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: February 13, 2009

RE: Dexter Axle Company / 113-27395-00008

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

Notice of Decision – Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER-AM.dot12/3/07

IDEM

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Mr. Mike Furfaro
Dexter Axle Company
500 South Seventh Street
Albion, IN 46701

February 13, 2009

Re: 113-27395-00008
First Administrative Amendment to
F113-26682-00008

Dear Mr. Furfaro:

Dexter Axle Company was issued a Federally Enforceable State Operating Permit (FESOP) Renewal No. F113-26682-00008 on November 25, 2008 for a stationary brake and axle component manufacturing plant located at 500 South Seventh Street, Albion, IN 46701. On January 22, 2009, the Office of Air Quality (OAQ) received an application from the source relating to construction and operation of an axle production line consisting of an electrostatic paint booth and flash tunnel, as well as the addition of insignificant natural gas combustion units and welding stations, of the same type and will comply with the same applicable requirements and permit terms and conditions as the existing spray booths and insignificant natural gas combustion units and welding stations. Please see the attached Appendix A for emissions calculations. The addition of these units to the permit is considered an administrative amendment pursuant to 326 IAC 2-8-10(a)(14). The entire source will continue to limit PM, PM10, and VOC emissions to less than Part 70 thresholds, rendering the requirements of 326 IAC 2-7 not applicable. The addition of these units will not cause the source's potential to emit to be greater than the threshold levels specified in 326 IAC 2-2 or 326 IAC 2-3.

Pursuant to the provisions of 326 IAC 2-8-10, the permit is hereby administratively amended as follows with the deleted language as ~~strikeouts~~ and new language **bolded**.

The source has revised it's SIC code to more accurately depict their operations.

...

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

The Permittee owns and operates a stationary brake and axle component manufacturing plant.

...

SIC Code: ~~3714~~ **3799**

...

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:

...

(f) One Axle Production Line, approved for construction in 2009, with a maximum capacity of 106 steel axles per hour, consisting of the following:

(1) One (1) electrostatic paint booth, identified as ESB-1, consisting of two (2) spay guns using electrostatic air atomized spray application, with particulate emissions controlled dry filters, and exhausting to stack ESB-1S.

(2) One (1) flash tunnel, identified as FT-1, with particulate emissions controlled by dry filters, and exhausting to stack FT-1S.

~~(f)~~**(g)** One (1) adhesive application and curing process, constructed in 2007, identified as ACO-2, equipped with one (1) natural gas-fired adhesive oven, exhausting to Stack 17, nominal capacity: 1,580 brake linings per hour, nominal heat input capacity: 2 million British thermal units per hour.

~~(g)~~**(h)** One (1) natural gas-fired cure oven, constructed in 2007, identified as CO-1, exhausting to Stack 16, nominal capacity: 1,580 brake linings per hour, nominal heat input capacity: 2 million British thermal units per hour;

~~(h)~~**(i)** One (1) covered conveyor system, identified as EU-2, constructed in 2007, with particulate matter controlled by baghouse VFR-2 and exhausting to the indoors, which conveys dry frictional material to mixer (EU-1) at a nominal capacity of 535 pounds per hour and consisting of the following emission units:
...

~~(i)~~**(j)** One (1) mixer, constructed in 2007, identified as EU-1, with particulate matter controlled by baghouse VFR-2 and exhausting to the indoors, nominal capacity: 640 pounds per hour;

~~(j)~~**(k)** One (1) grinding system, constructed in 1975, identified as EU-14, equipped with six (6) grinders and dry filters for particulate control, exhausting inside, nominal capacity: 1,800 pounds of friction material per hour.

...

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

This stationary source also includes the following insignificant activities:

(a) Natural gas-fired combustion sources, nominally rated at ~~40.68~~ **45.23** million British thermal units per hour total, consisting of the following:
...

(15) One (1) steel hardening oven, identified as OI-1, approved for construction in 2009, exhausting to Stack OI-1, nominal heat input capacity: 0.80 million British thermal units per hour.

(16) Fifteen (15) natural gas-fired Building 4 heating and air conditioning units, approved for construction in 2009, identified as UH1 through UH15, each is nominally rated at 0.25 million British thermal units per hour for a nominal total of 3.75 million British thermal units per hour.

~~(e)~~**(b)** Three (3) metal inert gas (MIG) welding stations, using L50 welding wire, nominal capacity: 6.00 pounds of welding wire per hour each.

(c) Eleven (11) gas metal arc welding (GMAW) welding stations, each with a maximum welding wire usage rate of 4.54 pounds per hour (GMAW Wire Type ER70S) and exhausting within the building.

~~(f)~~**(d)** Grinding and machining operation controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, consisting of the following:

(1) One (1) bullard system, consisting of eight (8) bullard machines, equipped with dry filters for particulate control, nominal capacity: 85 parts (3,443 pounds) per hour.

~~(g)~~**(e)** Paved and unpaved roads and parking lots with public access.

...

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

...

(f) One Axle Production Line, approved for construction in 2009, with a maximum capacity of 106 steel axles per hour, consisting of the following:

(1) One (1) electrostatic paint booth, identified as ESB-1, consisting of two (2) spay guns using electrostatic air atomized spray application, with particulate emissions controlled dry filters, and exhausting to stack ESB-1S.

(2) One (1) flash tunnel, identified as FT-1, with particulate emissions controlled by dry filters, and exhausting to stack FT-1S.

~~(f)~~**(g)** One (1) adhesive application and curing process, constructed in 2007, identified as ACO-2, equipped with one (1) natural gas-fired adhesive oven, exhausting to Stack 17, nominal capacity: 1,580 brake linings per hour, nominal heat input capacity: 2 million British thermal units per hour.

~~(g)~~**(h)** One (1) natural gas-fired cure oven, constructed in 2007, identified as CO-1, exhausting to Stack 16, nominal capacity: 1,580 brake linings per hour, nominal heat input capacity: 2 million British thermal units per hour;

~~(h)~~**(i)** One (1) covered conveyor system, identified as EU-2, constructed in 2007, with particulate matter controlled by baghouse VFR-2 and exhausting to the indoors, which conveys dry frictional material to mixer (EU-1) at a nominal capacity of 535 pounds per hour and consisting of the following emission units:

(1) Seven (7) frictional dry material feed bins, constructed in 2007, identified as HML-1, HML-2, HML-3, HML-4, HML-5, HML-6, and TS-1, with particulate matter controlled by cartridge dust filter RVF-1 and exhausting to the indoors, nominal capacity: 172 pounds per hour total;

(2) Three (3) bulk bag feed bins, constructed in 2007, identified as BBS-1, BBS-2, and BBS-3, with particulate matter controlled by baghouse DCF-3 and exhausting to the indoors, nominal capacity: 253 pounds per hour total;

(3) One (1) bag dump station, construct in 2007, identified as BDS-1, with particulate matter controlled by cartridge dust filer BVF-4 and exhausting to the indoors, nominal capacity: 37 pounds per hour;

(4) One (1) fiberglass blowing system, constructed in 2007, identified as RM-1, with particulate matter controlled by baghouse VFR-2 and exhausting to the indoors, nominal capacity: 73 pounds per hour;

~~(i)~~**(j)** One (1) mixer, constructed in 2007, identified as EU-1, with particulate matter controlled by baghouse VFR-2 and exhausting to the indoors, nominal capacity: 640 pounds per hour;

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

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

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-8-4] [326 IAC 2-2]

The total VOC usage for the one (1) shoe dip tank (EU-06), one (1) metal backing plate dip tank (EU-07), ~~three (3)~~ **four (4)** spray paint booths (EU-11, EU-12, ~~and~~ EU-15**, and ESB-1**), and one adhesive application and curing process (ACO-2) (Section D.2), shall not exceed 62.65 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with this limit, combined with the potential emissions of VOC from all other emission units as this source, will limit the source-wide total potential to emit VOC to less than 100 tons per 12 consecutive month period and render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (PSD) not applicable.

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

Pursuant to 326 IAC 8-2-9, the owner or operator shall not allow the discharge into the atmosphere VOC from the one (1) metal backing plate dip tank, identified as EU-07, and ~~one (1)~~ **two (2)** spray paint booth**s**, identified as EU-15 **and ESB-1**, in excess of three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, delivered to the applicator for air dried or forced warm air dried coatings.

D.1.3 Volatile Organic Compounds (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment of EU-07**,** ~~and~~ EU-15**, and ESB-1** during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

...

D.1.5 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the PM from the ~~three (3)~~ **four (4)** spray paint booths (EU-11, EU-12, ~~and~~ EU-15**, and ESB-1**) shall not exceed the pound per hour emission rate established as E in the following formula:

...

D.1.6 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the ~~three (3)~~ **four (4)** spray paint booths (EU-11, EU-12, ~~and~~ EU-15**, and ESB-1**) shall be controlled by dry filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.1.7 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for EU-11, EU-12, ~~and~~ EU-15**, and ESB-1** as well as any control devices.

Compliance Determination Requirements

D.1.8 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC requirements for all surface coating operations as well as the content limitation for EU-07**,** ~~and~~ EU-15**, and ESB-1** contained in Conditions D.1.1 and D.1.2 shall be

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

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

D.1.9 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (Stacks 11, 12, ~~and~~ 15**, and ESB-1S**) while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

...

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

~~(j)~~**(k)** One (1) grinding system, constructed in 1975, identified as EU-14, equipped with six (6) grinders and dry filters for particulate control, exhausting inside, nominal capacity: 1,800 pounds of friction material per hour.

