



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: August 18, 2010

RE: ArvinMeritor / 063 - 28866 - 00046

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



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

**Federally Enforceable State Operating Permit
Renewal
OFFICE OF AIR QUALITY**

**ArvinMeritor
849 Whitaker Road
Plainfield, Indiana 46168**

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

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

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

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

Operation Permit No.: F063-28866-00046	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: August 18, 2010 Expiration Date: August 18, 2020

TABLE OF CONTENTS

A. SOURCE SUMMARY.....	5
A.1 General Information [326 IAC 2-8-3(b)]	
A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]	
A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(l)]	
A.4 FESOP Applicability [326 IAC 2-8-2]	
B. GENERAL CONDITIONS	9
B.1 Definitions [326 IAC 2-8-1]	
B.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]	
B.3 Term of Conditions [326 IAC 2-1.1-9.5]	
B.4 Enforceability [326 IAC 2-8-6] [IC 13-17-12]	
B.5 Severability [326 IAC 2-8-4(4)]	
B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]	
B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]	
B.8 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]	
B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]	
B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]	
B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]	
B.12 Emergency Provisions [326 IAC 2-8-12]	
B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]	
B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]	
B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]	
B.16 Permit Renewal [326 IAC 2-8-3(h)]	
B.17 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]	
B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]	
B.19 Source Modification Requirement [326 IAC 2-8-11.1]	
B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2] [IC 13-30-3-1]	
B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]	
B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16] [326 IAC 2-1.1-7]	
B.23 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]	
C. SOURCE OPERATION CONDITIONS.....	19
Emission Limitations and Standards [326 IAC 2-8-4(1)]	
C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]	
C.2 Overall Source Limit [326 IAC 2-8]	
C.3 Opacity [326 IAC 5-1]	
C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]	
C.6 Fugitive Dust Emissions [326 IAC 6-4]	
C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
Testing Requirements [326 IAC 2-8-4(3)]	
C.8 Performance Testing [326 IAC 3-6]	
Compliance Requirements [326 IAC 2-1.1-11]	
C.9 Compliance Requirements [326 IAC 2-1.1-11]	

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

- C.10 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]
- C.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)]
[326 IAC 2-8-5(1)]

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

- C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
- C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]
- C.14 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]
- C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]
[326 IAC 2-8-5]

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

- C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]
- C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

Stratospheric Ozone Protection

- C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

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

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

- D.1.1 FESOP [326 IAC 2-8-4] [326 IAC 2-2]
- D.1.2 Particulate [326 IAC 6-3-2] [326 IAC 2-2]
- D.1.3 PM Limits [326 IAC 2-2]
- D.1.4 Preventive Maintenance Plan [326 IAC 1-6-3]

Compliance Determination Requirements

- D.1.5 Particulate Control

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

- D.1.6 Broken or Failed Bag/Cartridge Detection
- D.1.7 Baghouse Parametric Monitoring

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

- D.1.8 Record Keeping Requirements

D.2 EMISSIONS UNIT OPERATION CONDITIONS: Surface Coating Operations..... 31

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

- D.2.1 Volatile Organic Compound (VOC) [326 IAC 8-2-9]
- D.2.2 Particulate [326 IAC 6-3-2(d)]
- D.2.3 Preventive Maintenance Plan [326 IAC 1-6-3]

Compliance Determination Requirements

- D.2.4 Volatile Organic Compounds (VOC)
- D.2.5 Particulate Control
- D.2.6 Manufacturer's Specifications [326 IAC 2-8-4(3)]

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

- D.2.7 Monitoring

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

D.2.8 Record Keeping Requirements

D.3 EMISSIONS UNIT OPERATION CONDITIONS: Degreasing Operations 34

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

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

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

D.4 EMISSIONS UNIT OPERATION CONDITIONS: Insignificant Activities 36

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

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

D.4.2 Incinerator Requirements [326 IAC 4-2]

D.4.3 Carbon Monoxide Emission Limits 326 IAC 9-1-2

Certification Form 38

Emergency Occurrence Form 39

Quarterly Deviation and Compliance Monitoring Report Form 41

SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary transmission and brake rebuilding source.

Source Address:	849 Whitaker Road, Plainfield, Indiana 46168
General Source Phone Number:	317-839-9525
SIC Code:	3714
County Location:	Hendricks
Source Location Status:	Nonattainment for PM2.5 standard Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) One (1) tumblast wheelabrator, identified as PL-100, installed after 1990, using a baghouse (DC-1) for particulate control, exhausting inside the building, capacity: 660 pounds of transmission and brake parts per hour, utilizing 12,000 pounds of steel shot per hour.
- (b) One (1) spinblast wheelabrator, identified as PL-101, installed after 1990, using a mpf cartridge collector (DC-2) for particulate control, exhausting inside the building, capacity: 2,100 pounds of transmission and brake parts per hour, utilizing 27,000 pounds of steel shot per hour.
- (c) One (1) sandblast wheelabrator, identified as PL-104, installed after 1990, using a baghouse (DC-3) for particulate control, exhausting inside the building, capacity: 100 pounds of transmission and brake parts per hour, utilizing 570 pounds of sand per hour.
- (d) One (1) tumblast wheelabrator, identified as PL-118, installed after 1990, using a baghouse (DC-4) for particulate control, exhausting inside the building, capacity: 660 pounds of transmission and brake parts per hour, utilizing 12,000 pounds of steel shot per hour.
- (e) One (1) tumblast finishing unit, identified as PL-123, installed after 1990, equipped with a baghouse (DC-5) for particulate control, exhausting inside the building, capacity: 1,980 pounds of transmission and brake parts per hour, utilizing 16,800 pounds of steel shot per hour.
- (f) One (1) tumblast finishing unit, identified as PL-124, installed after 1990, equipped with a baghouse (DC-7) for particulate control, exhausting inside the building, capacity: 1,980 pounds of transmission and brake parts per hour, utilizing 16,800 pounds of steel shot per hour.

- (g) One (1) tumblast finishing unit, identified as PL-125, installed after 1990, equipped with a baghouse (DC-6) for particulate control, exhausting inside the building, capacity: 1,980 pounds of transmission and brake parts per hour, utilizing 16,800 pounds of steel shot per hour.
- (h) One (1) twelve (12) cubic feet pangborn rotoblast barrel abrasive blasting unit #4, identified as PL-126, installed after 1990, equipped with a baghouse (DC-6) for particulate control, exhausting inside the building, capacity: 4,680 pounds of transmission and brake parts per hour, utilizing 33,600 pounds of steel shot per hour.
- (i) One (1) twelve (12) cubic feet abrasive tumble blaster, identified PL-127, installed after 1990, equipped with a baghouse (DC-6) for particulate control, exhausting inside the building, capacity: 4,680 pounds of transmission and brake parts per hour, utilizing 33,600 pounds of steel shot per hour.
- (j) One (1) abrasive tumble blast unit, identified as PL-128, installed in 2005, equipped with a cartridge dust collector (DC-8) for particulate control, exhausting inside the building, capacity: 1980 pounds of transmission and brake parts per hour, utilizing 15,300 pounds of steel shot per hour.
- (k) One (1) abrasive tumble blast unit, identified as PL-129, installed in 2005, equipped with a cartridge dust collector (DC-9) for particulate control, exhausting inside the building, capacity: 1980 pounds of transmission and brake parts per hour, utilizing 15,300 pounds of steel shot per hour.
- (l) One (1) abrasive tumble blast unit, identified as PL-130, installed in 2005, equipped with a cartridge dust collector (DC-10) for particulate control, exhausting inside the building, capacity: 1980 pounds of transmission and brake parts per hour, utilizing 15,300 pounds of steel shot per hour.
- (m) One (1) abrasive blasting unit, identified as PL-131, constructed in 2007, with a capacity of 2,025 pounds of parts processed per hour, using 54,275 pounds of steel shot per hour and a six (6) cartridge dust collection system, identified as (DC-11) for particulate control, and exhausting inside the building.
- (n) One (1) steel blaster, identified PL-132, constructed in 2009, equipped with baghouse (DC-12) for particulate control, exhausting inside the building, capacity: 4,680 pounds of transmission and brake parts per hour, utilizing 33,600 pounds of steel shots per hour.
- (o) One (1) steel blaster, identified PL-133, constructed in 2009, equipped with baghouse (DC-13) for particulate control, exhausting inside the building, capacity: 4,680 pounds of transmission and brake parts per hour, utilizing 33,600 pounds of steel shots per hour.
- (p) One (1) dip coating booth, identified as PL-121A, installed after 1990, exhausting to stack PL-121A, capacity: 750 metal brake shoes per hour.
- (q) One (1) spray paint booth, identified as PB-1, installed after 1990, equipped with two (2) HVLP spray guns, equipped with dry filters for particulate control, exhausting to stack S-13, capacity: 40 transmission units per hour.
- (r) One (1) axle spray coating operation, constructed in 2007, applying either a water-based primer or a zinc primer/urethane based topcoat, with a maximum capacity of 9 units per hour due to an operational bottleneck at the one (1) abrasive blasting unit, identified as PL-131, consisting of:

- (1) One (1) spray paint booth, identified as PB-2, constructed in 2007, equipped with two (2) HVLP spray guns with a maximum application rate of 0.266 gallons per unit, using dry filters for particulate control and exhausting to stack SVPB-2.
- (s) One (1) spray paint booth, identified as PB-4, constructed in 2008, equipped with two (2) HVLP spray guns with a maximum application rate of 0.20 gallons per hour, seven (7) pieces per hour, utilizing water based primer and black water-reducible coat, using panel dry filters for particulate control and exhausting to stack SVPB-4.
- (t) One (1) enclosed powder coating booth, identified as PC1, utilizing electrostatic airless gun, constructed in 2008, equipped with integral cartridge filters for particulate control, capacity: 0.087 pounds of powder per unit and 960 brake shoes per hour, with a maximum process throughput of 4.36 tons per hour and venting inside.
- (u) Degreasing operations consisting of:
 - (1) Handwipe operations, installed after 1990, using a maximum of 1,080 gallons of degreasing solvent per year.
 - (2) Eight (8) cold cleaner degreaser dip tanks identified as PL-103, PL-111, PL-112, PL-113, PL-114, PL-115, PL-116, PL-117 and two (2) vibratory degreaser tanks identified as, PL-102 and PL-120, installed after 1990, capacity: 1500 gallons per year, total.
 - (3) One (1) Cold Cleaner degreaser dip tank, identified as CC11, approved for construction in 2007, uncontrolled and using a maximum of 365 gallons of degreasing solvent per year.
 - (4) One (1) Cold Cleaner degreaser dip tank, identified as CC12, approved for construction in 2008, uncontrolled and using a maximum of 365 gallons of degreasing solvent per year.
- (v) One (1) Falcon Graphite cutting/weld removal operation, identified as WRB1, approved for construction in 2007, with a maximum capacity of nine (9) axles per hour and no control, exhausting through stack WRB-1. [326 IAC 6-3-2]

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

This stationary source also includes the following insignificant activities:

- (a) One (1) bake-off oven, identified as PL-110, installed after 1990, equipped with an integral secondary combustion chamber, exhausting to Stack S-9, capacity: 0.5 million British thermal units per hour.[326 IAC 4-2]
- (b) One (1) MIG welding station, identified as PL-119, installed after 1990, with a maximum wire consumption of 0.02 pounds per day.
- (c) One (1) natural gas-fired Proceco brake parts washer, identified as PL-122, installed after 1990, using only water and detergents and employing two (2) natural gas-fired tube heaters, exhausting to stack PL-122, capacity: 1.90 million British thermal units per hour, combined.
- (d) One (1) natural gas-fired Proceco aqueous core washer, identified as PL-106, installed after 1990, using only water and detergents, exhausting to stack PL-106, capacity: 0.90 million British thermal units per hour.

- (e) One (1) natural gas-fired Mart aqueous parts washer, identified as PL-105, installed after 1990, using only water and detergents, exhausting to stack PL-105, capacity: 0.5 million British thermal units per hour.
- (f) One (1) natural gas-fired Mart aqueous tornado parts washer, identified as PL-107, installed after 1990, using only water and detergents, exhausting to stack PL-107, capacity: 0.5 million British thermal units per hour.
- (g) One (1) natural gas-fired Mart aqueous clutch washer, identified as PL-109, installed after 1990, using only water and detergents, exhausting to stack PL- 109, capacity: 0.5 million British thermal units per hour.
- (h) One (1) natural gas-fired, aqueous parts washer, identified as PW1A, installed in 2007, using only water, exhausting to stack SVPW1A, capacity: 1.5 million British thermal units per hour.
- (i) One (1) natural gas-fired, aqueous parts washer, identified as PW2, approved for construction in 2008 using alkaline (non-VOC) detergents, exhausting to stack SVPW2, capacity: 0.5 million British thermal units per hour.
- (j) Natural Gas-fired combustion units:
 - (1) One (1) natural gas-fired process water heater, identified as PCS1, approved for construction in 2008, exhausting to stack SVPW2, capacity: 2.0 million British thermal units per hour.
 - (2) One (1) natural gas-fired process water heater, identified as PCS3, approved for construction in 2008, exhausting to stack SVPW2, capacity: 1.5 million British thermal units per hour.
 - (3) One (1) natural gas-fired powder coat drying oven, identified as PCD1, approved for construction in 2008, exhausting to stack SVPW2, capacity: 1.5 million British thermal units per hour.
 - (4) One (1) natural gas-fired Powder coat curing oven, identified as PCC1, approved or construction in 2008, exhausting to stack SVPW2, capacity: 2.5 million British thermal units per hour.
- (k) One (1) MIG and stick welding station, identified as WLD2, approved for construction in 2009, exhausting inside, with a maximum wire consumption of 5.40 pounds per hour combined.
- (l) Miscellaneous hand held equipment usage for paint application containing VOC, approved for construction in 2009, utilizing spray cans, roll coat method, capacity: less than three (3) pounds per day VOC.
- (m) Platinum Line Touch Up Painting Operation, approved for construction in 2010, identified as PL-134, using spray/aerosol can, maximum capacity is 3.37 gallons per day, with no control, exhausting inside the building

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

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

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, F063-28866-00046, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability [326 IAC 2-8-6] [IC 13-17-12]

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

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

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

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

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

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

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

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

- (a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:

- (i) it contains a certification by an "authorized individual", as defined by 326 IAC 2-1.1-1(1), and
- (ii) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

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

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

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

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

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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

- (a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:
- (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.

