



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: December 14, 2009

RE: Vibration Control Technologies, LLC / 113-28237-00080

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

Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures
FNPER.dot12/03/07



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Minor Source Operating Permit Renewal OFFICE OF AIR QUALITY

Vibration Control Technologies, LLC
1496 Gerber Street
Ligonier, Indiana 46767

(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.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

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 MSOP under 326 IAC 2-6.1.

Operation Permit No.: M113-28237-00080	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: December 14, 2009 Expiration Date: December 14, 2019

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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 and A.2 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 2-5.1-3(c)][326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary automobile parts production plant for machining and surface coating of auto parts operation.

Source Address:	1496 Gerber Street, Ligonier, Indiana 46767
Mailing Address:	1496 Gerber Street, Ligonier, Indiana 46767
General Source Phone Number:	(260) 894-7199
SIC Code:	3499
County Location:	Noble
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source 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

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

- (a) One (1) spray booth, identified as P-1, constructed in 1989, with a maximum capacity of 100 units per hour, using dry filters as particulate matter control, and exhausting to stack S-15.
- (b) One (1) spray booth, identified as P-2, constructed in 1989, with a maximum capacity of 105 machined metal parts per hour, using dry filters as control, and exhausting to stack S-8.
- (c) One (1) spray shadow booth, identified as P-3, constructed in 1989, with a maximum capacity of 92 units per hour, and exhausting to stack S-17.
- (d) One (1) spray final booth, identified as P-4, constructed in 1989, with a maximum capacity of 92 units per hour, using dry filters as particulate matter control, and exhausting to stack S-18.
- (e) One (1) spray shadow booth, identified as P-5, constructed in 1989, with a maximum capacity of 92 units per hour, and exhausting to stack S-19.
- (f) One (1) spray final booth, identified as P-6, constructed in 1989, with a maximum capacity of 92 units per hour, using dry filters as particulate matter control, and exhausting to stack S-20.
- (g) One (1) spray booth, identified as P-7, constructed in 1989, with a maximum capacity of 100 units per hour, using dry filters as particulate matter control, and exhausting to stack S-14.

- (h) One (1) spray booth, identified as P-8, constructed in 1989, with a maximum capacity of 60 units per hour, and exhausting to stack S-16.
- (i) One spray booth, identified as P-9, constructed in 1989, with a maximum capacity of 225 units per hour, and exhausting to stack S-6.
- (j) One (1) brush coater or timing mark station, identified as BC-1, constructed in 1989, with a maximum capacity of 100 units per hour, and exhausting to the atmosphere.
- (k) One (1) brush coater or timing mark station, identified as BC-2, constructed in 1989, with a maximum capacity of 92 units per hour, and exhausting to the atmosphere.
- (l) One (1) brush coater or timing mark station, identified as BC-3, constructed in 1989, with a maximum capacity of 92 units per hour, and exhausting to the atmosphere.
- (m) One (1) brush coater or timing mark station, identified as BC-4, constructed in 1989, with a maximum capacity of 60 units per hour, and exhausting to the atmosphere.
- (n) One (1) adhesive roll coater, identified as AR-1, constructed in 1989, with a maximum capacity of 105 machined metal parts per hour, and exhausting to stack S-9.
- (o) One (1) adhesive roll coater, identified as AR-2, constructed in 2007, with a maximum capacity of 75 machined metal parts per hour, and exhausting to general ventilation.
- (p) One (1) adhesive roll coater, identified as AR-3, constructed in 2007, with a maximum capacity of 85 machined metal parts per hour, and exhausting to general ventilation.
- (q) One (1) rust inhibitor, identified as RI-1, constructed in 2007, with a maximum capacity of 75 machined metal parts per hour, exhausting to general ventilation.
- (r) One (1) rust inhibitor, identified as RI-2, constructed in 2007, with a maximum capacity of 85 machined metal parts per hour, exhausting to general ventilation.
- (s) One (1) paint booth, identified as PB-1, constructed in 2007, with a maximum capacity of 85 machined metal parts per hour, using dry filters as particulate matter control, and exhausting to general ventilation.
- (t) One (1) NMP washer, identified as N-1, constructed in 1989, with a maximum capacity of 105 machined metal parts per hour, exhausting to general ventilation.
- (u) One (1) NMP washer, identified as N-2, constructed in 2007, with a maximum capacity of 75 machined metal parts per hour, and exhausting to stack S-7.
- (v) One (1) NMP washer, identified as N-3, constructed in 2007, with a maximum capacity of 85 machined metal parts per hour, and exhausting to stack S-2.
- (w) Four (4) Wabash rubber molding presses, identified as W-1-4, constructed in 1989, with a maximum capacity of 81 lb/hr each, exhausting to stack S-5.
- (x) Four (4) Rep rubber molding presses, identified as R-1-4, with units R-1 and R-2 constructed in 2002, and units R-3 and R-4 constructed in 2006, with a maximum capacity of 58.5 lb/hr each, exhausting to stacks S-13, S-21 and S-22.
- (y) Two (2) Desma rubber molding presses, identified as D-1 and D-2, constructed in 2008, with a maximum capacity of 60 lb/hr each, exhausting through roof stacks.

- (z) Two (2) electric Grieve post cure ovens, constructed in 2008, with a maximum throughput of 28.5 lb/hr of rubber each, exhausting to stacks GR1 and GR2.
- (aa) Three (3) enclosed mechanical shot blasters, identified as Blaster 1, Blaster 2 and Blaster 3. Blaster 1 was constructed in 1989, Blaster 2 and 3 were constructed in 2008, with a maximum capacity of 80 lb/hr of parts each, using baghouses as control and exhausting to the atmosphere.
- (bb) Two (2) natural gas-fired heaters, rated at 0.2 million British thermal units (MMBTU) per hour each.
- (cc) One (1) natural gas-fired heater, rated at 0.1 million British thermal units (MMBTU) per hour.
- (dd) Three (3) natural gas-fired heaters, rated at 0.32 million British thermal units (MMBTU) per hour each.
- (ee) Four (4) natural gas-fired sealer tank heaters, rated at 0.3 million British thermal units (MMBTU) per hour each.
- (ff) Four (4) natural gas-fired wash tank heaters, rated at 0.4 million British thermal units (MMBTU) per hour each.
- (gg) Natural Gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (hh) Vessels storing the following: hydraulic oils, lubricating oils and machining fluids
- (ii) Degreasing operations that do not exceed one hundred forty-five (145) gallons per twelve(12) months, except if subject to 326 IAC 20-6.
- (jj) Noncontact cooling tower systems with the following: forced and induced draft cooling tower systems not regulated under a NESHAP.
- (kk) Paved and unpaved roads and parking lots with public access.
- (ll) Blowdown for the following: compressors

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-1.1-1]

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 2-1.1-1) shall prevail.

B.2 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

-
- (a) This permit, M113-28237-00080, 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

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

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

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

B.7 Duty to Provide Information

-
- (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

- (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 Notification [326 IAC 2-6.1-5(a)(5)]

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, IN 46204-2251
- (c) The notification 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.

B.10 Preventive Maintenance Plan [326 IAC 1-6-3]

- (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.11 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to M113-28237-00080 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.12 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

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 one hundred twenty (120) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

B.13 Permit Renewal [326 IAC 2-6.1-7]

- (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 2-6.1-7. Such information shall be included in the application for each emission unit at this source. 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
Permit Administration and Support Section, 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 one hundred twenty (120) days 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 2-6.1 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.14 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 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
Permit Administration and Support Section, 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 shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.15 Source Modification Requirement

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

B.16 Inspection and Entry

[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][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 permitted 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.17 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

(a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 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
Permit Administration and Support Section, 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 notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

B.18 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees due within thirty (30) calendar days of receipt of a bill from IDEM, OAQ,.
- (b) 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.19 Credible Evidence [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 2-6.1-5(a)(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 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

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 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
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 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. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-6.1-5(a)(2)]

C.8 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 and Enforcement Branch, 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.9 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 2-6.1-5(a)(2)]

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

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.11 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.12 Instrument Specifications [326 IAC 2-1.1-11]

- (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

C.13 Response to Excursions or Exceedances

- (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.14 Actions Related to Noncompliance Demonstrated by a Stack Test

- (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 2-6.1-5(a)(2)]

C.15 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).

- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.16 General Record Keeping Requirements [326 IAC 2-6.1-5]

- (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 or ninety (90) days of initial start-up, whichever is later.

C.17 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) Reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (b) 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.
- (c) 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).
- (d) 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.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) spray booth, identified as P-1, constructed in 1989, with a maximum capacity of 100 units per hour, using dry filters as particulate matter control, and exhausting to stack S-15.
- (b) One (1) spray booth, identified as P-2, constructed in 1989, with a maximum capacity of 105 machined metal parts per hour, using dry filters as control, and exhausting to stack S-8.
- (c) One (1) spray shadow booth, identified as P-3, constructed in 1989, with a maximum capacity of 92 units per hour, and exhausting to stack S-17.
- (d) One (1) spray final booth, identified as P-4, constructed in 1989, with a maximum capacity of 92 units per hour, using dry filters as particulate matter control, and exhausting to stack S-18.
- (e) One (1) spray shadow booth, identified as P-5, constructed in 1989, with a maximum capacity of 92 units per hour, and exhausting to stack S-19.
- (f) One (1) spray final booth, identified as P-6, constructed in 1989, with a maximum capacity of 92 units per hour, using dry filters as particulate matter control, and exhausting to stack S-20.
- (g) One (1) spray booth, identified as P-7, constructed in 1989, with a maximum capacity of 100 units per hour, using dry filters as particulate matter control, and exhausting to stack S-14.
- (h) One (1) spray booth, identified as P-8, constructed in 1989, with a maximum capacity of 60 units per hour, and exhausting to stack S-16.
- (i) One spray booth, identified as P-9, constructed in 1989, with a maximum capacity of 225 units per hour, and exhausting to stack S-6.
- (j) One (1) brush coater or timing mark station, identified as BC-1, constructed in 1989, with a maximum capacity of 100 units per hour, and exhausting to the atmosphere.
- (k) One (1) brush coater or timing mark station, identified as BC-2, constructed in 1989, with a maximum capacity of 92 units per hour, and exhausting to the atmosphere.
- (l) One (1) brush coater or timing mark station, identified as BC-3, constructed in 1989, with a maximum capacity of 92 units per hour, and exhausting to the atmosphere.
- (m) One (1) brush coater or timing mark station, identified as BC-4, constructed in 1989, with a maximum capacity of 60 units per hour, and exhausting to the atmosphere.
- (n) One (1) adhesive roll coater, identified as AR-1, constructed in 1989, with a maximum capacity of 105 machined metal parts per hour, and exhausting to stack S-9.
- (o) One (1) adhesive roll coater, identified as AR-2, constructed in 2007, with a maximum capacity of 75 machined metal parts per hour, and exhausting to general ventilation.
- (p) One (1) adhesive roll coater, identified as AR-3, constructed in 2007, with a maximum capacity of 85 machined metal parts per hour, and exhausting to general ventilation.

