



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: September 26, 2008

RE: Aisin Brake & Chassis / 167-26654-00131

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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**New Source Construction and Federally Enforceable
State Operating Permit
OFFICE OF AIR QUALITY
AND VIGO COUNTY AIR POLLUTION CONTROL**

**Aisin Brake & Chassis, Inc.
10550 James Adam Street
Terre Haute, Indiana 47802**

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

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

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

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

Operation Permit No.: F167-26654-00131	
Original signed by: Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: September 26, 2008 Expiration Date: September 26, 2013

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary automotive brake and brake component plant.

Source Address:	10550 James Adams Street, Terre Haute, IN 47802
Mailing Address:	10550 James Adams Street, Terre Haute, IN 47802
General Source Phone Number:	(812) 298-1617
SIC Code:	3714
County Location:	Vigo
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) One (1) surface coating line with a maximum capacity of 4,100 parts per hour including:
 - (1) One (1) dip surface coating operation, identified as EFS, constructed in March 2004, utilizing no control devices, exhausting to stack EFS.
- (b) One (1) brake shoe primer line with a maximum capacity of 2,500 units per hour including:
 - (1) One (1) brake shoe dip primer coating operation, identified as SS2-2, constructed in March 2006, utilizing no control devices, exhausting to stack SS2-2.
 - (2) One (1) brake shoe dip primer coating operation, identified as SS2-3, approved for construction in 2008, utilizing no control devices, exhausting to stack SS2-3.
- (c) One (1) brake shoe adhesive application line with a maximum capacity of 2,500 units per hour including:
 - (1) Two (2) brake shoe adhesive application operations, identified as SS3-1 and SS3-2 constructed in March 2006, utilizing no control devices, exhausting to stacks SS3-1 and SS3-2.
 - (2) Two (2) brake shoe adhesive electric cure ovens, identified as SS3-3 and SS 3-4, constructed in March 2006, exhausting to stacks SS3-3 and SS3-4.
- (d) One (1) brake shoe grinding operation final cure electric oven, identified as SS4-3, constructed in March 2006, with a maximum capacity of 2,500 units per hour, exhausting to stack SS4-3.
- (e) One Brake shoe grinding operation with a combined maximum capacity of 2500 units per hour, consisting of the following emission units:

- (1) Two (2) brake shoe grinding stations, identified as SS4-1a and SS4-1b, constructed in March 2006, each utilizing a separate cyclone for particulate control; collectively exhausting through stack SS4-1-1.
- (2) Two (2) brake shoe grinding stations, identified as SS4-1c through SS4-1d, approved for construction in 2008, utilizing one (1) cyclone for particulate control; collectively exhausting within the building.
- (3) Two (2) brake shoe grinding stations, identified as SS4-1e through SS4-1f, approved for construction in 2008, utilizing one (1) cyclone for particulate control; collectively exhausting within the building.

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) Welding and cutting operations, constructed in March 2006, consisting of the following:
 - (1) One (1) brake shoe resistance welding station, identified as SS1-1, with a maximum capacity of 2,500 units per hour and an electrode consumption rate of 0.05 pounds per hour, utilizing a fabric filter as particulate control, exhausting within the building.
 - (2) One (1) resistance welding station with a maximum electrode consumption rate of 0.2 pounds per hour, utilizing no control devices.
 - (3) Four (4) metal inert gas (MIG) welding stations, each with a maximum electrode consumption rate of 2.0 pounds per hour, utilizing no control devices.
 - (4) One (1) stick welding station with a maximum electrode consumption rate of 0.1 pounds per hour, utilizing no control devices.
 - (5) One (1) tungsten inert gas (TIG) welding station with a maximum electrode consumption rate of 0.1 pounds per hour, utilizing no control devices.
 - (6) One (1) oxyacetylene welding station with a maximum electrode consumption rate of 0.1 pounds per hour, utilizing no control devices.
 - (7) One (1) plasma cutting station with a maximum cutting rate of 12 inches per minute at a material thickness of 0.5 inches, utilizing no control devices.
- (b) Machining where an aqueous cutting coolant continuously floods the machining interface including:

Three (3) wet machining operations, constructed in March 2004, utilizing mist eliminators for particulate control; exhausting within the building, consisting of the following:

 - (1) One (1) wet machining unit, identified as 311 Plunger, with a maximum capacity of 134 pieces per hour.
 - (2) One (1) wet machining unit, identified as 321 Cover, with a maximum capacity of 131 pieces per hour.
 - (3) One (1) wet machining unit, identified as 331 Fusion, with a maximum capacity of 57 pieces per hour.

- (c) One (1) electric induction heat treat hardening oven, identified as SS1-2, approved for construction in 2008, with a maximum capacity of 2,500 units per hour, utilizing a mist eliminator for particulate control, and exhausting within the facility.
- (d) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, including:
 - (1) Eight (8) natural gas units, identified as RTF-1 through RTF-8, constructed in February 2002, with each rated for a maximum capacity of 0.54 MMBtu/hr.
 - (2) Thirteen (13) natural gas units, identified as RTF-12 through RTF-24, constructed in June 2006, with each rated for a maximum capacity of 0.54 MMBtu/hr.
 - (3) One (1) natural gas fired hot water boiler, identified as BS1, constructed in September 2003, rated at a maximum capacity of 5.0 MMBtu/hr, utilizing no control devices, and exhausting to stack BS1.
 - (4) One (1) natural gas fired paint dry/bake oven, identified as BS2, constructed in September 2003, rated at a maximum capacity of 3.5 MMBtu/hr, utilizing no control devices, and exhausting to stack BS2.
 - (5) One (1) natural gas fired curing oven, identified as SS4-2, approved for construction in 2008, rated at a maximum capacity of 4.6 MMBtu/hr, utilizing no control devices, and exhausting to stack SS4-2.
- (e) Emergency generator:
 - (1) One (1) natural gas fired back up generator, identified as Back-up Generator 1, constructed in March 2006, rated at a maximum capacity of 0.59 MMBtu/hr, utilizing no control devices, and exhausting to stack Back-up Generator.
- (f) Degreasing operations that do not exceed one hundred forty-five (145) gallons per twelve (12) months, except if subject to 326 IAC 20-6; including the following:
 - (1) One (1) degreasing operation identified as MC, constructed in March 2006, exhausting to stack MC.
 - (2) Maintenance cold cleaners.
- (g) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (h) Cleaners and solvents characterized as follows:
 - (1) Having a vapor pressure equal to or less than 0.7 kPAI 5mm Hg; or 0.1 psi measured at 20° C (68° F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (i) Closed loop heating and cooling systems.
- (j) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.
- (k) Any operation using aqueous solutions containing less than 1% VOC by weight of VOCs excluding HAPs including the following:
 - (1) One (1) aqueous pre-treatment cleaning operation, identified as PT, constructed in

March 2006, utilizing no control devices, exhausting to stack PT.

- (2) One (1) aqueous brake shoe washing operation, identified as SS2-1, constructed in March 2006, utilizing no control devices, exhausting to stack SS2-1.
- (3) One (1) aqueous degreasing operation, identified as DSU, constructed in June 2006, exhausting to stack DSU.
- (l) Quenching operations used with heat treating processes.
- (m) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (n) Heat exchanger cleaning and repair.
- (o) Paved and unpaved roadways and parking lots with public access.
- (p) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (q) On-site fire and emergency response training approved by the department.
- (r) Filter or coalescer media changeout
- (s) A laboratory as defined in 326 IAC 2-7-1(20)(C).

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

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) 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 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit 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.

B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4][326 IAC 2-8]

This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 and [326 IAC 2-8] when prior to the start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as proposed in the application or the permit. The emission units covered in this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as proposed.
- (b) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.
- (c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

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

- (a) This permit, F167-26654-00131, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ and VCAPC, 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.5 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.6 Enforceability [326 IAC 2-8-6]

- (a) 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 and VCAPC, the

United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

- (b) Unless otherwise stated, all terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by VCAPC.