The Permittee shall implement the PMPs.

- (b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

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

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

The Permittee shall implement the PMPs.

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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

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

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

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

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

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

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

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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

- (a) All terms and conditions of permits established prior to F063-28866-00046 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised, or

(3) deleted.

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

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

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

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

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

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

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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 nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
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 does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) through (d) without a prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
 - (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

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

and

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

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

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

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

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

B.19 Source Modification Requirement [326 IAC 2-8-11.1]

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

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

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

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

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

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

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

Indiana Department of Environmental Management
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 does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

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

- (a) The Permittee shall pay annual fees to IDEM, OAQ no later than thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.23 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

(a) Pursuant to 326 IAC 2-8:

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

(b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

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

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

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-1 (Applicability) and 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 except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

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 that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

C.8 Performance Testing [326 IAC 3-6]

- (a) For performance testing required by this permit, 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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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 2-8-4][326 IAC 2-8-5(a)(1)]

C.10 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or of initial start-up, whichever is later, to begin such monitoring. If due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance or the date of initial startup, whichever is later, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

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

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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

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

C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

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

C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

C.14 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

- (a) The Permittee shall take reasonable response steps to 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 excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned or are returning 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 normal or usual manner of operation.
- (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 record the reasonable response steps taken.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) 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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

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

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

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (b) The address for report submittal is:

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
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

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

SECTION D.1

FACILITY OPERATION CONDITIONS

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

- (a) One (1) tumblast wheelabrator, identified as PL-100, installed after 1990, using a baghouse (DC-1) for particulate control, exhausting inside the building, capacity: 660 pounds of transmission and brake parts per hour, utilizing 12,000 pounds of steel shot per hour.
- (b) One (1) spinblast wheelabrator, identified as PL-101, installed after 1990, using a mpf cartridge collector (DC-2) for particulate control, exhausting inside the building, capacity: 2,100 pounds of transmission and brake parts per hour, utilizing 27,000 pounds of steel shot per hour.
- (c) One (1) sandblast wheelabrator, identified as PL-104, installed after 1990, using a baghouse (DC-3) for particulate control, exhausting inside the building, capacity: 100 pounds of transmission and brake parts per hour, utilizing 570 pounds of sand per hour.
- (d) One (1) tumblast wheelabrator, identified as PL-118, installed after 1990, using a baghouse (DC-4) for particulate control, exhausting inside the building, capacity: 660 pounds of transmission and brake parts per hour, utilizing 12,000 pounds of steel shot per hour.
- (e) One (1) tumblast finishing unit, identified as PL-123, installed after 1990, equipped with a baghouse (DC-5) for particulate control, exhausting inside the building, capacity: 1,980 pounds of transmission and brake parts per hour, utilizing 16,800 pounds of steel shot per hour.
- (f) One (1) tumblast finishing unit, identified as PL-124, installed after 1990, equipped with a baghouse (DC-7) for particulate control, exhausting inside the building, capacity: 1,980 pounds of transmission and brake parts per hour, utilizing 16,800 pounds of steel shot per hour.
- (g) One (1) tumblast finishing unit, identified as PL-125, installed after 1990, equipped with a baghouse (DC-6) for particulate control, exhausting inside the building, capacity: 1,980 pounds of transmission and brake parts per hour, utilizing 16,800 pounds of steel shot per hour.
- (h) One (1) twelve (12) cubic feet pangborn rotoblast barrel abrasive blasting unit #4, identified as PL-126, installed after 1990, equipped with a baghouse (DC-6) for particulate control, exhausting inside the building, capacity: 4,680 pounds of transmission and brake parts per hour, utilizing 33,600 pounds of steel shot per hour.
- (i) One (1) twelve (12) cubic feet abrasive tumble blaster, identified as PL-127, installed after 1990, equipped with a baghouse (DC-6) for particulate control, exhausting inside the building, capacity: 4,680 pounds of transmission and brake parts per hour, utilizing 33,600 pounds of steel shot per hour.
- (j) One (1) abrasive tumble blast units, identified as PL-128, installed in 2005, equipped with a cartridge dust collector (DC-8) for particulate control, exhausting inside the building, capacity: 1980 pounds of transmission and brake parts per hour, utilizing 15,300 pounds of steel shot per hour.
- (k) One (1) abrasive tumble blast unit, identified as PL-129, installed in 2005, equipped with a cartridge dust collector (DC-9) for particulate control, exhausting inside the building, capacity: 1980 pounds of transmission and brake parts per hour, utilizing 15,300 pounds of steel shot per hour.

- (l) One (1) abrasive tumble blast unit, identified as PL-130, installed in 2005, equipped with a cartridge dust collector (DC-10) for particulate control, exhausting inside the building, capacity: 1980 pounds of transmission and brake parts per hour, utilizing 15,300 pounds of steel shot per hour.
- (m) One (1) abrasive blasting unit, identified as PL-131, constructed in 2007, with a capacity of 2,025 pounds of parts processed per hour, using 54,275 pounds of steel shot per hour and a six (6) cartridge dust collection system, identified as DC-11 for particulate control, and exhausting inside the building.
- (n) One (1) steel blaster, identified PL-132, constructed in 2009, equipped with baghouse (DC-12) for particulate control, exhausting inside the building, capacity: 4,680 pounds of transmission and brake parts per hour, utilizing 33,600 pounds of steel shots per hour .
- (o) One (1) steel blaster, identified PL-133, constructed in 2009, equipped with baghouse (DC-13) for particulate control, exhausting inside the building, capacity: 4,680 pounds of transmission and brake parts per hour, utilizing 33,600 pounds of steel shots per hour.

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

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

D.1.1 FESOP [326 IAC 2-8-4] [326 IAC 2-2]

Pursuant to 326 IAC 2-8-4, each of the abrasive blasting units equipped with baghouses/ cartridges, shall not exceed the following hourly PM₁₀ and PM_{2.5} emission limits:

Unit ID/Control Device	PM ₁₀ Emission Limits (pounds/hour)	PM _{2.5} Emission Limits (pounds/hour)
PL-100 / DC-1	0.41	0.41
PL-101 / DC-2	0.93	0.93
PL-104 / DC-3	0.16	0.16
PL-118 / DC-4	0.41	0.41
PL-123 / DC-5	0.58	0.58
PL-124 / DC-7	0.58	0.58
PL-125, PL-126, and PL-127 / DC-6	2.90	2.90
PL-128 / DC-8	0.53	0.53
PL-129 / DC-9	0.53	0.53
PL-130 / DC-10	0.53	0.53
PL-131 / DC-11	0.19	0.19
PL-132 / DC-12	1.156	1.156
PL-133 / DC-13	0.578	0.578

Compliance with these limits, combined with the PM₁₀ and PM_{2.5} from other emission units, shall limit emissions from the entire source to less than one hundred (100) tons per year for PM₁₀ and PM_{2.5} each and render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (PSD) not applicable.

D.1.2 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rates from the abrasive blasting operations shall be limited as follows:

Unit ID/Control Device	Process Weight Rate (ton/hour)	Particulate Emission Limits (pound/hour)
PL-100 / DC-1	0.33	1.95
PL-101 / DC-2	1.05	4.24
PL-104 / DC-3	0.05	0.551
PL-118 / DC-4	0.33	1.95
PL-123 / DC-5	0.99	4.07
PL-125 / DC-6	0.99	4.07
PL-126 / DC-6	2.34	7.25
PL-127 / DC-6	2.34	7.25
PL-124 / DC-7	0.99	4.07
PL-128 / DC-8	0.99	4.07
PL-129 / DC-9	0.99	4.07
PL-130 / DC-10	0.99	4.07
PL-131 / DC-11	1.01	4.13
PL-132 / DC-12	2.34	7.25
PL-133/ DC-13	2.34	7.25

The pounds per hour limitations were calculated with the following equation:

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

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

D.1.3 PM Limits [326 IAC 2-2]

Pursuant to 326 IAC 2-2, the allowable particulate emission rates from the abrasive blasting operations shall be limited as follows:

Unit ID / Control Device	Particulate Emission Limits (pounds / hour)
PL-100 / DC-1	1.95
PL-101 / DC-2	4.24
PL-104 / DC-3	0.551
PL-118 / DC-4	1.95
PL-123 / DC-5	4.07
PL-124 / DC-7	4.07
PL-125, PL-126, and PL-127 / DC-6	5.75

PL-128 / DC-8	4.07
PL-129 / DC-9	4.07
PL-130 / DC-10	4.07
PL-131 / DC-11	4.13
PL-132 / DC-12	7.24
PL-133/ DC-13	7.24

This source shall comply with these limits through the use of the control devices, DC-1 through DC-13.

Compliance with these limits combined with the PM from other emission units shall limit emissions from the entire source to less than two hundred fifty (250) tons per year for PM and render the requirements of 326 IAC 2-2 (PSD) not applicable.

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

A Preventive Maintenance Plan is required for these facilities and their control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventative maintenance plan required by this condition.

Compliance Determination Requirements

D.1.5 Particulate Control

In order to comply with Conditions D.1.1, and D.1.2, the baghouses/cartridges, identified as DC-1 through DC-13, for particulate control shall be in operation and control emissions from the abrasive blasting operations at all times that the abrasive blasting operations are in operation.

Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.6 Broken or Failed Bag/Cartridge Detection

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

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

D.1.7 Baghouse Parametric Monitoring

- (a) The Permittee shall record the pressure drop across each baghouse when used in conjunction with the abrasive blasting at least once per day when the process is in operation. When for any one reading, the pressure drop across each baghouse is outside the normal range of 2.0 and 8.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the

reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

- (b) The Permittee shall record the pressure drop across the cartridge dust collectors when used in conjunction with the abrasive blasting at least once per day when the process is in operation. When for any one reading, the pressure drop across the cartridge dust collectors is outside the normal range of 1.0 and 7.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (c) The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.8 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.6, the Permittee shall maintain records once per day of the pressure drop during normal operation. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g., the process did not operate that day).
- (b) Section C - General Record Keeping Requirements, of this permit contains the Permittee's obligation with regard to the reports required by this condition.

SECTION D.2

FACILITY OPERATION CONDITIONS

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

- (p) One (1) dip coating booth, identified as PL-121A, installed after 1990, exhausting to stack PL-121A, capacity: 750 metal brake shoes per hour.
- (q) One (1) spray paint booth, identified as PB-1, installed after 1990, equipped with two (2) HVLP spray guns, equipped with dry filters for particulate control, exhausting to stack S-13, capacity: 40 transmission units per hour.
- (r) One (1) axle spray coating operation, constructed in 2007, applying either a water-based primer or a zinc primer/urethane based topcoat, with a maximum capacity of 9 units per hour due to an operational bottleneck at the one (1) abrasive blasting unit, identified as PL-131, consisting of:
 - (1) One (1) spray paint booth, identified as PB-2, constructed in 2007, equipped with two (2) HVLP spray guns with a maximum application rate of 0.266 gallons per unit, using dry filters for particulate control and exhausting to stack SVPB-2.
- (s) One (1) spray paint booth, identified as PB-4, constructed in 2008, equipped with two (2) HVLP spray guns with a maximum application rate of 0.20 gallons per hour, seven (7) pieces per hour, utilizing water based primer and black water-reducible coat, using panel dry filters for particulate control and exhausting to stack SVPB-4.
- (t) One (1) enclosed powder coating booth, identified as PC1, utilizing electrostatic airless gun, constructed in 2008, equipped with integral cartridge filters for particulate control, capacity: 0.087 pounds of powder per unit and 960 brake shoes per hour, with a maximum process throughput of 4.36 tons per hour and venting inside.

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

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

D.2.1 Volatile Organic Compound (VOC) [326 IAC 8-2-9]

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to PL-121A, PB-1, PB-2, PB-4, and PC1 shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air (less than 90°C or 194°F) dried coatings.
- (b) Solvent sprayed from HVLP application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.2.2 Particulate [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2(d) (Particulate Emission Limitations for Manufacturing Processes), particulate from each of the paint booths PL-121A, PB-1, PB-2, PB-4 and powder coating booth, PC1 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) Pursuant to 326 IAC 6-3-2 (e) (Particulate Emission Limitations for Manufacturing Processes) particulate matter (PM) from the powder coating booth, identified as PC1 shall not exceed 11.0 pounds per hour, when operating at a process weight rate of 4.36 tons per hour.

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

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

D.2.3 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for spray paint booths PB-1, PB-2, PB-4, and powder coating booth PC1, associated control devices and powder cartridge filtration system which is considered integral to the system. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventative maintenance plan required by this condition.

Compliance Determination Requirements

D.2.4 Volatile Organic Compounds (VOC)

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

D.2.5 Particulate Control

In order to comply with Condition D.2.2(a), the dry filters for particulate control shall be in operation and control emissions from the paint booths PL-121A, PB-1, PB-2 and PB-4 at all times that the paint booths are in operation. In order to comply with Condition D.2.2(b), the cartridge filtration system integral to the powder coating booth, shall be in operation at all times when powder coating booth, identified as PC1, is in operation.

D.2.6 Manufacturer's Specifications [326 IAC 2-8-4(3)]

The powder coating booth, identified as PC1 and its cartridge filtration integral to the system shall operate per manufacturer's specifications.

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

D.2.7 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the dry particulate filters controlling each of the paint booths PL-121A, PB-1, PB-2 and PB-4. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks S-13, SVPB-2 and SVPB-4 while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

D.2.8 Record Keeping Requirements

- (a) To document the compliance status with Condition D.2.1, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC content limit established in Condition D.2.1.
 - (1) The VOC content (both as packaged and less water and exempt solvent) of each coating material and solvent used.
 - (2) The amount of each coating material and solvent used on monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (C) In the event only a single coating is used, MSDS sheets or manufacturer's information would suffice to demonstrate compliance with D.2.1 in lieu of tracking the amount of coating material.
- (b) To document the compliance status with Condition D.2.3, the Permittee shall maintain a log of weekly overspray observations, and daily and monthly inspections
- (c) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligation with regard to the records required by this condition.