- (q) One (1) rust inhibitor, identified as RI-1, constructed in 2007, with a maximum capacity of 75 machined metal parts per hour, exhausting to general ventilation.
- (r) One (1) rust inhibitor, identified as RI-2, constructed in 2007, with a maximum capacity of 85 machined metal parts per hour, exhausting to general ventilation.
- (s) One (1) paint booth, identified as PB-1, constructed in 2007, with a maximum capacity of 85 machined metal parts per hour, using dry filters as particulate matter control, and exhausting to general ventilation.
- (t) One (1) NMP washer, identified as N-1, constructed in 1989, with a maximum capacity of 105 machined metal parts per hour, exhausting to general ventilation.
- (u) One (1) NMP washer, identified as N-2, constructed in 2007, with a maximum capacity of 75 machined metal parts per hour, and exhausting to stack S-7.
- (v) One (1) NMP washer, identified as N-3, constructed in 2007, with a maximum capacity of 85 machined metal parts per hour, and exhausting to stack S-2.
- (w) Four (4) Wabash rubber molding presses, identified as W-1-4, constructed in 1989, with a maximum capacity of 81 lb/hr each, exhausting to stack S-5.
- (x) Four (4) Rep rubber molding presses, identified as R-1-4, with units R-1 and R-2 constructed in 2002, and units R-3 and R-4 constructed in 2006, with a maximum capacity of 58.5 lb/hr each, exhausting to stacks S-13, S-21 and S-22;
- (y) Two (2) Desma rubber molding presses, identified as D-1 and D-2, constructed in 2008, with a maximum capacity of 60 lb/hr each, exhausting through roof stacks.
- (z) Two (2) electric Grieve post cure ovens, constructed in 2008, with a maximum throughput of 28.5 lb/hr of rubber each, exhausting to stacks GR1 and GR2.

(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 2-6.1-5(a)(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

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

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of

the waste solvent (by weight) can evaporate into the atmosphere.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the NMP washers, units N-1, N-2 and N-3, cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:
- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:

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

D.1.3 Particulate [326 IAC 6-3-2(d)]

- (a) Particulate from the surface coating manufacturing processes shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:
 - (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
 - (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

D.1.4 Preventive Maintenance Plan [326 IAC 1-6-3]

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

Compliance Determination Requirements

D.1.5 Particulate Matter (PM)

In order to comply with condition D.1.3, the dry filters for PM control shall be in operation and control emissions from the spray booths at all times that the spray booths are in operation.

D.1.6 Training Requirements

In order to comply with condition D.1.3 the Permittee shall implement an operator-training program.

- (1) All spray booth operators or employees that perform maintenance at the surface coating facilities shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within 60 days of the date of permit issuance. All new operators shall be trained upon hiring or transfer.
- (2) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site. The training program shall 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 1 hour for inspection by IDEM.
- (3) All operators shall be given refresher training annually.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.7 Record Keeping Requirements

- (a) In order to comply with Condition D.1.6, the Permittee shall maintain a copy of the operator-training program, all training records including the list of trained operators.

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

SECTION D.2 FACILITY OPERATION CONDITIONS

Emissions Unit Description:

- (aa) Three (3) enclosed mechanical shot blasters, identified as Blaster 1, Blaster 2 and Blaster 3. Blaster 1 was constructed in 1989, Blaster 2 and Blaster 3 were constructed in 2008, with a maximum capacity of 80 lb/hr of parts each, using baghouses as control, and exhausting to the atmosphere.

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

Emission Limitations and Standards

D.2.1 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 per blaster.

Compliance Determination Requirement

D.2.2 Particulate Control

In order to comply with D.2.1, each baghouse for particulate control shall be in operation and control emissions from the mechanical shot blasting operation at all times that the machines are in operation.

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

**MINOR SOURCE OPERATING PERMIT (MSOP)
CERTIFICATION**

Source Name: Vibration Control Technologies, LLC
Source Address: 1496 Gerber Street, Ligonier, Indiana 46767
Mailing Address: 1496 Gerber Street, Ligonier, Indiana 46767
MSOP No.: M113-28237-00080

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 AND ENFORCEMENT BRANCH**

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	Vibration Control Technologies, LLC
Address:	1496 Gerber Street
City:	Ligonier, Indiana 46767
Phone #:	(260) 894-7199
MSOP #:	M113-28237-00080

I hereby certify that Vibration Control Technologies, LLC
is :

still in operation.

no longer in operation.

I hereby certify that Vibration Control Technologies, LLC
is :

in compliance with the requirements of
MSOP M113-28237-00080.

not in compliance with the requirements of
MSOP M113-28237-00080.

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

MALFUNCTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY FAX NUMBER: (317) 233-6865

This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?____, 25 TONS/YEAR SULFUR DIOXIDE ?____, 25 TONS/YEAR NITROGEN OXIDES?____, 25 TONS/YEAR VOC ?____, 25 TONS/YEAR HYDROGEN SULFIDE ?____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?____, 25 TONS/YEAR FLUORIDES ?____, 100 TONS/YEAR CARBON MONOXIDE ?____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF "MALFUNCTION" AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: _____ PHONE NO. () _____
LOCATION: (CITY AND COUNTY) _____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: ____/____/20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/20____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____
INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

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

Technical Support Document (TSD) for a Minor Source Operating Permit Renewal

Source Background and Description

Source Name:	Vibration Control Technologies, LLC
Source Location:	1496 Gerber Street, Ligonier, Indiana 46767
County:	Noble
SIC Code:	3499
Permit Renewal No.:	113-28237-00080
Permit Reviewer:	Janet Mobley

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Vibration Control Technologies, LLC relating to the operation of an automobile parts production plant for machining and surface coating of auto parts.

History

On July 20, 2009, Vibration Control Technologies, LLC submitted an application to the OAQ requesting to renew its operating permit. Vibration Control Technologies, LLC was issued a MSOP on October 26, 2004.

Source Definition

During review of the application for NOC 113-23741-00080, the Permittee provided new source definition information and IDEM, OAQ concluded that Vibration Control Technologies LLC (VCT) and Vibracoustic North America (VNA), two plants previously owned by Freudenburg-NOK Company were now considered separate sources (see the Technical Support Document for 113-23741-00080 for the background information on how the determination was made). In reexamining this determination for VCT's renewal it was discovered that VNA had ceased operation and their operating permit (113-23616-00023) was revoked on July 9, 2009. VCT no longer receives product from VNA and they make their own components in-house.

Permitted Emission Units and Pollution Control Equipment

The renewal application received on July 20, 2009, identified the removal of some of the existing emission units, construction and operation of unpermitted emission units, and a change in the order and identification of the emission units by removing the description referring to car models. The following is a list of the units currently permitted at the source:

- (1) One (1) adhesive roll coater, with a maximum capacity of 105 machined metal parts per hour, and exhausting to stack S-9.
- (2) One (1) NMP washer, with a maximum capacity of 105 machined metal parts per hour, exhausting to general ventilation.
- (3) One (1) spray booth, identified as P-1, with a maximum capacity of 105 machined metal parts per hour, using dry filters as particulate matter control, and exhausting to stack S-10.
- (4) One (1) adhesive roll coater, with a maximum capacity of 105 machined metal parts per hour, and exhausting to general ventilation.