B.7 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.8 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.9 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

- (a) The Permittee shall furnish to IDEM, OAQ and VCAPC, within a reasonable time, any information that IDEM, OAQ and VCAPC 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 and VCAPC 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.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. 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

and

Vigo County Air Pollution Control
103 South Third Street
Terre Haute, Indiana 47807

- (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 and VCAPC, 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 and VCAPC 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.12 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ and VCAPC 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.13 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

and

Vigo County Air Pollution Control
103 South Third Street
Terre Haute, Indiana 47807

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 and VCAPC upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ and VCAPC. IDEM, OAQ and VCAPC 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.14 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, and VCAPC 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
Vigo County Air Pollution Control phone: (812) 462-3433; fax: (812) 462-3447

- (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

and

Vigo County Air Pollution Control
103 South Third Street
Terre Haute, Indiana 47807

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 and VCAPC 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 and VCAPC 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.15 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to F167-26654-00131 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.16 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.17 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

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

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

Vigo County Air Pollution Control
103 South Third Street
Terre Haute, Indiana 47807

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

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ and VCAPC 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 and VCAPC 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 and VCAPC at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ and VCAPC may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.19 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and VCAPC 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
and

Vigo County Air Pollution Control
103 South Third Street
Terre Haute, Indiana 47807

- (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 and VCAPC 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 and VCAPC 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 and VCAPC any additional information identified as being needed to process the application.

B.20 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
and
- Vigo County Air Pollution Control
103 South Third Street
Terre Haute, Indiana 47807
- 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.21 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

Vigo County Air Pollution Control
103 South Third Street
Terre Haute, Indiana 47807

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 and VCAPC 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.22 Source Modification Requirement [326 IAC 2-8-11.1]

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

B.23 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, and VCAPC 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.24 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

and

Vigo County Air Pollution Control
103 South Third Street
Terre Haute, Indiana 47807

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.25 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 and VCAPC 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 and VCAPC 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.26 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.27 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

(a) Pursuant to 326 IAC 2-8:

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

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

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

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

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

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

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

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

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

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

All required notifications shall be submitted to:

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

and

Vigo County Air Pollution Control
103 South Third Street
Terre Haute, Indiana 47807

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

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

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

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

-
- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. 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

and

Vigo County Air Pollution Control
103 South Third Street
Terre Haute, Indiana 47807

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 and VCAPC not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ and VCAPC 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

and

Vigo County Air Pollution Control
103 South Third Street
Terre Haute, Indiana 47807

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

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

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

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

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

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

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

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

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

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

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

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

- (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
 - (1) monitoring data;
 - (2) monitor performance data, if applicable; and
 - (3) corrective actions taken.

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

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ and VCAPC, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

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

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

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

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

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period.

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

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

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

Vigo County Air Pollution Control
103 South Third Street
Terre Haute, Indiana 47807

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

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

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) surface coating line with a maximum capacity of 4,100 parts per hour including:
 - (1) One (1) dip surface coating operation, identified as EFS, constructed in March 2004, utilizing no control devices, exhausting to stack EFS.
- (b) One (1) brake shoe primer line with a maximum capacity of 2,500 units per hour including:
 - (1) One (1) brake shoe washing operation, identified as SS2-1, constructed in March 2006, utilizing no control devices, exhausting to stack SS2-1.
 - (2) One (1) brake shoe dip primer coating operation, identified as SS2-2, constructed in March 2006, utilizing no control devices, exhausting to stack SS2-2.
 - (3) One (1) brake shoe dip primer coating operation, identified as SS2-3, approved for construction in 2008, utilizing no control devices, exhausting to stack SS2-3.
- (c) One (1) brake shoe adhesive application line with a maximum capacity of 2,500 units per hour including:
 - (1) Two (2) brake shoe adhesive application operations, identified as SS3-1 and SS3-2 constructed in March 2006, utilizing no control devices, exhausting to stacks SS3-1 and SS3-2.
 - (2) Two (2) brake shoe adhesive electric cure ovens, identified as SS3-3 and SS 3-4, constructed in March 2006, exhausting to stacks SS3-3 and SS3-4.

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

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

D.1.1 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4(1)]

- (a) The combined total input volatile organic compounds (VOC) including solvents, coatings, and adhesives delivered to emission units EFS, SS2-2, SS2-3, SS3-1, and SS3-2 shall be limited to less than or equal to 97.32 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) The combined total input hazardous air pollutants (HAP) delivered to emission units EFS, SS2-2, SS2-3, SS3-1, and SS3-2 shall be limited such that input of any single HAP shall not exceed 9.90 tons per twelve (12) consecutive month period with compliance determined at the end of each month. The input of total HAPs shall not exceed 23.48 tons per twelve (12) consecutive month period with compliance determined at the end of each month, respectively.

Compliance with these limitations in conjunction with the PTE of the other emission units limits the VOC of the entire source to less than 100 tons per year, Single HAP emissions of the entire source to 10 tons per year, and Combined HAP emissions of the entire source to 25 tons per year, and shall make the requirements of 326 IAC 2-2 (PSD) and 326 IAC 2-7 (Part 70) not applicable to the source.

D.1.2 Volatile Organic Compound (VOC) Limitations [326 IAC 8-2-9] [326 IAC 8-1-2]

- (a) Pursuant to 326 IAC 8-2-9, the Permittee shall not allow the discharge into the atmosphere of VOC in excess of three (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator of emission units EFS, SS2-2, and SS2-3.
- (b) Pursuant to 326 IAC 8-1-2, EFS, SS2-2, and SS2-3 VOC emissions shall be limited to no greater than the equivalent emissions of six and seven-tenths (6.7) pounds of VOC per gallon of coating solids for air dried or forced warm air dried coatings, as allowed at 326 IAC 8-1-2 (a)(9)(A).

Compliance Determination Requirements

D.1.3 Volatile Organic Compounds (VOCs) [326 IAC 8-1-2]

- (a) Compliance with the VOC content and usage limitations contained in Conditions D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the “as supplied” and “as applied” VOC data sheets. IDEM, OAQ, and VCAPC reserve the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.
- (b) Compliance with the equivalent VOC content limitation contained in D.1.2 shall be determined pursuant to 326 IAC 8-1-2(a)(9)(B) as follows:
 - (1) Calculate the VOC content of a dip coating, expressed in units of weight of VOC per volume of coating solids, on a thirty (30) day rolling average basis using the following equation:

$$VOC_A = ((W_{oi} \times D_{ci} \times Q_i) + (W_{oJ} \times D_{dJ} \times Q_J)) / ((V_{ni} \times Q_i))$$

Where:

VOC_A = The as-applied, VOC content in pound VOC per gallon (lb VOC/gal) of coating solids for a dip coating, calculated on a thirty (30) day rolling average basis.

W_{oi} = Percent VOC by weight of each as supplied coating (i) added to the dip coating process, expressed as a decimal fraction (that is 55% = 0.55).

D_{ci} = Density of each as supplied coating (i) added to the dip coating process, in pounds per gallon.

Q_i = Quantity of each as supplied coating (i) added to the dip coating process, in gallons.

V_{ni} = Percent solids by volume of each as supplied coating (i) added to the dip coating process, expressed as a decimal fraction.

W_{oJ} = Percent VOC by weight of each thinner (J) added to the dip coating process, expressed as a decimal fraction.

D_{dJ} = Density of each thinner (J) added to the dip coating process, in pounds per gallon.

Q_J = Quantity of each thinner (J) added to the dip coating process, in gallons.

- (b) Compliance with Condition D.1.1 shall be demonstrated within 30 days of the end of each month based on the VOC usage for the most recent twelve (12) consecutive month period.
- (c) Compliance with Conditions D.1.2 shall be demonstrated within 30 days of the end of each compliance period based on the VOC usage for the most recent thirty (30) day consecutive period.

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

D.1.4 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits and/or the VOC and HAP emission limits established in Condition D.1.1.
 - (1) The VOC and HAP content of the material and solvent used for each month;
 - (2) The amount of coating material and solvent less water used on monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC and HAPs usage for each month;
 - (5) The weight of VOCs and HAPs emitted for each compliance period.
- (b) To document compliance with Condition D.1.2, the Permittee shall maintain the following records on a daily basis for each VOC-containing coating, solvent, or other material added to the tank:
 - (1) The following parameters for each coating, thinner, or other material as supplied:
 - (aa) The coating, thinner, or other material identification number.
 - (bb) The volume used.
 - (cc) The mix ratio.
 - (dd) The density or specific gravity.
 - (ee) The weight percent of total volatiles, water, solids, and exempt solvents.
 - (ff) The volume percent of solids.
 - (2) The VOC content of each coating and thinner as supplied.
 - (3) The VOC content of each as-applied coating.