SECTION D.3

FACILITY OPERATION CONDITIONS

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

- (u) Degreasing operations consisting of:
- (1) Handwipe operations, installed after 1990, using a maximum of 1,080 gallons of degreasing solvent per year.
 - (2) Eight (8) cold cleaner degreaser dip tanks identified as PL-103, PL-111, PL-112, PL-113, PL-114, PL-115, PL-116, PL-117 and two (2) vibratory degreaser tanks identified as, PL-102 and PL-120, installed after 1990, capacity: 1500 gallons per year, total.
 - (3) One (1) Cold Cleaner degreaser dip tank, identified as CC11, constructed in 2007, uncontrolled, and using a maximum of 365 gallons of degreasing solvent per year.
 - (4) One (1) Cold Cleaner degreaser dip tank, identified as CC12, constructed in 2008, uncontrolled and using a maximum of 365 gallons of degreasing solvent per year.

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

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

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

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

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and 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.3.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the Permittee of a cold cleaner degreaser facility construction of which commenced after July 1, 1990, 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 nineteenth 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 Permittee 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.

SECTION D.4 FACILITY OPERATION CONDITIONS

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

- (v) One (1) Falcon Graphite cutting/weld removal operation, identified as WRB1, constructed in 2007, with a maximum capacity of nine (9) axles per hour and no control, exhausting through stack WRB-1. [326 IAC 6-3-2]

Insignificant Activities

- (a) One (1) bake-off oven, identified as PL-110, installed after 1990, equipped with an integral secondary combustion chamber, exhausting to Stack S-9, capacity: 0.5 million British thermal units per hour. [326 IAC 4-2]

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

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

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the Falcon Graphite cutting/weld removal operation, identified as WRB1, shall not exceed 4.13 pounds per hour when operating at a process weight rate of 1.01 tons per hour. The pound per hour limitation was calculated with the following equation:

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

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

D.4.2 Incinerator Requirements [326 IAC 4-2]

Pursuant to 326 IAC 4-2, the bake-off oven shall:

- (a) Consist of primary and secondary chambers or the equivalent;
- (b) Be equipped with a primary burner unless burning wood products;
- (c) Comply with 326 IAC 5-1 and 326 IAC 2;
- (d) Be maintained properly as specified by the manufacturer and approved by the commissioner;
- (e) Be operated according to the manufacturer's recommendations and only burn waste approved by the commissioner;
- (f) Comply with other state and/or local rules or ordinances regarding installation and operation of incinerators;
- (g) Be operated so that emissions of hazardous material including but not limited to viable pathogenic bacteria, dangerous chemicals or gases, or noxious odors are prevented;

- (h) Not emit particulate matter in excess of five-tenths (0.5) pounds of particulate matter per one thousand (1,000) pounds of dry exhaust gas at standard condition corrected to fifty percent (50%) excess air; and
- (i) Not create a nuisance or fire hazard.

If any of the above result, the burning shall be terminated immediately.

D.4.3 Carbon Monoxide Emission Limits [326 IAC 9-1-2]

Pursuant to 326 IAC 9-1-2(a)(3), the Permittee shall not operate bake-off oven, PL-110, unless the waste gas stream is burned in one (1) of the following:

- (a) Direct-flame afterburner.
- (b) Secondary chamber.

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

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

Source Name: ArvinMeritor
Source Address: 849 Whitaker Road, Plainfield, Indiana 46168
FESOP Permit No.: F063-28866-00046

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
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: (317) 233-0178
Fax: (317) 233-6865**

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

Source Name: ArvinMeritor
Source Address: 849 Whitaker Road, Plainfield, Indiana 46168
FESOP Permit No.: F063-28866-00046

This form consists of 2 pages

Page 1 of 2

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

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

Source Name: ArvinMeritor
Source Address: 849 Whitaker Road, Plainfield, Indiana 46168
FESOP Permit No.: F063-28866-00046

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

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

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

Source Background and Description

Source Name:	ArvinMeritor
Source Location:	849 Whitaker Road, Plainfield, Indiana 46168
County:	Hendricks
SIC Code:	3714
Permit Renewal No.:	063-28866-00046
Permit Reviewer:	Janet Mobley

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from ArvinMeritor relating to the operation of a transmission and brake rebuilding source.

History

On January 11, 2010, ArvinMeritor submitted an application to the OAQ requesting to renew its operating permit. ArvinMeritor was issued a New Source Construction/FESOP/New Source Review permit on November 10, 2005.

Permitted Emission Units and Pollution Control Equipment

- (a) One (1) tumblast wheelabrator, identified as PL-100, installed after 1990, using a baghouse (DC-1) for particulate control, exhausting inside the building, capacity: 660 pounds of transmission and brake parts per hour, utilizing 12,000 pounds of steel shot per hour.
- (b) One (1) spinblast wheelabrator, identified as PL-101, installed after 1990, using a mpf cartridge collector (DC-2) for particulate control, exhausting inside the building, capacity: 2,100 pounds of transmission and brake parts per hour, utilizing 27,000 pounds of steel shot per hour.
- (c) One (1) sandblast wheelabrator, identified as PL-104, installed after 1990, using a baghouse (DC-3) for particulate control, exhausting inside the building, capacity: 100 pounds of transmission and brake parts per hour, utilizing 570 pounds of sand per hour.
- (d) One (1) tumblast wheelabrator, identified as PL-118, installed after 1990, using a baghouse (DC-4) for particulate control, exhausting inside the building, capacity: 660 pounds of transmission and brake parts per hour, utilizing 12,000 pounds of steel shot per hour.
- (e) One (1) tumblast finishing unit, identified as PL-123, installed after 1990, equipped with a baghouse (DC-5) for particulate control, exhausting inside the building, capacity: 1,980 pounds of transmission and brake parts per hour, utilizing 16,800 pounds of steel shot per hour.
- (f) One (1) tumblast finishing unit, identified as PL-124, installed after 1990, equipped with a baghouse (DC-7) for particulate control, exhausting inside the building, capacity: 1,980 pounds of transmission and brake parts per hour, utilizing 16,800 pounds of steel shot per hour.

- (g) One (1) tumblast finishing unit, identified as PL-125, installed after 1990, equipped with a baghouse (DC-6) for particulate control, exhausting inside the building, capacity: 1,980 pounds of transmission and brake parts per hour, utilizing 16,800 pounds of steel shot per hour.
- (h) One (1) twelve (12) cubic feet pangborn rotoblast barrel abrasive blasting unit #4, identified as PL-126, installed after 1990, equipped with a baghouse (DC-6) for particulate control, exhausting inside the building, capacity: 4,680 pounds of transmission and brake parts per hour, utilizing 33,600 pounds of steel shot per hour.
- (i) One (1) twelve (12) cubic feet abrasive tumble blaster, identified PL-127, installed after 1990, equipped with a baghouse (DC-6) for particulate control, exhausting inside the building, capacity: 4,680 pounds of transmission and brake parts per hour, utilizing 33,600 pounds of steel shot per hour.
- (i) One (1) abrasive tumble blast unit, identified as PL-128, installed in 2005, equipped with a cartridge dust collector (DC-8) for particulate control, exhausting inside the building, capacity: 1980 pounds of transmission and brake parts per hour, utilizing 15,300 pounds of steel shot per hour.
- (k) One (1) abrasive tumble blast unit, identified as PL-129, installed in 2005, equipped with a cartridge dust collector (DC-9) for particulate control, exhausting inside the building, capacity: 1980 pounds of transmission and brake parts per hour, utilizing 15,300 pounds of steel shot per hour.
- (l) One (1) abrasive tumble blast unit, identified as PL-130, installed in 2005, equipped with a cartridge dust collector (DC-10) for particulate control, exhausting inside the building, capacity: 1980 pounds of transmission and brake parts per hour, utilizing 15,300 pounds of steel shot per hour.
- (m) One (1) abrasive blasting unit, identified as PL-131, constructed in 2007, with a capacity of 2,025 pounds of parts processed per hour, using 54,275 pounds of steel shot per hour and a six (6) cartridge dust collection system, identified as (DC-11) for particulate control, and exhausting inside the building.
- (n) One (1) steel blaster, identified PL-132, constructed in 2009, equipped with baghouse (DC-12) for particulate control, exhausting inside the building, capacity: 4,680 pounds of transmission and brake parts per hour, utilizing 33,600 pounds of steel shots per hour.
- (o) One (1) steel blaster, identified PL-133, constructed in 2009, equipped with baghouse (DC-13) for particulate control, exhausting inside the building, capacity: 4,680 pounds of transmission and brake parts per hour, utilizing 33,600 pounds of steel shots per hour.
- (p) One (1) dip coating booth, identified as PL-121A, installed after 1990, exhausting to stack PL-121A, capacity: 750 metal brake shoes per hour.
- (q) One (1) spray paint booth, identified as PB-1, installed after 1990, equipped with two (2) HVLP spray guns, equipped with dry filters for particulate control, exhausting to stack S-13, capacity: 40 transmission units per hour.
- (r) One (1) axle spray coating operation, constructed in 2007, applying either a water-based primer or a zinc primer/urethane based topcoat, with a maximum capacity of 9 units per hour due to an operational bottleneck at the one (1) abrasive blasting unit, identified as PL-131, consisting of:

- (1) One (1) spray paint booth, identified as PB-2, constructed in 2007, equipped with two (2) HVLP spray guns with a maximum application rate of 0.266 gallons per unit, using dry filters for particulate control and exhausting to stack SVPB-2.
- (s) One (1) spray paint booth, identified as PB-4, constructed in 2008, equipped with two (2) HVLP spray guns with a maximum application rate of 0.20 gallons per hour, seven (7) pieces per hour, utilizing water based primer and black water-reducible coat, using panel dry filters for particulate control and exhausting to stack SVPB-4.
- (t) One (1) enclosed powder coating booth, identified as PC1, utilizing electrostatic airless gun, constructed in 2008, equipped with integral cartridge filters for particulate control, capacity: 0.087 pounds of powder per unit and 960 brake shoes per hour, with a maximum process throughput of 4.36 tons per hour and venting inside.
- (u) Degreasing operations consisting of:
 - (1) Handwipe operations, installed after 1990, using a maximum of 1,080 gallons of degreasing solvent per year.
 - (2) Eight (8) cold cleaner degreaser dip tanks identified as PL-103, PL-111, PL-112, PL-113, PL-114, PL-115, PL-116, PL-117 and two (2) vibratory degreaser tanks identified as, PL-102 and PL-120, installed after 1990, capacity: 1500 gallons per year, total.
 - (3) One (1) Cold Cleaner degreaser dip tank, identified as CC11, constructed in 2007, uncontrolled and using a maximum of 365 gallons of degreasing solvent per year.
 - (4) One (1) Cold Cleaner degreaser dip tank, identified as CC12, constructed in 2008, uncontrolled and using a maximum of 365 gallons of degreasing solvent per year.
- (v) One (1) Falcon Graphite cutting/weld removal operation, identified as WRB1, constructed in 2007, with a maximum capacity of nine (9) axles per hour and no control, exhausting through stack WRB-1. [326 IAC 6-3-2]

Insignificant Activities:

- (a) One (1) bake-off oven, identified as PL-110, installed after 1990, equipped with an integral secondary combustion chamber, exhausting to Stack S-9, capacity: 0.5 million British thermal units per hour. [326 IAC 4-2]
- (b) One (1) natural gas-fired Proceco brake parts washer, identified as PL-122, installed after 1990, using only water and detergents and employing two (2) natural gas-fired tube heaters, exhausting to stack PL-122, capacity: 1.90 million British thermal units per hour, combined.
- (c) One (1) natural gas-fired Proceco aqueous core washer, identified as PL-106, installed after 1990, using only water and detergents, exhausting to stack PL-106, capacity: 0.90 million British thermal units per hour.
- (d) One (1) natural gas-fired Mart aqueous parts washer, identified as PL-105, installed after 1990, using only water and detergents, exhausting to stack PL-105, capacity: 0.5 million British thermal units per hour.

- (e) One (1) natural gas-fired Mart aqueous tornado parts washer, identified as PL-107, installed after 1990, using only water and detergents, exhausting to stack PL-107, capacity: 0.5 million British thermal units per hour.
- (f) One (1) natural gas-fired Mart aqueous clutch washer, identified as PL-109, installed after 1990, using only water and detergents, exhausting to stack PL- 109, capacity: 0.5 million British thermal units per hour.
- (g) One (1) natural gas-fired, aqueous parts washer, identified as PW1A, installed in 2007, using only water, exhausting to stack SVPW1A, capacity: 1.5 million British thermal units per hour.
- (h) One (1) natural gas-fired, aqueous parts washer, identified as PW2, constructed in 2008 using alkaline (non-VOC) detergents, exhausting to stack SVPW2, capacity: 0.5 million British thermal units per hour.
- (j) Natural Gas-fired combustion units:
 - (1) One (1) natural gas-fired process water heater, identified as PCS1, constructed in 2008, exhausting to stack SVPW2, capacity: 2.0 million British thermal units per hour.
 - (2) One (1) natural gas-fired process water heater, identified as PCS3, constructed in 2008, exhausting to stack SVPW2, capacity: 1.5 million British thermal units per hour.
 - (3) One (1) natural gas-fired powder coat drying oven, identified as PCD1, constructed in 2008, exhausting to stack SVPW2, capacity: 1.5 million British thermal units per hour.
 - (4) One (1) natural gas-fired Powder coat curing oven, identified as PCC1, constructed in 2008, exhausting to stack SVPW2, capacity: 2.5 million British thermal units per hour.
- (j) One (1) MIG and stick welding station, identified as WLD2, constructed in 2009, exhausting inside, with a maximum wire consumption of 5.40 pounds per hour combined.
- (k) One (1) MIG welding station, identified as PL-119, installed after 1990, with a maximum wire consumption of 0.02 pounds per day.
- (l) Miscellaneous hand held equipment usage for paint application containing VOC, constructed in 2009, utilizing spray cans, roll coat method, capacity: less than three (3) pounds per day VOC.
- (m) Platinum Line Touch Up Painting Operation, approved for construction in 2010, identified as PL-134, coating metal using spray/aerosol can, maximum capacity is 3.37 gallons per day, with no control, exhausting inside the building.

