68 tons/yr**

**326 IAC 6-3-2 Particulate Emissions Limitations Compliance Determination**

Emission Unit	Max. Throughput (pcs/hr)				
RM1220 Mill Groover	60				
RM1215 Blanchard Grinder	60				
RM1211 OD Grinder	20				
RM1210 ID Grinder	20				
RM1216 Mattison Grinder	20				
<b>Total</b>	<b>180</b>	<b>pcs/hr</b>	<b>*</b>	<b>15 lbs/pc</b>	<b>= 2700 lbs/hr / 2000 lb per ton = 1.35 tons/hr</b>

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate for process weight rates up to 60,000 pounds per hour shall be accomplished by use of the following equation:

$$E = 4.10 P^0 \text{ where } E = \text{rate of emission in pounds per hour; and } P = \text{process weight rate in tons per hour}$$

$$E = 4.10 * ( 1.35 )^{0.67} = \mathbf{5.01 \text{ lbs/hr}}$$

(will comply using baghouse B1018)

**Appendix A: Emissions Calculations**  
**New Emission Unit Summary**  
**From Adhesive Coating Operations - RM1200**  
**Catalytic Oxidizer E6022**

**Company Name:** Raybestos Powertrain  
**Address City IN Zip:** 609 E. Chaney St., Sullivan, IN 47882  
**Permit No.:** 153-20733-00015  
**Permit Revision No.:** 153-25848-00015  
**Reviewer:** Hannah L. Desrosiers  
**Date Received:** 1/7/2008

Back-Calculation to Determine Application Ratio of Adhesive Coating R84048 and Ethanol Mix:

VOC Content of Final Mix = 75% by weight and is determined by Allomatic Products  
VOC Content of Adhesive Coating R84048 as supplied = 42.70% by weight less water  
VOC Content of Ethanol Solvent as supplied = 100% by volume. It is assumed to be 100% by weight.  
Volume of R84048 and Ethanol Solvent mix used per steel friction assembly = 0.08 gal  
Throughput rate of steel friction assembly = 36 pcs/hr

VOC Content of Final Mix = VOC Content of Adhesive Coating R84048 as supplied (% weight) \* (% of R84048 in Final Mix) + VOC Content of Ethanol Solvent as supplied (%weight) \* (% of Ethanol in Final Mix) + (1-% of R84048 in Final Mix)  
75% = (42.70%) \* (% of R84048 in Final Mix) + (100%) \* (1-% of R84048 in Final Mix)  
% of R84048 in Final Mix = 43.63 %  
% of Ethanol in Final Mix = (100% - 43.63%) = 56.37%

\*Notes:

VOC (% weight) is from the MSDS for the adhesive coating R84048.  
VOC (% Volume) is from the MSDS for the ethanol solvent.

Material	Maximum Capacity (gal/hr)	VOC (lbs/gal)	Potential VOC (lbs/hr)	Potential VOC (lbs/yr)	Potential VOC (tons/yr)	Potential PM ** (lbs/hr)
Adhesive Coating R84048	1.257	3.49	4.38693	38430	19.21	0.0000
Ethanol Solvent (UCI Form I) in Mix	1.623	6.84	11.10	97248	48.62	0.0000
Ethanol Solvent (UCI Form I) in Process	1.200	6.84	8.208	71902	35.95	0.0000

"Worst Case" Uncontrolled Emissions = 23.70    207579.15    103.79    0.00  
Catalytic Oxidizer E6022 Control Efficiency = 85.0%

**Total VOC Emissions after controls/limits (tons/yr) = 15.57**

**326 IAC 2-8 FESOP VOC Emission Limitation (lbs/hr) = 3.55**

\*Notes:

Maximum Capacity (gal/hr) Adhesive Coating R84048 = Volume of R84048 and Ethanol Solvent Mix used per steel friction assembly \* % of R84048 in Final Mix \* Throughput rate of Steel Friction Assembly

Maximum Capacity (gal/hr) Adhesive Coating R84048 = (0.08 gal/pc) \* (0.4363 percent by weight) \* (36 pcs/hr) = 1.257 gal/hr  
VOC (lbs/gal) is from the MSDS for the adhesive coating R84048.

Ethanol Solvent (UCI Form I) in Mix is the ethanol mixed directly with the adhesive coating R84048 before initial application.

Maximum Capacity (gal/hr) Ethanol Solvent in Mix = Volume of R84048 and Ethanol Solvent Mix used per steel friction assembly \* % of Ethanol in Final Mix \* Throughput rate of Steel Friction Assembly

Maximum Capacity (gal/hr) Ethanol Solvent in Mix = (0.08 gal/pc) \* (0.5637) \* (36 pcs/hr) = 1.623 gal/hr

VOC (lbs/gal) for the Ethanol Solvent was calculated using the following:

\*Specific Gravity of Ethanol from MSDS = 0.82

\*Specific weight of water = 8.3453 lb/gal

\*Since the volatile content of the ethanol is 100% by volume from the MSDS, it is assumed that the entire substance is volatile

\*VOC (lbs/gal) Adhesive Coating R84048/Ethanol Mix = Specific Gravity of Ethanol \* Weight of water = (0.82)\*(8.3453 lb/gal) = 6.843 lb/gal

\*\* Adhesive is applied using roll coating application with transfer efficiency of 100%

Ethanol Solvent (UCI Form I) in Process is the ethanol added after initial adhesive coating mix application to maintain proper viscosity.