- (c) Maintain all records necessary to confirm compliance with Condition D.1.2:
 - (1) On-site for the most recent three (3) year period.
 - (2) Make reasonably accessible for an additional two (2) years.
- (d) Records maintained for (b)(1) through (b)(3) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.5 Reporting Requirements

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

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (d) One (1) brake shoe grinding operation final cure electric oven, identified as SS4-3, constructed in March 2006, with a maximum capacity of 2,500 units per hour, exhausting to stack SS4-3.
- (e) One Brake shoe grinding operation with a combined maximum capacity of 2500 units per hour, consisting of the following emission units:
 - (1) Two (2) brake shoe grinding stations, identified as SS4-1a and SS4-1b, constructed in March 2006, each utilizing a separate cyclone for particulate control; collectively exhausting through stack SS4-1-1.
 - (2) Two (2) brake shoe grinding stations, identified as SS4-1c through SS4-1d, approved for construction in 2008, utilizing one (1) cyclone for particulate control; collectively exhausting within the building.
 - (3) Two (2) brake shoe grinding stations, identified as SS4-1e through SS4-1f, approved for construction in 2008, utilizing one (1) cyclone for particulate control; collectively exhausting within the building.

Insignificant Activities:

- (a) Welding and cutting operations, constructed in March 2006, consisting of the following:
 - (1) One (1) brake shoe resistance welding station, identified as SS1-1, with a maximum capacity of 2,500 units per hour and an electrode consumption rate of 0.05 pounds per hour, utilizing a fabric filter as particulate control, exhausting within the building.
 - (2) One (1) resistance welding station with a maximum electrode consumption rate of 0.2 pounds per hour, utilizing no control devices.
 - (3) Four (4) metal inert gas (MIG) welding stations, each with a maximum electrode consumption rate of 2.0 pounds per hour, utilizing no control devices.
 - (4) One (1) stick welding station with a maximum electrode consumption rate of 0.1 pounds per hour, utilizing no control devices.
 - (5) One (1) tungsten inert gas (TIG) welding station with a maximum electrode consumption rate of 0.1 pounds per hour, utilizing no control devices.
 - (6) One (1) oxyacetylene welding station with a maximum electrode consumption rate of 0.1 pounds per hour, utilizing no control devices.
 - (7) One (1) plasma cutting station with a maximum cutting rate of 12 inches per minute at a material thickness of 0.5 inches, utilizing no control devices.
- (b) Machining where an aqueous cutting coolant continuously floods the machining interface including:

Three (3) wet machining operations, constructed in March 2004, utilizing mist eliminators for particulate control; exhausting within the building, consisting of the following:

- (1) One (1) wet machining unit, identified as 311 Plunger, with a maximum capacity of 134 pieces per hour.
 - (2) One (1) wet machining unit, identified as 321 Cover, with a maximum capacity of 131 pieces per hour.
 - (3) One (1) wet machining unit, identified as 331 Fusion, with a maximum capacity of 57 pieces per hour.
- (c) One (1) electric induction heat treat hardening oven, identified as SS1-2, approved for construction in 2008, with a maximum capacity of 2,500 units per hour, utilizing a mist eliminator for particulate control, and exhausting within the facility.

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

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

D.2.1 Particulate [326 IAC 6.5-1-2]

- (a) Pursuant to 326 IAC 6.5-1-2(a), the brake shoe grinding operations, identified as SS4-1a and SS4-1b, shall not allow or permit discharge to the atmosphere of any gases which contain particulate matter in excess of 0.03 grain per dry standard cubic foot (dscf).
- (b) Pursuant to 326 IAC 6.5-1-2(a), the brake shoe grinding operations, identified as SS4-1c and SS4-1d, shall not allow or permit discharge to the atmosphere of any gases which contain particulate matter in excess of 0.03 grain per dry standard cubic foot (dscf).
- (c) Pursuant to 326 IAC 6.5-1-2(a), the brake shoe grinding operations, identified as SS4-1e and SS4-1f, shall not allow or permit discharge to the atmosphere of any gases which contain particulate matter in excess of 0.03 grain per dry standard cubic foot (dscf).
- (c) Pursuant to 326 IAC 6.5-1-2(a), brake shoe welding operations including the resistance welding booth SS1-1 shall not allow or permit discharge to the atmosphere of any gases which contain particulate matter in excess of 0.03 grain per dry standard cubic foot (dscf).
- (d) Pursuant to 326 IAC 6.5-1-2(a), the wet machining operations, identified as 311 Plunger, 321 Cover, and 331 Fusion, shall not allow or permit discharge to the atmosphere of any gases which contain particulate matter in excess of 0.03 grain per dry standard cubic foot (dscf).
- (e) Pursuant to 326 IAC 6.5-1-2(a), the electric induction hardening heat treat oven, identified as SS1-2, shall not allow or permit discharge to the atmosphere of any gases which contain particulate matter in excess of 0.03 grain per dry standard cubic foot (dscf).

D.2.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for grinding stations SS4-1a through SS4-1f, the welding operations including welding station SS1-1, the wet machining operations identified as 311 Plunger, 321 Cover, and 331 Fusion, and the induction heat treat hardening oven SS1-2.

Compliance Determination Requirements

D.2.3 Particulate Matter (PM)

The cyclone dust collection system, consisting of four (4) cyclone separators shall be in operation and control emissions from the grinding stations identified as SS4-1a through SS4-1f at all times the emission units are in operation.

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

D.2.4 Cyclone Failure Detection

In the event that cyclone failure has been observed:

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.

D.2.5 Visible Emissions Notations

- (a) Visible emission notations of the SS4-1-1 stack exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

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

D.2.6 Record Keeping Requirement

- (a) To document compliance with Condition D.2., the Permittee shall maintain records of visible emission notations of the SS4-1-1 stack exhaust once per day. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Insignificant Activities:

- (d) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, including:
 - (1) Eight (8) natural gas units, identified as RTF-1 through RTF-8, constructed in February 2002, with each rated for a maximum capacity of 0.54 MMBtu/hr.
 - (2) Thirteen (13) natural gas units, identified as RTF-12 through RTF-24, constructed in June 2006, with each rated for a maximum capacity of 0.54 MMBtu/hr.
 - (3) One (1) natural gas fired hot water boiler, identified as BS1, constructed in September 2003, rated at a maximum capacity of 5.0 MMBtu/hr, utilizing no control devices, and exhausting to stack BS1.
 - (4) One (1) natural gas fired paint dry/bake oven, identified as BS2, constructed in September 2003, rated at a maximum capacity of 3.5 MMBtu/hr, utilizing no control devices, and exhausting to stack BS2.
 - (5) One (1) natural gas fired curing oven, identified as SS4-2, approved for construction in 2008, rated at a maximum capacity of 4.6 MMBtu/hr, utilizing no control devices, and exhausting to stack SS4-2.
- (e) Emergency generator:
 - (1) One (1) natural gas fired back up generator, identified as Back-up Generator 1, constructed in March 2006, rated at a maximum capacity of 0.59 MMBtu/hr, utilizing no control devices, and exhausting to stack Back-up Generator.
- (f) Degreasing operations that do not exceed one hundred forty-five (145) gallons per twelve (12) months, except if subject to 326 IAC 20-6; including the following:
 - (1) One (1) degreasing operation identified as MC, constructed in March 2006, exhausting to stack MC.
 - (2) Maintenance cold cleaners.
- (g) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (h) Cleaners and solvents characterized as follows:
 - (1) Having a vapor pressure equal to or less than 0.7 kPAI 5mm Hg; or 0.1 psi measured at 20° C (68° F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (i) Closed loop heating and cooling systems.
- (j) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.
- (k) Any operation using aqueous solutions containing less than 1% VOC by weight of VOCs excluding HAPs including the following:

- (1) One (1) aqueous pre-treatment cleaning operation, identified as PT, constructed in March 2006, utilizing no control devices, exhausting to stack PT.
- (2) One (1) aqueous brake shoe washing operation, identified as SS2-1, constructed in March 2006, utilizing no control devices, exhausting to stack SS2-1.
- (3) One (1) aqueous degreasing operation, identified as DSU, constructed in June 2006, exhausting to stack DSU.
- (l) Quenching operations used with heat treating processes.
- (m) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (n) Heat exchanger cleaning and repair.
- (o) Paved and unpaved roadways and parking lots with public access.
- (p) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (q) On-site fire and emergency response training approved by the department.
- (r) Filter or coalescer media changeout
- (s) A laboratory as defined in 326 IAC 2-7-1(20)(C).