- (5) One (1) NMP washer, with a maximum capacity of 105 machined metal parts per hour, and exhausting to stack S-7.
- (6) One (1) spray booth, identified as P-2, with a maximum capacity of 105 machined metal parts per hour, using dry filters as control, and exhausting to stack S-8.
- (7) One (1) spray booth, with a maximum capacity of 100 units per hour, using dry filters as particulate matter control, and exhausting to the stack S-15.
- (8) One (1) spray booth, with a maximum capacity of 100 units per hour, using dry filters as particulate matter control, and exhausting to the stack S-14.
- (9) One (1) brush coater or timing mark station, with a maximum capacity of 100 units per hour, and exhausting to the atmosphere.
- (10) One (1) spray shadow booth, with a maximum capacity of 92 units per hour, and exhausting to the stack S-17.
- (11) One (1) spray final booth, with a maximum capacity of 92 units per hour, using dry filters as particulate matter control, and exhausting to the stack S-18.
- (12) One (1) brush coater or timing mark station, with a maximum capacity of 92 units per hour, and exhausting to the atmosphere.
- (13) One (1) spray shadow booth, with a maximum capacity of 92 units per hour, and exhausting to the stack S-19.
- (14) One (1) spray final booth, with a maximum capacity of 92 units per hour, using dry filters as particulate matter control, and exhausting to the stack S-20.
- (15) One (1) brush coater or timing mark station, with a maximum capacity of 92 units per hour, and exhausting to the atmosphere.
- (16) One (1) adhesive roll coater, with a maximum capacity of 85 machined metal parts per hour, and exhausting to general ventilation.
- (17) One (1) NMP washer, with a maximum capacity of 85 machined metal parts per hour, and exhausting to stack S-2.
- (18) One (1) dip tank, with a maximum capacity of 85 machined metal parts per hour, using dry filters as particulate matter control, and exhausting to stack S-1.
- (19) One mechanical shot blaster, with a maximum capacity of 80 lb/hr of parts, and exhausting to the atmosphere.
- (20) One (1) adhesive spray booth, with a maximum capacity of 225 units per hour, using dry filters as particulate matter control, and exhausting to the stack S-4.
- (21) One (1) spray booth, with a maximum capacity of 225 units per hour, using dry filters as particulate matter control, and exhausting to the stack S-6.
- (22) Four (4) rubber molding presses, with a maximum capacity of 81 lb/hr each, exhausting to stack S-5.
- (23) One (1) spray booth, with a maximum capacity of 105 machined metal parts per hour, and exhausting to the stack S-11.

- (24) Three (3) natural gas-fired heaters, rated at 0.32 million British thermal units (MMBTU) per hour each.
- (25) Two (2) natural gas-fired heaters, rated at 0.2 million British thermal units (MMBTU) per hour each.
- (26) One (1) natural gas-fired heaters, rated at 0.1 million British thermal units (MMBTU) per hour each.
- (27) Four (4) natural gas-fired sealer tank heaters, rated at 0.3 million British thermal units (MMBTU) per hour each.
- (28) Four (4) natural gas-fired wash tank heaters, rated at 0.4 million British thermal units (MMBTU) per hour each.
- (29) One (1) spray booth, with a maximum capacity of 60 units per hour, and exhausting to the stack S-16.
- (30) One (1) brush coater or timing mark station, with a maximum capacity of 60 units per hour, and exhausting to the atmosphere.
- (31) One (1) spray booth, constructed in 2002, coating metal with a maximum capacity of 225 units per hour, using dry filters as particulate matter control, exhausting to the stack S-12;
- (32) Four (4) rubber molding presses , with two (2) units constructed in 2002, and the two (2) new units to be constructed in 2006, with a maximum capacity of 58.5 lb/hr each, exhausting to stacks S-13 ,S-21 and S-22;
- (33) One (1) primer booth, to be constructed in 2006, coating metal with a maximum capacity of 225 units per hour, using dry filters as particulate matter control, exhausting through general ventilation;
- (34) One (1) adhesive booth, to be constructed in 2006, coating metal with a maximum capacity of 225 units per hour, using dry filters as particulate matter control, exhausting through general ventilation;
- (35) Two (2) shadow booths, to be constructed in 2006, coating metal with a total maximum capacity of 100 parts/hr, using dry filters as particulate matter control, exhausting through general ventilation; and
- (36) Two (2) final booths, to be constructed in 2006, coating metal with a total maximum capacity of 100 parts/hr, using dry filters as particulate matter control, exhausting through general ventilation.
- (37) One (1) dip tank, with a maximum capacity of 85 units per hour, and exhausting to stack S-3.

Emission Units and Pollution Control Equipment that have been removed from the source:

- (1) One (1) adhesive roll coater, with a maximum capacity of 105 machined metal parts per hour, and exhausting to general ventilation.
- (2) One (1) adhesive roll coater, with a maximum capacity of 85 machined metal parts per hour, and exhausting to general ventilation.
- (3) One (1) NMP washer, with a maximum capacity of 85 machined metal parts per hour, and exhausting to stack S-1.

- (4) One (1) spray booth, identified as P-1, with a maximum capacity of 85 machined metal parts per hour, using dry filters as particulate matter control, and exhausting to stack S-1.
- (5) One (1) adhesive spray booth, with a maximum capacity of 225 units per hour, using dry filters as particulate matter control, and exhausting to the stack S-4.
- (6) One (1) spray booth, with a maximum capacity of 105 machined metal parts per hour, and exhausting to the stack S-11.
- (7) One (1) spray booth, constructed in 2002, coating metal with a maximum capacity of 225 units per hour, using dry filters as particulate matter control, exhausting to the stack S-12.
- (8) One (1) primer booth, constructed in 2006, coating metal with a maximum capacity of 225 units per hour, using dry filters as particulate matter control, exhausting through general ventilation.
- (9) One (1) adhesive booth, constructed in 2006, coating metal with a maximum capacity of 225 units per hour, using dry filters as particulate matter control, exhausting through general ventilation.
- (10) Two (2) shadow booths, constructed in 2006, coating metal with a total maximum capacity of 100 parts/hr, using dry filters as particulate matter control, exhausting through general ventilation.
- (11) Two (2) final booths, constructed in 2006, coating metal with a total maximum capacity of 100 parts/hr, using dry filters as particulate matter control, exhausting through general ventilation.
- (12) One (1) dip tank, with a maximum capacity of 85 units per hour, and exhausting to stack S-3.
- (13) One (1) dip tank, with a maximum capacity of 85 machined metal parts per hour, using dry filters as particulate matter control, and exhausting to stack S-1.

Emission Units and Pollution Control Equipment that are being added in this permit renewal:

- (1) Two (2) Desma rubber molding presses, constructed in 2008, with a maximum capacity of 60 lb/hr each, exhausting through roof stacks.
- (2) Two (2) electric Grieve post cure ovens, identified as Oven 1 and Oven 2, constructed in 2008, with a maximum throughput of 28.5 lb/hr of rubber each, exhausting through roof stacks, GR1 and GR2.
- (3) Two (2) mechanical shot blasters, identified as Blaster 2 and Blaster 3, constructed in 2008, with a maximum capacity of 80 lb/hr of parts, each, and exhausting to the the atmosphere.
- (4) Natural Gas-fired combustion sources with heat input eual to or less than ten million (10,000,000) Btu per hour.
- (5) Vessels storing the following: hydraulic oils, lubricating oils and machining fluids
- (6) Degreasing operations that do not exceed one hundred forty-five (145) gallons per twelve(12) months, except if subject to 326 IAC 20-6.
- (7) Noncontact cooling tower systems with the following: forced and induced draft cooling tower systems not regulated under a NESHAP.

- (8) Repair activities: Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (9) Paved and unpaved roads and parking lots with public access.
- (10) Blowdown for the following: compressors

Description of Permitted Emission Units (after the issuance of this FESOP Renewal)

This stationary source consists of the following permitted emission units and control equipment:

- (a) One (1) spray booth, identified as P-1, constructed in 1989, with a maximum capacity of 100 units per hour, using dry filters as particulate matter control, and exhausting to stack S-15.
- (b) One (1) spray booth, identified as P-2, constructed in 1989, with a maximum capacity of 105 machined metal parts per hour, using dry filters as control, and exhausting to stack S-8.
- (c) One (1) spray shadow booth, identified as P-3, constructed in 1989, with a maximum capacity of 92 units per hour, and exhausting to stack S-17.
- (d) One (1) spray final booth, identified as P-4, constructed in 1989, with a maximum capacity of 92 units per hour, using dry filters as particulate matter control, and exhausting to stack S-18.
- (e) One (1) spray shadow booth, identified as P-5, constructed in 1989, with a maximum capacity of 92 units per hour, and exhausting to stack S-19.
- (f) One (1) spray final booth, identified as P-6, constructed in 1989, with a maximum capacity of 92 units per hour, using dry filters as particulate matter control, and exhausting to stack S-20.
- (g) One (1) spray booth, identified as P-7, constructed in 1989, with a maximum capacity of 100 units per hour, using dry filters as particulate matter control, and exhausting to stack S-14.
- (h) One (1) spray booth, identified as P-8, constructed in 1989, with a maximum capacity of 60 units per hour, and exhausting to stack S-16.
- (i) One spray booth, identified as P-9, constructed in 1989, with a maximum capacity of 225 units per hour, and exhausting to stack S-6.
- (j) One (1) brush coater or timing mark station, identified as BC-1, constructed in 1989, with a maximum capacity of 100 units per hour, and exhausting to the atmosphere.
- (k) One (1) brush coater or timing mark station, identified as BC-2, constructed in 1989, with a maximum capacity of 92 units per hour, and exhausting to the atmosphere.
- (l) One (1) brush coater or timing mark station, identified as BC-3, constructed in 1989, with a maximum capacity of 92 units per hour, and exhausting to the atmosphere.
- (m) One (1) brush coater or timing mark station, identified as BC-4, constructed in 1989, with a maximum capacity of 60 units per hour, and exhausting to the atmosphere.
- (n) One (1) adhesive roll coater, identified as AR-1, constructed in 1989, with a maximum capacity of 105 machined metal parts per hour, and exhausting to stack S-9.