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

...

SECTION D.4 EMISSIONS UNIT OPERATION CONDITIONS

Insignificant Activities:

(a) Source-wide natural gas-fired combustion, nominally rated at 40.72 million British thermal units per hour total, consisting of the following:

(1) Three (3) air makeup units, nominal heat input capacity: 5.00 million British thermal units per hour each;

(2) Eight (8) heaters/air conditioners, nominal heat input capacity: 0.475 million British thermal units per hour each;

(3) Twenty-five (25) natural gas-fired space heaters, nominal heat input capacity: 0.150 million British thermal units per hour each;

(4) Three (3) bonders, nominal heat input capacity: 0.800 million British thermal units per hour each;

(5) Three (3) parts washers, nominal heat input capacity: 0.650 million British thermal units per hour each;

(6) One (1) parts washer, nominal heat input capacity: 0.880 million British thermal

units per hour;

(7) One (1) parts washer, nominal heat input capacity: 1.80 million British thermal units per hour;

(8) One (1) parts washer, nominal heat input capacity: 4.80 million British thermal units per hour;

(9) Three (3) office furnaces, nominal heat input capacity: 0.080 million British thermal units per hour each;

(10) One (1) natural gas-fired boiler, approved for construction in 2007, exhausting to Stack 18, nominal heat input capacity: 0.16 million British thermal units per hour; and

(11) Four (4) natural gas-fired heaters, approved for construction in 2007, nominal heat input capacity: 0.475 million British thermal units per hour each.

(12) One (1) natural gas-fired Building 1 parts washer, with a nominal heat input capacity of 0.8 million British thermal units per hour. This washer uses a non-VOC and a non-HAP spray cleaner.

(13) One (1) natural gas-fired Building 2 parts washer, with a nominal heat input capacity of 1.8 million British thermal units per hour. This washer uses a non-VOC and a non-HAP spray cleaner.

(14) Eight (8) natural gas-fired Building 2 heating and air conditioning units, each are nominally rated at 0.175 million British thermal units per hour for a nominal total of 1.4 million British thermal units per hour.

(15) One (1) steel hardening oven, identified as OI-1, approved for construction in 2009, exhausting to Stack OI-1, nominal heat input capacity: 0.80 million British thermal units per hour.

(16) Fifteen (15) natural gas-fired Building 4 heating and air conditioning units, approved for construction in 2009, identified as UH1 through UH15, each is nominally rated at 0.25 million British thermal units per hour for a nominal total of 3.75 million British thermal units per hour.

(b) Three (3) metal inert gas (MIG) welding stations, using L50 welding wire, nominal capacity: 6.00 pounds of welding wire per hour each.

~~(c) Paved and unpaved roads and parking lots with public access.~~

(c) Eleven (11) gas metal arc welding (GMAW) welding stations, each with a maximum welding wire usage rate of 4.54 pounds per hour (GMAW Wire Type ER70S) and exhausting within the building.

(d) Grinding and machining operation controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, consisting of the following:

1. One (1) bullard system, consisting of eight (8) bullard machines, equipped with dry filters for particulate control, nominal capacity: 85 parts (3,443 pounds) per

hour.

(e) Paved and unpaved roads and parking lots with public access.

~~(e) One (1) natural gas-fired Building 1 parts washer, with a nominal heat input capacity of 0.8 million British thermal units per hour. This washer uses a non-VOC and a non-HAP spray cleaner.~~

~~(f) One (1) natural gas-fired Building 2 parts washer, with a nominal heat input capacity of 1.8 million British thermal units per hour. This washer uses a non-VOC and a non-HAP spray cleaner.~~

~~(g) Eight (8) natural gas-fired Building 2 heating and air conditioning units, each are nominally rated at 0.175 million British thermal units per hour for a nominal total of 1.4 million British thermal units per hour.~~

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

...

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

FESOP Quarterly Report

Source Name:	Dexter Axle Company
Source Address:	500 South Seventh Street, Albion, Indiana 46701
Mailing Address:	PO Box 108, Albion, Indiana 46701
FESOP Permit No.:	F113-17172-00008
Facility:	One (1) adhesive application and curing process (ACO-2), one (1) shoe dip tank (EU-06), one (1) metal backing plate dip tank (EU-07), and ~~three (3)~~ **four (4)**spray paint booths (EU-11, EU-12, ~~and~~ EU-15**, and ESB-1**)
Parameter:	VOC Usage
Limit:	Not to exceed 62.65 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

...

IDEM, OAQ has decided to make additional revisions to the permit as described below.

The insignificant activities in Section A.3 were inconsistently identified in Section D.4. The insignificant activities in Section D.4 were modified to show consistency with how the units were identified in Section A.3.

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

A copy of the permit is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/. 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

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Jason R. Krawczyk, of my staff, at 317-232-8427 or 1-800-451-6027, and ask for extension 2-8427.

Sincerely,

Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

Attachments: Updated Permit
Updated Calculations

IC/JRK

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

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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Federally Enforceable State Operating Permit Renewal
OFFICE OF AIR QUALITY

Dexter Axle Company
500 South Seventh Street
Albion, Indiana 46701

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

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

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

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

Operation Permit No.: F113-26682-00008	
Issued by: *Originally Signed By:* Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: November 25, 2008 Expiration Date: November 25, 2018

First Administrative Amendment No.: F113-27395-00008	
Issued by: Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: February 13, 2009 Expiration Date: November 25, 2018

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary brake and axle component manufacturing plant.

Source Address:	500 South Seventh Street, Albion, Indiana 46701
Mailing Address:	P.O. Box 108, Albion, Indiana, 46701
General Source Phone Number:	(574) 266-7356
SIC Code:	3799
County Location:	Noble
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) shoe dip tank constructed in 1974, identified as EU-06, exhausting to Stack 6, nominal capacity: 2,034 brake shoes per hour.

(b) One (1) metal backing plate dip tank, identified as EU-07, constructed in 2000, exhausting to Stack 7, nominal capacity: 923 metal backing plates per hour.

(c) One (1) spray paint booth constructed in 1969, identified as EU-11, equipped with five (5) high volume low pressure (HVLP) spray guns and dry filters to control particulate overspray, exhausting to Stack 11, nominal capacity: 429 metal brake parts per hour.

(d) One (1) spray paint booth constructed in 1973, identified as EU-12, equipped with ten (10) high volume low pressure (HVLP) spray guns and dry filters to control particulate overspray, exhausting to Stack 12, nominal capacity: 429 metal brake parts per hour.

(e) One (1) spray paint booth, identified as EU-15, equipped with eleven (11) high volume low pressure (HVLP) spray guns and dry filters to control particulate overspray, exhausting to Stack 15, nominal capacity: 429 metal brake parts per hour.

(f) One Axle Production Line, approved for construction in 2009, with a maximum capacity of 106 steel axles per hour, consisting of the following:

(1) One (1) electrostatic paint booth, identified as ESB-1, consisting of two (2) spay guns using electrostatic air atomized spray application, with particulate emissions controlled dry filters, and exhausting to stack ESB-1S.

(2) One (1) flash tunnel, identified as FT-1, with particulate emissions controlled by dry filters, and exhausting to stack FT-1S.

(g) One (1) adhesive application and curing process, constructed in 2007, identified as ACO-2, equipped with one (1) natural gas-fired adhesive oven, exhausting to Stack 17, nominal capacity: 1,580 brake linings per hour, nominal heat input capacity: 2 million British thermal units per hour.

(h) One (1) natural gas-fired cure oven, constructed in 2007, identified as CO-1, exhausting to Stack 16, nominal capacity: 1,580 brake linings per hour, nominal heat input capacity: 2 million British thermal units per hour;

(i) One (1) covered conveyor system, identified as EU-2, constructed in 2007, with particulate matter controlled by baghouse VFR-2 and exhausting to the indoors, which conveys dry frictional material to mixer (EU-1) at a nominal capacity of 535 pounds per hour and consisting of the following emission units:

(1) Seven (7) frictional dry material feed bins, constructed in 2007, identified as HML-1, HML-2, HML-3, HML-4, HML-5, HML-6, and TS-1, with particulate matter controlled by cartridge dust filter RVF-1 and exhausting to the indoors, nominal capacity: 172 pounds per hour total;

(2) Three (3) bulk bag feed bins, constructed in 2007, identified as BBS-1, BBS-2, and BBS-3, with particulate matter controlled by baghouse DCF-3 and exhausting to the indoors, nominal capacity: 253 pounds per hour total;

(3) One (1) bag dump station, construct in 2007, identified as BDS-1, with particulate matter controlled by cartridge dust filer BVF-4 and exhausting to the indoors, nominal capacity: 37 pounds per hour;

(4) One (1) fiberglass blowing system, constructed in 2007, identified as RM-1, with particulate matter controlled by baghouse VFR-2 and exhausting to the indoors, nominal capacity: 73 pounds per hour;

(j) One (1) mixer, constructed in 2007, identified as EU-1, with particulate matter controlled by baghouse VFR-2 and exhausting to the indoors, nominal capacity: 640 pounds per hour;

(k) One (1) grinding system, constructed in 1975, identified as EU-14, equipped with six (6) grinders and dry filters for particulate control, exhausting inside, nominal capacity: 1,800 pounds of friction material per hour.