Potential VOC (lbs/hr) = Maximum Capacity (gal/hr)\*VOC(lbs/gal)

Potential VOC (lbs/yr) = Potential VOC (lbs/hr)\*(8760 hr/yr)

Potential VOC (ton/yr) = Potential VOC (lbs/yr)\*(1 ton/2000 lbs)

326 IAC 2-8 FESOP VOC Emission Limitation (lbs/hr) = "Worst Case" Uncontrolled VOC Emissions (lb/hr) \* 1 - Control Efficiency

Material	Density (lb/gal)	Maximum Capacity (gal/hr)	Weight % Methanol	Potential Methanol (tons/yr)	Weight % Phenol	Potential Phenol (tons/yr)	Weight % Formaldehyde	Potential Formaldehyde (tons/yr)
Adhesive Coating R84048	8.59	1.257	4.23%	2.001	2.93%	1.39	0.35%	0.166
Ethanol Solvent (UCI Form I) in Mix	6.84	1.623	3.30%	1.605	0	0	0	0
Ethanol Solvent (UCI Form I) in Process	6.84	1.200	3.30%	1.186	0	0	0	0

Catalytic Oxidizer Control Efficiency = 85.0%

HAP Emissions after controls/limits = 0.72

**Total HAP Emissions after controls/limits (tons/yr) = 0.95**

**326 IAC 2-8 FESOP HAP Emission Limitation (lbs/hr) = 0.22**

\*Notes:

Weight % were gathered from the MSDS

Density values were gathered from the MSDS for adhesive coating R84048

Density value for the Ethanol Solvent was calculated using the following:

\*Specific weight of water = 8.3453 lb/gal

\*Specific gravity of ethanol solvent from MSDS = 0.82

\*Density of ethanol solvent = specific weight of water (lb/gal) \* specific gravity of ethanol solvent = 6.84 lb/gal

Potential for various HAPs = Density (lb/gal) \* Maximum Capacity (gal/hr) \* Weight % HAP \* (8760 hrs/yr) \* (1 ton/2000 lbs)

Potential for various HAPs = Maximum Capacity (lbs/hr) \* Weight % HAP \* (8760 hrs/yr) \* (1 ton/2000 lbs)

326 IAC 2-8 FESOP HAP Emissions (lbs/hr) = Total HAP Emissions after controls/limits (tons/yr) \* (1 yr/8760 hrs) \* (2000lbs/1 ton)

**Appendix A: Emissions Calculations  
New Emission Unit Summary  
Natural Gas Combustion**

**Company Name:** Raybestos Powertrain  
**Address City IN Zip:** 609 E. Chaney St., Sullivan, IN 47882  
**Permit No.:** 153-20733-00015  
**Permit Revision No.:** 153-25848-00015  
**Reviewer:** Hannah L. Desrosiers  
**Date Received:** 1/7/2008

	Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr	Pollutant					
			PM*	PM10*	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO
Drying Oven RM1201	1.2	10.5						
Catalytic Oxidizer E6022	1.0	8.8						
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0		
<b>Drying Oven RM1201</b> Potential Emission in tons/yr	0.01	0.04	0.003	0.53	0.03	0.44		
<b>Catalytic Oxidizer E6022</b> Potential Emission in tons/yr	0.008	0.03	0.003	0.44	0.02	0.37		
<b>Totals</b>	<b>0.02</b>	<b>0.07</b>	<b>0.01</b>	<b>0.96</b>	<b>0.05</b>	<b>0.81</b>		

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

\*\*Emission Factors for NO<sub>x</sub>: Uncontrolled = 100, Low NO<sub>x</sub> Burner = 50, Low NO<sub>x</sub> Burners/Flue gas recirculation = 32

	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
<b>Drying Oven RM1201</b> Potential Emission in tons/yr	1.104E-05	6.307E-06	3.942E-04	9.461E-03	1.787E-05
<b>Catalytic Oxidizer E6022</b> Potential Emission in tons/yr	5.801E-08	3.315E-08	2.072E-06	4.973E-05	9.393E-08
<b>Totals</b>	<b>1.11E-05</b>	<b>6.34E-06</b>	<b>3.96E-04</b>	<b>0.01</b>	<b>1.80E-05</b>