- (o) One (1) adhesive roll coater, identified as AR-2, constructed in 2007, with a maximum capacity of 75 machined metal parts per hour, and exhausting to general ventilation.
- (p) One (1) adhesive roll coater, identified as AR-3, constructed in 2007, with a maximum capacity of 85 machined metal parts per hour, and exhausting to general ventilation.
- (q) One (1) rust inhibitor, identified as RI-1, constructed in 2007, with a maximum capacity of 75 machined metal parts per hour, exhausting to general ventilation.
- (r) One (1) rust inhibitor, identified as RI-2, constructed in 2007, with a maximum capacity of 85 machined metal parts per hour, exhausting to general ventilation.
- (s) One (1) paint booth, identified as PB-1, constructed in 2007, with a maximum capacity of 85 machined metal parts per hour, using dry filters as particulate matter control, and exhausting to general ventilation.
- (t) One (1) NMP washer, identified as N-1, constructed in 1989, with a maximum capacity of 105 machined metal parts per hour, exhausting to general ventilation.
- (u) One (1) NMP washer, identified as N-2, constructed in 2007, with a maximum capacity of 75 machined metal parts per hour, and exhausting to stack S-7.
- (v) One (1) NMP washer, identified as N-3, constructed in 2007, with a maximum capacity of 85 machined metal parts per hour, and exhausting to stack S-2.
- (w) Four (4) Wabash rubber molding presses, identified as W-1-4, constructed in 1989, with a maximum capacity of 81 lb/hr each, exhausting to stack S-5.
- (x) Four (4) Rep rubber molding presses, identified as R-1-4, with units R-1 and R-2 constructed in 2002, and units R-3 and R-4 constructed in 2006, with a maximum capacity of 58.5 lb/hr each, exhausting to stacks S-13, S-21 and S-22;
- (y) Two (2) Desma rubber molding presses, identified as D-1 and D-2, constructed in 2008, with a maximum capacity of 60 lb/hr each, exhausting through roof stacks.
- (z) Two (2) electric Grieve post cure ovens, constructed in 2008, with a maximum throughput of 28.5 lb/hr of rubber each, exhausting to stacks GR1 and GR2.
- (aa) Three (3) mechanical shot blasters, identified as Blaster 1, Blaster 2 and Blaster 3. Blaster 1 was constructed in 1989, Blaster 2 and Blaster 3 were constructed in 2008, with a maximum capacity of 80 lb/hr of parts each, using baghouses as control and exhausting to the atmosphere.
- (bb) Two (2) natural gas-fired heaters, rated at 0.2 million British thermal units (MMBTU) per hour each.
- (cc) One (1) natural gas-fired heater, rated at 0.1 million British thermal units (MMBTU) per hour.
- (dd) Three (3) natural gas-fired heaters, rated at 0.32 million British thermal units (MMBTU) per hour each.
- (ee) Four (4) natural gas-fired sealer tank heaters, rated at 0.3 million British thermal units (MMBTU) per hour each.
- (ff) Four (4) natural gas-fired wash tank heaters, rated at 0.4 million British thermal units (MMBTU) per hour each.

- (gg) Natural Gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (hh) Vessels storing the following: hydraulic oils, lubricating oils and machining fluids.
- (ii) Degreasing operations that do not exceed one hundred forty-five (145) gallons per twelve (12) months, except if subject to 326 IAC 20-6.
- (jj) Noncontact cooling tower systems with the following: forced and induced draft cooling tower systems not regulated under a NESHAP.
- (kk) Paved and unpaved roads and parking lots with public access.
- (ll) Blowdown for the following: compressors.

Existing Approvals

Since the issuance of MSOP (113-16637-00080) on October 16, 2004, the source has constructed or has been operating under the following approvals as well:

- (a) Minor Permit Revision No. 113-21996-00080 issued on December 27, 2005.
- (b) Minor Permit Revision No. 113-22521-00080 issued on March 28, 2006.
- (c) Notice Only Change No. 113-23741-00080 issued on January 26, 2007.

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

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Noble County

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

¹Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.
Unclassifiable or attainment effective April 5, 2005, for PM_{2.5}.

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

Unrestricted Potential Emissions

Appendix A of this TSD reflects the unrestricted potential emissions of the source.

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all criteria pollutants is still less than 100 tons per year. The source is not subject to the provisions of 326 IAC 2-7. Therefore, the source will be issued an MSOP Renewal.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year.
- (c) Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-7, fugitive emissions are not counted toward the determination of Part 70 applicability.

Potential to Emit After Issuance

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

Process/ Emission Unit	Potential To Emit (tons/year)							
	PM	PM ₁₀	PM _{2.5}	SO ₂	VOC	CO	NO _x	HAPs
Spray Booth, P-1	11.07	11.07	11.07	0.00	0.00	0.00	0.00	0.00
Spray Booth, P-2	5.45	5.45	5.45	0.00	1.16	0.00	0.00	0.84
Spray Shadow Booth, P-3	2.60	2.60	2.60	0.00	0.26	0.00	0.00	0.00
Spray Final Booth, P-4	5.21	5.21	5.21	0.00	0.51	0.00	0.00	0.00
Spray Shadow Booth, P-5	2.60	2.60	2.60	0.00	0.26	0.00	0.00	0.00
Spray Final Booth, P-6	5.21	5.21	5.21	0.00	0.51	0.00	0.00	0.00
Spray Booth, P-7	5.19	5.19	5.19	0.00	1.11	0.00	0.00	0.80
Spray Booth, P-8	3.11	3.11	3.11	0.00	0.66	0.00	0.00	0.48
Spray Booth, P-9	7.63	7.63	7.63	0.00	1.63	0.00	0.00	0.70
Brush coater/timing mark station, BC-1	0.00	0.00	0.00	0.00	0.03	0.00	0.00	0.00
Brush coater/timing mark station, BC-2	0.00	0.00	0.00	0.00	0.03	0.00	0.00	0.00
Brush coater/timing mark station, BC-3	0.00	0.00	0.00	0.00	0.03	0.00	0.00	0.00
Brush coater/timing mark station, BC-4	0.00	0.00	0.00	0.00	0.03	0.00	0.00	0.00
Adhesive Roll Coater, AR-1	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.53
Adhesive Roll Coater, AR-2	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.73
Adhesive Roll Coater, AR-3	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.90
Rust Inhibitor Spray Booth, RI-1	0.02	0.02	0.02	0.00	0.60	0.00	0.00	0.00
Rust Inhibitor Spray Booth, RI-2	0.02	0.02	0.02	0.00	0.68	0.00	0.00	0.00
Paint Booth, PB-1	4.41	4.41	4.41	0.00	0.94	0.00	0.00	0.68
NMP washer, N-1	0.00	0.00	0.00	0.00	1.50	0.00	0.00	0.45
NMP washer, N-2	0.00	0.00	0.00	0.00	.90	0.00	0.00	0.45
NMP washer, N-3	0.00	0.00	0.00	0.00	1.20	0.00	0.00	0.45
Wabash rubber molding presses, W-1, W-2, W-3 and W-4	0.00	0.00	0.00	0.00	2.49	0.00	0.00	0.72
Rep rubber molding presses, R-1, R-2, R-3 and R-4	0.00	0.00	0.00	0.00	1.79	0.00	0.00	0.52
Desma rubber molding presses, D-1 and D-2	0.00	0.00	0.00	0.00	0.92	0.00	0.00	0.27
Grieve rubber post cure ovens	0.00	0.00	0.00	0.00	1.07	0.00	0.00	0.20
Mechanical Shot Blaster-Abrasive Blasting, Blaster 1	0.0034	0.0034	0.0034	0.00	0.00	0.00	0.00	0.00
Mechanical Shot Blaster-Abrasive Blasting, Blaster 2	0.0034	0.0034	0.0034	0.00	0.00	0.00	0.00	0.00
Mechanical Shot Blaster-Abrasive Blasting, Blaster 3	0.0034	0.0034	0.0034	0.00	0.00	0.00	0.00	0.00
Natural Gas combustion	0.14	0.14	0.14	0.01	0.10	1.57	1.87	0.04
Total Emissions	52.67	52.67	52.67	0.01	18.41	1.57	1.87	10.76
Title V Major Source Thresholds	NA	100	100	100	100	100	100	10/25
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA

- (a) This existing stationary source is not major for PSD because the emissions of each criteria pollutant are less than two hundred fifty (<250) tons per year, and it is not one of the twenty-eight (28) listed source categories.

- (b) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

Federal Rule Applicability

For NSPS/NESHAPs

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit renewal for this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit renewal.
- (c) This source is not subject to the requirements of the New Source Performance Standard (NSPS), Standards of Performance for Surface Coating of Metal Furniture, 326 IAC 12 (40 CFR 60.310 Subpart EE), because the provisions of this subpart apply to each metal furniture surface coating operation in which organic coatings are applied and the source does not contain any metal furniture surface coating operation.
- (d) This source is not subject to the requirements of the New Source Performance Standard (NSPS), Standards of Performance for Industrial Surface Coating: Large Appliances, 326 IAC 12 (40 CFR 60.450, Subpart SS), since Standards of Performance for Industrial Surface Coating: Large Appliances apply to each surface coating operation in a large appliance surface coating line and spray booth lines at the source do not fit the definition of large appliance surface coating line.
- (e) This source is not subject to the requirements of the New Source Performance Standard (NSPS), Standards of Performance for Metal Coil Surface Coating, 326 IAC 12 (40 CFR 60.460, Subpart TT), since the source does not contain any organic surface coating operation that applies coating to the surface of any continuous metal strip with thickness of 0.15 millimeter (mm) (0.006 in.) or more that is packaged in a roll or coil.
- (f) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants: Surface Coating of Large Appliances (NESHAP), Subpart NNNN since it is not a major HAP source as defined in 40 CFR 63, subpart A.
- (g) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Furniture (NESHAP), Subpart RRRR since it is not a major HAP source as defined in 40 CFR 63, subpart A.
- (h) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Coil (NESHAP), Subpart SSSS since it is not a major source as defined in 40 CFR 63, subpart A.
- (i) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Halogenated Solvent Cleaning, Subpart T because the provisions of this subpart apply to each individual batch vapor, in-line vapor, in-line cold, and batch cold solvent cleaning machine that uses any solvent containing methylene chloride (CAS No. 75-09-2), perchloroethylene (CAS No. 127-18-4), trichloroethylene (CAS No. 79-01-6), 1,1,1-trichloroethane (CAS No. 71-55-6), carbon tetrachloride (CAS No. 56-23-5) or chloroform (CAS No. 67-66-3), or any combination of these halogenated HAP solvents, in a total concentration greater than 5 percent by weight, as a cleaning and/or drying agent and the source does not have any washer/degreaser that uses any solvent mentioned in 40 CFR 63.460 (a).