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

This stationary source also includes the following insignificant activities:

(a) Natural gas-fired combustion sources, nominally rated at 45.23 million British thermal units per hour total, consisting of the following:

(1) Three (3) air makeup units, nominal heat input capacity: 5.00 million British thermal units per hour each;

(2) Eight (8) heaters/air conditioners, nominal heat input capacity: 0.475 million British thermal units per hour each;

(3) Twenty-five (25) natural gas-fired space heaters, nominal heat input capacity: 0.150 million British thermal units per hour each;

(4) Three (3) bonders, nominal heat input capacity: 0.800 million British thermal units per hour each;

(5) Three (3) parts washers, nominal heat input capacity: 0.650 million British thermal units per hour each;

(6) One (1) parts washer, nominal heat input capacity: 0.880 million British thermal units per hour;

(7) One (1) parts washer, nominal heat input capacity: 1.80 million British thermal units per hour;

(8) One (1) parts washer, nominal heat input capacity: 4.80 million British thermal units per hour;

(9) Three (3) office furnaces, nominal heat input capacity: 0.080 million British thermal units per hour each;

(10) One (1) natural gas-fired boiler, constructed in 2007, exhausting to Stack 18, nominal heat input capacity: 0.16 million British thermal units per hour; and

(11) Four (4) natural gas-fired heaters, constructed in 2007, nominal heat input capacity: 0.475 million British thermal units per hour each.

(12) One (1) natural gas-fired Building 1 parts washer, with a nominal heat input capacity of 0.8 million British thermal units per hour. This washer uses a non-VOC and a non-HAP spray cleaner.

(13) One (1) natural gas-fired Building 2 parts washer, with a nominal heat input capacity of 1.8 million British thermal units per hour. This washer uses a non-VOC and a non-HAP spray cleaner.

(14) Eight (8) natural gas-fired Building 2 heating and air conditioning units, each are nominally rated at 0.175 million British thermal units per hour for a nominal total of 1.4 million British thermal units per hour.

(15) One (1) steel hardening oven, identified as OI-1, approved for construction in 2009, exhausting to Stack OI-1, nominal heat input capacity: 0.80 million British thermal units per hour.

(16) Fifteen (15) natural gas-fired Building 4 heating and air conditioning units, approved for construction in 2009, identified as UH1 through UH15, each is nominally rated at 0.25 million British thermal units per hour for a nominal total of 3.75 million British thermal units per hour.

(b) Three (3) metal inert gas (MIG) welding stations, using L50 welding wire, nominal capacity: 6.00 pounds of welding wire per hour each.

(c) Eleven (11) gas metal arc welding (GMAW) welding stations, each with a maximum welding wire usage rate of 4.54 pounds per hour (GMAW Wire Type ER70S) and exhausting within the building.

(d) Grinding and machining operation controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, consisting of the following:

(1) One (1) bullard system, consisting of eight (8) bullard machines, equipped with dry filters for particulate control, nominal capacity: 85 parts (3,443 pounds) per hour.

(e) Paved and unpaved roads and parking lots with public access.

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

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

SECTION B GENERAL CONDITIONS

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

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

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

(a) This permit, F113-26682-00008, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and Northern Regional Office 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

Northern Regional Office phone: (574) 245-4870; fax: (574) 245-4877**.**

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

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

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

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

(A) A description of the emergency;

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

(C) Corrective actions taken.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(a) All terms and conditions of permits established prior to F113-26682-00008 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised, or

(3) deleted.

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

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

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

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

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

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

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

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

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

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

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

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

(1) That this permit contains a material mistake.

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

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

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

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

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

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

Request for renewal shall be submitted to:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(4) The Permittee notifies the:

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

and

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

77 West Jackson Boulevard
Chicago, Illinois 60604-3590

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

(a) Pursuant to 326 IAC 2-8:

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

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

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

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

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

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

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

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

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

All required notifications shall be submitted to:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(1) initial inspection and evaluation;

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

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

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

(1) monitoring results;

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

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

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

(e) The Permittee shall maintain the following records:

(1) monitoring data;

(2) monitor performance data, if applicable; and

(3) corrective actions taken.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Stratospheric Ozone Protection

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

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

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

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

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) One (1) shoe dip tank constructed in 1974, identified as EU-06, exhausting to Stack 6, nominal capacity: 2,034 brake shoes per hour.

(b) One (1) metal backing plate dip tank, identified as EU-07, constructed in 2000, exhausting to Stack 7, nominal capacity: 923 metal backing plates per hour.

(c) One (1) spray paint booth constructed in 1969, identified as EU-11, equipped with five (5) high volume low pressure (HVLP) spray guns and dry filters to control particulate overspray, exhausting to Stack 11, nominal capacity: 429 metal brake parts per hour.

(d) One (1) spray paint booth constructed in 1973, identified as EU-12, equipped with ten (10) high volume low pressure (HVLP) spray guns and dry filters to control particulate overspray, exhausting to Stack 12, nominal capacity: 429 metal brake parts per hour.

(e) One (1) spray paint booth, identified as EU-15, equipped with eleven (11) high volume low pressure (HVLP) spray guns and dry filters to control particulate overspray, exhausting to Stack 15, nominal capacity: 429 metal brake parts per hour.

(f) One Axle Production Line, approved for construction in 2009, with a maximum capacity of 106 steel axles per hour, consisting of the following:

(1) One (1) electrostatic paint booth, identified as ESB-1, consisting of two (2) spay guns using electrostatic air atomized spray application, with particulate emissions controlled dry filters, and exhausting to stack ESB-1S.

(2) One (1) flash tunnel, identified as FT-1, with particulate emissions controlled by dry filters, and exhausting to stack FT-1S.

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

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

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-8-4] [326 IAC 2-2]

The total VOC usage for the one (1) shoe dip tank (EU-06), one (1) metal backing plate dip tank (EU-07), four (4) spray paint booths (EU-11, EU-12, EU-15, and ESB-1), and one adhesive application and curing process (ACO-2) (Section D.2), shall not exceed 62.65 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with this limit, combined with the potential emissions of VOC from all other emission units as this source, will limit the source-wide total potential to emit VOC to less than 100 tons per 12 consecutive month period and render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (PSD) not applicable.

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

Pursuant to 326 IAC 8-2-9, the owner or operator shall not allow the discharge into the atmosphere VOC from the one (1) metal backing plate dip tank, identified as EU-07, and two (2) spray paint booths, identified as EU-15 and ESB-1, in excess of three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, delivered to the applicator for air dried or forced warm air dried coatings.

D.1.3 Volatile Organic Compounds (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment of EU-07, EU-15, and ESB-1 during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

D.1.4 Particulate Matter (PM) and Particulate Matter Less Than Ten Microns (PM_{10}) [326 IAC 2-8-11.1 (d)(5)(E)] [326 IAC 2-8-4] [326 IAC 2-2]

Pursuant to 326 IAC 2-8-11.1(d)(5)(E), the input of solids to spray paint booth (EU-15) shall not exceed 99.6 tons per twelve (12) consecutive month period with compliance determined at the end of each month, equivalent to 24.9 tons of PM and PM_{10} per year each, based on a minimum transfer efficiency and minimum control efficiency of fifty percent (50%) each.

Compliance with these limits, combined with the potential PM and PM10 emissions from all other emission units at this source, shall limit the source-wide potential to emit PM and PM10 to less than two hundred fifty (250) tons per year and one hundred (100) tons per year, respectively, and render the requirements of 326 IAC 2-2 (PSD) and 326 IAC 2-7 (Part 70 Permits) not applicable.

D.1.5 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the PM from the four (4) spray paint booths (EU-11, EU-12, EU-15, and ESB-1) shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

D.1.6 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the four (4) spray paint booths (EU-11, EU-12, EU-15, and EBS-1) shall be controlled by dry filters, and the Permittee shall operate the control device in accordance with manufacturer(s) specifications.

D.1.7 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for EU-11, EU-12, EU-15, and ESB-1 as well as any control devices.

Compliance Determination Requirements

D.1.8 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC requirements for all surface coating operations as well as the content limitation for EU-07, EU-15, and ESB-1 contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the “as supplied” and “as applied” VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.1.9 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (Stacks 11, 12, 15, and

ESB-1S) while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

D.1.10 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC requirement and content limits established in Conditions D.1.1 and D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

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

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

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

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

(3) The cleanup solvent usage for each month;

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

(5) The weight of VOC emitted for each compliance period.

(b) To document compliance with Condition D.1.4, the Permittee shall maintain records of the input of solids to EU-15 each month.

(c) To document compliance with Condition D.1.9, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections.

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

D.1.11 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.4 shall be submitted to the address listed in Section C - General Reporting Requirements, of this

permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(g) One (1) adhesive application and curing process, constructed in 2007, identified as ACO-2, equipped with one (1) natural gas-fired adhesive oven, exhausting to Stack 17, nominal capacity: 1,580 brake linings per hour, nominal heat input capacity: 2 million British thermal units per hour.