Emission Units and Pollution Control Equipment Constructed and/or Operated without a Permit

The source does not have any emission units that were constructed and/or operating without a permit during this review.

Emission Units and Pollution Control Equipment Removed From the Source

The source does not have any emission units that have been removed from the source since the previous permit.

Existing Approvals

Since the issuance of the FESOP permit (063-21574-00046) on November 10, 2005, the source has constructed or has been operating under the following approvals as well:

- (a) First Significant Permit Revision No. 063-24572-00046 issued on June 26, 2007
- (b) First Administrative Amendment, No. 063-25205-00046 issued on October 9, 2007
- (c) Second Significant Permit Revision No. 063-25043-00046 issued on November 27, 2007
- (d) Second Administrative Amendment No. 063-25884-00046 issued on March 3, 2008
- (e) Third Administrative Amendment No. 063-27178-00046 issued on December 16, 2008
- (f) Fourth Administrative Amendment No. 063-27270-00046 issued on January 7, 2009
- (g) Fifth Administrative Amendment No. 063-28394-00046 issued on September 15, 2009.

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.

Air Pollution Control Justification as an Integral Part of the Process

A determination for the powder coating booth, PC1, cartridge filtration system was made in Administrative Amendment No. 063-27178-00046 issued on December 16, 2008, and is documented in this renewal as follows:

- (a) The powder coat recycle system is an integral and inherent part of the powder coat paint process because the control device also serves as a product recovery device, recycling the unused powder coating. The powder coat system could not be operated economically without the recycle system.
- (b) The primary purpose of the system is to collect and redistribute the reused powder coating mixed with virgin powder. A minimum of 20 % of the powder is collected and effectively reused. Five percent of the total powder used is estimated to be classified as waste. The actual waste percentage will be less than 5 %. The 20% recovery rate is the reason for the system.
- (c) Savings from the powder coat recovery system saves ArvinMeritor \$592,624.51 per year. The annualized cost of the recovery / powder recirculation system per year is \$18,000.00, which includes depreciated cost of the equipment, interest accumulated, and operation and maintenance costs of expected replacement parts and labor. Thus, the powder recirculation system saves ArvinMeritor a net of \$574,624.51 per year.

IDEM, OAQ evaluated the justifications submitted and agreed that the cartridge filtration system should be considered an integral part of the powder coating operation. This determination is based on the fact that the primary purpose of the system is to collect and reapply the reused powder coating mixed with virgin powder which results in the overwhelming positive net economic cost savings of \$574,624.51 per year to the permittee. Therefore, the permitting level is determined using the potential to emit after the

cartridge filtration system. Operating conditions in the permit specify that this cartridge filtration system shall operate at all times when the powder coating is in operation.

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 Hendricks County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Attainment effective October 19, 2007, 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.
Basic nonattainment designation effective federally April 5, 2005, for PM_{2.5}.

(a) Ozone Standards

- (1) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.
- (2) On September 6, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Allen, Clark, Elkhart, Floyd, LaPorte, and St. Joseph as attainment for the 8-hour ozone standard.
- (3) On November 9, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Boone, Clark, Elkhart, Floyd, LaPorte, Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Morgan, Shelby, and St. Joseph as attainment for the 8-hour ozone standard.
- (4) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Hendricks 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) PM_{2.5}

U.S. EPA, in the Federal Register Notice 70 FR 943 dated January 5, 2005, has designated Hendricks County as nonattainment for PM_{2.5}. On March 7, 2005 the Indiana Attorney General's Office, on behalf of IDEM, filed a law suit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of nonattainment areas without sufficient data. However, in order to ensure that sources

are not potentially liable for a violation of the Clean Air Act, the OAQ is following the U.S. EPA's New Source Review Rule for PM_{2.5} promulgated on May 8th, 2008, and effective on July 15th 2008. Therefore, direct PM_{2.5} and SO₂ emissions were reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5. See the State Rule Applicability – Entire Source section.

- (c) **Other Criteria Pollutants**
 Hendricks County has been classified as attainment or unclassifiable in Indiana for all other pollutants. 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 PM, PM₁₀ is equal to or greater than 100 tons per year. The source is subject to the provisions of 326 IAC 2-7. However, the source has agreed to limit their PM, PM₁₀, emissions to less than Title V levels, therefore the source will be issued a FESOP Renewal.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all other criteria pollutants are less than 100 tons per year.
- (c) 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 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.
- (d) 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 FESOP source. The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this FESOP 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
Abrasive/Mechanical Blasting, consisting of units:								
Tumblast Wheelabrator, PL-100	8.54	1.80	1.80	0.00	0.00	0.00	0.00	0.00
Spinblast Wheelabrator, PL-101	18.57	4.07	4.07	0.00	0.00	0.00	0.00	0.00
Sandblast Wheelabrator, PL-104	2.41	0.70	0.70	0.00	0.00	0.00	0.00	0.00
Tumblast Wheelabrator, PL-118	8.54	1.79	1.79	0.00	0.00	0.00	0.00	0.00
Tumblast Finishing Unit, PL-123	17.83	2.54	2.54	0.00	0.00	0.00	0.00	0.00

Process/Emission Unit	Potential To Emit (tons/year)							
	PM	PM ₁₀	PM _{2.5}	SO ₂	VOC	CO	NO _x	HAPs
Pangborn Rotoblast Barrel Abrasive Blasting Unit, PL-124	17.83	2.54	2.54	0.00	0.00	0.00	0.00	0.00
Tumblast Finishing Unit, PL-125, PL-126 and PL-127	25.19	12.70	12.70	0.00	0.00	0.00	0.00	0.00
Tumble Blast Unit, PL-128	17.83	2.32	2.32	0.00	0.00	0.00	0.00	0.00
Tumble Blast Unit, PL-129	17.83	2.32	2.32	0.00	0.00	0.00	0.00	0.00
Tumble Blast Unit, PL-130	17.83	2.32	2.32	0.00	0.00	0.00	0.00	0.00
Abrasive Blasting Unit, PL-131	18.09	0.83	0.83	0.00	0.00	0.00	0.00	0.00
Steel Blaster Unit, PL-132	31.71	5.06	5.06	0.00	0.00	0.00	0.00	0.00
Steel Blaster Unit, PL-133	31.71	2.53	2.53	0.00	0.00	0.00	0.00	0.00
Dip coating Booth, PL-121A - Line 1	0.01	0.01	0.01	0.00	27.10	0.00	0.00	0.00
Spray Paint Booth, PB-1, Line 2	0.55	0.55	0.55	0.00	8.98	0.00	0.00	0.00
Axle spray coating operation PL-131, Line 3, consisting of Spray Paint Booth PB-2	2.55	2.55	2.55	0.00	25.34	0.00	0.00	0.82
Spray Paint Booth, PB-4	0.15	0.15	0.15	0.00	0.78	0.00	0.00	1.34
Powder coating booth, PC1	0.01	0.01	0.01	0.00	3.66	0.00	0.00	0.00
Degreasing operations consisting of:								
Handwipe Operations	0.00	0.00	0.00	0.00	3.78	0.00	0.00	0.00
Cold Cleaner Degreaser Dip tanks, units - PL-103, PL-111, PL-112, PL-113, PL-114, PL-115, PL-116, PL-117 and PL-102 and PL-120	0.00	0.00	0.00	0.00	4.88	0.00	0.00	0.00
Cold Cleaner Degreaser dip tank, unit CC11	0.00	0.00	0.00	0.00	1.22	0.00	0.00	0.00
Cold Cleaner Degreaser dip tank, unit CC12	0.00	0.00	0.00	0.00	1.22	0.00	0.00	0.00
Falcon Graphite cutting/weld removal operation, (WRB1)	11.86	11.86	11.86	0.00	0.00	0.00	0.00	0.00
Insignificant Activities - Bake-off Oven, PL-110 and Natural Gas Combustion Parts/aqueous Washers (Units - PL-106, PL-122, PL-105, PL-107, PL-109, PW1A and PW2)	0.06	0.23	0.23	0.02	0.16	2.50	2.98	0.06
Insignificant Activities - Natural Gas Combustion Units - Process water heaters and ovens, Units PCS1, PCS3, PCD1 and PCC1	0.06	0.25	0.25	0.02	0.18	2.76	3.29	0.00
MIG and Stick Welding Station, WLD2	0.41	0.41	0.41	0.00	0.00	0.00	0.00	0.01
MIG Welding Station, PL-119	0.00	0.00	0.00	0.00	0.04	0.55	0.66	0.00
Misc. VOC usage plant wide	0.00	0.00	0.00	0.0	3.56	0.00	0.00	0.96
Platinum Line Touch Up Painting Operation, PL-134	0.25	0.25	0.25	0.00	2.69	0.00	0.00	0.00

Process/Emission Unit	Potential To Emit (tons/year)							
	PM	PM ₁₀	PM _{2.5}	SO ₂	VOC	CO	NO _x	HAPs
Total Emissions	249.82	57.79	57.79	0.04	83.59	5.81	6.93	3.19
Title V Major Source Thresholds	NA	100	100	100	100	100	100	10/25
PSD Major Source Thresholds	250	250	NA	250	250	250	250	NA
Emission Offset/ Nonattainment New Source Review/ Major Source Thresholds	NA	NA	100	NA	NA	NA	NA	NA
* Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal ten (10) micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". Additionally, US EPA has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions.								

- (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) This existing stationary source is not major for Emission Offset because no nonattainment regulated pollutant is emitted at a rate of 100 tons per year or more.
- (c) 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) The requirements of the New Source Performance Standard, for Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations 326 IAC 12 (40 CFR 60.390, Subpart MM), are not included in the permit for this source because this source is not a light duty truck assembly plant.
- (b) The requirements of the New Source Performance Standard, for Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984 326 IAC 12 (40 CFR 60.110, Subpart Kb), are not included in the permit for this source because the tanks do not reach a capacity of 75 cubic meters.
- (c) There are no other New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.
- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), for Automobile & Light Duty Truck Surface Coating (Subpart IIII), are not included in the permit for this source because this source is not a major source of HAPs, as defined in 40 CFR 63.2.
- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), for Miscellaneous Metal Parts and Products Surface Coating (Subpart MMMM), are not included in the permit for this source because this source is not a major source of HAPs, as defined in 40 CFR 63.2.

- (f) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR 63, Subpart T (National Emission Standards for Halogenated Solvent Cleaning (326 IAC 14), are not included in the permit for this source because this source is not a major source of HAPs, as defined in 40 CFR 63.2, and because this operation does not use a degreasing solvent that contains any of the halogenated compounds listed in 40 CFR 63.460(a).
- (g) 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.

Compliance Assurance Monitoring (CAM)

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

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

The requirements of 326 IAC 2-2 (PSD) are not applicable to this source, since this source was initially constructed before the applicability date of August 7, 1977, it is not one of the 28 listed source categories defined in 326 IAC 2-2-1(y)(1), no major modifications were done to this source, and the potential to emit of all attainment regulated pollutants is less than, or limited to less than, 250 tons per year.

This source is still a minor source under 326 IAC 2-2 (PSD), 326 IAC 2-1.1-5 (Nonattainment New Source Review) and 326 IAC 2-7 (Part 70 Permit). Since the unrestricted potential to emit of this source is greater than 250 tons of PM per year and 100 tons of PM₁₀ per year, the Permittee will continue to limit the abrasive blasting operations, in order to maintain the source-wide potential to emit of PM and PM₁₀ to less than 250 and 100 tons of per year.

326 IAC 2-1.1-5 (Nonattainment Area New Source Review)

This source is located in a county that is designated as nonattainment for PM_{2.5}. The unrestricted potential particulate emissions are less than one hundred (100) tons per year. Therefore, this source is a minor source under the nonattainment new source review rules.

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

The operation of this transmissions and brakes rebuilding source will emit less than ten (10) tons per year of a single HAP or twenty five (25) tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

This existing source is not subject to 326 IAC 2-6 (Emission Reporting), because it is located in Hendricks County, it is not required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, and it does not emit lead into the ambient air at levels equal to or greater than five (5) tons per year. Therefore, pursuant to 326 IAC 2-6-1(b), the source is only subject to additional information requests as provided in 436 IAC 2-6-5.

326 IAC 5-1 (Opacity Limitations)

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

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

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

326 IAC 6-4 (Fugitive Dust Emissions Limitations)

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

326 IAC 2-8 (PM₁₀ and PM_{2.5} FESOP Limit)

Pursuant to 326 IAC 2-8, the source will continue to limit PM₁₀ and PM_{2.5} emissions to below 100 tons per year by complying with their existing limits. The limits have not changed in this renewal.

The source will be in compliance by limiting the emissions of the controlled units PM₁₀ and PM_{2.5} per twelve (12) consecutive month period. Each of the abrasive blasting units equipped with baghouses/cartridges, shall not exceed the following hourly PM₁₀ and PM_{2.5} emission limits:

Unit ID / Control Device	PM ₁₀ Emission Limits (pounds/hour)	PM _{2.5} Emission Limits (pounds/hour)	PM ₁₀ /PM _{2.5} Emission Limits (ton/year)
PL-100 / DC-1	0.41	0.41	1.80
PL-101 / DC-2	0.93	0.93	4.07
PL-104 / DC-3	0.16	0.16	0.70
PL-118 / DC-4	0.41	0.41	1.79
PL-123 / DC-5	0.58	0.58	2.54
PL-124 / DC-7	0.58	0.58	2.54
PL-125, PL-126 and PL127/ DC-6	2.90	2.90	12.70
PL-128 / DC-8	0.53	0.53	2.32
PL-129 / DC-9	0.53	0.53	2.32
PL-130 / DC-10	0.53	0.53	2.32
PL-131 / DC-11	0.19	0.19	0.83
PL-132 / DC-12	1.156	1.156	5.06
PL-133 / DC-13	0.578	0.578	2.53
		TOTAL	41.52

The source shall comply with this limit and control emissions from the abrasive blasting units by having the mpf cartridge dust collectors and baghouses in operation at all times that the abrasive blasting units are in operation.