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
<b>Drying Oven RM1201</b> Potential Emission in tons/yr	2.628E-06	5.782E-06	7.358E-06	1.997E-06	1.104E-05
<b>Catalytic Oxidizer E6022</b> Potential Emission in tons/yr	1.381E-08	3.039E-08	3.868E-08	1.050E-08	5.801E-08
<b>Totals</b>	<b>2.64E-06</b>	<b>5.81E-06</b>	<b>7.40E-06</b>	<b>2.01E-06</b>	<b>1.11E-05</b>

**Total Combined HAP Emissions = 0.010 tpy**

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

**Appendix A: Emissions Calculations  
Emission Limitation Summary  
VOC Compliance Determination**

**Company Name:** Raybestos Powertrain  
**Address City IN Zip:** 609 E. Chaney St., Sullivan, IN 47882  
**Permit No.:** 153-20733-00015  
**Permit Revision No.:** 153-25848-00015  
**Reviewer:** Hannah L. Desrosiers  
**Date Received:** 1/7/2008

**Calculation of emission limit equivalent to:** 3.50 lbs VOC/gal

$$E = \frac{3.5 \text{ lb VOC / gal}}{1 - \frac{3.50 \text{ lb VOC / gal}}{7.36 \text{ lb VOC / gal}}} = 6.67 \text{ lb VOC / gal solids}$$

**Calculation of actual emissions as applied and minimum control efficiency required for compliance:**

New Emission Unit - RM1200 with Catalytic Oxidizer E6022

$$O = \frac{44.00 \text{ lb/gal} - 6.67 \text{ lb VOC/gal}}{44.00 \text{ lb/gal}} * 100 = 84.84\%$$

VOC Content as applied:

R84048	Ethanol	
% of R84048 in Mixt = 43.63%	% of ethanol in Mixture =	56.37%
Density of R84048 = 8.59 lbs/gal	Density of ethanol =	6.83 lbs/gal
Weight % Organics = 42.70%	Weight % Organics =	100.00%
Volume % Solids = 45.00%	Volume % Solids =	0.00%
V = 8.151 lb/gal solids	V = #DIV/0!	lb/gal solids

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

V = V of R84048 \* (Total VOC for mixture in lbs/hr / Total VOC for R84048 in lbs/hr)

V = (8.151 lb/gal) \* (23.70 lbs/hr) / (4.39 lbs/hr)

V = 44.00 lb VOC / gal solids

Revised Emission Unit - RM2002 with Catalytic Oxidizer RE6001

For Band Pads - VOC Content as applied:

PL700	Methyl Ethyl Ketone
V = 25.41 lbs VOC/gal solids	V = #DIV/0!

V Initial Mix = V of PL700 \* (Total VOC for mixture in lbs/hr / Total VOC for PL700 in lbs/hr)

V = (25.41 lbs/gal) \* (4.85 lbs/hr) / (3.44 lbs/hr)

V = 35.83 lbs VOC / gal solids

$$O = \frac{35.83 \text{ lb/gal} - 6.67 \text{ lb VOC/gal}}{35.83 \text{ lb/gal}} * 100 = 81.38\%$$

For Torque Rings - VOC Content as applied:

PL700	Methyl Ethyl Ketone
V = 25.41 lbs VOC/gal solids	V = #DIV/0!

V Initial Mix = V of PL700 \* (Total VOC for mixture in lbs/hr / Total VOC for PL700 in lbs/hr)

V = (25.41 lbs/gal) \* (661.06 lbs/hr) / (469.54 lbs/hr)

V = 35.77 lbs VOC / gal solids

$$O = \frac{35.77 \text{ lb/gal} - 6.67 \text{ lb VOC/gal}}{35.77 \text{ lb/gal}} * 100 = 81.35\%$$

Revised Emission Unit - RM5020 with Catalytic Oxidizer RE6001

V = 9.85 lb VOC / gal Solids

$$O = \frac{9.85 \text{ lb/gal} - 6.67 \text{ lb/gal}}{9.85 \text{ lb/gal}} * 100 = 32.28\%$$

Revised Emission Unit - M2003/M2028 with Catalytic Oxidizer E6003

V = 33.61 lb VOC / gal Solids

$$O = \frac{33.61 \text{ lb/gal} - 6.67 \text{ lb/gal}}{33.61 \text{ lb/gal}} * 100 = 80.15\%$$

**Methodology**

E = Equivalent VOC Emission Limitation (lbs VOC/gal solids) as applied

L = Article 8 Emission Limit

D = Baseline Solvent Density of VOC in coating,  
which is equal to 7.36 lbs VOC per gal coating

V = VOC content (lbs per gallon solids)

O = The equivalent overall control efficiency (or) minimum control efficiency required for compliance

W = "Worst Case" VOC Emission rate after controls/limits (lbs/hr)

P = Potential VOC pounds per hour

E = L/(1-L/D)

V = [Density (lb/gal) \* Wt % Organics] / Volume % Solids

O = [(V-E)/V]\*100

W = P \* (1- control Efficiency)