(h) One (1) natural gas-fired cure oven, constructed in 2007, identified as CO-1, exhausting to Stack 16, nominal capacity: 1,580 brake linings per hour, nominal heat input capacity: 2 million British thermal units per hour;

(i) One (1) covered conveyor system, identified as EU-2, constructed in 2007, with particulate matter controlled by baghouse VFR-2 and exhausting to the indoors, which conveys dry frictional material to mixer (EU-1) at a nominal capacity of 535 pounds per hour and consisting of the following emission units:

(1) Seven (7) frictional dry material feed bins, constructed in 2007, identified as HML-1, HML-2, HML-3, HML-4, HML-5, HML-6, and TS-1, with particulate matter controlled by cartridge dust filter RVF-1 and exhausting to the indoors, nominal capacity: 172 pounds per hour total;

(2) Three (3) bulk bag feed bins, constructed in 2007, identified as BBS-1, BBS-2, and BBS-3, with particulate matter controlled by baghouse DCF-3 and exhausting to the indoors, nominal capacity: 253 pounds per hour total;

(3) One (1) bag dump station, construct in 2007, identified as BDS-1, with particulate matter controlled by cartridge dust filer BVF-4 and exhausting to the indoors, nominal capacity: 37 pounds per hour;

(4) One (1) fiberglass blowing system, constructed in 2007, identified as RM-1, with particulate matter controlled by baghouse VFR-2 and exhausting to the indoors, nominal capacity: 73 pounds per hour;

(j) One (1) mixer, constructed in 2007, identified as EU-1, with particulate matter controlled by baghouse VFR-2 and exhausting to the indoors, nominal capacity: 640 pounds per hour;

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

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

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 2-8-4] [326 IAC 2-2]

The total VOC usage for the one (1) shoe dip tank (EU-06), one (1) metal backing plate dip tank (EU-07), three (3) spray paint booths (EU-11, EU-12, and EU-15) (Section D.1), and one adhesive application and curing process (ACO-2), shall not exceed the limit contained in Condition D.1.1 of this permit.

D.2.2 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-1-6] [326 IAC 2-8-4]

(a) The potential to emit VOC from the brake lining mixture used in the cure oven process (emission unit CO-1) shall not exceed 195 pounds of VOC per ton of resin used.

(b) The total resin usage for the cure oven process (emission unit CO-1) shall not exceed 255.43 tons of resin per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with these limits will limit the cure oven process (emission unit CO-1) to less than 24.9 tons per 12 consecutive month period and render the requirements of 326 IAC 8-1-6 (BACT) and 326 IAC 2-7 (Part 70 Permits) not applicable.

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

D.2.3 Record Keeping Requirements

(a) To document compliance with Condition D.2.1, 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 content and VOC emission limitations established in Condition D.4.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

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

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

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

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

(3) The cleanup solvent usage for each month;

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

(5) The weight of VOC emitted for each compliance period.

(b) To document compliance with Condition D.2.2, the Permittee shall maintain records of the total resin usage for each month. Records maintained for resin usage shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limitations established in Condition D.2.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

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

D.2.4 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.2.1 and D.2.2(b) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(k) One (1) grinding system, constructed in 1975, identified as EU-14, equipped with six (6) grinders and dry filters for particulate control, exhausting inside, nominal capacity: 1,800 pounds of friction material per hour.

(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 Matter Less Than Ten Microns (PM_{10}) [326 IAC 2-8-4] [326 IAC 2-2]

The PM_{10} emission rates from the one (1) grinding system, identified as EU-14, shall not exceed 12.0 pounds per hour. Compliance with this limit, combined with the potential PM10 emissions from all other emission units at this source, shall limit the source-wide potential to emit PM10 to less than one hundred (100) tons per year and render the requirements of 326 IAC 2-2 (PSD) and 326 IAC 2-7 (Part 70 Permits) not applicable.

D.3.2 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate from the one (1) grinding system, identified as EU-14, shall not exceed 3.82 pounds per hour when operating at a process weight rate of 0.900 tons per hour.

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

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

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

Compliance with this limit, combined with the potential PM emissions from all other emission units at this source, shall limit the source-wide potential to emit PM to less than two hundred fifty (250) tons per year and render the requirements of 326 IAC 2-2 (PSD) not applicable.

D.3.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for one (1) grinding system, identified as EU-14 and its control device.

Compliance Determination Requirements

D.3.4 Particulate Control

In order to comply with Conditions D.3.1 and D.3.2, the dry filters for particulate control shall be in operation and control emissions from the one (1) grinding system, identified as EU-14, at all times that the one (1) grinding system, identified as EU-14, is in operation.

D.3.5 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

(a) For any change or modification that causes the exhaust from the one (1) grinding system, identified as EU-14 to vent to the outside atmosphere, within one hundred eighty (180) days after the change or modification, in order to demonstrate compliance with Condition D.3.1, the Permittee shall perform PM testing on EU-14 utilizing methods as approved by the commissioner.

(b) For any change or modification that causes the exhaust from the one (1) grinding system, identified as EU-14 to vent to the outside atmosphere, within 180 days of publication of the new or revised condensable PM test method(s) referenced in the U.S. EPA's Final Rule for Implementation of the New Source Review (NSR) Program for Particulate Matter Less Than 2.5 Micrometers ($PM_{2.5}$), signed May 8th, 2008, in order to demonstrate compliance with Condition D.3.1, the Permittee shall perform $PM_{2.5}$ and PM_{10} testing on the exhaust for EU-14 utilizing methods as approved by the Commissioner. When venting to the outside atmosphere, the test shall be repeated at least once every five (5) years from the date of the valid compliance demonstration. Testing when venting to the outside atmosphere, shall be conducted in accordance with Section C - Performance Testing.

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

D.3.6 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the dry filters. To monitor the performance of the dry filters, weekly observations shall be made of the visible emissions from the one (1) grinding system, identified as EU-14, when exhausting to the outside atmosphere. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

(b) The Permittee shall implement an operator-training program.

(1) All operators that perform grinding operations using grinding equipment shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained upon issuance of FESOP 113-26682-00008 if training was not completed within the last twelve (12) months. All new operators shall be trained within thirty (30) days of hiring or transfer.

(2) Training shall include proper filter alignment, filter inspection on a daily basis, maintenance, and trouble shooting practices. The training program shall be written and include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within one (1) hour for inspection by IDEM, OAQ.

(3) All operators shall be given refresher training annually.

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

D.3.7 Record Keeping Requirements

(a) To document compliance with Condition D.3.6(a), the Permittee shall maintain records of the results of the inspections required under Condition D.3.6(a).

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

SECTION D.4 EMISSIONS UNIT OPERATION CONDITIONS

Insignificant Activities:

(a) Source-wide natural gas-fired combustion, nominally rated at 40.72 million British thermal units per hour total, consisting of the following:

(1) Three (3) air makeup units, nominal heat input capacity: 5.00 million British thermal units per hour each;

(2) Eight (8) heaters/air conditioners, nominal heat input capacity: 0.475 million British thermal units per hour each;

(3) Twenty-five (25) natural gas-fired space heaters, nominal heat input capacity: 0.150 million British thermal units per hour each;

(4) Three (3) bonders, nominal heat input capacity: 0.800 million British thermal units per hour each;

(5) Three (3) parts washers, nominal heat input capacity: 0.650 million British thermal units per hour each;

(6) One (1) parts washer, nominal heat input capacity: 0.880 million British thermal units per hour;

(7) One (1) parts washer, nominal heat input capacity: 1.80 million British thermal units per hour;

(8) One (1) parts washer, nominal heat input capacity: 4.80 million British thermal units per hour;

(9) Three (3) office furnaces, nominal heat input capacity: 0.080 million British thermal units per hour each;

(10) One (1) natural gas-fired boiler, approved for construction in 2007, exhausting to Stack 18, nominal heat input capacity: 0.16 million British thermal units per hour; and

(11) Four (4) natural gas-fired heaters, approved for construction in 2007, nominal heat input capacity: 0.475 million British thermal units per hour each.

(12) One (1) natural gas-fired Building 1 parts washer, with a nominal heat input capacity of 0.8 million British thermal units per hour. This washer uses a non-VOC and a non-HAP spray cleaner.

(13) One (1) natural gas-fired Building 2 parts washer, with a nominal heat input capacity of 1.8 million British thermal units per hour. This washer uses a non-VOC and a non-HAP spray cleaner.

(14) Eight (8) natural gas-fired Building 2 heating and air conditioning units, each are nominally rated at 0.175 million British thermal units per hour for a nominal total of 1.4 million British thermal units per hour.

(15) One (1) steel hardening oven, identified as OI-1, approved for construction in

2009, exhausting to Stack OI-1, nominal heat input capacity: 0.80 million British thermal units per hour.

(16) Fifteen (15) natural gas-fired Building 4 heating and air conditioning units, approved for construction in 2009, identified as UH1 through UH15, each is nominally rated at 0.25 million British thermal units per hour for a nominal total of 3.75 million British thermal units per hour.

(b) Three (3) metal inert gas (MIG) welding stations, using L50 welding wire, nominal capacity: 6.00 pounds of welding wire per hour each.

(c) Eleven (11) gas metal arc welding (GMAW) welding stations, each with a maximum welding wire usage rate of 4.54 pounds per hour (GMAW Wire Type ER70S) and exhausting within the building.

(d) Grinding and machining operation controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, consisting of the following:

1. One (1) bullard system, consisting of eight (8) bullard machines, equipped with dry filters for particulate control, nominal capacity: 85 parts (3,443 pounds) per hour.

(e) Paved and unpaved roads and parking lots with public access.

(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.4.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate from the insignificant bullard system, shall not exceed 5.90 pounds per hour when operating at a process weight rate of 1.72 tons per hour.

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

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

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

Compliance Determination Requirements

D.4.2 Particulate Control

In order to comply with Condition D.4.1, the dry filters for particulate control shall be in operation and control emissions from the insignificant bullard system at all times that the insignificant bullard system is in operation.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Dexter Axle Company
Source Address: 500 South Seventh Street, Albion, Indiana 46701
Mailing Address: P.O. Box 108, Albion, Indiana, 46701
FESOP Permit No.: F113-26682-00008

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

Please check what document is being certified:

☐ Annual Compliance Certification Letter

☐ Test Result (specify)_____

☐ Report (specify)_____

☐ Notification (specify)_____

☐ Affidavit (specify)_____

☐ Other (specify)_____

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

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT

Source Name: Dexter Axle Company
Source Address: 500 South Seventh Street, Albion, Indiana 46701
Mailing Address: P.O. Box 108, Albion, Indiana, 46701
FESOP Permit No.: F113-26682-00008

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

□ This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (**2**) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16

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

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

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by:_____

Title / Position:_____

Date:_____

Phone: _____

A certification is not required for this report.