Compliance with these limits, combined with the PM₁₀ and PM_{2.5} from other emission units, shall limit emissions from the entire source to less than one hundred (100) tons per year for PM₁₀ and PM_{2.5} each and render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (PSD) not applicable. Therefore, the Part 70 rules (326 IAC 2-7) do not apply and the source shall retain its minor PSD source status, and the source will be issued a FESOP Renewal.

NOTE: Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM₁₀), not particulate matter (PM), is

considered as a "regulated air pollutant". US EPA has directed states to regulate PM₁₀ emissions as surrogate for PM_{2.5} emissions.

PM limits are required because the potential to emit before controls exceeds two hundred and fifty (250) tons per year. The PM emissions, from the abrasive blasting operations shall be limited to:

Unit ID / Control Device	Particulate Emission Limits (pounds/hour)	Limited Potential (tons/year)
PL-100 / DC-1	1.95	8.54
PL-101 / DC-2	4.24	18.57
PL-104 / DC-3	0.551	2.41
PL-118 / DC-4	1.95	8.54
PL-123 / DC-5	4.07	17.83
PL-124 / DC-7	4.07	17.83
PL-125, PL-126, and PL-127 / DC-6	5.75	25.19
PL-128 / DC-8	4.07	17.83
PL-129 / DC-9	4.07	17.83
PL-130 / DC-10	4.07	17.83
PL-131 / DC-11	4.13	18.09
PL-132 / DC-12	7.24	31.71
PL-133/ DC-13	7.24	31.71

This source shall comply with these limits through the use of the control devices, DC-1 through DC-13.

State Rule Applicability – Individual Facilities

Abrasive Blasting Operations

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) the particulate emissions from the source shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

The emission rate E has been established for the units as follows:

Unit ID / Control Device	Process Weight Rate (ton/hour) (each)	Particulate Emission Limits (pound/hour) (each)
PL-100 / DC-1	0.33	1.95
PL-101 / DC-2	1.05	4.24

Unit ID / Control Device	Process Weight Rate (ton/hour) (each)	Particulate Emission Limits (pound/hour) (each)
PL-104 / DC-3	0.05	0.551
PL-118 / DC-4	0.33	1.95
PL-123 / DC-5	0.99	4.07
PL-124 / DC-7	0.99	4.07
PL-125 / DC-6	0.99	4.07
PL-126 / DC-6	2.34	7.25
PL-127 / DC-6	2.34	7.25
PL-128 / DC-8	0.99	4.07
PL-129 / DC-9	0.99	4.07
PL-130 / DC-10	0.99	4.07
PL-131 / DC-11	1.01	4.13
PL-132 / DC-12	2.34	7.25
PL-133/ DC-13	2.34	7.25

The baghouses and mpf cartridge dust collectors shall be in operation at all times the abrasive blasting operations are in operation, in order to comply with this limit. Compliance with these limits combined with the PM from other emission units shall limit emissions from the entire source to less than two hundred fifty (250) tons per year for PM and render the requirements of 326 IAC 2-2 (PSD) not applicable.

Surface Coating Operations

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

- (a) Pursuant to 326 IAC 6-3-2(d), particulate from each of the spray paint booths, identified as PB-1, PB-2 and PB-4, shall be controlled by a dry particulate filters, and the dry filters for PM control shall be in operation at all times and the Permittee shall operate the control device in accordance with manufacturer's specifications.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Spray paint booths PB-1, PB-2 and PB-4 each use dry filters to control particulate overspray and are each able to comply with 326 IAC 6-3-2.

- (b) The one (1) dip coating booth, identified as PI-121A, uses dip coating as the application method. Therefore, pursuant to 326 IAC 6-3-1(b)(5), this emission unit is exempt and the requirements of 326 IAC 6-3-2 do not apply.
- (c) Pursuant to 326 IAC 6-3-2(e) (Particulate Emission Limitations for Manufacturing Processes) particulate matter (PM) from the powder coating booth, identified as PC1 shall not exceed 11.0 pounds per hour, when operating at a process weight rate of 4.36 tons per hour.

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

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

Powder coating booth PC1 and its cartridge filtration integral to the system shall operate per manufacturer's specifications and is able to comply with 326 IAC 6-3-2.

- (d) Pursuant to 326 IAC 6-3-2(d)(3), sources that operate according to a valid permit pursuant to 326 IAC 2-7 (Part 70) or 326 IAC 2-8 (FESOP) are exempt from 326 IAC 6-3-2(d)(2).

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

- (a) Pursuant to 326 IAC 8-2-1(a)(4), the spray paint booths, identified as PB-1, PB-4 and the one (1) dip coating booth, identified as PL-121A, were constructed after 1990 and the actual VOC emissions are greater than 15 pounds per day, they are therefore subject to the requirements of 326 IAC 8-2-9. Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of the coating delivered to the transmissions and metal brake shoes at the spray paint booth and the dip coating booth shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.

Based on the MSDS submitted by the source and calculations made, the spray paint booths and the dip coating booth are in compliance with this requirement. The source will use surface coatings that comply with the 3.5 pounds per gallon limit in the dip coating booth and the spray paint booth.

- (b) The spray paint booth PB-2, which was constructed after 1990, previously had VOC emissions greater than fifteen (15) pounds per day. The maximum application rate of spray paint booth, PB-2, was revised from 0.102 gallons per unit to 0.117 gallons per unit Pursuant to 326 IAC 8-1-1(a), even though the source has now switched to coatings which reduce the VOC emissions to below fifteen (15) pounds per day, the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating) are still applicable to the spray paint booth PB-2. Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of the coating delivered to PB-2 shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.

Based on the MSDSs submitted by the source for the surface coatings used in spray paint booth PB-2, and calculations made, the permittee is able to comply with this requirement.

Degreasing Operations

326 IAC 8-3 (Organic Solvent Degreasing Operations)

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, 326 IAC 8-3-5(a) and 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation), for cold cleaner degreaser facility construction of which commenced after July 1, 1990, that perform organic solvent degreasing operations anywhere in the state are applicable to the units at this source. The source has handwipe operations using organic solvents, cold cleaner dip tanks, identified as PL-103, PL-111, PL-112, PL-113, PL-114, PL-115, PL-116, PL-117, CC11, CC12 and vibratory degreaser tanks identified as PL-102 and PL-120, that meet the definition of a cold cleaner degreaser under 326 IAC 1-2-18.5, utilizing an organic solvent containing volatile organic compounds (VOCs) (as defined by 326 IAC 1-2-90), were constructed after July 1, 1990, and do not have remove solvent reservoirs.

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

Pursuant to 326 IAC 8-3-2, for the cold cleaner operations, the Permittee shall:

- (1) equip the cleaner with a cover;
- (2) equip the cleaner with a facility for draining cleaned parts;
- (3) close the degreaser cover whenever parts are not being handled in the cleaner;
- (4) drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (5) provide a permanent, conspicuous label summarizing the operating requirements;
- (6) 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) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the Permittee of a cold cleaner degreaser facility construction of which commenced after July 1, 1990, 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), for a cold cleaning facility construction of which commenced after July 1, 1990, the Permittee shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

Cutting/Weld Removal Operation

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

Pursuant to 326 IAC 6-3-2(e), the particulate matter (PM) from the Falcon Graphite cutting/weld removal operation WRB1, shall not exceed 4.13 pounds per hour when operating at a process weight rate of 1.01 tons per hour. The pound per hour limitation was calculated with the following equation:

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

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

The unlimited potential to emit PM from the Falcon Graphite cutting/weld removal operation is less than 4.13 pound per hour; therefore, WRB1 is in compliance with this limit.

Insignificant Activities - Bake-Off Oven

326 IAC 4-2-2 (Incinerators)

The natural gas fired bake-off oven, PL-110, is subject to the requirements of 326 IAC 4-2-1 because it burns waste oil residue. Pursuant to 326 IAC 4-2-2 (Incinerators), the natural gas fired bake-off oven, PL-110, shall comply with the following:

- (a) Consist of primary and secondary chambers or the equivalent;
- (b) Be equipped with a primary burner unless burning wood products;
- (c) Comply with 326 IAC 5-1 and 326 IAC 2;
- (d) Be maintained properly as specified by the manufacturer and approved by the commissioner;

- (e) Be operated according to the manufacturer's recommendations and only burn waste approved by the commissioner;
- (f) Comply with other state and/or local rules or ordinances regarding installation and operation of incinerators;
- (g) Be operated so that emissions of hazardous material including but not limited to viable pathogenic bacteria, dangerous chemicals or gases, or noxious odors are prevented;
- (h) Not emit particulate matter in excess of five-tenths (0.5) pounds of particulate matter per one thousand (1,000) pounds of dry exhaust gas at standard condition corrected to fifty percent (50%) excess air; and
- (i) Not create a nuisance or fire hazard.

If any of the above result, the burning shall be terminated immediately.

326 IAC 9-1-2 (Carbon monoxide Emission Limits)

Pursuant to 326 IAC 9-1-2(a)(3), the Permittee shall not operate bake-off oven, PL-110, unless the waste gas stream is burned in one (1) of the following:

- (a) Direct-flame afterburner.
- (b) Secondary chamber.

Bake-off oven, PL-110, is equipped with an integral secondary combustion chamber and therefore will comply with the rule requirements.

Insignificant Activities - Parts/aqueous Washers

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

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

Since the five (5) insignificant parts/aqueous washers use only water and detergents and not organic solvents the requirements of 326 IAC 8-3-2 and 326 IAC 8-3-5 are not applicable.

326 IAC 8-3 (Organic Solvent Degreasing Operations)

Pursuant to 326 IAC 8-3-1 (Organic Solvent Degreasing Operations), the natural gas-fired, oscillating cold solvent washer (PW1A) is subject to the requirements of 326 IAC 8-3-2 (Cold Cleaner Operations) and 326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control), since it meets the definition of a cold cleaner degreaser under 326 IAC 1-2-18.5, utilizing an organic solvent containing volatile organic compounds (VOCs) (as defined by 326 IAC 1-2-90), was constructed after the July 1, 1990, and does not have a remove solvent reservoir.

326 IAC 6-2 (Particulate Emissions from Indirect Heating Units)

The natural gas-fired, oscillating cold solvent washer, identified as PW1A, is not subject to 326 IAC 6-2 as it is not a source of indirect heating.

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

The natural gas-fired, oscillating cold solvent washer, identified as PW1A, is not subject to the requirements of 326 IAC 6-3, since it is not a "manufacturing process" as defined by 326 IAC 6-3-1.5.

326 IAC 7-1 (Sulfur dioxide emission limitations: applicability)

The natural gas-fired, oscillating cold solvent washer, identified as PW1A, is not subject to the requirements of 326 IAC 7-1, because the potential and the actual emissions are less than twenty-five (25) tons per year and ten (10) pounds per hour respectively.

Insignificant Activities - Welding Operations

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

Pursuant to 326 IAC 6-3-1(b)(9), welding operations which consume less than 625 pounds of wire per day and 326 IAC 6-3-1(b)(10), torch cutting operations which cuts less than 3,400 inches per hour of one inch thickness stocks are exempt from this rule. The welding and cutting operations, (WLD2) at this source are exempt.

Pursuant to 326 IAC 6-3-1(b)(9), welding operations that consume less than 625 pounds per day of wire are exempt. Since the one (1) MIG welding operation (PL-119) consumes 0.02 pounds per day of wire, this rule does not apply.

Insignificant Activities - Misc. VOC Usage

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

Pursuant to 326 IAC 2-7-1(21) the Volatile Organic Compounds (VOC), the exemption limit is less than three (3) pounds per hour or fifteen (15) pounds per day. Miscellaneous hand held equipment usage for paint application containing VOC is less than three (3) pounds per hour each and less than fifteen (15) pounds per day each. Therefore, pursuant to 326 IAC 6-3-1(b)(6), this emission unit is exempt and the requirements of 326 IAC 6-3-2 do not apply.

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

Pursuant to 326 IAC 8-2-1(a)(4), the miscellaneous hand held equipment usage, constructed after 1990 and the actual VOC emissions are less than 15 pounds per day each, they are therefore not subject to the requirements of 326 IAC 8-2-9.

Insignificant Activities - Platinum Line Touch Up Painting Operation

326 IAC 2-7-1(21)(D) (Other emission units, not regulated by a NESHAP, with PM₁₀ and SO₂ emissions less than five (5) pounds per hour or twenty-five (25) pounds per day, CO emissions less than twenty-five (25) pounds per day, lead emissions less than six-tenths (0.6) tons per year or three and twenty-nine (3.29) pounds per day, and emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP, or emitting greater than one (1) pound per day but less than twelve and five tenths (12.5) pounds per day or two and five tenths (2.5) ton per year of any combination of HAPs)

Pursuant to 326 IAC 2-7-1(21)(D) the Platinum Line Touch Up Painting Operation, coating metal using spray/aerosol cans use is 3.37 gallons per day, VOC is less than 15 lb/day, less than 25 lb/day PM₁₀, SO₂ and the coating used in the touch up does not contain HAPs.

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

The actual VOC emissions from the touch up painting operations are less than 15 pounds per day. Therefore, the requirements of 326 IAC 8-2-9 are not applicable. Any change or modification which may increase the actual VOC emissions to greater than 15 pounds per day must be approved by OAQ before any such change may occur.

Testing Requirements

There are no proposed testing requirements in this renewal because all emission calculations are based from AP-42, and no individual emission unit exceeds 40% of the uncontrolled potential to emit.

Compliance Determination and Monitoring Requirements

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

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

The compliance determination and monitoring requirements applicable to this source are as follows:

Emission Unit/Control	Operating Parameters	Frequency
PL-100/DC-1, PL-101/DC-2, PL-104/DC-3, PL-118/DC-4, PL-123/DC-5, PL-124/DC-7, PL-125/DC-6, PL-126/DC-6, PL-127/DC-6, PL-128/DC-8, PL-129/DC-9, PL-130/DC-10, PL-131/DC-11, PL-132/DC-12 and PL-133-DC-13	Visible Emissions Notations	Once per day
	Pressure Drop 2 to 8 inches for baghouses and 1.0 to 7.0 inches for cartridge dust collectors	Once per day

These monitoring conditions are necessary because the baghouses controlling the abrasive blasting for the above units must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-8 (FESOP).