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

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

D.3.1 Particulate [326 IAC 6.5-1-2]

- (a) Pursuant to 326 IAC 6.5-1-2(a), the natural gas-fired combustion sources RTF-1 through RTF-8, RTF-12 through RTF-24, BS2, and SS4-2 shall not allow or permit discharge to the atmosphere of any gases which contain particulate matter in excess of 0.03 grain per dry standard cubic foot (dscf).
- (b) Pursuant to 326 IAC 6.5-1-2(b)(3), the natural gas BS1, shall not allow or permit discharge to the atmosphere of any gasses which contain particulate matter in excess of 0.01 grain per dry standard cubic foot (dscf).

D.3.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-2][326 IAC 8-3-5]

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

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;

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

Pursuant to 326 IAC 8-3-5(a), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:

- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
- (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
- (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

Pursuant to 326 IAC 8-3-5(b), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:

- (1) Close the cover whenever articles are not being handled in the degreaser.
- (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
- (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

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

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

Source Name: Aisin Brake & Chassis, Inc.
Source Address: 10550 James Adam Street, Terre Haute, Indiana 47802
Mailing Address: 10550 James Adams Street, Terre Haute, IN 47802
FESOP Permit No.: F167-26654-00131

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**

and VCAPC

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

Source Name: Aisin Brake & Chassis, Inc.
Source Address: 10550 James Adam Street, Terre Haute, Indiana 47802
Mailing Address: 10550 James Adams Street, Terre Haute, IN 47802
FESOP Permit No.: F167-26654-00131

This form consists of 2 pages

Page 1 of 2

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

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
SEMI- ANNUAL NATURAL GAS FIRED BOILER CERTIFICATION**

Source Name: Aisin Brake & Chassis, Inc.
Source Address: 10550 James Adam Street, Terre Haute, Indiana 47802
Mailing Address: 10550 James Adams Street, Terre Haute, IN 47802
FESOP Permit No.: F167-26654-00131

<input type="checkbox"/> Natural Gas Only <input type="checkbox"/> Alternate Fuel burned From: _____ To: _____
--

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: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Aisin Brake & Chassis, Inc.
 Source Address: 10550 James Adam Street, Terre Haute, Indiana 47802
 Mailing Address: 10550 James Adams Street, Terre Haute, IN 47802
 FESOP Permit No.: F167-26654-00131
 Facility: Emission Units EFS, SS2-2, SS2-3, SS3-1, and SS3-2
 Parameter: VOC
 Limit: The combined total input volatile organic compounds (VOC) including solvents, coatings, and adhesives delivered shall be limited to less than or equal to 97.32 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

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

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

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Aisin Brake & Chassis, Inc.
Source Address: 10550 James Adam Street, Terre Haute, Indiana 47802
Mailing Address: 10550 James Adams Street, Terre Haute, IN 47802
FESOP Permit No.: F167-26654-00131
Facility: Emission Units EFS, SS2-2, SS2-3, SS3-1, and SS3-2
Parameter: HAPs
Limit: The total input hazardous air pollutants (HAP) including solvents, coatings, and adhesives delivered shall be limited such that the input of single HAP and total input HAPs shall not exceed 9.90 and 23.48 tons per twelve (12) consecutive month period with compliance determined at the end of each month, respectively.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

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

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

Attach a signed certification to complete this report.

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

Source Name: Aisin Brake & Chassis, Inc.
 Source Address: 10550 James Adam Street, Terre Haute, Indiana 47802
 Mailing Address: 10550 James Adams Street, Terre Haute, IN 47802
 FESOP Permit No.: F167-26654-00131

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

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Mail to: Permit Administration & Development Section
Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Aisin Brake & Chassis, Inc.
10550 James Adam Street
Terre Haute, Indiana 47802

Affidavit of Construction

I, _____, being duly sworn upon my oath, depose and say:
(Name of the Authorized Representative)

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of _____ for _____.
(Title) (Company Name)
3. By virtue of my position with _____, I have personal
(Company Name)
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of _____.
(Company Name)
4. I hereby certify that Aisin Brake & Chassis, Inc. 10550 James Adam Street, Terre Haute, Indiana 47802, completed construction of the automotive brake and brake component plant on _____ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on June 12, 2008 and as permitted pursuant to New Source Construction Permit and Federally Enforceable State Operating Permit No. F167-26654-00131, Plant ID No. 167-00131 issued on _____.

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature _____

Date _____

STATE OF INDIANA)
)SS

COUNTY OF _____)

Subscribed and sworn to me, a notary public in and for _____ County and State of Indiana
on this _____ day of _____, 20 _____. My Commission expires: _____.

Signature _____

Name _____ (typed or printed)

**Indiana Department of Environmental Management
Office of Air Quality
And Vigo County Air Pollution Control**

Technical Support Document (TSD) for a MSOP Transitioning to a Federally
Enforceable State Operating Permit (FESOP)
with New Source Review (NSR)

Source Description and Location

Source Name: Aisin Brake & Chassis, Inc.
Source Location: 10550 James Adams Street, Terre Haute, IN 47802
County: Vigo County
SIC Code: 3714
Operation Permit No.: F 167-26654-00131
Permit Reviewer: Jason R. Krawczyk

On June 12, 2008, the Office of Air Quality (OAQ) has received an application from Aisin Brake & Chassis, Inc. related to the construction and operation of new emission units at an existing stationary automotive brake and brake component plant and transition from a MSOP to a FESOP.

Existing Approvals

The source has been operating under MSOP No. 167-22458-00131, issued on August 22, 2007.

Due to this application, the source is transitioning from a MSOP to a FESOP.

County Attainment Status

The source is located in Vigo County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Attainment effective February 6, 2006, for the Terre Haute area, including Vigo County, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.
¹ Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for PM _{2.5} .	

(a) Ozone Standards

- (1) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.
- (2) 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 the 8-hour ozone standard.

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

(b) PM2.5

Vigo County has been classified as attainment for PM2.5. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM2.5 emissions, and the effective date of these rules was July 15th, 2008. Indiana has three years from the publication of these rules to revise its PSD rules, 326 IAC 2-2, to include those requirements. The May 8, 2008 revisions require IDEM to regulate PM10 emissions as a surrogate for PM2.5 emissions until 326 IAC 2-2 is revised.

(c) Other Criteria Pollutants

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

Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

Background and Description of Permitted Emission Units

The Office of Air Quality (OAQ) has reviewed an application, submitted by Aisin Brake and Chassis, Inc. on June 12, 2008, relating to:

- 1) The addition of an electric induction heat treat hardening oven controlled by a mist eliminator,
- 2) The addition of one new dip coating station,
- 3) The addition of one new 4.6 MMBtu/hr natural gas fired curing oven, and
- 4) The addition of four new grinding stations with particulate emissions controlled by two cyclones.

The source consists of the following permitted emission unit(s):

- (a) One surface coating line with a maximum capacity of 4,100 parts per hour including:
- (1) One (1) dip surface coating operation, identified as EFS, constructed in March 2004, utilizing no control devices, exhausting to stack EFS.
- (b) One brake shoe primer line with a maximum capacity of 2,500 units per hour including:
- (1) One (1) brake shoe dip primer coating operation, identified as SS2-2, constructed in March 2006, utilizing no control devices, and exhausting to stack SS2-2.

- (c) One brake shoe adhesive application line with a maximum capacity of 2,500 units per hour including:
 - (1) Two (2) brake shoe adhesive application operations, identified as SS3-1 and SS3-2 constructed in March 2006, utilizing no control devices, exhausting to stacks SS3-1 and SS3-2.
 - (2) Two (2) brake shoe adhesive electric cure ovens, identified as SS3-3 and SS 3-4, constructed in March 2006, utilizing no control devices, exhausting to stacks SS3-3 and SS3-4.
- (d) One (1) brake shoe grinding operation final cure electric oven, identified as SS4-3, constructed in March 2006, with a maximum capacity of 2,500 units per hour, exhausting to stack SS4-3.
- (e) One (1) brake shoe grinding operation with a combined maximum capacity of 2500 units per hour consisting of the following emission units:
 - (1) Two (2) brake shoe grinding stations, identified as SS4-1a and SS4-1b, constructed in March 2006, with a combined maximum capacity of 2,500 units per hour, each utilizing a separate cyclone for particulate control; collectively exhausting through stack SS4-1-1.