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

FESOP Quarterly Report

Source Name: Dexter Axle Company
Source Address: 500 South Seventh Street, Albion, Indiana 46701
Mailing Address: P.O. Box 108, Albion, Indiana, 46701
FESOP Permit No.: F113-26682-00008
Facility: Spray Paint Booth (EU-15)
Parameter: Input of solids
Limit: Not to exceed 99.6 tons per twelve consecutive month period with compliance determined at the end of each month, equivalent to 24.9 tons of PM and PM_{10} per year each.

YEAR:_____

Month	Input of Solids (tons)	Input of Solids (tons)	Input of Solids (tons)
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
Deviation has been reported on:_____

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

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Dexter Axle Company
Source Address: 500 South Seventh Street, Albion, Indiana 46701
Mailing Address: PO Box 108, Albion, Indiana 46701
FESOP Permit No.: F113-17172-00008
Facility: One (1) adhesive application and curing process (ACO-2), one (1) shoe dip tank (EU-06), one (1) metal backing plate dip tank (EU-07), and four (4) spray paint booths (EU-11, EU-12, EU-15, and ESB-1)
Parameter: VOC Usage
Limit: Not to exceed 62.65 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR:_____

Month	VOC Usage (tons)	VOC Usage (tons)	VOC Usage (tons)
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
Deviation has been reported on:_____

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

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Dexter Axle Company
Source Address: 500 South Seventh Street, Albion, Indiana 46701
Mailing Address: PO Box 108, Albion, Indiana 46701
FESOP Permit No.: F113-17172-00008
Facility: One (1) Natural Gas-Fired Cure Oven (CO-1)
Parameter: Resin Usage
Limit: Not to exceed 255.43 tons of resin per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR:_____

Month	**Resin Usage (tons)**	**Resin Usage (tons)**	**Resin Usage (tons)**
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

□ No deviation occurred in this quarter.

□ Deviation/s occurred in this quarter.
Deviation has been reported on:_____

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

Attach a signed certification to complete this report.

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

Source Name: Dexter Axle Company
Source Address: 500 South Seventh Street, Albion, Indiana 46701
Mailing Address: P.O. Box 108, Albion, Indiana, 46701
FESOP Permit No.: F113-26682-00008

Months: _____ to _____ Year: _____

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked ANo deviations occurred this reporting period@.

□ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

□ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

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

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

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

Form Completed by:_____

Title / Position:_____

Date:_____

Phone: _____

Attach a signed certification to complete this report.

SUMMARY OF EMISSIONS

Company Name: Dexter Axle Company
Address City IN Zip: 500 South Seventh Street, Albion, IN 46701
Permit Number: 113-27395-00008
Plt ID: 113-00008
Reviewer: Jason R. Krawczyk
Date: January 28, 2009

Uncontrolled Emissions (Tons/Yr)

Pollutant	Combustion	CO-1	ACO-2	Surface Coating					ESB-1 & FT-1	Grinding	Welding	Covered Conveyor	Mixer	Bullard System	Unpaved Roads (Fugitive) (3)	Total PTE	
				EU-06	EU-07	EU-11	EU-12	EU-15									
PM	0.41	-	-	0.00	0.00	27.95	27.95	27.95	24.77	275.94	3.08	1.17	1.40	128.20	21.63	518.82	
PM10	1.64	-	-	0.00	0.00	27.95	27.95	27.95	24.77	275.94	3.08	1.17	1.40	12.82	5.51	404.67	
PM2.5	1.64	-	-	0.00	0.00	27.95	27.95	27.95	24.77	275.94	3.08	1.17	1.40	12.82	0.55	404.67	
VOC	1.19	76.24	16.50	26.25	24.50	6.69	6.69	6.69	55.45	-	-	-	-	-	-	220.19	
NOx	21.56	-	-	-	-	-	-	-	-	-	-	-	-	-	-	21.56	
SO2	0.13	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.13	
CO	18.11	-	-	-	-	-	-	-	-	-	-	-	-	-	-	18.11	
Single HAP	0.39	1.52	-	0.32	-	-	-	-	0.01	-	0.00	-	-	-	-	1.52	Ethyl Benzene
Combined HAPs	0.41	3.05	0.99	0.32	-	-	-	-	0.01	-	0.00	-	-	-	-	4.78	

Controlled Emissions (Tons/Yr)

Pollutant	Combustion	CO-1	ACO-2	Surface Coating					ESB-1 & FT-1	Grinding	Welding	Covered Conveyor	Mixer	Bullard System	Unpaved Roads (Fugitive) (3)	Total PTE	
				EU-06	EU-07	EU-11	EU-12	EU-15									
PM	0.41	-	-	0.00	0.00	2.24	2.24	24.90	2.48	0.03	3.08	0.00	0.00	12.82	10.81	48.19	
PM10	1.64	-	-	0.00	0.00	2.24	2.24	24.90	2.48	0.03	3.08	0.00	0.00	1.28	2.76	37.88	
PM2.5	1.64	-	-	0.00	0.00	2.24	2.24	24.90	2.48	0.03	3.08	0.00	0.00	1.28	0.28	37.88	
VOC	1.19	76.24	16.50	26.25	24.50	6.69	6.69	6.69	55.45	-	-	-	-	-		220.19	
NOx	21.56	-	-	-	-	-	-	-	-	-	-	-	-	-		21.56	
SO2	0.13	-	-	-	-	-	-	-	-	-	-	-	-	-		0.13	
CO	18.11	-	-	-	-	-	-	-	-	-	-	-	-	-		18.11	
Single HAP	0.39	1.52	-	0.32	-	-	-	-	0.01	-	0.00	-	-	-		1.52	Ethyl Benzene
Combined HAPs	0.41	3.05	0.99	0.32	-	-	-	-	0.01	-	0.00	-	-	-		4.78	

Limited PTE (Tons/Yr)

Pollutant	Combustion	CO-1	ACO-2	Surface Coating					ESB-1 & FT-1	Grinding	Welding	Covered Conveyor	Mixer	Bullard System	Unpaved Roads (Fugitive) (3)	Total PTE	
				EU-06	EU-07	EU-11	EU-12	EU-15									
PM (2)	0.41	-	-	0.00	0.00	2.24	2.24	24.90	2.48	16.73	3.08	1.17	1.40	12.82	10.81	67.47	
PM10 (2)	1.64	-	-	0.00	0.00	2.24	2.24	24.90	2.48	52.56	3.08	1.17	1.40	1.28	2.76	92.99	
PM2.5	1.64	-	-	0.00	0.00	2.24	2.24	24.90	2.48	52.56	3.08	1.17	1.40	1.28	0.28	92.99	
VOC (1)	1.19	24.90				62.65				-	-	-	-	-	-	88.74	
NOx	21.56	-	-	-	-	-	-	-	-	-	-	-	-	-	-	21.56	
SO2	0.13	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.13	
CO	18.11	-	-	-	-	-	-	-	-	-	-	-	-	-	-	18.11	
Single HAP	0.39	0.50	0.83	0.32	-	-	-	-	0.01	-	0.00	-	-	-	-	0.83	Phenol
Combined HAPs	0.41	1.00	0.99	0.32	-	-	-	-	0.01	-	0.00	-	-	-	-	2.73	

Note:

(1) Emission Units EU-06, EU-07, EU-11, EU-12, EU-15, ESB-1, and ACO-2 have a combined limited potential to emit after issuance of 62.25 tons per year VOC

(2)Condition D.1.4 of the permit limits the input of solids to EU-15 to 99.6 tons per twelve (12) consecutive month period with compliance determined at the end of each month, which is the equivalent to 24.9 tons of Particulate per year, based on a minimum transfer efficiency and minimum control efficiency of fifty percent (50%).

(3)Fugitive Emissions are not counted toward the determination of Part 70 or PSD applicablility.