Control	Parameter	Frequency	Range	Excursions and Exceedances
Spray paint booths PL-121A, PB-1, PB-2 and PB-4 - dry filters	Inspections	Daily	Normal- Abnormal	Response Steps
The coating emissions from S-13, SVPB-2 and SVPB-4 for the presence of overspray on the rooftops and the nearby ground	Inspections	Weekly and Monthly	Normal- Abnormal	Response Steps

These monitoring conditions are necessary because the filters for the spray paint booths, PL-121A, PB-1, PB-2 and PB-4, must operate properly to ensure compliance with 326 IAC 6-3-2(d)

((Particulate Emission Limitations for Manufacturing Processes) and to render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD), and 326 IAC 2-7 (Part 70 Permits) not applicable.

Recommendation

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

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

An application for the purposes of this review was received on January 11, 2010.

Conclusion

The operation of this transmission and brake rebuilding source shall be subject to the conditions of the attached FESOP Renewal No. 063-28866-00046.

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 extension 4-5373.
- (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: ArvinMeritor
Address City IN Zip: 849 Whitaker Road, Plainfield, Indiana 46168
Permit No: 063-28866-00046
Reviewer: Janet Mobley

	Unlimited Potential to Emit (tons/year)							
	PM	PM10	PM2.5	SO ₂	VOC	CO	NOx	HAPs
Abrasive/Mechanical Blasting, consisting of units:								
Tumbleblast Wheelabrator, PL-100	210.00	181.00	181.00	0.00	0.00	0.00	0.00	0.00
Spinblast Wheelabrator, PL-101	473.00	407.00	407.00	0.00	0.00	0.00	0.00	0.00
Sandblast Wheelabrator, PL-104	102.36	71.65	71.65	0.00	0.00	0.00	0.00	0.00
Tumbleblast Wheelabrator, PL-118	210.00	181.00	181.00	0.00	0.00	0.00	0.00	0.00
Tumbleblast Finishing Unit, PL-123	294.00	253.00	253.00	0.00	0.00	0.00	0.00	0.00
Pangborn Rotoblast Barrel Abrasive Blasting Unit, PL-124	294.00	253.00	253.00	0.00	0.00	0.00	0.00	0.00
Tumbleblast Finishing Unit, PL-125	294.00	253.00	253.00	0.00	0.00	0.00	0.00	0.00
Tumbleblast Finishing Unit, PL-126	589.00	506.00	506.00	0.00	0.00	0.00	0.00	0.00
Tumble Blaster, PL-127	589.00	506.00	506.00	0.00	0.00	0.00	0.00	0.00
Tumble Blast Unit, PL-128	268.00	231.00	231.00	0.00	0.00	0.00	0.00	0.00
Tumble Blast Unit, PL-129	268.00	231.00	231.00	0.00	0.00	0.00	0.00	0.00
Tumble Blast Unit, PL-130	268.00	231.00	231.00	0.00	0.00	0.00	0.00	0.00
Abrasive Blasting Unit, PL-131	950.90	817.80	817.80	0.00	0.00	0.00	0.00	0.00
Steel Blaster Unit, PL-132	588.67	506.26	506.26	0.00	0.00	0.00	0.00	0.00
Steel Blaster Unit, PL-133	294.34	253.13	253.13	0.00	0.00	0.00	0.00	0.00
Dip coating Booth, PL-121A - Line 1	0.01	0.01	0.01	0.00	27.10	0.00	0.00	0.00
Spray Paint Booth, PB-1, Line 2	5.53	5.53	5.53	0.00	8.98	0.00	0.00	0.00
Axle spray coating operation PL-131, Line 3, consisting of Spray Paint Booth PB-2	51.06	51.06	51.06	0.00	25.34	0.00	0.00	0.82
Spray Paint Booth, PB-4	2.93	2.93	2.93	0.00	0.78	0.00	0.00	1.34
Powder coating booth, PC1	0.01	0.01	0.01	0.00	3.66	0.00	0.00	0.00
Degreasing operations consisting of:								
Handwipe Operations								
Cold Cleaner Degreaser Dip tanks, units - PL-103, PL-111, PL-112, PL-113, PL-114, PL-115, PL-116, PL-117 and PL-102 and PL-120	0.00	0.00	0.00	0.00	4.88	0.00	0.00	0.00
Cold Cleaner Degreaser dip tank, unit CC11	0.00	0.00	0.00	0.00	1.22	0.00	0.00	0.00
Cold Cleaner Degreaser dip tank, unit CC12	0.00	0.00	0.00	0.00	1.22	0.00	0.00	0.00
Falcon Graphite cutting/weld removal operation, (WRB1)	11.86	11.86	11.86	0.00	0.00	0.00	0.00	0.00
Insignificant Activities - Bake-off Oven, PL-110 and Natural Gas Combustion Parts/aqueous Washers (Units - PL-106, PL-122, PL-105, PL-107, PL-109, PW1A and PW2	0.06	0.06	0.06	0.02	0.16	2.50	2.98	0.056
Insignificant Activities - Natural Gas Combustion Units - Process water heaters and ovens, Units PCS1, PCS3, PCD1 and PCC1	0.06	0.25	0.25	0.02	0.18	2.76	3.29	0.06
MIG and Stick Welding Station, WLD2	0.41	0.41	0.41	0.00	0.00	0.00	0.00	0.01
MIG Welding Station, PL-119	4.91	5.05	5.05	0.00	0.04	0.55	0.66	0.00
Misc. VOC usage plant wide	0.41	0.41	0.41	0.00	3.56	0.00	0.00	0.91
Platinum Line Touch Up Painting Operation, PL-134	1.39	0.25	0.25	0.00	2.69	0.00	0.00	0.00
TOTAL PTE	5771.91	4959.67	4959.67	0.04	83.59	5.81	6.93	3.21

On May 8, 2008 U. S. EPA promulgated the new requirements for Prevention Of Significant Deterioration (PSD) for PM 2.5 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. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM2.5 emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM2.5 emissions, 326 IAC 2-2 for PM2.5 emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as a surrogate for PM2.5 emissions. There are no emissions factors for PM2.5 in AP42, PM10 = PM2.5

Appendix A: Emission Calculations
Summary of Emissions

Company Name: ArvinMeritor
Address City IN Zip: 849 Whitaker Road, Plainfield, Indiana 46168
Permit No: 063-28866-00046
Reviewer: Janet Mobley

Potential to Emit (PTE) After Issuance (tons/year)								
	PM	PM10	PM2.5	SO ₂	VOC	CO	Nox	HAPs
Abrasives/Mechanical Blasting, consisting of units:								
Tumbleblast Wheelabrator, PL-100	8.54	1.80	1.80	0.00	0.00	0.00	0.00	0.00
Spinblast Wheelabrator, PL-101	18.57	4.07	4.07	0.00	0.00	0.00	0.00	0.00
Sandblast Wheelabrator, PL-104	2.41	0.70	0.70	0.00	0.00	0.00	0.00	0.00
Tumbleblast Wheelabrator, PL-118	8.54	1.79	1.79	0.00	0.00	0.00	0.00	0.00
Tumbleblast Finishing Unit, PL-12	17.83	2.54	2.54	0.00	0.00	0.00	0.00	0.00
Pangborn Rotoblast Barre Abrasive Blasting Unit, PL-12	17.83	2.54	2.54	0.00	0.00	0.00	0.00	0.00
Tumbleblast Finishing Unit, PL-125, PL-126 and PL-127	25.19	12.70	12.70	0.00	0.00	0.00	0.00	0.00
Tumble Blast Unit, PL-128	17.83	2.32	2.32	0.00	0.00	0.00	0.00	0.00
Tumble Blast Unit, PL-129	17.83	2.32	2.32	0.00	0.00	0.00	0.00	0.00
Tumble Blast Unit, PL-130	17.83	2.32	2.32	0.00	0.00	0.00	0.00	0.00
Abrasive Blasting Unit, PL-131	18.09	0.83	0.83	0.00	0.00	0.00	0.00	0.00
Steel Blaster Unit, PL-132	31.71	5.06	5.06	0.00	0.00	0.00	0.00	0.00
Steel Blaster Unit, PL-133	31.71	2.53	2.53	0.00	0.00	0.00	0.00	0.00
Dip coating Booth, PL-121A - Line 1	0.01	0.01	0.01	0.00	27.10	0.00	0.00	0.00
Spray Paint Booth, PB-1, Line 2	0.55	0.55	0.55	0.00	8.98	0.00	0.00	0.00
Axle spray coating operation PL-131, Line 3, consisting of Spray Paint Booth PB-2	2.55	2.55	2.55	0.00	25.34	0.00	0.00	0.82
Spray Paint Booth, PB-4	0.15	0.15	0.15	0.00	0.78	0.00	0.00	1.34
Powder coating booth, PC1	0.01	0.01	0.01	0.00	3.66	0.00	0.00	0.00
Degreasing operations consisting of								
Handwipe Operations								
Cold Cleaner Degreaser Dip tanks, units - PL-103, PL-111, PL-112, PL-113, PL-114, PL-115, PL-116, PL-117 and PL-102 and PL-120	0.00	0.00	0.00	0.00	4.88	0.00	0.00	0.00
Cold Cleaner Degreaser dip tank, unit CC1	0.00	0.00	0.00	0.00	1.22	0.00	0.00	0.00
Cold Cleaner Degreaser dip tank, unit CC1	0.00	0.00	0.00	0.00	1.22	0.00	0.00	0.00
Falcon Graphite cutting/weld removal operation, (WRB1)	11.86	11.86	11.86	0.00	0.00	0.00	0.00	0.00
Insignificant Activities - Bake-off Oven, PL-110 and Natural Gas Combustion Parts/aqueous Washers (Units - PL-106, PL-122, PL-105, PL-107, PL-109, PW1A and PW2	0.06	0.23	0.23	0.02	0.16	2.50	2.98	0.056
Insignificant Activities - Natural Gas Combustion Units - Process water heaters and ovens, Units PCS1, PCS3, PCD1 and PCC1	0.06	0.25	0.25	0.02	0.18	2.76	3.29	0.00
MIG and Stick Welding Station, WLD2	0.41	0.41	0.41	0.00	0.00	0.00	0.00	0.01
MIG Welding Station, PL-119	0.00	0.00	0.00	0.00	0.04	0.55	0.66	0.00
Misc. VOC usage plant wide	0.00	0.00	0.00	0.00	3.56	0.00	0.00	0.96
Platinum Line Touch Up Painting Operation, PL 134	0.25	0.25	0.25	0.00	2.69	0.00	0.00	0.00
TOTAL PTE	249.82	57.79	57.79	0.04	83.59	5.81	6.93	3.19

NOTE: *Based on calculations the total PM PTE After Control for the source is 71.92

On May 8, 2008 U. S. EPA promulgated the new requirements for Prevention Of Significant Deterioration (PSD) for PM 2.5 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 IAC2-2, to include those requirements. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM2.5 emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM2.5 emissions, 326 IAC 2-2 for PM2.5 emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as a surrogate for PM2.5 emissions. There are no emissions factors for PM2.5 in AP42, PM10 = PM2.5

Appendix A: Emissions Calculations

Tumble Blasting
(Using Steel Shot)

Company Name: ArvinMeritor
 Address City IN Zip: 849 Whitaker Road, Plainfield, Indiana 46168
 Permit No.: 063-28866-00046
 Reviewer: Janet Mobley

Emission Unit	Uncontrolled Emission Factor PM (pound/pound)	Steel Shot Rate (pounds/hour)	Uncontrolled Maximum Emissions of PM (pounds/hour)	Uncontrolled Emission Factor PM10 (pound/pound)	Uncontrolled Maximum Emissions of PM ₁₀ (pounds/hour)	Control Efficiency (%)	Controlled Potential to Emit of PM (pounds/hour)	Controlled Potential to Emit PM (tons/year)	Controlled Potential to Emit of PM ₁₀ (tons/year)	Uncontrolled PTE of PM (tons/year)	Uncontrolled PTE of PM ₁₀ (tons/year)
PL-100	0.004	12000	48.0	0.00344	41.3	99.0%	0.480	2.10	1.81	210	181
PL-101	0.004	27000	108	0.00344	92.9	99.0%	1.08	4.73	4.07	473	407
PL-118	0.004	12000	48.0	0.00344	41.3	99.0%	0.480	2.10	1.81	210	181
PL-123	0.004	16800	67.2	0.00344	57.8	99.0%	0.672	2.94	2.53	294	253
PL-124	0.004	16800	67.2	0.00344	57.8	99.0%	0.672	2.94	2.53	294	253
PL-125	0.004	16800	67.2	0.00344	57.8	99.0%	0.672	2.94	2.53	294	253
PL-126	0.004	33600	134	0.00344	116	99.0%	1.34	5.89	5.06	589	506
PL-127	0.004	33600	134	0.00344	116	99.0%	1.34	5.89	5.06	589	506
PL-128	0.004	15300	61.2	0.00344	52.6	99.0%	0.612	2.68	2.31	268	231
PL-129	0.004	15300	61.2	0.00344	52.6	99.0%	0.612	2.68	2.31	268	231
PL-130	0.004	15300	61.2	0.00344	52.6	99.0%	0.612	2.68	2.31	268	231
PL-131	0.004	54275	217.1	0.00344	186.706	99.00%	2.171	0.95	0.82	951	817.77
PL-132	0.004	33600	134.4	0.00344	115.584	99.00%	1.344	5.89	5.06	589	506.26
PL-133	0.004	33600	134.4	0.00344	115.584	99.00%	1.344	5.89	5.06	589	506.26
Total								50.3	43.3	5886	5062

Methodology

Emission Factors from STAPPA/ALAPCO "Air Quality Permits", Vol. I, Section 3 "Abrasive Blasting" (1991 edition)
 PM 10 emission factor = 0.86 X (0.004 pound/pound) = 0.00344 pound/pound
 PM Emissions (tons/year) = PM emission factor * Steel Shot Rate * 8,760 hrs / yr * 1 ton / 2000 lbs