- (j) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants for Nine Metal Fabrication and Finishing Source Categories (40 CFR 63, Subpart XXXXXX), because even though this source is an area source engaging in fabrication of metal products and is in one of the SIC categories that are applicable to Subpart XXXXXX, the existing affected source does not use materials that contain cadmium, chromium, lead, or nickel in amounts greater than or equal to 0.1 percent by weight (of the metal), and materials that contain manganese in amounts greater than or equal to 1.0 percent by weight (of the metal), as shown in the Material Safety Data Sheets.
- (k) This source is not subject to the requirements of Subpart HHHHHH - National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources.

The requirements of this NESHAP apply to an area source of HAPs which is involved in any of the following activities:

- (a) Performs Paint stripping operations that involve the use of chemical strippers that contain methylene chloride (MeCl) (Chemical Abstract Service number 75092) in paint removal processes.
- (b) Performs spray coating operations for autobody refinishing and mobile equipment.
- (c) Performs spray coatings (containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd)) operations for any part or product made of metal or plastic, or combinations of metal and plastic.

The source does not perform any paint stripping operations that involve the use of chemical strippers that contain methylene chloride (MeCl) (Chemical Abstract Service number 75092) in paint removal processes and does not perform refinishing operations on automobiles or mobile equipment. Although, the source performs metal coating (miscellaneous coating) operations, the source does not use any coatings that contain chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd).

- (l) The requirements of 40 CFR Part 64, Compliance Assurance Monitoring (CAM) is not included in this permit. This source is operating as a MSOP. Therefore, the requirements of 40 CFR 64, Compliance Assurance Monitoring are not applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))

MSOP applicability is discussed under the Permit Level Determination – MSOP section above.

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

The potential to emit of all attainment regulated pollutants from the entire source will continue to be less than 250 tons per year, and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply. See PTE of the Entire Source.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The operation of the auto parts surface coating operation will emit less than 10 tons per year of a single HAP and less than 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

Pursuant to 326 IAC 2-6-1, this source is not subject to this rule because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake or Porter counties and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Opacity Limitations)

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

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

326 IAC 8-6-1 (Organic Solvent Emission Limitations)

326 IAC 8-6-1 is not applicable to this source since the source is located in Noble County and was constructed after January 1, 1980. Moreover, the source-wide VOC emissions are less than one hundred (100) tons per year.

State Rule Applicability – Individual Facilities

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

Particulate from the surface coating operations shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:

Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

Pursuant to 326 IAC 6-3-2 (d) (4), surface coating manufacturing processes are exempted from the requirements of 326 IAC 6-3 since each of them uses less than five (5) gallons of coating per day.

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

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.

The mechanical shot blasters have a maximum process weight rate of 80 pounds per unit and the methods in 326 IAC 6-3-2 (b) through (d) do not apply. Therefore the allowable emissions for each of the facilities will be 0.551 pounds per hour.

$$\text{Limited emissions from each shot blaster} = \frac{(0.01 \text{ lb PM})(80 \text{ lb})(1-.999)}{(\text{lb abrasive})(\text{hr})} = 0.0008 \text{ lb/hr}$$

The controlled emission of 0.0008 lb/hr is less than the allowable emission of 0.551 lb/hr, therefore each of these units comply with this limit. The baghouse shall be in operation at all times the mechanical shot blasters are in operation, in order to comply with this limit.

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

This source performs the metal coating process and the source is under the Standard Industrial Classification Code of major group #34, so applicability was determined for each booth.

Pursuant to 326 IAC 8-2-1(2) the spray booths identified as P-1, P-2, P-3, P-4, P-5, P-6, P-7, P-8, P-9, the brush coater or timing mark stations identified as BC-1, BC-2, BC-3, BC-4, and the adhesive roll coater identified as AR-1 are all not subject to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) although the booths were all constructed in 1989, which is after the November 1, 1980, applicability date and are located in Noble county, each of the booths do not have PTE of or greater than twenty-five tons per year.

Pursuant to 326 IAC 8-2-1(4), the adhesive roll coater units, AR-2 and AR-3, the rust inhibitor units identified as RI-1 and RI-2 and the paint booth identified as PB-1 are all not subject to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) although these booths were all constructed in 2007, which is after the July 1, 1990, applicability date, and located in Noble county, each of the booths do not have actual emissions of greater than fifteen (15) pounds of VOC per day.

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

Pursuant to 326 IAC 8-3-2, the owner or operator of the NMP washers cold cleaning shall:

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

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

- (a) The requirements of 326 IAC 8-3-5 apply to any new cold cleaner degreaser located in any county in Indiana and not equipped with remote solvent reservoirs. The NMP washers, cold cleaner degreaser facilities are not equipped with remote solvent reservoirs and therefore the requirements of 326 IAC 8-3-5 shall apply.

Pursuant to 326 IAC 8-3-5(a), the owner or operator of the NMP washers, cold cleaner degreaser facilities shall:

- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

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

326 IAC 20-6-1 (Halogenated solvent cleaning)

326 IAC 20-6-1 is not applicable to the NMP washers, cold cleaners and degreaser facilities because these facilities do not use any solvent containing the halogenated compounds listed in 326 IAC 20-6-1 (a).

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-6.1 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-6.1-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

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

There continues to be no specific testing requirements associated with any of the emission units located at this source and no specific compliance monitoring requirements for the activities, and each of the natural gas-fired combustion sources.

Particulate from the surface coating operations must be controlled by dry filters and operate in accordance with manufacturer's specifications to ensure compliance with 326 IAC 6-3 and 326 IAC 2-6.1 (MSOP). The shot blasters must be controlled by the baghouses at all times when operating.

The source shall continue to follow the operator-training program for all spray booth operators or employees that perform maintenance at the surface coating facilities. Employees shall be trained in the proper set-up and operation of the particulate control system and shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. All existing operators should have already been trained within 60 days of the issuance of permit notice only change (112-23741-00080) on January 26, 2007, and all new operators thereafter shall be trained upon hiring or transfer and all operators shall be given refresher training annually. The training program shall be in writing and include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. The source is to maintain a copy of the training program, the list of trained operators and all training records on site or available within 1 hour for inspection by IDEM.

Recommendation

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

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

An application for the purposes of this review was received on July 20, 2009. Additional information was received on September 3, September 28, October 2 and October 14, 2009.

Conclusion

The operation of this stationary automobile parts product plant for machining and surface coating of auto parts operation shall be subject to the conditions of the attached MSOP Renewal No. **113-28237-00080**.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Janet Mobley at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5373 or toll free at 1-800-451-6027.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>.
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov.

**Appendix A: Emission Calculations
Summary of Emissions**

**Company Name: Vibration Control Technologies, LLC
Address: 1496 Gerber Street, Ligonier, Indiana 46767
MSOP M113-28237-00080
Reviewer: Janet Mobley**

POTENTIAL TO EMIT IN TONS PER YEAR

Emission Units	PM	PM10	PM2.5	SO ₂	VOC	CO	NOx	HAPs
Spray Booth, P-1	11.07	11.07	11.07	0.00	0.00	0.00	0.00	0.00
Spray Booth, P-2	5.45	5.45	5.45	0.00	1.16	0.00	0.00	0.84
Spray Shadow Booth, P-3	2.60	2.60	2.60	0.00	0.26	0.00	0.00	0.00
Spray Final Booth, P-4	5.21	5.21	5.21	0.00	0.51	0.00	0.00	0.00
Spray Shadow Booth, P-5	2.60	2.60	2.60	0.00	0.26	0.00	0.00	0.00
Spray Final Booth, P-6	5.21	5.21	5.21	0.00	0.51	0.00	0.00	0.00
Spray Booth, P-7	5.19	5.19	5.19	0.00	1.11	0.00	0.00	0.80
Spray Booth, P-8	3.11	3.11	3.11	0.00	0.66	0.00	0.00	0.48
Spray Booth, P-9	7.63	7.63	7.63	0.00	1.63	0.00	0.00	0.70
Brush coater/timing mark station, BC-1	0.00	0.00	0.00	0.00	0.03	0.00	0.00	0.00
Brush coater/timing mark station, BC-2	0.00	0.00	0.00	0.00	0.03	0.00	0.00	0.00
Brush coater/timing mark station, BC-3	0.00	0.00	0.00	0.00	0.03	0.00	0.00	0.00
Brush coater/timing mark station, BC-4	0.00	0.00	0.00	0.00	0.03	0.00	0.00	0.00
Adhesive Roll Coater, AR-1	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.53
Adhesive Roll Coater, AR-2	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.73
Adhesive Roll Coater, AR-3	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.90
Rust Inhibitor Spray Booth, RI-1	0.02	0.02	0.02	0.00	0.60	0.00	0.00	0.00
Rust Inhibitor Spray Booth, R-2	0.02	0.02	0.02	0.00	0.68	0.00	0.00	0.00
Paint Booth, PB-1	4.41	4.41	4.41	0.00	0.94	0.00	0.00	0.68
NMP washer, N-1	0.00	0.00	0.00	0.00	1.50	0.00	0.00	0.45
NMP washer, N-2	0.00	0.00	0.00	0.00	0.90	0.00	0.00	0.45
NMP washer, N-3	0.00	0.00	0.00	0.00	1.20	0.00	0.00	0.45
Wabash rubber molding presses, W-1, W-2, W-3 and W-4	0.00	0.00	0.00	0.00	2.49	0.00	0.00	0.72
Rep rubber molding presses, R-1, R-2, R-3 and R-4	0.00	0.00	0.00	0.00	1.79	0.00	0.00	0.52
Desma rubber molding presses, D-1 and D-2	0.00	0.00	0.00	0.00	0.92	0.00	0.00	0.27
Grieve rubber post cure ovens	0.00	0.00	0.00	0.00	1.07	0.00	0.00	0.20
Mechanical Shot Blaster-Abrasive Blasting, Blaster 1	3.40	3.40	3.40	0.00	0.00	0.00	0.00	0.00
Mechanical Shot Blaster-Abrasive Blasting, Blaster 2	3.40	3.40	3.40	0.00	0.00	0.00	0.00	0.00
Mechanical Shot Blaster-Abrasive Blasting, Blaster 3	3.40	3.40	3.40	0.00	0.00	0.00	0.00	0.00
Natural Gas combustion	0.14	0.14	0.14	0.01	0.10	1.57	1.87	0.04
TOTALS	62.86	62.86	62.86	0.01	18.41	1.57	1.87	10.76