Assumed: PM10 = PM2.5

Appendix A: Emissions Calculations
Natural Gas Combustion Only
From Insignificant Activities

Company Name: Dexter Axle Company
Address City IN Zip: 500 South Seventh Street, Albion, IN 46701
Permit Number: 113-27395-00008
Plt ID: 113-00008
Reviewer: Jason R. Krawczyk
Date: January 28, 2009

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr	Emission Units
15.00	131.4	(3) air make-up units @ 3.0 MMBtu each
3.80	33.3	(8) heaters/air conditioners @ 0.475 MMBtu each
3.75	32.9	(25) space heaters @ 0.15 MMBtu each
2.40	21.0	(3) bonders @ 0.8 MMBtu each
1.95	17.1	(3) parts washers @ 0.65 MMBtu each
0.88	7.7	(1) parts washer @ 0.88 MMBtu
1.80	15.8	(1) parts washer @ 1.8 MMBtu
4.80	42.0	(1) parts washer @ 4.8 MMBtu
0.24	2.1	(3) office furnaces @ 0.08 MMBtu each
0.16	1.4	(1) boiler @ 0.16 MMBtu
1.90	16.6	(4) heaters @ 0.475 MMBtu each
0.80	7.0	(1) building 1 parts washer @ 0.8 MMBtu
1.80	15.8	(1) building 2 parts washer @ 1.8 MMBtu
1.40	12.3	(8) building 2 heating/air conditioning units @ 0.175 MMBtu each
3.75	32.9	(15) building 4 space heaters @ 0.25 MMBtu each
0.80	7.0	(1) steel hardening oven @ 0.80 MMBtu
45.23	396.2	

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.38	1.51	0.12	19.81	1.09	16.64

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
See page 3 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
HAPs Emissions

Company Name: Dexter Axle Company
Address City IN Zip: 500 South Seventh Street, Albion, IN 46701
Permit Number: 113-27395-00008
Plt ID: 113-00008
Reviewer: Jason R. Krawczyk
Date: January 28, 2009

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	4.160E-04	2.377E-04	1.486E-02	3.566E-01	6.736E-04

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	9.905E-05	2.179E-04	2.774E-04	7.528E-05	4.160E-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
VOC and HAPs
From Cure Oven (CO-1)

Company Name: **Dexter Axle Company**
Address City IN Zip: **500 South Seventh Street, Albion, Indiana 46701**
Permit Number: **113-27395-00008**
Plt ID: **113-00008**
Reviewer: **Jason R. Krawczyk**
Date: **January 28, 2009**

Potential to Emit (Unlimited)												
Material	Density (Lb/Gal)	Weight % Volatile (H20 & 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	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year
Carbolite Resin	7.5	20.00%	0.0%	20.0%	0.0%	0.00%	0.007335	1580.000	1.502	17.41	417.77	76.24
									Total	**17.41**	**417.77**	**76.24**

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating less Water (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating less Water (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating less Water (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Potential to Emit (Unlimited)													
Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Ethyl Benzene*	Weight % Phenol	Weight % Xylene*	Weight % Toluene*	Weight % Formaldehyde	Ethyl Benzene Emissions (ton/yr)	Phenol Emissions (ton/yr)	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)
Carbolite Resin	7.5	0.007335	1580.00	2.00%	0.00%	1.00%	1.00%	0.00%	1.52	0.00	0.76	0.76	0.00
								Total	**1.52**	**0.00**	**0.76**	**0.76**	**0.00**
								Total HAPs	**3.05**				

Methodology:

Potential HAPs (Tons per Year) = Weight % HAPs * Potential Unlimited VOC tons per year

* Carbolite Resin contains Naptha (CAS # 8030-30-6). According to 40 CFR 63 aliphatic solvent types typically have an organic HAP composition (% by mass) of 1% Xylene, 1% Toluene, and 1% Ethylbenzene

Appendix A: Emissions Calculations
Natural Gas Combustion Only
From Cure Oven (CO-1)

Company Name: **Dexter Axle Company**
Address City IN Zip: **500 South Seventh Street, Albion, IN 46701**
Permit Number: **113-26682-00008**
Plt ID: **113-00008**
Reviewer: **Jason R. Krawczyk**
Date: **August 25, 2008**

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr	Emission Units
2.00	17.5	(1) cure oven CO1 @ 2.0 MMBtu

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.02	0.07	0.01	0.88	0.05	0.74

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology:
All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
See page 6 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
From Cure Oven (CO-1)
HAPs Emissions

Company Name: **Dexter Axle Company**
Address City IN Zip: **500 South Seventh Street, Albion, IN 46701**
Permit Number: **113-26682-00008**
Plt ID: **113-00008**
Reviewer: **Jason R. Krawczyk**
Date: **August 25, 2008**

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	1.840E-05	1.051E-05	6.570E-04	1.577E-02	2.978E-05

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	4.380E-06	9.636E-06	1.226E-05	3.329E-06	1.840E-05

Methodology is the same as page 5.

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
VOC and HAPs
From Adhesive Oven (ACO-2)

Company Name: **Dexter Axle Company**
Address City IN Zip: **500 South Seventh Street, Albion, Indiana 46701**
Permit Number: **113-27395-00008**
Plt ID: **113-00008**
Reviewer: **Jason R. Krawczyk**
Date: **January 28, 2009**

Potential to Emit (Unlimited)												
Material	Density (Lb/Gal)	Weight % Volatile (H20 & 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	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year
Adhesive	8.1	52.00%	0.0%	52.0%	0.0%	0.00%	0.000565	1580.000	4.22	3.77	90.41	16.50
									Total	**3.77**	**90.41**	**16.50**

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating less Water (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating less Water (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating less Water (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Potential to Emit (Unlimited)													
Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Ethyl Benzene*	Weight % Phenol	Weight % Xylene*	Weight % Toluene*	Weight % Formaldehyde	Ethyl Benzene Emissions (ton/yr)	Phenol Emissions (ton/yr)	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)
Adhesive	8.1	0.000565	1580.00	0.00%	5.00%	0.00%	0.00%	1.00%	0.00	0.83	0.00	0.00	0.17
								Total	**0.00**	**0.83**	**0.00**	**0.00**	**0.17**
								Total HAPs	**0.99**				

METHODOLOGY

Potential HAPs (Tons per Year) = Weight % HAPs * Potential Unlimited VOC tons per year

Appendix A: Emissions Calculations
Natural Gas Combustion Only
From Adhesive Oven (ACO-2)

Company Name: **Dexter Axle Company**
Address City IN Zip: **500 South Seventh Street, Albion, IN 46701**
Permit Number: **113-26682-00008**
Plt ID: **113-00008**
Reviewer: **Jason R. Krawczyk**
Date: **January 28, 2009**

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr	Emission Units
2.00	17.5	(1) adhesive application & curing process ACO2 @ 2.0 MMBtu

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.02	0.07	0.01	0.88	0.05	0.74

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology:
All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
See page 9 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
From Adhesive Oven (ACO-2)
HAPs Emissions

Company Name: **Dexter Axle Company**
Address City IN Zip: **500 South Seventh Street, Albion, IN 46701**
Permit Number: **113-26682-00008**
Plt ID: **113-00008**
Reviewer: **Jason R. Krawczyk**
Date: **January 28, 2009**

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	1.840E-05	1.051E-05	6.570E-04	1.577E-02	2.978E-05

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	4.380E-06	9.636E-06	1.226E-05	3.329E-06	1.840E-05

Methodology is the same as page 8.

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
VOCs, Particulate, HAPs
From Surface Coating Operations
Electrostatic Paint Booth ESB-1 and Flash Tunnel FT-2

Company Name: Dexter Axle Company
Address City IN Zip: 500 South Seventh Street, Albion, IN 46701
Permit Number: 113-27395-00008
Plt ID: 113-00008
Reviewer: Jason R. Krawczyk
Date: January 28, 2009

Volatile Organic Comounds (VOC) and Particulate Matter (PM)

Operation and Material*	Primary Type of Surface Coated	Density (lb/gal)	Weight % Volatile (H20 & Organics)	Weight % Water + Non-VOCs	Weight % Solids	Weight % VOCs	Volume % Water + Non-VOCs	Volume % Solids	Usage (gal/unit)	Maximum Capacity (unit/hr)	Maximum Usage (gal/day)	Maximum Usage (lb/hr)	Pounds VOC per gallon of coating less water and non-VOCs	Pounds VOC per gallon of coating	PTE VOC (lb/hr)	PTE VOC (lb/day)	PTE VOC (tons/yr)	PTE PM/PM10/PM2.5 (lb/hr)	PTE PM/PM10/PM2.5 (tons/yr)	lb VOC per gal solids	Transfer Efficiency	Control Efficiency
Z Shield 7900	Metal	10.76	33.0%	3.0%	67.0%	30.0%	3.90%	56.0%	0.0370	106.0	94.13	42.20	3.36	3.23	12.66	303.85	55.45	5.65	24.77	5.76	80%	90.0%

* Transfer efficiency of electrostatic application concervatively estimated at 80%

Total Uncontrolled Potential to Emit (PTE) =	**12.66**	**303.85**	**55.45**	**5.65**	**24.77**
Total Controlled Potential to Emit (PTE) =	**12.66**	**303.85**	**55.45**	**0.57**	**2.48**

Methodology:

Maximum Usage (gal/day) = [Usage (gal/unit)] * [Maximum Capacity (units/hour)] * [24 hours/day]
Maximum Usage (lbs/hr) = [Maximum Usage (gal/day)] * [Density (lb/gal)] / [24 hour/day]
Pounds of VOC per Gallon Coating less Water and non-VOCs = [Density (lb/gal)] * [Weight % VOCs] / [1 - (Volume % water and non-VOCs)]
Pounds of VOC per Gallon Coating = [Density (lb/gal)] * [Weight % VOCs]
PTE of VOC (lbs/hr) = [Maximum Usage (lbs/hr)] * [Weight % VOCs]
PTE of VOC (lbs/day) = [PTE of VOC (lbs/hr)] * [24 hours/day]
PTE of VOC (tons/yr) = [PTE of VOC (lbs/day)] * [(365 days/yr)] * [1 ton/2000 lbs]
PTE of PM/PM10 (tons/yr) = [Density (lbs/gal)] * [Maximum Usage (gal/day)] * [(Weight % Solids)] * [1 - Transfer efficiency)] * [365 days/yr] * [1 ton/2000 lbs]
Pounds VOC per Gallon of Solids = [Density (lbs/gal)] * [Weight % VOCs] / [Volume % solids]
Controlled PTE = [Uncontrolled PTE] * [1 - Control Efficiency]
Actual Emissions of VOCs (lbs/day) = [Uncontrolled PTE of VOCs (lbs/hour)] * [Actual Hours of Operation (hours/day)]