Insignificant activities consisting of the following:

- (a) Welding and cutting operations, constructed in March 2006, consisting of the following:
 - (1) One (1) brake shoe resistance welding station, identified as SS1-1, with a maximum capacity of 2,500 units per hour and an electrode consumption rate of 0.05 pounds per hour, utilizing a fabric filter as particulate control, exhausting within the building.
 - (2) One (1) resistance welding station with a maximum electrode consumption rate of 0.2 pounds per hour, utilizing no control devices.
 - (3) Four (4) metal inert gas (MIG) welding stations, each with a maximum electrode consumption rate of 2.0 pounds per hour, utilizing no control devices.
 - (4) One (1) stick welding station with a maximum electrode consumption rate of 0.1 pounds per hour, utilizing no control devices.
 - (5) One (1) tungsten inert gas (TIG) welding station with a maximum electrode consumption rate of 0.1 pounds per hour, utilizing no control devices.
 - (6) One (1) oxyacetylene welding station with a maximum electrode consumption rate of 0.1 pounds per hour, utilizing no control devices.
 - (7) One (1) plasma cutting station with a maximum cutting rate of 12 inches per minute at a material thickness of 0.5 inches, utilizing no control devices.
- (b) Machining where an aqueous cutting coolant continuously floods the machining interface including:

Three (3) wet machining operations, constructed in March 2004, utilizing mist eliminators for particulate control; exhausting within the building, consisting of the following:

 - (1) One (1) wet machining unit, identified as 311 Plunger, with a maximum capacity of 134 pieces per hour.
 - (2) One (1) wet machining unit, identified as 321 Cover, with a maximum capacity of 131 pieces

per hour.

- (3) One (1) wet machining unit, identified as 331 Fusion, with a maximum capacity of 57 pieces per hour.
- (c) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, including:
- (1) Eight (8) natural gas units, identified as RTF-1 through RTF-8, constructed in February 2002, with each rated for a maximum capacity of 0.54 MMBtu/hr.
 - (2) Thirteen (13) natural gas units, identified as RTF-12 through RTF-24, constructed in June 2006, with each rated for a maximum capacity of 0.54 MMBtu/hr.
 - (3) One (1) natural gas fired hot water boiler, identified as BS1, constructed in September 2003, rated at a maximum capacity of 5.0 MMBtu/hr, utilizing no control devices, and exhausting to stack BS1.
 - (4) One (1) natural gas fired paint dry/bake oven, identified as BS2, constructed in September 2003, rated at a maximum capacity of 3.5 MMBtu/hr, utilizing no control devices, and exhausting to stack BS2.
- (d) Emergency generator:
- (1) One (1) natural gas fired back up generator, identified as Back-up Generator 1, constructed in March 2006, rated at a maximum capacity of 0.59 MMBtu/hr, utilizing no control devices, and exhausting to stack Back-up Generator.
- (e) Degreasing operations that do not exceed one hundred forty-five (145) gallons per twelve (12) months, except if subject to 326 IAC 20-6; including the following:
- (1) One (1) degreasing operation identified as MC, constructed in March 2006, exhausting to stack MC.
 - (2) Maintenance cold cleaners.
- (f) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (g) Cleaners and solvents characterized as follows:
- (1) Having a vapor pressure equal to or less than 0.7 kPAI 5mm Hg; or 0.1 psi measured at 20° C (68° F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (h) Closed loop heating and cooling systems.
- (i) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.
- (j) Any operation using aqueous solutions containing less than 1% VOC by weight of VOCs excluding HAPs including the following:
- (1) One (1) aqueous pre-treatment cleaning operation, identified as PT, constructed in March 2006, utilizing no control devices, exhausting to stack PT.

- (2) One (1) aqueous brake shoe washing operation, identified as SS2-1, constructed in March 2006, utilizing no control devices, exhausting to stack SS2-1.
- (3) One (1) aqueous degreasing operation, identified as DSU, constructed in June 2006, exhausting to stack DSU.
- (k) Quenching operations used with heat treating processes.
- (l) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (m) Heat exchanger cleaning and repair.
- (n) Paved and unpaved roadways and parking lots with public access.
- (o) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (p) On-site fire and emergency response training approved by the department.
- (q) Filter or coalescer media changeout
- (r) A laboratory as defined in 326 IAC 2-7-1(20)(C).

The following is a list of the new emission unit(s) and pollution control device(s):

- (a) One (1) brake shoe dip primer operation, identified as SS2-3, approved for construction in 2008, with a maximum capacity of 2,500 units per hour, utilizing no control devices, exhausting to stack SS2-3.
- (b) Two (2) brake shoe grinding stations, identified as SS4-1c through SS4-1d, approved for construction in 2008, each utilizing one (1) cyclone for particulate control; collectively exhausting within the building.
- (c) Two (2) brake shoe grinding stations, identified as SS4-1e through SS4-1f, approved for construction in 2008, each utilizing one (1) cyclone for particulate control; collectively exhausting within the building.

The following is a list of the new insignificant activities and pollution control device(s):

- (a) One (1) electric induction heat treat hardening oven, identified as SS1-2, approved for construction in 2008, with a maximum capacity of 2,500 units per hour, utilizing a mist eliminator for particulate control, and exhausting within the facility.
- (b) One (1) natural gas fired curing oven, identified as SS4-2, approved for construction in 2008, rated at a maximum capacity of 4.6 MMBtu/hr, utilizing no control devices, exhausting to stack SS4-2.

The following modifications were made to the permitted emission unit(s) and pollution control device(s):

- (a) The overall production capacity for the adhesive application and grinding processes increased from 340 units per hour to 2,500 units per hour.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted emission units operating at this source.

Enforcement Issues

There are no pending enforcement actions related to this source.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – FESOP

The following table reflects the unlimited potential to emit (PTE) of the entire source before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	Greater than 250
PM10 ⁽¹⁾	Less than 100
SO ₂	Less than 100
NO _x	Less than 100
VOC	Greater than 100, Less than 250
CO	Less than 100

(1) 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". PM10 emissions are assumed to be equal to PM2.5.

HAPs	Potential To Emit (tons/year)
Single (Toluene)	Greater than 10
Single (Methanol)	Greater than 10
Single (Others)	Less than 10
Combined	Greater than 25

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(29)) of VOC is greater than one hundred (100) tons per year. The PTE of PM is greater than 250 tons per year. The PTE of all other regulated criteria pollutants are less than one hundred (100) tons per year. The source would have been subject to the provisions of 326 IAC 2-7. However, the source will be issued a Federally Enforceable State Operating Permit (FESOP) (326 IAC 2-8), because the source will limit emissions to less than the Title V major source threshold levels.
- (b) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(29)) of any single HAP is greater than ten (10) tons per year and the PTE of a combination of HAPs is greater than twenty-five (25) tons per year. Therefore, the source would have been subject to the provisions of 326 IAC 2-7. However, the source will be issued a FESOP (326 IAC 2-8), because the source will limit emissions of HAPs to less than the Title V major source threshold levels.

PTE of the Entire Source After Issuance of the FESOP

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

Process/Emission Unit	Potential To Emit of the Entire Source After Issuance of FESOP (tons/year)							
	PM	PM10*	SO ₂	NOx	VOC	CO	Total HAPs	Worst Single HAP
Surface Coating Line ^(α)	-	-	-	-	-	-	-	-
Primer Line ^(α)	0.00	0.00	negl.	negl.	97.32	negl.	23.48	9.90
Adhesive Application Line ^(α)	-	-	-	-	-	-	-	-
Grinding Operations	42.45	4.24	negl.	negl.	negl.	negl.	negl.	negl.
Induction Heat Treat Oven	0.01	0.01	negl.	negl.	negl.	negl.	negl.	negl.
Combustion	0.20	0.84	0.07	21.25	0.89	9.21	0.21	0.20 Hexane
Welding	0.22	0.22	negl.	negl.	negl.	negl.	0.02	negl.
Degreasing	negl.	negl.	negl.	negl.	0.79	negl.	0.79	0.79 Diethanolamine
Wet Machining	0.04	0.04	negl.	negl.	negl.	negl.	negl.	negl.
Total PTE After Issuance	42.93	5.36	0.07	21.25	99.00	9.21	24.50	9.90
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
negl. = negligible * 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". PM10 emissions are assumed to be equal to PM2.5 emissions. α Emissions for the Surface Coating Line, Primer Line, and Adhesive Application Line are included together because the same limit affects their combined PTE.								

(a) FESOP Status

This existing source is not a Title V major stationary source, because the potential to emit criteria pollutants from the entire source will be limited to less than the Title V major source threshold levels.