Appendix A: Emission Calculations
Abrasive Blasting - Confined
Sandblast Wheelabrator, Unit PL-104
Company Name: ArvinMeritor
Address City IN Zip: 849 Whitaker Road, Plainfield, Indiana 46168
Permit No.: 063-28866-00046
Reviewer: Janet Mobley

Table 1 - Emission Factors for Abrasives (PL-104)

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

Table 2 - Density of Abrasives (lb/ft3)

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

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 =

570
99
99
0.375
0.375

Flow Rate (FR) (lb/hr) = 570.000 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 =

0.041
570.000
0
1

Uncontrolled PM Emissions =	23.37 lb/hr
	102.36 ton/yr
Controlled PM Emissions =	0.234 lb/hr
	1.02 ton/yr
Uncontrolled PM10 Emissions =	16.36 lb/hr
	71.65 ton/yr
Controlled PM10 Emissions =	0.164 lb/hr
	0.717 ton/yr

Control Efficiency is 99%

METHODOLOGY

Emission Factors from STAPPA/ALAPCO "Air Quality Permits", Vol. 1, 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
w should be entered in as a whole number (if w is 50%, enter 50)

**Appendix A: Emission Calculations
Abrasive Blasting - Mechanical Blasting (PL-131)**

Company Name: ArvinMeritor
Address City IN Zip: 849 Whitaker Road, Plainfield, Indiana 46168
Operation Permit No.: 063-288664-00046
Reviewer: Janet Mobley

Emission Factors for Abrasives - Steel Shot (PL-131)

Abrasive	lb PM / lb abrasive	lb PM10 / lb PM
Steel Shot	0.004	0.86

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

Design Abrasive Throw Rate for Mechanical Blaster

1587	lb/min
3.8	minutes/cycle
9	cycles/hr
54275.4	lb/hr

Control Efficiency of Dust Collector is 99.9%

Potential to Emit

EF = emission factor (lb PM/ lb abrasive) =	0.004
FR = Flow Rate (lb/hr) =	54275.40

Uncontrolled PM Emissions =	217.1	lb/hr
	950.9	ton/yr
Controlled PM Emissions =	0.22	lb/hr
	0.95	ton/yr
Uncontrolled PM10 Emissions =	186.7	lb/hr
	817.8	ton/yr
Controlled PM10 Emissions =	0.19	lb/hr
	0.82	ton/yr

METHODOLOGY

Uncontrolled PM/PM10 Emissions (tpy) = Steel Shot Emission Factor (lb PM/PM10 / lb abrasive) x Abrasive Throw Rate (lb abrasive / hr) x 8760 hr/yr x 1 ton/2000 lbs

Controlled PM/PM10 Emissions (tpy) = Steel Shot Emission Factor (lb PM/PM10 / lb abrasive) x Abrasive Throw Rate (lb abrasive / hr) x (1-Control Efficiency%) x 8760 hr/yr x 1 ton/2000 lbs

Appendix A: Emission Calculations
Abrasive Blasting - Confined PL132
Company Name: ArvinMeritor, Plainfield, IN
Address City IN Zip: 849 Whitaker Rd, Plainfield, IN
Permit No.: 063-28866-00046
Reviewer: Janet Mobley

Table 1 - Emission Factors for Abrasives

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

Table 2 - Density of Abrasives (lb/ft3)

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

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

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

487

(Shot Rate Was Supplied, therefore, nozzle/density calculation wasn't needed) **Flow Rate (FR) (lb/hr) = 33600.000** 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 =

0.004
33600.000
0 %
1

			PM10
Uncontrolled PM Emissions =	134.40	lb/hr	115.58
	588.67	ton/yr	506.26
Controlled PM Emissions =	1.344	lb/hr	1.156
	5.887	ton/yr	5.063

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

w should be entered in as a whole number (if w is 50%, enter 50)

Table 1 - Emission Factors for Abrasives

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

Table 2 - Density of Abrasives (lb/ft3)

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

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

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

	487

(Shot Rate Was Supplied, therefore, nozzle/density calculation wasn't needed) **Flow Rate (FR) (lb/hr) = 16800.000** 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 =

	0.004
	16800.000
	0 %
	1

			PM10
Uncontrolled PM Emissions =	67.20	lb/hr	57.79
	294.34	ton/yr	253.13
Controlled PM Emissions =	0.672	lb/hr	0.578
	2.943	ton/yr	2.531

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

w should be entered in as a whole number (if w is 50%, enter 50)

Appendix A: Emissions Calculations

From Surface Coating Operations

Units PL-121A, PB-1 and PB-2
 Company Name: ArvinMeritor
 Address City IN Zip: 849 Whitaker Road, Plainfield, Indiana 46168
 Permit No.: 063-28866-00046
 Reviewer: Janet Mobley

Sourcewide VOC and Particulate Summary

Material	Unit ID	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Maximum Application (gal/unit)	Maximum Throughput (unit/hour)	Maximum Usage (gal/day)	Maximum Usage (lb/hr)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	**Actual VOC (lb/day)	Potential VOC tons per year	***Actual VOC (ton/yr)	Potential Particulate (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Dip Coating Booth, PL-121A, Line 1																					
Y-M Black WR Dip Enamel	PL-121A	9.1	65.5%	49.4%	16.1%	54.4%	26.40%	0.006	750	101.34	38.42	3.21	1.47	6.19	148.47	49.5	27.10	9.03	0.00	5.55	100%
Spray Coating Booth, PB-1, Line 2																					
Y-M WIP-2618 Spray Primer	PB-1	10.1	50.0%	29.7%	20.3%	35.8%	36.00%	0.025	40.0	24.00	10.10	3.19	2.05	2.05	49.21	16.4	8.98	2.99	5.53	5.70	75%
Axle Spray Coating Operation * - PL-131 - Line 3																					
Valgard 120	PB-2	17.70	15.44%	0.00%	15.4%	0.00%	59.80%	0.12	9.00	25.31	18.668	2.73	2.73	2.88	69.18	23.1	12.62	4.21	34.57	4.57	50%
R-Cure 800 2.8	PB-2	9.28	39.27%	15.85%	23.4%	0.00%	47.95%	0.15	9.00	32.06	12.398	2.17	2.17	2.90	69.68	23.2	12.72	4.24	16.49	4.53	50%
* The maximum capacity of the Axle Spray Coating Operation is limited by an operational bottleneck to 9 units per hour.																Uncontrolled		61.42	20.47	56.59	
																State Potential Emissions		PM Control Efficiency:		95.0%	
																Controlled		61.42	20.47	2.83	

METHODOLOGY

Note: Actual usage based on 8hrs per day and 365 days per year.

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

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

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

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

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

Potential Particulate (tons per year) = Maximum Throughput (units/hour) * Maximum Application (gal/unit) * Maximum Usage (lbs/gal) * (1-Weight % Volatiles) * (1-Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)

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

Total = Worst Coating + Sum of all solvents used

**Actual VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * 8hrs

***Actual VOC tons per year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (2920 hr/yr) * (1 ton/2000 lbs)

Total Gal of Mat. Used /yr =	66,690.98
-------------------------------------	------------------

Appendix A: Emissions Calculations

From Surface Coating Operations

HAP Calculations for PB-2
 Company Name: ArvinMeritor
 Address City IN Zip: 849 Whitaker Road, Plainfield, Indiana 46168
 Permit No.: 063-28866-00046
 Reviewer: Janet Mobley

HAP Emission Calculations

Material	Unit ID	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum Usage (unit/hour)	Weight % Cobalt Compounds	Weight % Methyl Isobutyl Ketone**	Weight % Toluene	***Cobalt Compound Emissions (ton/yr)	Methyl Isobutyl Ketone Emissions (ton/yr)	Toluene Emissions (ton/yr)
Line 3 - Axle Spray Coating Operation *										
Valgard 120	PB-2	17.70	0.12	9.000	0.00%	1.00%	0.00%	0.0000	0.8177	0.0000
R-Cure 800 2.8	PB-2	9.28	0.15	9.000	0.00%	0.00%	0.00%	0.0000	0.0000	0.0000
Uncontrolled								0.0000	0.8177	0.0000
PM Control Efficiency:								95.0%		
Controlled								0.0000	0.8177	0.0000
Total HAPs =								0.8177		

* The maximum capacity of the Axle Spray Coating Operation is limited by an operational bottleneck to 9 units per hour.

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

** Weight % of MIBK comes from component of final product.

***Cobalt Compound Emissions relating to Surface Coating Operations are particulate in nature and are controlled in the same manner as PM emissions.

**Appendix A: Emissions Calculations
PB-4 Surface Coating Operations**

Company Name: ArvinMeritor, Plainfield, IN
Address City IN Zip: 849 Whitaker Rd, Plainfield, IN
Permit No.: 063-28866-00046
Reviewer: Janet Mobley

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Maximum Application (gal/unit)	Maximum Throughput (unit/hour)	Maximum Usage (gal/day)	Maximum Usage (lb/hr)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	**Actual VOC (lb/day)	Potential VOC tons per year	***Actual VOC (ton/yr)	% Cobalt	Cobalt (tons/yr)	Potential Particulate (ton/yr)	lb VOC/gal solids	Transfer Efficiency												
NCP N-5570N Black Primer*	11.75	44.00%	36.5%	7.5%	51.3%	37.00%	0.029	7	4.87	2.39	1.81	0.88	0.18	4.29	1.4	0.78	0.26	5%	0.52	2.93	2.38	50%												
																Uncontrolled																		
																State Potential Emissions		0.78	0.26		0.52	2.93												
																Controlled		0.78	0.26		0.03	0.15												
																PM Control Efficiency:					95.0%													

* Only primer is applied in this booth, no other coating is applied

METHODOLOGY

Note: Actual usage based on 8hrs per day and 365 days per year.

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

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

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

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

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

Potential Particulate (tons per year) = Maximum Throughput (units/hour) * Maximum Application (gal/unit) * Maximum Usage (lbs/gal) * (1-Weight % Volatiles) * (1-Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)

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

Total = Worst Coating + Sum of all solvents used

**Actual VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * 8hrs

***Actual VOC tons per year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (2920 hr/yr) * (1 ton/2000 lbs)

**Appendix A: Emission Calculations
Brake Shoe-Powder Coating Booth (PC1)**

Company Name: ArvinMeritor
Address City IN Zip: 849 Whitaker Road, Plainfield, Indiana 46168
Permit No.: 063-28866-00046
Reviewer: Janet Mobley

Emission Unit	Maximum Powder Use (lbs/part)	Maximum Powder Use (parts/hr)	Maximum Powder Use (lbs/hr)	Maximum Powder Use (tons/yr)	VOC %	VOC (lbs/hr)	VOC (lbs/day)	PTE VOC (tons/yr)	Transfer Efficiency (%)	Integral Cartridge filter Efficiency	PTE after cartridge filters PM/PM ₁₀ /PM _{2.5} (lbs/hr)	PTE before cartridge filter PM/PM ₁₀ /PM _{2.5} (tons/yr)	PTE after control PM/PM ₁₀ /PM _{2.5} (tons/yr)	PM/PM ₁₀ /PM _{2.5} Allowable (PM lbs/hr)	
PC1															
Powder Spray Booth	0.087	960.000	83.520	365.818	1.0	0.84	20.04	3.66	75.0%	99.99%	0.02	91.5	0.01	7.78	
Total												0.02	91.5	0.01	

There are no exempt solvents nor water in the coating

NOTE: The VOC content per gallon of coating = 0.129 lbs/gal (see below) < 3.5 pounds of VOC per gal -complies with 326 IAC 8-2-9 (d)

The weight of the part coated is 9 lbs. each

Process weight rate (tons/hr) = [960 parts/hr * (9lbs/part) + 83.52 lbs/hr powder] * 1/2000 lbs/ton = 11 tons per hour

The transfer efficiency of 75 % is provided by the applicant for Electrostatic gun-flat surfaces

The control efficiency of the integral cartridge filters is provided by the source

There are no emission factors for PM_{2.5} in AP42, PM₁₀ = PM_{2.5}

Methodology

The specific gravity of the powder is 1.55

The specific gravity of water is 8.34

One gallon of powder = 1.55 * 8.34 =12.91 lbs

Maximum VOC of 1% = 12.91 *0.01 = 0.129 lbs/gal

Potential Emissions (lbs/hr) = Powder usage rate * (1- transfer efficiency)

Emissions (tons/yr) = Emissions (lbs/hr) * 8760 hrs/yr / 2000 lbs/ton

PM₁₀ emissions are assumed to equal PM.