**Appendix A: Emission Calculations
Summary of Emissions**

**Company Name: Vibration Control Technologies, LLC
Address: 1496 Gerber Street, Ligonier, Indiana 46767
MSOP M113-28237-00080
Reviewer: Janet Mobley**

POTENTIAL TO EMIT IN TONS PER YEAR AFTER CONTROLS/LIMITS

Emission Units	PM	PM10	PM2.5	SO ₂	VOC	CO	Nox	HAPs
Spray Booth, P-1	11.07	11.07	11.07	0.00	0.00	0.00	0.00	0.00
Spray Booth, P-2	5.45	5.45	5.45	0.00	1.16	0.00	0.00	0.84
Spray Shadow Booth, P-3	2.60	2.60	2.60	0.00	0.26	0.00	0.00	0.00
Spray Final Booth, P-4	5.21	5.21	5.21	0.00	0.51	0.00	0.00	0.00
Spray Shadow Booth, P-5	2.60	2.60	2.60	0.00	0.26	0.00	0.00	0.00
Spray Final Booth, P-6	5.21	5.21	5.21	0.00	0.51	0.00	0.00	0.00
Spray Booth, P-7	5.19	5.19	5.19	0.00	1.11	0.00	0.00	0.80
Spray Booth, P-8	3.11	3.11	3.11	0.00	0.66	0.00	0.00	0.48
Spray Booth, P-9	7.63	7.63	7.63	0.00	1.63	0.00	0.00	0.70
Brush coater/timing mark station, BC-1	0.00	0.00	0.00	0.00	0.03	0.00	0.00	0.00
Brush coater/timing mark station, BC-2	0.00	0.00	0.00	0.00	0.03	0.00	0.00	0.00
Brush coater/timing mark station, BC-3	0.00	0.00	0.00	0.00	0.03	0.00	0.00	0.00
Brush coater/timing mark station, BC-4	0.00	0.00	0.00	0.00	0.03	0.00	0.00	0.00
Adhesive Roll Coater, AR-1	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.53
Adhesive Roll Coater, AR-2	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.73
Adhesive Roll Coater, AR-3	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.90
Rust Inhibitor Spray Booth, RI-1	0.02	0.02	0.02	0.00	0.60	0.00	0.00	0.00
Rust Inhibitor Spray Booth, R-2	0.02	0.02	0.02	0.00	0.68	0.00	0.00	0.00
Paint Booth, PB-1	4.41	4.41	4.41	0.00	0.94	0.00	0.00	0.68
NMP washer, N-1	0.00	0.00	0.00	0.00	1.50	0.00	0.00	0.45
NMP washer, N-2	0.00	0.00	0.00	0.00	0.90	0.00	0.00	0.45
NMP washer, N-3	0.00	0.00	0.00	0.00	1.20	0.00	0.00	0.45
Wabash rubber molding presses, W-1, W-2, W-3 and W-4	0.00	0.00	0.00	0.00	2.49	0.00	0.00	0.72
Rep rubber molding presses, R-1, R-2, R-3 and R-4	0.00	0.00	0.00	0.00	1.79	0.00	0.00	0.52
Desma rubber molding presses, D-1 and D-2	0.00	0.00	0.00	0.00	0.92	0.00	0.00	0.27
Grieve rubber post cure ovens	0.00	0.00	0.00	0.00	1.07	0.00	0.00	0.20
Mechanical Shot Blaster-Abrasive Blasting, Blaster 1	0.00340	0.00340	0.00340	0.00	0.00	0.00	0.00	0.00
Mechanical Shot Blaster-Abrasive Blasting, Blaster 2	0.00340	0.00340	0.00340	0.00	0.00	0.00	0.00	0.00
Mechanical Shot Blaster-Abrasive Blasting, Blaster 3	0.00340	0.00340	0.00340	0.00	0.00	0.00	0.00	0.00
Natural Gas combustion	0.14	0.14	0.14	0.01	0.10	1.57	1.87	0.04
TOTALS	52.67	52.67	52.67	0.01	18.41	1.57	1.87	10.76

Company Name: Vibration Control Technologies, LLC
Address City IN Zip: 1496 Gerber Street, Ligonier, Indiana 46767
MSOP: M113-28237-00080
Reviewer: Janet Mobley

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency ²
Spray Booths																
Spray Booth, Unit P-2																
Kalcor 094-91110	10.10	6.94%	0.0%	6.9%	0.0%	59.90%	0.00360	105.000	0.70	0.70	0.26	6.36	1.16	5.45	1.17	65%
Spray Booth, Unit P-7																
Kalcor 094-91110	10.10	6.94%	0.0%	6.9%	0.0%	59.90%	0.00360	100.000	0.70	0.70	0.25	6.06	1.11	5.19	1.17	65%
Spray Booth, Unit P-1																
Struktol SCA 1100	7.91	0.00%	0.0%	0.0%	0.0%	0.00%	0.00355	100.000	0.00	0.00	0.00	0.00	0.00	11.07	0.00	10%
Spray Booth, Unit P-8																
Kalcor 094-91110	10.10	6.94%	0.0%	6.9%	0.0%	59.90%	0.00360	60.000	0.70	0.70	0.15	3.63	0.66	3.11	1.17	65%
Spray Shadow Booth, Unit P-3																
Kalcor 094-9218FR	11.30	4.70%	0.0%	4.7%	0.0%	37.00%	0.00120	92.000	0.53	0.53	0.06	1.41	0.26	2.60	1.44	50%
Spray Final Booth, Unit P-4																
Kalcor 094-9218FR	11.30	4.70%	0.0%	4.7%	0.0%	37.00%	0.00240	92.000	0.53	0.53	0.12	2.81	0.51	5.21	1.44	50%
Spray Shadow Booth, Unit P-5																
Kalcor 094-9218FR	11.30	4.70%	0.0%	4.7%	0.0%	37.00%	0.00120	92.000	0.53	0.53	0.06	1.41	0.26	2.60	1.44	50%
Spray Final Booth, Unit P-6																
Kalcor 094-9218FR	11.30	4.70%	0.0%	4.7%	0.0%	37.00%	0.00240	92.000	0.53	0.53	0.12	2.81	0.51	5.21	1.44	50%
Spray Booth, Unit P-9																
VCT Blend	6.60	6.94%	0.0%	6.9%	0.0%	59.90%	0.00360	225.000	0.46	0.46	0.37	8.90	1.63	7.63	0.76	65%
													6.10	48.06		
Brush Coater or Timing Mark Stations																
Brush Coater or Timing Mark Station, Unit BC-1																
Carco F-224	9.19	14.40%	0.0%	80.0%	10.0%	10.00%	0.00001	100.000	8.17	7.35	0.01	0.18	0.03	0.00	73.52	100%
Brush Coater or Timing Mark Station, Unit BC-2																
Carco F-224	9.19	14.40%	0.0%	80.0%	10.0%	10.00%	0.00001	92.000	8.17	7.35	0.01	0.16	0.03	0.00	73.52	100%
Brush Coater or Timing Mark Station, Unit BC-3																
Carco F-224	9.19	14.40%	0.0%	80.0%	10.0%	10.00%	0.00001	92.000	8.17	7.35	0.01	0.16	0.03	0.00	73.52	100%
Brush Coater or Timing Mark Station, Unit BC-4																
Carco F-224	9.19	14.40%	0.0%	80.0%	10.0%	10.00%	0.00001	92.000	8.17	7.35	0.01	0.16	0.03	0.00	73.52	100%
													0.12	0.00		
Adhesive Roll Coaters																
Adhesive Roll Coater, Unit AR-1																
Rubinate M	10.33	0.00%	0.0%	0.0%	0.0%	100.00%	0.00100	105.000	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%
Adhesive Roll Coater, Unit AR-2																
Rubinate M	10.33	0.00%	0.0%	0.0%	0.0%	100.00%	0.00100	75.000	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%
Adhesive Roll Coater, AR-3																
Rubinate M	10.33	0.00%	0.0%	0.0%	0.0%	100.00%	0.00100	85.000	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%
													0.00	0.00		
Rust Inhibitor Spray Booths																
Rust Inhibitor, Unit RI-1																
Rust Veto 4240	6.46	94.00%	0.0%	94.0%	0.0%	6.0w%	0.00030	75.000	6.07	6.07	0.14	3.28	0.60	0.02	n/a	50%
Rust Inhibitor, Unit RI-2																
Rust Veto 4240	6.46	94.00%	0.0%	94.0%	0.0%	6.0w%	0.00030	85.000	6.07	6.07	0.15	3.72	0.68	0.02	n/a	50%
													1.28	0.04		
Paint Booth																
Paint Booth, Unit PB-1																
Kalor 094-91110	10.10	6.94%	0.0%	6.9%	0.0%	59.90%	0.00360	85.000	0.70	0.70	0.21	5.15	0.94	4.41	1.17	65%
											1.92	46.21	15.94	52.47		