In addition, this existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because the potential to emit HAPs is limited to less than ten (10) tons per year for a single HAP and twenty-five (25) tons per year of total HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act and is 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:

- (1) The combined total input volatile organic compounds (VOC) including solvents, coatings, and adhesives delivered to emission units EFS, SS2-2, SS2-3, SS3-1, and SS3-2 shall be limited to less than or equal to 97.32 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (2) The combined total input hazardous air pollutants (HAP) delivered to emission units EFS, SS2-2, SS2-3, SS3-1, and SS3-2 shall be limited such that input of any single HAP shall not exceed 9.90 tons per twelve (12) consecutive month period with compliance determined at the end of each month. The input of total HAPs shall not exceed 23.48 tons per twelve (12) consecutive month period with compliance determined at the end of each month, respectively.

Compliance with these limits, combined with the potential to emit VOC and HAPs from all other emission units at this source, shall limit the source-wide total potential to emit of all criteria pollutants to less than 100 tons per 12 consecutive month period each, 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 existing source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit PM is limited to less than 250 tons per year and the potential to emit all other attainment regulated pollutants are less than 250 tons per year, and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Compliance with 6.5-1-2 Particulate Emission Limitations shall limit PM to less than 250 tons per year and shall render 326 IAC 2-2 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 in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Halogenated Solvent Cleaning, 40 CFR 63.460, Subpart T (326 IAC 20-80), are not included in the permit, since this source does not use a degreasing solvent that contains any of the halogenated compounds listed in 40 CFR 63.460(a).
- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63.3880, Subpart M (326 IAC 20-80), are not included in the permit because the source is not a major source of HAPs as defined in 40 CFR 63.2.
- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63.11169, Subpart H (326 IAC 20-80), are not included in the permit because the source does not use paint stripping operations that involve the use of chemical strippers that contain methylene chloride (MeCl), and does not do any spray application of coatings.
- (e) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

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 source:

- (a) 326 IAC 1-5-2 (Emergency Reduction Plans)
Pursuant to 326 IAC 1-5-2, this source is not subject to this rule because it does not have the potential to emit one hundred (100) tons per year, or more, of any pollutant after issuance.

- (b) 326 IAC 2-8-4 (FESOP)
FESOP applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.
- (c) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
PSD applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.
- (d) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The unlimited potential to emit of HAPs from the new/modified unit(s) is greater than ten (10) tons per year for any single HAP and/or greater than twenty-five (25) tons per year of a combination of HAPs. However, the source shall limit the potential to emit of HAPs from the new/modified unit(s) 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, the source is not subject to the requirements of 326 IAC 2-4.1. See PTE of the Entire Source After Issuance of the FESOP Section above.
- (e) 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.
- (f) 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.
 - (3) This source is not located in the area of Vigo County referenced in 326 IAC 5-1-1(c)(8).
- (g) 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.
- (h) 326 IAC 6.5-1-2 (Particulate Emission Limitations)
The source has the potential to emit one hundred (100) tons or more, and actual emissions of (10) tons or more of particulate matter per year. Therefore the requirements of 326 IAC 6.5-1-2 are applicable.

Compliance with this limit is in addition to those control devices making the requirements of 326 IAC 2-2 and 2-7 not applicable which was discussed above under the section titled "Permit Level Determination - PSD".
- (i) 326 IAC 6.5-9-1 (Particulate Emission Limitations Vigo County)
Pursuant to 326 IAC 6.5-9-1, this source is not subject to this rule, because it is not one of the sources listed in 326 IAC 6.5-9-2 through 326 IAC 6.5-9-20.

Surface Coating Line (EFS) / Brake Shoe Primer Line (SS2-2 & SS2-3)

- (j) Volatile Organic Compound (VOC) Limitations (326 IAC 8-2-9) (326 IAC 8-1-2)
EFS, SS2-2, and SS2-3 are subject to 326 IAC 8-2-9 because the actual VOC emissions are greater than 15 lb/day.
- (1) Pursuant to 326 IAC 8-2-9, the Permittee shall not allow the discharge into the atmosphere of VOC in excess of three (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator.
 - (2) Pursuant to 326 IAC 8-1-2(b), EFS, SS2-2, and SS2-3 VOC emissions shall be limited to no greater than the equivalent emissions of six and seven-tenths (6.7) pounds of VOC per gallon of coating solids for air dried or forced warm air dried coatings, as allowed at 326 IAC 8-1-2 (a)(9)(A).

Brake Shoe Grinding Stations (SS4-1a and SS4-1b)

- (k) 326 IAC 6.5-1-2(a) (Particulate Emission Limitation)
Pursuant to 326 IAC 6.5-1-2(a), emission units SS4-1a through SS4-1f shall not allow or permit discharge to the atmosphere of any gases which contain particulate matter in excess of 0.03 grain per dry standard cubic foot (dscf).

Particulate emissions from SS4-1a and SS4-1b shall be controlled by cyclone separators in order to comply with this limit.

Brake Shoe Grinding Stations (SS4-1c and SS4-1d)

- (l) 326 IAC 6.5-1-2(a) (Particulate Emission Limitation)
Pursuant to 326 IAC 6.5-1-2(a), emission units SS4-1c and SS4-1d shall not allow or permit discharge to the atmosphere of any gases which contain particulate matter in excess of 0.03 grain per dry standard cubic foot (dscf).

Particulate emissions from SS4-1c and SS4-1d shall be controlled by a cyclone separator in order to comply with this limit.

Brake Shoe Grinding Stations (SS4-1e and SS4-1f)

- (m) 326 IAC 6.5-1-2(a) (Particulate Emission Limitation)
Pursuant to 326 IAC 6.5-1-2(a), emission units SS4-1e and SS4-1f shall not allow or permit discharge to the atmosphere of any gases which contain particulate matter in excess of 0.03 grain per dry standard cubic foot (dscf).

Particulate emissions from SS4-1e and SS4-1f shall be controlled by a cyclone separator in order to comply with this limit.

Brake Shoe Welding Operation (SS1-1)

- (n) 326 IAC 6.5-1-2(a) (Particulate Emission Limitation)
Pursuant to 326 IAC 6.5-1-2(a), the brake shoe welding operations including SS1-1 shall not allow or permit discharge to the atmosphere of any gases which contain particulate matter in excess of 0.03 grain per dry standard cubic foot (dscf).

The dry particulate filter is not necessary to comply with this particulate emission limitation because the PM PTE before control is less than 0.00002 gr/dscf.

Wet Machining Operations (311 Plunger, 321 Cover, 331 Fusion)

- (o) 326 IAC 6.5-1-2(a) (Particulate Emission Limitation)
Pursuant to 326 IAC 6.5-1-2(a), emission units 311 Plunger, 321 Cover, and 331 Fusion shall not allow or permit discharge to the atmosphere of any gases which contain particulate matter in excess of 0.03 grain per dry standard cubic foot (dscf).

The mist eliminator is not necessary to comply with this particulate emission limitation because the PM PTE before control is less than 0.008 gr/dscf.

Electric Induction Heat Treat Oven (SS1-2)

- (p) 326 IAC 6.5-1-2(a) (Particulate Emission Limitation)
Pursuant to 326 IAC 6.5-1-2(a), emission unit SS1-2 shall not allow or permit discharge to the atmosphere of any gases which contain particulate matter in excess of 0.03 grain per dry standard cubic foot (dscf).

The mist eliminator is not necessary to comply with this particulate emission limitation because the PM PTE before control is less than 0.007 gr/dscf.

Natural Gas Fired Combustion Sources (RTF-1 through RTF-8, RTF-12 through RTF-24, BS1, BS2, SS4-2)

- (q) 326 IAC 6.5-1-2(a) (Particulate Emission Limitation)
Pursuant to 326 IAC 6.5-1-2(a), the natural gas-fired combustion sources RTF-1 through RTF-8, RTF-12 through RTF-24, BS2, and SS4-2 shall not allow or permit discharge to the atmosphere of any gases which contain particulate matter in excess of 0.03 grain per dry standard cubic foot (dscf).
- (r) 326 IAC 6.5-1-2(b)(3) (Particulate Emission Limitation)
Pursuant to 326 IAC 6.5-1-2(b)(3), the natural gas fired hot water boiler BS1, shall not allow or permit discharge to the atmosphere of any gasses which contain particulate matter in excess of 0.01 grain per dry standard cubic foot (dscf).