Hazardous Air Pollutants (HAPs)

Operation and Material	PTE of VOC (tons/yr)	Weight % Xylene*	PTE of Xylene (tons/yr)
Z Shield 7900	55.45	0.025%	1.4E-02
	TOTAL (tons/year)		**1.4E-02**

Methodology:

HAPS emission rate (tons/yr) = [PTE of VOC (tons/yr)] * Weight % HAP

Z Sheild 7900 contains 0.5% Aromatic 100 (CAS No. 64742-95-6), which is conservatively estimated to consist of 5% xylene, based on 40 CFR 63. Therefore, Z Shield 7900 will have a xylene content of (0.5%)(5.0%) = 0.025% by weight

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

Company Name: Dexter Axle Company
Address City IN Zip: 500 South Seventh Street, Albion, Indiana 46701
Permit Number: 113-27395-00008
Plt ID: 113-00008
Reviewer: Jason R. Krawczyk
Date: January 28, 2009

Potential to Emit of Existing Units (Unlimited)

Material	Density (lbs/gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (units/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)	Uncontrolled Particulate PTE (tons/yr)	Controlled Particulate PTE (tons/yr)*	lbs VOC/gal solids	Transfer Efficiency	PM Control Efficiency
Shoe Dip Tank EU-06																		
BSL 79-30	7.05	70.35%	61.99%	8.4%	0.00%	0.00%	0.005	2034	0.59	0.59	5.99	144	26.3	0.00	0.00	N/A	100.00%	92.00%
Backing Dip Tank EU-07																		
Black Backing	8.61	68.42%	56.69%	11.73%	0.00%	0.00%	0.006	923	1.01	1.01	5.6	134	24.5	0.00	0.00	N/A	100.00%	92.00%
Spray Booth EU-11																		
Black (water based)	11.38	53.80%	52.29%	1.51%	0.00%	37.14%	0.0055	429	0.17	0.17	0.41	9.7	1.8	13.58	1.09	0.46	75.00%	92.00%
Tan (water based)	12.12	41.50%	40.16%	1.34%	0.00%	42.0%	0.0065	429	0.162	0.162	0.45	10.9	1.98	21.65	1.73	0.39	75.00%	92.00%
Red Enamel (water based)	11.58	42.50%	41.06%	1.44%	0.00%	43.2%	0.0065	429	0.167	0.167	0.46	11.2	2.04	20.33	1.63	0.39	75.00%	92.00%
Red Oxide (water based)	12.28	43.00%	41.63%	1.37%	0.00%	41.0%	0.0085	429	0.168	0.168	0.61	14.7	2.69	27.95	2.24	0.41	75.00%	92.00%
Blue Lacquer (water based)	8.43	76.84%	63.65%	13.2%	0.00%	22.7%	0.0032	429	1.11	1.11	1.53	36.6	6.69	2.93	0.23	4.90	75.00%	92.00%
Spray Booth EU-12																		
Black Enamel (water based)	11.38	53.80%	52.29%	1.51%	0.00%	37.14%	0.0055	429	0.17	0.17	0.41	9.7	1.8	13.58	1.09	0.46	75.00%	92.00%
Tan (water based)	12.12	41.50%	40.16%	1.34%	0.00%	42.0%	0.0065	429	0.162	0.162	0.45	10.9	1.98	21.65	1.73	0.39	75.00%	92.00%
Red Enamel (water based)	11.58	42.50%	41.06%	1.44%	0.00%	43.2%	0.0065	429	0.167	0.167	0.46	11.2	2.04	20.33	1.63	0.39	75.00%	92.00%
Red Oxide (water based)	12.28	43.00%	41.63%	1.37%	0.00%	41.0%	0.0085	429	0.168	0.168	0.61	14.7	2.69	27.95	2.24	0.41	75.00%	92.00%
Blue Lacquer (water based)	8.43	76.84%	63.65%	13.2%	0.00%	22.7%	0.0032	429	1.11	1.11	1.53	36.6	6.69	2.93	0.23	4.90	75.00%	92.00%
Spray Booth EU-15																		
Black Enamel (water based)	11.38	53.80%	52.29%	1.51%	0.00%	37.14%	0.0055	429	0.17	0.17	0.41	9.7	1.8	13.58	1.09	0.46	75.00%	92.00%
Tan (water based)	12.12	41.50%	40.16%	1.34%	0.00%	42.0%	0.0065	429	0.162	0.162	0.45	10.9	1.98	21.65	1.73	0.39	75.00%	92.00%
Red Enamel (water based)	11.58	42.50%	41.06%	1.44%	0.00%	43.2%	0.0065	429	0.167	0.167	0.46	11.2	2.04	20.33	1.63	0.39	75.00%	92.00%
Red Oxide (water based)	12.28	43.00%	41.63%	1.37%	0.00%	41.0%	0.0085	429	0.168	0.168	0.61	14.7	2.69	27.95	24.90	0.41	75.00%	92.00%
Blue Lacquer (water based)	8.43	76.84%	63.65%	13.2%	0.00%	22.7%	0.0032	429	1.11	1.11	1.53	36.6	6.69	2.93	0.23	4.90	75.00%	92.00%
Potential to Emit			**Add worst case coating to all solvents**							**Total:**	**16.17**	**387.99**	**70.81**	**83.85**	**29.37**			

Notes:

* Condition D.1.4 of the permit limits the input of solids to EU-15 to 99.6 tons per twelve (12) consecutive month period with compliance determined at the end of each month, which is the equivalent to 24.9 tons of Particulate per year, based on a minimum transfer efficiency and minimum control efficiency of fifty percent (50%).

Methodology:

Pounds of VOC per Gallon Coating less Water = (Density (lbs/gal) * Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lbs/gal) * Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

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

Total = Worst Coating + Sum of all solvents used

Appendix A: Emission Calculations
HAP Emissions
From Surface Coating Operations

Company Name: Dexter Axle Company
Address City IN Zip: 500 South Seventh Street, Albion, Indiana 46701
Permit Number: 113-27395-00008
Plt ID: 113-00008
Reviewer: Jason R. Krawczyk
Date: January 28, 2009

Material	Density (lbs/gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Formaldehyde (%)	Formaldehyde Emissions (tons/yr)
Shoe Dip Tank EU-06					
Shoe Dip	7.09	0.005	2034	0.100%	0.316
				Total HAPs:	**0.316**

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

Appendix A: Emissions Calculations
Particulate Emissions From Grinding

Company Name: **Dexter Axle Company**
Address City IN Zip: **500 South Seventh Street, Albion, Indiana 46701**
Permit Number: **113-27395-00008**
Plt ID: **113-00008**
Reviewer: **Jason R. Krawczyk**
Date: **January 28, 2009**

Shoe Grinding Systems

Emission Unit	Capacity (lbs/hr)	Percentage (%) of Capacity Collected	Potential to Emit PM/PM10/PM2.5 Before Controls (lbs/hr)	Potential to Emit PM/PM10/PM2.5 Before Controls (tons/yr)	Control Efficiency(%)	Potential to Emit PM/PM10PM2.5 After Controls (tons/yr)
EU-14	1800	3.50%	63.0	275.94	99.99%	0.028

Note that the grinding systems are controlled by a HEPA Filtration System

Methodology:
The Percentage Capacity Collected is based on the amount of non-asbestos material processed through the grinding system
Potential to Emit PM and PM-10 Before Controls (lbs/hr) = Capcity (lbs/hr) * Percentage (%) Capacity Collected
Potential to Emit PM and PM-10 Before Controls (tons/yr) = Potential to Emit PM and PM-10 (lbs/hr) * (1 ton/2,000 lbs) * (8,760 hrs/yr)
Potential to Emit PM and PM-10 After Controls (tons/yr) = Potential to Emit PM and PM-10 Before Controls (tons/yr) * (1 - Control Effiency %)
Asbestos has been replaced with Friction Material at this Emission Unit.
Friction Material does not contain any HAPs

Appendix A: Emissions Calculations
Emissions from Welding

Company Name: Dexter Axle Company
Address City IN Zip: 500 South Seventh Street, Albion, Indiana 46701
Permit Number: 113-27395-00008
Plt ID: 113-00008
Reviewer: Jason R. Krawczyk
Date: January 28, 2009

PROCESS	Number of Stations	Max. electrode consumption per station	EMISSION FACTORS * (lb pollutant / lb electrode)				EMISSIONS (lb/hr)				TOTAL HAPS (lb/hr)
WELDING		(lbs/hr)	PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Metal Inert Gas (MIG)(L50)	3	6	0.0241	0.000034		0.00001	0.434	0.0006	0.000	0.0002	0.001
Gas Metal Arc Welding (GMAW) (ER70	11	4.54	0.0054	0.000318	0.000001	0.000001	0.270	0.0159	0.000	0.0000	0.016
EMISSION TOTALS							PM = PM10	Mn	Ni	Cr	Total HAPs
Potential Emissions lbs/hr							0.703	0.0165	0.000	0.0002	0.017
Potential Emissions lbs/day							16.9	0.396	0.00	0.006	0.403
Potential Emissions tons/year							**3.08**	0.0722	0.000	0.0010	**0.004**

Methodology:

*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column. Consult AP-42 or other reference for different electrode types.

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

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

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

Welding and other flame cutting emission factors are from an internal training session document.

See AP-42, Chapter 12.19 for additional emission factors for welding.