METHODOLOGY

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

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

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

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

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

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

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

Transfer Efficiency for HVLP and flat coated surface is 65%

Transfer Efficiency for air atomization spray and flat coated surface is 50%

Appendix A: Emission Calculations

HAP Emission Calculations

Surface coating - spray booths, brush coaters, adhesive roll coaters, rust inhibitor, paint booth and washers

Company Name: Vibration Control Technologies, LLC

Address City IN Zip: 1496 Gerber Street, Ligonier, Indiana 46767

MSOP: M113-28237-00080

Reviewer: Janet Mobley

Material	Density (Lb/Gal)	NMP washer usage (gal/hr)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Diphenylmethane Diisocyanate	Weight % Ethylene Glycol	MIBK	MDI Emissions (ton/yr)	Ethylene Glycol Emissions (ton/yr)	HAPs (ton/yr)
Kalcor 094-91110	10.10		0.00360	105	0.00%	5.00%		0.00	0.84	0.00
Kalcor 094-91110	10.10		0.00360	100	0.00%	5.00%		0.00	0.80	0.00
Struktol SCA 1100	7.91		0.00355	100						
Kalcor 094-91110	10.10		0.00360	60	0.00%	5.00%		0.00	0.48	0.00
Kalcor 094-9218F	10.28		0.00355	92						
Kalcor 094-9218F	10.28		0.00355	92						
Kalcor 094-9218F	10.28		0.00355	92						
Kalcor 094-9218F	10.28		0.00355	92						
VCT Blend	6.60		0.00360	225	0.00%		3.00%	0.00	0.00	0.70
Carco F-224	9.19		0.00001	100						
Carco F-224	9.19		0.00001	92						
Carco F-224	9.19		0.00001	92						
Carco F-224	9.19		0.00001	92						
Rubinate M	10.33		0.00100	75	45.00%	0.00%		1.53	0.00	0.00
Rubinate M	10.33		0.00100	85	45.00%	0.00%		1.73	0.00	0.00
Rubinate M	10.33		0.00042	105	45.00%	0.00%		0.90	0.00	0.00
Rust Veto 4240	6.50		0.00030	85						
Rust Veto 4240	6.50		0.00030	75						
Kalcor 094-91110	10.10		0.00360	85	0.00%	5.00%		0.00	0.68	0.00
SP708	8.54	0.04		105	0.00%	5.00%		0.00	0.45	0.00
SP708	8.54	0.02		75	0.00%	5.00%		0.00	0.45	0.00
SP708	8.54	0.03		85	0.00%	5.00%		0.00	0.45	0.00

Total State Potential Emissions

4.16

4.14

0.70

METHODOLOGY

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

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

Appendix A: Emissions Calculations

VOC and Particulate

NMP Washers, N-1, N-2 and N-3

Company Name: Vibration Control Technologies, LLC

Address City IN Zip: 1496 Gerber Street, Ligonier, Indiana 46767

MSOP: M113-28237-00080

Reviewer: Janet Mobley

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	NMP washer usage (gal/hr)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency*
NMP Washers																	
NMP Washer, Unit N-1																	
SP-708	8.54	100.00%	0.0%	100.0%	0.0%	0.00%	0.040	0.00	105.00	8.54	8.54	0.34	8.20	1.50	0.00	n/a	n/a
NMP Washer, Unit N-2																	
SP-708	8.54	100.00%	0.0%	100.0%	0.0%	0.00%	0.024	0.00	75.00	8.54	8.54	0.20	4.92	0.90	0.00	n/a	n/a
NMP Washer, Unit N-3																	
SP-708	8.54	100.00%	0.0%	100.0%	0.0%	0.00%	0.0320	0.00	85.00	8.54	8.54	0.27	6.56	1.20	0.00	n/a	n/a

0.82	19.68	3.59
-------------	--------------	-------------

Methodolgy

Potential VOC pounds per hour = NMP washer usage(gal/hr) x lbs VOC/gal of coating(lb/gal)

Potential VOC pounds per day = Potential VOC lbs/hr*24hrs/day

Potential VOC tons per year = VOC lbs/hr*(8760 hr/yr)*(1ton/2000lbs)

VOC Emissions from Molding (Four Presses)

Wabash Rubber Molding Presses, W-1, W-2, W-3 and W-4

Company Name: Vibration Control Technologies, LLC

Address City IN Zip: 1496 Gerber Street, Ligonier, Indiana 46767

MSOP: M113-28237-00080

Reviewer: Janet Mobley

Rubber Processing Capacity (lb/hr)

324

Four Presses

81 lb/hr each

Pollutant	Emission Factor (lb/lb)	Emission Rate (Lb/hr) (lb/hr)	Total Emissions (tons/year)
VOC	0.00175	0.567	2.48346
1,1,1-Trichloroethane	0.0000042	0.0013608	0.005960304
1,2,4-Trichlorobenzene	0	0	0
1,3-Butadiene	7.53E-06	0.00243972	0.010685974
1,4-Dichlorobenzene	0	0	0
Methyl Ethyl Ketone	3.02E-06	0.00097848	0.004285742
2,4 Toluenediamine	0	0	0
MIBK	0	0	0
Acetaldehyde	7.64E-06	0.00247536	0.010842077
Acetonitrile	0	0	0
Acetophenone	0.00044	0.14256	0.6244128
Acrylonitrile	0	0	0
Aniline	0	0	0
Benzene	0	0	0
Methylene Chloride	1.84E-06	0.00059616	0.002611181
Biphenyl	0	0	0
Bis (2-ethylhexyl) phthalate	0.0000026	0.0008424	0.003689712
Carbondisulfide	0.0000042	0.0013608	0.005960304
Carbonyl sulfide	0	0	0
Chloromethane	0	0	0
Cumene	2.76E-06	0.00089424	0.003916771
Dibutylphthalate	7.16E-06	0.00231984	0.010160899
Dibenzofuran	6.72E-08	2.17728E-05	9.53649E-05
Dimethylphthalate	0	0	0
Ethylbenzene	0	0	0
Hexachlorobutadiene	3.93E-07	0.000127332	0.000557714
Napthalene	4.04E-06	0.00130896	0.005733245
Hexane	1.64E-05	0.0053136	0.023273568
o-Toludine	0	0	0
o-Xylene	0	0	0
Phenol	1.28E-06	0.00041472	0.001816474
Propylene Oxide	0	0	0
Tetrachloroethylene	0	0	0
Toluene	2.72E-06	0.00088128	0.003860006
Total HAPs (tons/year)			0.72

Methodology:

Emissions factors are obtained from Volume 4: Emission Factors Application Manual for the Rubber Manufacturer's Association (RMA), May 1996.

Emissions factors were provided by the applicant.

Potential Emissions in tons per year = Max. production rate (lbs/hr) * e.f. (lb/lb) * 4.38

VOC Emissions from Molding (Four Presses)
Rep Rubber Molding Presses R-1, R-2, R-3 and R-4
Company Name: Vibration Control Technologies, LLC
Address City IN Zip: 1496 Gerber Street, Ligonier, Indiana 46767
MSOP: M113-28237-00080
Reviewer: Janet Mobley

Rubber Processing Capacity (lb/hr)

234

Four Presses

58.5 lb/hr each

Pollutant	Emission Factor (lb/lb)	Emission Rate (Lb/hr) (lb/hr)	Total Emissions (tons/year)
VOC	0.00175	0.4095	1.79361
1,1,1-Trichloroethane	0.0000042	0.0009828	0.004304664
1,2,4-Trichlorobenzene	0	0	0
1,3-Butadiene	7.53E-06	0.00176202	0.007717648
1,4-Dichlorobenzene	0	0	0
Methyl Ethyl Ketone	3.02E-06	0.00070668	0.003095258
2,4 Toluenediamine	0	0	0
MIBK	0	0	0
Acetaldehyde	7.64E-06	0.00178776	0.007830389
Acetonitrile	0	0	0
Acetophenone	0.00044	0.10296	0.4509648
Acrylonitrile	0	0	0
Aniline	0	0	0
Benzene	0	0	0
Methylene Chloride	1.84E-06	0.00043056	0.001885853
Biphenyl	0	0	0
Bis (2-ethylhexyl) phthalate	0.0000026	0.0006084	0.002664792
Carbondisulfide	0.0000042	0.0009828	0.004304664
Carbonyl sulfide	0	0	0
Chloromethane	0	0	0
Cumene	2.76E-06	0.00064584	0.002828779
Dibutylphthalate	7.16E-06	0.00167544	0.007338427
Dibenzofuran	6.72E-08	1.57248E-05	6.88746E-05
Dimethylphthalate	0	0	0
Ethylbenzene	0	0	0
Hexachlorobutadiene	3.93E-07	0.000091962	0.000402794
Napthalene	4.04E-06	0.00094536	0.004140677
Hexane	1.64E-05	0.0038376	0.016808688
o-Toludine	0	0	0
o-Xylene	0	0	0
Phenol	1.28E-06	0.00029952	0.001311898
Propylene Oxide	0	0	0
Tetrachloroethylene	0	0	0
Toluene	2.72E-06	0.00063648	0.002787782
Total HAPs (tons/year)			0.52

Methodology:

Emissions factors are obtained from Volume 4: Emission Factors Application Manual for the Rubber Manufacturer's Association (RMA), May 1996.

Emissions factors were provided by the applicant.