Emergency Generator (Back-Up Generator 1)

- (s) 326 IAC 6.5-1-2(a) (Particulate Emission Limitation)
Pursuant to 326 IAC 6.5-1-2(a), the natural gas-fired combustion source Back-Up Generator 1, shall not allow or permit discharge to the atmosphere of any gases which contain particulate matter in excess of 0.03 grain per dry standard cubic foot (dscf).

Degreasing Operations (MC)

- (t) 326 IAC 8-3-2 (Cold Cleaner Operations)
Pursuant to 326 IAC 8-3-2, for cold cleaning operations constructed after January 1, 1980, the Permittee shall:
- (a) Equip the cleaner with a cover;
 - (b) Equip the cleaner with a facility for draining cleaned parts;
 - (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
 - (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
 - (e) Provide a permanent, conspicuous label summarizing the operation requirements;

- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.
- (u) 326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)
Pursuant to 326 IAC 8-3-5(a), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:
- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

Pursuant to 326 IAC 8-3-5(b), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:

- (1) Close the cover whenever articles are not being handled in the degreaser.
- (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
- (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

Compliance Determination, Monitoring and Testing Requirements

- (a) The compliance determination and monitoring requirements applicable to this source are as follows:

Emission Unit / Stack ID	Parameter	Frequency	Range	Excursions and Exceedances
SS4-1-1	Visible Emissions	Daily	Normal/ Abnormal	Response Steps

- (b) There are no applicable testing requirements for this source.

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 June 12, 2008.

The operation of this source shall be subject to the conditions of the attached proposed New Source Review and FESOP No. 167-26654-00131. The staff recommends to the Commissioner that this New Source Review and FESOP be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Jason R. Krawczyk 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) 234-5175 or toll free at 1-800-451-6027 extension 4-5175.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

SUMMARY OF EMISSIONS

Company Name: Aisin Brake & Chasis, Inc.
Address City IN Zip: 10550 James Adams Street, Terre Haute, IN 47802
Permit Number: F167-26654-00131
Plt ID: 167-00131
Reviewer: Jason R. Krawczyk
Date: August 12, 2008

Uncontrolled Emissions (Tons/Yr)								
Pollutant	Combustion	Primer / Coating / Adhesive Application	Cold Cleaning	Welding	Grinding	Wet Machining	Heat Treat Oven	Total PTE
PM	0.20	0.00	-	0.23	530.62	4.29	0.64	535.98
PM10	0.84	0.00	-	0.23	53.06	4.29	0.64	59.06
VOC	0.89	208.62	0.79	-	-	-	-	210.30
NOx	21.25	-	-	-	-	-	-	21.25
SO2	0.07	-	-	-	-	-	-	0.07
CO	9.21	-	-	-	-	-	-	9.21
Single HAP	-	28.26	-	-	-	-	-	28.26
Combined HAPs	0.21	57.66	0.79	0.02	-	-	-	58.67

Limited / Controlled Emissions (Tons/Yr)								
Pollutant	Combustion	Primer / Coating / Adhesive Application	Cold Cleaning	Welding	Grinding	Wet Machining	Heat Treat Oven	Total PTE
PM	0.20	0.00	-	0.22	42.45	0.04	0.01	42.93
PM10	0.84	0.00	-	0.22	4.24	0.04	0.01	5.36
VOC	0.89	97.32	0.79	-	-	-	-	99.00
NOx	21.25	-	-	-	-	-	-	21.25
SO2	0.07	-	-	-	-	-	-	0.07
CO	9.21	-	-	-	-	-	-	9.21
Single HAP	-	9.90	-	-	-	-	-	9.90
Combined HAPs	0.21	23.48	0.79	0.02	-	-	-	24.50

Note:

Fugitive Emissions are not counted toward the determination of Part 70 applicability

**Appendix A: Emissions Calculations
Natural Gas Combustion Only**

Company Name: Aisin Brake & Chasis, Inc.
Address City IN Zip: 10550 James Adams Street, Terre Haute, IN 47802
Permit Number: F167-26554-00131
Plt ID: 167-00131
Reviewer: Jason R. Krawczyk
Date: August 12, 2008

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

11.34 RTF Heating Units
 5.00 BS1
 3.50 BS2
 4.60 SS4-2

24.44

214.09

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.20	0.81	0.06	10.70	0.59	8.99

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

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

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

**Appendix A: Emissions Calculations
Natural Gas Combustion Only**

HAPs Emissions

Company Name: Aisin Brake & Chasis, Inc.
Address City IN Zip: 10550 James Adams Street, Terre Haute, IN 47802
Permit Number: F167-26654-00131
Plt ID: 167-00131
Reviewer: Jason R. Krawczyk
Date: August 12, 2008

	HAPs - Organics				
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	2.248E-04	1.285E-04	8.029E-03	1.927E-01	3.640E-04

	HAPs - Metals				
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	5.352E-05	1.178E-04	1.499E-04	4.068E-05	2.248E-04

Methodology is the same as page 2.

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

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
Back-Up Generator**

Company Name: Aisin Brake & Chasis, Inc.
Address City IN Zip: 10550 James Adams Street, Terre Haute, IN 47802
Permit Number: F167-26654-00131
Plt ID: 167-00131
Reviewer: Jason R. Krawczyk
Date: August 12, 2008

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

0.59

5.2

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	0.1	10.0	0.6	4080.00	118.0	84.0
Potential Emission in tons/yr	2.584E-04	0.026	1.551E-03	10.544	0.305	0.217

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

* Natural Gas heat content = 1000 MMBtu/MMCF

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 3.2, Table 3.2-2

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

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
Back-Up Generator**

HAPs Emissions
Company Name: Aisin Bake & Chasis, Inc.
Address City IN Zip: 10550 James Adams Street, Terre Haute, IN 47802
Permit Number: F167-26654-00131
Plt ID: 167-00131
Reviewer: Jason R. Krawczyk
Date: August 12, 2008

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	5.427E-06	3.101E-06	1.938E-04	4.652E-03	8.786E-06

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	1.292E-06	2.843E-06	3.618E-06	9.820E-07	5.427E-06

Methodology is the same as page 4.

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

VOC and Particulate

From Primer, Surface Coating, and Adhesive Application Operations

Company Name: Aisin Brake & Chasis, Inc.
 Address City IN Zip: 10550 James Adams Street, Terre Haute, IN 47802
 Permit Number: F167-26654-00131
 Plt ID: 167-00131
 Reviewer: Jason R. Krawczyk
 Date: August 12, 2008

PTE VOC EFS

Material	Density (Lb/Gal)	Weight % Volatile (H2O & 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
Powercon 8000	9.20	60.00%	59.7%	0.3%	65.9%	34.00%	0.00183	4100	0.08	0.03	0.21	4.97	0.91	0.00	0.08	100%

Total Potential Emissions

0.21 4.97 0.91 0.00

PTE VOC SS2-2

Material	Density (Lb/Gal)	Weight % Volatile (H2O & 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
Sundine 685W	7.17	88.00%	0.0%	88.0%	0.0%	11.30%	0.00171	1250	6.31	6.31	13.52	324.49	59.22	0.00	55.84	100%
MEK	6.75	100.00%	0.0%	100.0%	0.0%	0.00%	0.00057	1250	6.75	6.75	4.82	115.71	21.12	0.00	N/A	100%

Total Potential Emissions

18.34 440.21 80.34 0.00

PTE VOC SS2-3

Material	Density (Lb/Gal)	Weight % Volatile (H2O & 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
Sundine 685W	7.17	88.00%	0.0%	88.0%	0.0%	11.30%	0.00171	1250	6.31	6.31	13.52	324.49	59.22	0.00	55.84	100%
MEK	6.75	100.00%	0.0%	100.0%	0.0%	0.00%	0.00057	1250	6.75	6.75	4.82	115.71	21.12	0.00	N/A	100%

Total Potential Emissions

18.34 440.21 80.34 0.00

PTE VOC SS3-1

Material	Density (Lb/Gal)	Weight % Volatile (H2O & 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
PL-60551*	8.10						0.00095	1250	4.51	4.51	5.37	128.86	23.52	0.00	13.79	100%

Total Potential Emissions

5.37 128.86 23.52 0.00

PTE VOC SS3-2

Material	Density (Lb/Gal)	Weight % Volatile (H2O & 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
PL-60551*	8.10						0.00095	1250	4.51	4.51	5.37	128.86	23.52	0.00	13.79	100%

Total Potential Emissions

5.37 128.86 23.52 0.00

Combined Total Emissions:

47.63	1143.10	208.62	0.00
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Notes:

Individual source Maximum (unit/hour) estimated from each line's operational capacity.
 * Pounds VOC per gallon of coating (PL605-51) derived from evaporation rate VOC 4.51 lb/gal less water & nnegligibly photochemically reactive materials

Methodology:

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

**Appendix A: Grinding Emission Calculations
PM/PM10**

Company Name: Aisin Brake & Chasis, Inc.
Address City IN Zip: 10550 James Adams Street, Terre Haute, IN 47802
Permit Number: F167-26654-00131
Plt ID: 167-00131
Permit Reviewer: Jason R. Krawczyk
Date: August 12, 2008

Emission Unit ¹ Description	PM Emission Factor (lbs/unit)	PM10 Emission Factor (lbs/unit)	Production Rate (units/hr)	Potential PM Emissions		Potential PM2.5/PM10 Emissions	
				Before Controls (lb/hr)	Before Controls (tons/yr)	Before Controls (lb/hr)	Before Controls (tons/yr)
SS4-1a through SS4-1f	0.048	0.005	2500	121.15	530.62	12.11	53.06

Uncontrolled Potential to Emit: 530.62 53.06

Emission Unit ¹ Description	PM Emission Factor (lbs/unit)	PM10 Emission Factor (lbs/unit)	Production Rate (units/hr)	Control Efficiency (%)	Potential PM Emissions		Potential PM2.5/PM10 Emissions	
					After Controls (lb/hr)	After Controls (tons/yr)	After Controls (lb/hr)	After Controls (tons/yr)
SS4-1a through SS4-1f	0.048	0.005	2500	92.00%	9.69	42.45	0.97	4.24

Controlled Potential to Emit: 42.45 4.24

Notes:

1. The Grinding Operations consist of six (6) grinding stations identified as SS4-1a through SS4-1f; particulate emissions are controlled by three (3) cyclones.
 Uncontrolled PM emission factor for grinding stations based on a weight loss evaluation at the facility, weighing parts before and after grinding to determine the total weight loss: 22 grams per part.
 Uncontrolled PM10 emission factor for grinding stations is based on 10% of the emission factor for PM, which is consistent with the ratio of PM/PM10 emissions for the grinding emission rates found within
 PM10 emissions are assumed to be equal to PM2.5

Methodology:

Potential PM Emissions Before Controls (lbs/hr) = PM Emission Factor (lbs/unit) * Production Rate (units/hr)
 Potential PM Emissions Before Controls (tons/yr) = Potential PM Emissions Before Controls (lbs/hr) * 8760 hrs / 2000 lbs
 Potential PM10 Emissions Before Controls (lbs/hr) = PM10 Emission Factor (lbs/unit) * Production Rate (units/hr)
 Potential PM10 Emissions Before Controls (tons/yr) = Potential PM10 Emissions Before Controls (lbs/hr) * 8760 hrs / 2000 lbs
 Potential PM Emissions After Controls (lb/hr) = Potential PM Emissions Before Controls (lb/hr) * (1 - Control Efficiency (%))

**Appendix A: Emissions Calculations
Welding and Thermal Cutting**

Company Name: Aisin Brake & Chasis, Inc.
Address City IN Zip: 10550 James Adams Street, Terre Haute, IN 47802
Permit Number: F167-26654-00131
Plt ID: 167-00131
Permit Reviewer: Jason R. Krawczyk
Date: August 12, 2008

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)		EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
WELDING												
Resistance (SS1-1)	1	0.05		0.0055	0.0005			0.0003	0.000	0.000	0	0.000
Resistance	1	0.2		0.0055	0.0005			0.001	0.000	0.000	0	0.000
Metal Inert Gas (MIG)(carbon steel)	4	2		0.0055	0.0005			0.044	0.004	0.000	0	0.004
Stick (E7018 electrode)	1	0.1		0.0211	0.0009			0.002	0.000	0.000	0	0.000
Tungsten Inert Gas (TIG)(carbon steel)	1	0.1		0.0055	0.0005			0.001	0.000	0.000	0	0.000
Oxyacetylene(carbon steel)	1	0.1		0.0055	0.0005			0.001	0.000	0.000	0	0.000
FLAME CUTTING	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)**				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Plasma**	1	0.5	12	0.0039				0.003	0.000	0.000	0.000	0.000
UNCONTROLLED EMISSION TOTALS												
Potential Emissions lbs/hr								0.05				0.00
Potential Emissions lbs/day								1.23				0.10
Potential Emissions tons/year								0.23				0.02
CONTROLLED EMISSION TOTALS												
Potential Emissions lbs/hr								0.05				0.00
Potential Emissions lbs/day								1.23				0.10
Potential Emissions tons/year								0.22				0.02

Methodology:

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

**Emission Factor for plasma cutting from American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted). Therefore, the emission factor for plasma cutting is for 8 mm thick rather than 1 inch, and the maximum metal thickness is not used in calculating the emissions.

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

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

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

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

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

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

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

Controlled Emissions, tons/yr = [(Resistance (SS1-1) emissions, lb/hr * (1 - control efficiency)) + (Sum emissions, lb/hr)] * (8,760 hrs / yr * 1 ton / 2,000 lbs).

**Appendix A: Wet Machining Emissions
PM/PM10**

**Company Name: Aisin Brake & Chasis, Inc.
Address City IN Zip: 10550 James Adams Street, Terre Haute, IN 47802
Permit Number: F167-26654-00131
Plt ID: 167-00131
Permit Reviewer: Jason R. Krawczyk
Date: August 12, 2008**

Process	Emission Unit Capacity			Emission Factor (lbs/gal oil)		Uncontrolled PTE (tons/yr)		Controlled PTE (tons/yr)		Control Efficiency (%)
	No. of Stations	Production Rate		PM	PM10/PM2.5	PM	PM10/PM2.5	PM	PM10/PM2.5	
Wet Machining	3	20	gallons oil collected per week	8.26	8.26	4.29	4.29	0.043	0.043	99.0%
Totals:						4.29	4.29	0.043	0.043	

Note:

Emission Factors based on mass balance, actual collection of 20 gallons per week for the wet machining processes, and a density of 8.17 lbs/gallon.

Methodology:

Uncontrolled PTE = Production Rate (gallons oil collected per week) * Emission Factor (lbs/gal oil) * 52 weeks / year * 1 ton / 2,000 lbs

Controlled PTE = Uncontrolled PTE * (1 - Control Efficiency)

**Appendix A: Induction Heat Treat Emissions
PM/PM10**

**Company Name: Aisin Brake & Chasis, Inc.
Address City IN Zip: 10550 James Adams Street, Terre Haute, IN 47802
Permit Number: F167-26654-00131
Plt ID: 167-00131
Permit Reviewer: Jason R. Krawczyk
Date: August 12, 2008**

Process	Emission Unit Capacity			Emission Factor (lbs/gal oil)		Uncontrolled PTE (tons/yr)		Controlled PTE (tons/yr)		Control Efficiency (%)
	No. of Stations	Production Rate		PM	PM10/PM2.5	PM	PM10/PM2.5	PM	PM10/PM2.5	
Electric Induction Hardening Heat Treat Oven	1	3	gallons oil collected per week	8.26	8.26	0.64	0.64	0.006	0.006	99.0%
Totals:						0.64	0.64	0.006	0.006	

Note:

Emission Factors based on mass balance, actual collection of 3 gallons per week for the Induction Heat Treat process, and an oil density of 8.34 lbs/gallon.

Methodology:

Uncontrolled PTE = Production Rate (gallons oil collected per week) * Emission Factor (lbs/gal oil) * 52 weeks / year * 1 ton / 2,000 lbs

Controlled PTE = Uncontrolled PTE * (1 - Control Efficiency)

**Appendix A: Emissions Calculations
Degreasing Operations**

Company Name: Aisin Bake & Chasis, Inc.
Address City IN Zip: 10550 James Adams Street, Terre Haute, IN 47802
Permit Number: F167-26654-00131
Plt ID: 167-00131
Reviewer: Jason R. Krawczyk
Date: August 12, 2008

Unit MC

Substance	Maximum Usage	Density	Percent by weight VOC	Potential VOC Emissions		Potential HAPS	
	gal/day	lb/gal	%	lbs/day	tons/yr	lbs/day	tons/yr
SUNECON A-140B (diethanolamine)	1.5	8.75	33.00%	4.33	0.79	4.33	0.79

Methodology

Potential emissions (tons/yr) = maximum usage (gal/day) * density (lb/gal) * percent by weight * 365 days * 1 ton/2000 lbs