Appendix A: Emissions Calculations
Particulate Emissions From Bullard System

Company Name: Dexter Axle Company
Address City IN Zip: 500 South Seventh Street, Albion, Indiana 46701
Permit Number: 113-27395-00008
Plt ID: 113-00008
Reviewer: Jason R. Krawczyk
Date: January 28, 2009

Insignificant Machining

Emission Unit	Capacity	Weight of Part	Process Weight Rate		Emission Factors		PTE PM Before Controls		PTE PM-10/PM2.5 Before Controls		Control Efficiency	PTE PM After Controls	PTE PM10/PM2.5 After Controls
Bullard System	(parts/hr)	(lbs/part)	(lbs/hr)	(tons/hr)	PM (lbs/ton)	PM10 / PM2.5 (lbs/ton)	(lbs/hr)	(tons/yr)	(lbs/hr)	(tons/yr)	(%)	(tons/yr)	(tons/yr)
	85	40.51	3443	1.72	17	1.7	29.27	128	2.93	12.82	90.00%	12.82	1.28

Methodology:
Weight Rate (tons/hr) = Capacity * Weight of Part (lbs/part) = Weight Rate (lbs/hr) * (1 ton/2000lbs)
Potential to Emit PM or PM10 Before Controls (tons/yr) = Weight Rate (tons/hr) * PM or PM-10 Emission Factor (lbs/ton) * (2000lbs/ton)
Potential to Emit PM and PM-10 After Controls (tons/yr) = Potential to Emit PM and PM-10 Before Controls (tons/yr) * (1 - Control Effiency %)
PM and PM-10 Emission Factors are from FIRES 6.23 SCC# 3-04-003-40 For Grinding and Machining of Gray Iron

Appendix A: Emissions Calculations
Particulate Emissions from Covered Conveyor System (EU-2)

Company Name: **Dexter Axle Company**
Address City IN Zip: **500 South Seventh Street, Albion, Indiana 46701**
Permit Number: **113-27395-00008**
Plt ID: **113-00008**
Reviewer: **Jason R. Krawczyk**
Date: **January 28, 2009**

Potential to Emit from Material Handling Process					
Facility/Operation	Throughput (lb/hr)	Emission Factor [a, b] (lb/ton)	Uncontrolled PM/PM10/PM2.5 Emissions (ton/yr)	Control Efficiency (%)	Controlled PM/PM10/PM2.5 Emissions (ton/yr)
Frictional Dry Ingredient Feed Bins, HML-1 through HML-6 and TS-1 exhausting to RVF-1	172	PM = 1 PM10 = 1 PM2.5 = 1	0.37668	99.98%	7.53E-05
Bulk Bag Feed Bins, BBS-1 through BBS-3 exhausting to DCF-3	253	PM = 1 PM10 = 1 PM2.5 = 1	0.55407	99.90%	5.54E-04
Bag Dump Station, BDS-1 exhausting to BVF-4	37	PM = 1 PM10 = 1 PM2.5 = 1	0.08103	99.90%	8.10E-05
Fiberglass Blowing System, RM-1 exhausting to VFR-2	73	PM = 1 PM10 = 1 PM2.5 = 1	0.15987	99.90%	1.60E-04
		Total	**1.17**		**8.70E-04**

Methodology:

PM/PM10/PM2.5 Uncontrolled Emissions (ton/yr) = Throughput (lb/hr) * 1/2000 (ton/lb) * Emission Factor (lb/ton) * 8760 hours * 1/2000 (ton/lb)

PM/PM10/PM2.5 Controlled Emissions (ton/yr) = PM/PM10 Uncontrolled Emissions (ton/yr) * (1-Efficiency of Control Device %)

[a]PM/PM10 emission factor provided by source and is greater than any similar emission factor found in AP-42 for the types of material handled during this process.

[b]US EPA has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions

Appendix A: Emissions Calculations
Particulate Emissions from Mixer EU-1

Company Name: **Dexter Axle Company**
Address City IN Zip: **500 South Seventh Street, Albion, Indiana 46701**
Permit Number: **113-27395-00008**
Plt ID: **113-00008**
Reviewer: **Jason R. Krawczyk**
Date: **January 28, 2009**

Potential to Emit from Material Handling Process					
Facility/Operation	Throughput (lb/hr)	Emission Factor [a, b] (lb/ton)	Uncontrolled PM/PM10/PM2.5 Emissions (ton/yr)	Control Efficiency (%)	Controlled PM/PM10/PM2.5 Emissions (ton/yr)
Mixer, (EU-1) exhausting to VFR-2	640	PM = 1 PM10 = 1 PM2.5 = 1	1.4016	99.90%	1.40E-03
		Total	**1.40**		**1.40E-03**

Methodology:
PM/PM10/PM2.5 Uncontrolled Emissions (ton/yr) = Throughput (lb/hr) * 1/2000 (ton/lb) * Emission Factor (lb/ton) * 8760 hours * 1/2000 (ton/lb)
PM/PM10/PM2.5 Controlled Emissions (ton/yr) = PM/PM10 Uncontrolled Emissions (ton/yr) * (1-Efficiency of Control Device %)
[a]PM/PM10 emission factor provided by source and is greater than any similar emission factor found in AP-42 for the types of material handled during this process.
[b]US EPA has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions

Appendix A: Emissions Calculations
Limited Emissions
Fugitive Dust Emissions - Unpaved Roads

Company Name: Dexter Axle Company
Address City IN Zip: 500 South Seventh Street, Albion, Indiana 46701
Permit Number: 113-27395-00008
Plt ID: 113-00008
Reviewer: Jason R. Krawczyk
Date: January 28, 2009

Unpaved Roads

The following calculations determine the amount of emissions created by unpaved roads, based on 8,760 hours of use and AP-42, Ch 13.2.2 (12/2003).

Vehicle Type	Trips per Hour	Maximum Weight of Vehicle and Load (tons/trip)	Maximum trips per year (trip/yr)	Total Weight driven per year (ton/yr)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/yr)
Semi w/ Tractor Trailer	3.0	30	2.63E+04	7.88E+05	1848	0.350	9198.0
Forklift	1	4.5	8.76E+03	3.94E+04	528	0.100	876.0
Total			**3.50E+04**	**8.28E+05**			**1.01E+04**

Average Vehicle Weight Per Trip = 23.6 tons/trip
Average Miles Per Trip = 0.288 miles/trip

Unmitigated Emission Factor, Ef = k*[(s/12)^a]*[(W/3)^b] (Equation 1a from AP-42 13.2.2)

	PM	PM10	PM2.5	
where k =	4.9	1.5	0.15	lb/mi = particle size multiplier (AP-42 Table 13.2.2-2 for Industrial Roads)
s =	4.8	4.8	4.8	% = mean % silt content of unpaved roads (AP-42 Table 13.2.2-3 Sand/Gravel Processing Pla
a =	0.7	0.9	0.9	= constant (AP-42 Table 13.2.2-2)
W =	23.6	23.6	23.6	tons = average vehicle weight (provided by source)
b =	0.45	0.45	0.45	= constant (AP-42 Table 13.2.2-2)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = E * [(365 - P)/365]
Mitigated Emission Factor, Eext = E * [(365 - P)/365]
where P = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	6.53	1.66	0.17	lb/mile
Mitigated Emission Factor, Eext =	4.29	1.09	0.11	lb/mile
Dust Control Efficiency =	50%	50%	50%	(pursuant to control measures outlined in fugitive dust control plan)

Vehicle Type	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM (tons/yr)	Controlled PTE of PM (tons/yr)	Controlled PTE of PM10 (tons/yr)	Controlled PTE of PM (tons/yr)
Semi w/ Tractor Trailer	30.03	7.65	0.77	19.75	5.03	0.50	9.87	2.52	0.25
Forklift	2.86	0.73	0.07	1.88	0.48	0.05	0.94	0.24	0.02
Totals	**32.89**	**8.38**	**0.84**	**21.63**	**5.51**	**0.55**	**10.81**	**2.76**	**0.28**

Note:
The calculations determine the amount of emissions created by unpaved roads, based on 8,760 hours of use and AP-42, Ch 13.2.2 (12/2003).
Fugitive Emissions are not counted toward the determination of Part 70 or PSD applicablility.

Methodology:
Maximum Weight of Vehicle and Load (tons/trip) = [Maximum Weight of Vehicle (tons/trip)] + [Maximum Weight of Load (tons/trip)]
Maximum trips per year (trip/yr) = [Throughput (tons/yr)] / [Maximum Weight of Load (tons/trip)]
Total Weight driven per year (ton/yr) = [Maximum Weight of Vehicle and Load (tons/trip)] * [Maximum trips per year (trip/yr)]
Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip) / [5280 ft/mile]
Maximum one-way miles (miles/yr) = [Maximum trips per year (trip/yr)] * [Maximum one-way distance (mi/trip)]
Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per year (ton/yr)] / SUM[Maximum trips per year (trip/yr)]
Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/yr)] / SUM[Maximum trips per year (trip/yr)]
Unmitigated PTE (tons/yr) = (Maximum one-way miles (miles/yr)) * (Unmitigated Emission Factor (lb/mile)) * (ton/2000 lbs)
Mitigated PTE (tons/yr) = (Maximum one-way miles (miles/yr)) * (Mitigated Emission Factor (lb/mile)) * (ton/2000 lbs)
Controlled PTE (tons/yr) = (Mitigated PTE (tons/yr)) * (1 - Dust Control Efficiency)

Abbreviations:
PM = Particulate Matter
PM10 = Particulate Matter (<10 um)
PM2.5 = Particulate Matter (< 2.5 um)
PTE = Potential to Emit