Potential Emissions in tons per year = Max. production rate (lbs/hr) * e.f. (lb/lb) * 4.38

Appendix A: Emissions Calculations
VOC Emissions from Molding (Two Presses)

Desma Rubber Molding Presses

Company Name: Vibration Control Technologies, LLC
Address City IN Zip: 1496 Gerber Street, Ligonier, Indiana 46767
MSOP: M113-28237-00080
Reviewer: Janet Mobley

Rubber Processing Capacity (lb/hr)
60 lb/hr each

120	Two Presses
-----	-------------

Pollutant	Emission Factor (lb/lb)	Emission Rate (Lb/hr) (lb/hr)	Total Emissions (tons/year)
VOC	0.00175	0.21	0.9198
1,1,1-Trichloroethane	0.0000042	0.000504	0.00220752
1,2,4-Trichlorobenzene	0	0	0
1,3-Butadiene	7.53E-06	0.0009036	0.003957768
1,4-Dichlorobenzene	0	0	0
Methyl Ethyl Ketone	3.02E-06	0.0003624	0.001587312
2,4 Toluenediamine	0	0	0
MIBK	0	0	0
Acetaldehyde	7.64E-06	0.0009168	0.004015584
Acetonitrile	0	0	0
Acetophenone	0.00044	0.0528	0.231264
Acrylonitrile	0	0	0
Aniline	0	0	0
Benzene	0	0	0
Methylene Chloride	1.84E-06	0.0002208	0.000967104
Biphenyl	0	0	0
Bis (2-ethylhexyl) phthalate	0.0000026	0.000312	0.00136656
Carbondisulfide	0.0000042	0.000504	0.00220752
Carbonyl sulfide	0	0	0
Chloromethane	0	0	0
Cumene	2.76E-06	0.0003312	0.001450656
Dibutylphthalate	7.16E-06	0.0008592	0.003763296
Dibenzofuran	6.72E-08	0.00008064	3.53203E-05
Dimethylphthalate	0	0	0
Ethylbenzene	0	0	0
Hexachlorobutadiene	3.93E-07	0.00004716	0.000206561
Napthalene	4.04E-06	0.0004848	0.002123424
Hexane	1.64E-05	0.001968	0.00861984
o-Toludine	0	0	0
o-Xylene	0	0	0
Phenol	1.28E-06	0.0001536	0.000672768
Propylene Oxide	0	0	0
Tetrachloroethylene	0	0	0
Toluene	2.72E-06	0.0003264	0.001429632
Total HAPs (tons/year)			0.27

Methodology:

Emissions factors are obtained from Volume 4: Emission Factors Application Manual for the Rubber Manufacturer's Association (RMA), May 1996.

Emissions factors were provided by the applicant.

Potential Emissions in tons per year = Max. production rate (lbs/hr) * e.f. (lb/lb) * 4.38

VOC and HAP Emissions from Two (2) Electric Grieve Ovens

Company Name: Vibration Control Technologies, LLC
 Address City IN Zip: 1496 Gerber Street, Ligonier, Indiana 46767
 MSOP No.: M113-28237-00080
 Reviewer: Janet Mobley

Rubber Throughput,
 28.5 pounds each

57

	Total VOC	Total Organic HAPs	Total Metal HAPs	Total HAPs	Total Particulate Matter
Emission Factor in lb/lb	0.0187	0.0035	0.0000	0.0035	0.0000
Potential Emission in tons/yr	1.07	0.20	0.00	0.20	0.00

Methodology

Total Voc = Potential Throughput (pounds)*E.F.lb/lb

Emission Factors were provided by the source. Attachment B Oven Curing Emissions backup documentation

Potential Emission (tons/yr) = Throughput (pounds/hr)* Emission Factor (lb/lb)

Abrasive Blasting - Confined

Company Name: Vibration Control Technologies, LLC
 Address City IN Zip: 1496 Gerber Street, Ligonier, Indiana 46767
 MSOP: M113-28237-00080
 Reviewer: Janet Mobley

These calculations are for one unit - there are 3 identical units total, Blaster1, Blaster2 and Blaster 3

Table 1 - Emission Factors for Abrasives

Abrasive	Emission Factor	
	lb PM / lb abrasive	lb PM10 / lb PM
Sand	0.041	0.70
Grit	0.010	0.70
Steel Shot	0.004	0.86
Other	0.010	1.00

Table 2 - Density of Abrasives (lb/ft3)

Abrasive	Density (lb/ft3)
Al oxides	160
Sand	99
Plastic	12.51

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

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

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

Calculations

Adjusting Flow Rates for Different Abrasives and Nozzle Diameters

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

615
12.51
99
0.5
0.5

Flow Rate (FR) (lb/hr) = 77.714 per nozzle

Uncontrolled Emissions (E, lb/hr)

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

0.010
77.714
0
1

Uncontrolled Emissions =	0.78 lb/hr
	3.40 ton/yr
Controlled Emissions =	0.0034 ton/yr

METHODOLOGY

Emission Factors from STAPPA/ALAPCO "Air Quality Permits", Vol. I, Section 3 "Abrasive Blasting" (1991 edition)

Ton/yr = lb/hr X 8760 hr/yr X ton/2000 lbs

Flow Rate (FR) (lb/hr) = FR1 x (ID/ID1)2 x (D/D1)

E = EF x FR x (1-w/200) x N

PM and PM10 emissions are controlled by a baghouse with a 99.9% control efficiency.

Appendix A: Emission Calculations

Abrasive Blasting - Confined

Company Name: Vibration Control Technologies, LLC
Address City IN Zip: 1496 Gerber Street, Ligonier, Indiana 46767
MSOP: M113-28237-00080
Reviewer: Janet Mobley

Compliance with 326 IAC 6-3-2

Pursuant to 326 IAC 6-3-2 (e) (2), allowable Particulate Emissions = 0.551 lb/hr

Controlled emissions= 0.000777136 <<< 0.551 hence this process complies with 326 IAC 6-3-2.

Appendix A: Emissions Calculations
Natural Gas Fired Heating Units - MMBtu/hr < 100
Company Name: Vibration Control Technologies, LLC
Address City IN Zip: 1496 Gerber Street, Ligonier, Indiana 46767
MSOP: M113-28237-00080
Reviewer: Janet Mobley

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr	
0.960	8.41	Three (3) Space Heaters, each rated @ 0.32 MMBtu/hr
0.400	3.50	Two (2) Space Heaters, each rated @ 0.20 MMBtu/hr
0.100	0.88	One (1) Space Heater rated @ 0.10 MMBtu/hr
1.600	14.02	Four (4) Wash Tank Heaters, each rated @ 0.40 MMBtu/hr
1.200	10.51	Four (4) Sealer Tank Heaters, each rated @ 0.30 MMBtu/hr
Total	37.32	

	Pollutant					
Emission Factor in lb/MMCF	PM*	PM10*	SO2	NOx	VOC	CO
	7.6	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.14	0.14	0.01	1.87	0.10	1.57

*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 next page for HAPs emissions calculations.

**Appendix A: Emissions Calculations
Natural Gas Fired Heating Units - MMBtu/hr < 100**

HAP Emissions

Company Name: Vibration Control Technologies, LLC
Address City IN Zip: 1496 Gerber Street, Ligonier, Indiana 46767
MSOP: M113-28237-00080
Reviewer: Janet Mobley

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	3.918E-05	2.239E-05	1.399E-03	3.359E-02	6.344E-05

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	9.329E-06	2.052E-05	2.612E-05	7.090E-06	3.918E-05

Methodology is the same as previous page.

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



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

SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED

TO: Robert Sams
Vibration Control Technologies, LLC
555 Marathon Blvd.
Findlay, IN 45840

DATE: December 14, 2009

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

SUBJECT: Final Decision
MSOP - Renewal
113-28237-00080

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.

The final decision is being sent to you because our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person.

A copy of the final decision and supporting materials has also been sent via standard mail to:
Steve Sperlazza (President/CEO)
OAQ Permits Branch Interested Parties List

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit. If you think you have received this document in error, please contact Joanne Smiddie-Brush of my staff at 1-800-451-6027 (ext 3-0185), or via e-mail at jbrush@idem.IN.gov.

Final Applicant Cover letter.dot 11/30/07



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December 14, 2009

TO: Ligonier Public Library

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

Subject: **Important Information for Display Regarding a Final Determination**

Applicant Name: Vibration Control Technologies, LLC
Permit Number: 113-28237-00080

You previously received information to make available to the public during the public comment period of a draft permit. Enclosed is a copy of the final decision and supporting materials for the same project. Please place the enclosed information along with the information you previously received. To ensure that your patrons have ample opportunity to review the enclosed permit, **we ask that you retain this document for at least 60 days.**

The applicant is responsible for placing a copy of the application in your library. If the permit application is not on file, or if you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185.

Enclosures
Final Library.dot 11/30/07

Mail Code 61-53

IDEM Staff	MIDENNEY 12/14/2009 Vibration Control Technologies, LLC 113-28237-00080 (final)		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING	
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: CERTIFICATE OF MAILING ONLY	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Robert Sams Vibration Control Technologies, LLC 555 Marathon Blvd Findlay OH 45840 (Source CAATS) via confirmed delivery										
2		Steve Sperlazza President/CEO Vibration Control Technologies, LLC 1496 Gerber St Ligonier IN 46767 (RO CAATS)										
3		Noble County Board of Commissioners 101 North Orange Street Albion IN 46701 (Local Official)										
4		Noble County Health Department 2090 N. State Rd 9, Suite C Albion IN 46701-9566 (Health Department)										
5		Mr. Steve Christman NISWMD 2320 W 800 S, P.O. Box 370 Ashley IN 46705 (Affected Party)										
6		Frederick & Iva Moore 6019 W 650 N Ligonier IN 46767 (Affected Party)										
7		Ligonier City Council and Mayors Office 103 West Third Street Ligonier IN 46767 (Local Official)										
8		Ligonier Public Library 300 S Main St Ligonier IN 46767-1812 (Library)										
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