Degreasing Operations

(Handwipe Operations, 8 Dip Tanks and 2 Vibratory Degreaser Tanks)

Company Name: ArvinMeritor

Address City IN Zip: 849 Whitaker Road, Plainfield, Indiana 46168

Permit No.: 063-28866-00046

Reviewer: Janet Mobley

Type of Operation	VOC content of Solvent (lbs/gal)	Maximum Amount of Solvent Used** (gal/year)	PTE for VOC (tons/year)
Handwipe	7	1,080.00	3.78
8 Cold Cleaner Degreasers Units- PL-103, PL-111, PL-112, PL-113, PL-114, PL-115 and PL-117 2 Vibratory Degreaser Tanks - PL-102 and PL-120	6.5	1,500.00	4.88
Total			8.66

Methodology :

** Based on information provided by the source. Estimate is for 8760 hours of operation.

PTE = VOC Content (lbs/gal) * Max. Amount of Solvent used (gal/year) * 1 ton/2000 lbs

**Appendix A: Emissions Calculations
CC11 and CC12-Solvent/Cleaning Operations**

Company Name: ArvinMeritor
Address City IN Zip: 849 Whitaker Road, Plainfield, Indiana 46168
Permit No.: 063-28866-00046
Reviewer: Janet Mobley

VOC and Particulate

Material	Unit ID	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Maximum Usage (daily replacement volume) (gal/day)	Maximum Usage (lb/hr)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	*Actual PTE VOC (lb/day)	Potential VOC tons per year	*Actual VOC (ton/yr)	Particulate Potential (ton/yr)	lb VOC/ gal solids	Transfer Efficiency
Safety Kleen Premium Solvent	CC11	6.70	100.00%	0.00%	100.0%	0.00%	0.00%	1.00	0.279	6.70	6.70	0.28	6.70	2.2	1.22	0.41	0.00E+00	0.00	100%
Safety Kleen Premium Solvent	CC12	6.70	100.00%	0.00%	100.0%	0.00%	0.00%	1.00	0.279	6.70	6.70	0.28	6.70	2.2	1.22	0.41	0.00E+00	0.00	100%
														State Potential Emissions	Uncontrolled	2.45	0.00		
															PM Control Efficiency:		95.0%		
														Controlled	2.45	0.00			

METHODOLOGY

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

HAP Emissions

Material	Unit ID	Density (Lb/Gal)	Maximum Usage (daily replacement volume) (gal/day)	Maximum Usage (lb/hr)	Weight % PCE	PCE Emissions (ton/yr)	Weight % Toluene	Toluene Emissions (ton/yr)
Safety Kleen Premium Solvent	CC11	6.70	1.00	0.279	0.20%	0.0024	0.10%	0.0012
Safety Kleen Premium Solvent	CC12	6.70	1.00	0.279	0.20%	0.0024	0.10%	0.0012

PCE = Perchloroethylene

Total HAPs = 9.34E-03

METHODOLOGY

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

**Appendix A: Emission Calculations
Cutting/weld removal operation (WRB1)**

**Company Name: ArvinMeritor
Address City IN Zip: 849 Whitaker Road, Plainfield, Indiana 46168
Permit No.: 063-28866-00046
Reviewer: Janet Mobley**

Note: PTE for Graphite Weld Removal will be demonstrated by adding the emissions from flame cutting and total consumption of the graphite stick, combined

PROCESS	Number of Stations	Max. electrode consumption (lb/hr)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)**				Flame Cutting Emissions				HAPS	
FLAME CUTTING	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Weld Removal Stick *												
Graphite (Natural, worst case)	1	2.7										
Oxyacetylene (assume worst case)	1	1	0.9	0.1622	0.0005	0.0001	0.0003	0.009	4.38E-06	4.38E-10	1.46E-13	4.38E-06
EMISSION TOTALS												
Potential Emissions (lbs/hr)								2.71				4.38E-06
Potential Emissions (lbs/day)								65.01				1.05E-04
Potential Emissions (tons/year)								11.86				1.92E-05

* Assumes all consumed graphite is emitted as PM/PM10

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

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

Methodology

Flame Cutting Emissions (lb/hr) = [# of stations] x [Max. metal thickness (in)] x [Max. cutting rate (in/min)] x 60 min/hr x [Emission factor (lb. pollutant/1,000 in. cut, 1" thick)]

Potential Emissions (tons/year) = Flame Cutting Emissions (lb/hr) + Max. electrode consumption (lb/hr) x 8760 hr/yr x 1 ton/2000 lb

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

Insignificant Activities - Bakeoff Oven and Washers

Company Name: ArvinMeritor
Address City IN Zip: 849 Whitaker Road, Plainfield, Indiana 46168
Permit No.: 063-28866-00046
Reviewer: Janet Mobley

Unit ID #	Capacity (MMBtu)
PL-110	0.50
PL-106	0.90
PL-122	1.90
PL-105	0.50
PL-107	0.50
PL-109	0.50
PW1A	1.50
PW2	0.50
Total	6.80

Heat Input Capacity
MMBtu/hr

6.80

Potential Throughput
MMCF/yr

60

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.90	7.60	0.600	100 **see below	5.50	84.0
Potential Emission in tons/yr	0.057	0.226	0.018	2.978	0.164	2.502

*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 Combustion Only
MM BTU/HR <100**

Insignificant Activities - Bakeoff Oven and Washers

Company Name: ArvinMeritor
Address City IN Zip: 849 Whitaker Road, Plainfield, Indiana 46168
Permit No.: 063-28866-00046
Reviewer: Janet Mobley

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 0.00210	Dichlorobenzene 0.00120	Formaldehyde 0.07500	Hexane 1.80000	Toluene 0.00340
Potential Emission in tons/yr	0.000063	0.000036	0.002234	0.053611	0.000101

HAPs - Metals						
Emission Factor in lb/MMcf	Lead 0.0005	Cadmium 0.0011	Chromium 0.0014	Manganese 0.0004	Nickel 0.0021	Total
Potential Emission in tons/yr	0.00001	0.00003	0.00004	0.00001	0.00006	0.056

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.

**Appendix A: Emissions Calculations
Individual Parts Washer Natural Gas Combustion Only
MM BTU/HR <100**

Company Name: **ArvinMeritor**
Address City IN Zip: **849 Whitaker Road, Plainfield, Indiana 46168**
Permit No.: **063-28866-00046**
Reviewer: **Janet Mobley**

Heat Input Capacity
MMBtu/hr
0.50

Potential Throughput
MMCF/yr
4.38

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.0042	0.0166	0.0013	0.2190	0.0120	0.1840

*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

Total PM = 0.00
Total PM10 = 0.02

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

HAPs Emissions

Emission Factor in lb/MMcf	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
	0.002100	0.001200	0.075000	1.800000	0.003400
Potential Emission in tons/yr	4.60E-06	2.63E-06	1.64E-04	3.94E-03	7.45E-06

Emission Factor in lb/MMcf	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
	0.000500	0.001100	0.001400	0.000380	0.002100
Potential Emission in tons/yr	1.10E-06	2.41E-06	3.07E-06	8.32E-07	4.60E-06

Total HAPs = 0.00

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

Appendix A: Emissions Calculations**(4) Combustion units****Insignificant Activities - Process water heaters and Ovens****Company Name: ArvinMeritor****Address City IN Zip: 849 Whitaker Road, Plainfield, Indiana 46168****Permit No.: 063-28866-00046****Reviewer: Janet Mobley**

Pollutant	PM*	PM10*	SO2	NOx**	VOC	CO	Benzene	DCB	Formaldehyde	Hexane	Toluene	Pb	Cd	Cr	Mn	Ni
Emission Factor (lb/MMCF)	1.9	7.6	0.6	100	5.5	84.0	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03

Emission Unit	Number of Units	Unit Heat Input Capacity MMBtu/hr	Combined Total Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr	Potential Emission tons/yr															
					PM*	PM10*	SO2	NOx**	VOC	CO	Benzene	DCB	Formaldehyde	Hexane	Toluene	Pb	Cd	Cr	Mn	Ni
Process water heater - PCS1	1	2.0	2.000	17.52	0.02	0.1	0.0	0.9	0.0	0.7	1.8E-05	1.1E-05	6.6E-04	1.6E-02	3.0E-05	4.4E-06	9.6E-06	1.2E-05	3.3E-06	1.8E-05
Process water heater - PCS3	1	1.5	1.500	13.14	0.01	0.0	0.0	0.7	0.0	0.6	1.4E-05	7.9E-06	4.9E-04	1.2E-02	2.2E-05	3.3E-06	7.2E-06	9.2E-06	2.5E-06	1.4E-05
Powder coating drying oven - PCD1	1	1.5	1.500	13.14	0.012	0.05	0.004	0.7	0.036	0.6	1.4E-05	7.9E-06	4.9E-04	1.2E-02	2.2E-05	3.3E-06	7.2E-06	9.2E-06	2.5E-06	1.4E-05
Powder coat curing oven - PCC1	1	2.5	2.500	21.90	0.021	0.08	0.007	1.1	0.060	0.9	2.3E-05	1.3E-05	8.2E-04	2.0E-02	3.7E-05	5.5E-06	1.2E-05	1.5E-05	4.2E-06	2.3E-05
Totals					0.06	0.25	0.02	3.29	0.18	2.76	6.90E-05	3.94E-05	2.46E-03	5.91E-02	1.12E-04	1.64E-05	3.61E-05	4.60E-05	1.25E-05	6.90E-05

*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

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

Methodology

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

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

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)

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu, MMCF = 1,000,000 Cubic Feet of Gas

Abbreviations

PM = Particulate

PM10 = Particulate

SO2 = Sulfur Dioxide

DCB = Dichlorobenzene

Pb = Lead

Cd = Cadmium

Cr = Chromium

Mn = Manganese

Ni = Nickel

ARVINMERITOR WELDING and FLAME CUTTING, UNIT WLD2

Company Name: ArvinMeritor, Plainfield, IN
 Address City IN Zip: 849 Whitaker Rd, Plainfield, IN
 Permit No: 063-28866-00046
 Reviewer: Janet Mobley

PROCESS	# of Stations	Max. Electrode Consumption per Station (lb/hr)		EMISSION FACTORS (lb pollutant/lb electrode)					EMISSIONS (lb/hr)					
				PM/PM10	Mn	Ni	Co	Cr	PM/PM10	Mn	Ni	Co	Cr	HAPs
WELDING														
Submerged Arc	0	0.00		0.036	0.011	0	0	0	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Metal Inert Gas (MIG) Carbon Steel E705	2	1.70		0.0052	0.000318	0.000001	0.000001	0.000001	0.01768	0.00108	0.00000	0.00000	0.00000	0.00109
Stick (E6011)	2	1.00		0.0384	0.000998	0.000005	0.000001	0.000005	0.07680	0.00200	0.00001	0.00000	0.00001	0.00202
Tungsten Inert Gas (TIG) Carbon Steel	0	0.00		0.0055	0.0005	0	0	0	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Oxyacetylene (Carbon Steel)	0	0.00		0.0055	0.0005	0	0	0	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
	# of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (inches/min)	(lb pollutant/1,000 inches cut, 1" thickness)										
FLAME CUTTING														
Oxyacetylene	0	0	0	0.1622	0.0005	0.0001	0	0.0003	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Oxymethane	0	0	0	0.0815	0.0002	0	0	0.0002	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Plasma**	0	0	0	0.0039	0	0	0	0	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
EMISSION TOTALS									0.09448	0.00308	0.00001	0.00001	0.00001	0.00311

Potential To Emit (PTE)	PM/PM10 (tpy)	Mn (tpy)	Ni (tpy)	Co (tpy)	Cr (tpy)	HAPs (tpy)
	0.414	0.013	0.000	0.000	0.000	0.014

METHODOLOGY

Emission factors are default values for carbon steel unless a specific electrode type is noted in the Process column, which are taken from AP-42, Table 12.19.1 & 2
 Emission Factor for plasma cutting from American Welding Society. Trials reported for wet cutting of 8mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted).
 Therefore, the emission factor for plasma cutting is for 8 mm thick rather than 1 inch, and the maximum metal thickness is not used in calculating the emissions.
 Using AWS average values: (0.25 g/min)(3.6 m/min) x (0.0022 lb/g)/(39.37 in/m) x (1,000 in.) = 0.00039 lb/1,000 in. cut, 8 mm thick
 Plasma Cutting Emissions, lb/hr: (# of stations)(max. cutting rate, in./min)(60 min/hr)(emission factor, lb, pollutant / 1,000 in. cut, 8 mm thick)
 Flame Cutting Emissions, lb/hr: (# of stations)(max. cutting rate, in./min)(60 min/hr)(emission factor, lb, pollutant / 1,000 in. cut, 1 " thick)
 Welding Emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb, pollutant/lb of electrode used)
 Emissions, ton/yr = emissions, lb/hr x 8760 hr/yr x 1 ton/2000 lb

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

**Company Name: ArvinMeritor
Address City IN Zip: 849 Whitaker Road, Plainfield, Indiana 46168
Permit Number: 063-28866-00046
Reviewer: Janet Mobley**

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)	
			PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr		
WELDING												
Submerged Arc	0	0	0.036	0.011			0.000	0.000	0.000	0	0.000	
Metal Inert Gas (MIG)(carbon steel)	1	0.00083	0.0055	0.0005			0.000005	0.000000	0.000000	0.000000	0.000004	
Stick (E7018 electrode)	0	0	0.0211	0.0009			0.000	0.000	0.000	0	0.000	
Tungsten Inert Gas (TIG)(carbon steel)	0	0	0.0055	0.0005			0.000	0.000	0.000	0	0.000	
Oxyacetylene(carbon steel)	0	0	0.0055	0.0005			0.000	0.000	0.000	0	0.000	
FLAME CUTTING												
	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)**				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Oxyacetylene	0	0	0	0.1622	0.0005	0.0001	0.0003	0.000	0.000	0.000	0.000	0.000
Oxymethane	0	0	0	0.0815	0.0002		0.0002	0.000	0.000	0.000	0.000	0.000
Plasma**	0	0	0	0.0039				0.000	0.000	0.000	0.000	0.000
EMISSION TOTALS												
Potential Emissions lbs/hr								0.000005				0.000004
Potential Emissions lbs/day								0.0001				0.00001
Potential Emissions tons/year								0.00002				0.000002

METHODOLOGY

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

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

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

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

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

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

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

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

Company Name: ArvinMeritor, Plainfield, IN
Address City IN Zip: 849 Whitaker Rd, Plainfield, IN
Permit No.: 063-28866-00046
Reviewer: Janet Mobley

Coating / Material	Estimated Annual Usage (Container UOM)	Container Size (Converted to gal)	Estimated Annual Usage (gal)	Estimated Annual Operating Hours	Density (Lb/Gal)	Wt % Volatile (W,ES,& VOC)	Wt % Water & ES	Wt % VOC	Vol% W&ES	Vol% Solids	VOC (lb/gal less W&ES)	VOC (lb/ gal)	PTE VOC (lb/hr)	PTE VOC (lb/day)	PTE VOC (ton/yr)	Uncontrolled PM/PM10 (lb/hr)	Uncontrolled PM/PM10 (lb/day)	Uncontrolled PM/PM10 (ton/yr)	Transfer Efficiency	Method of Application & Surface, if applicable
CRC Super Degreaser	564	0.156	88.15	5000	11.08	100.00%	1.62%	98.38%	1.62%	0.00%	11.08	10.90	0.192	4.612	0.842	0.00	0.00	0.00	50%	Spray, Metal
Marker Paint - Cambar	842	0.094	78.94	5000	7.50	81.20%	35.91%	45.30%	35.91%	18.80%	5.30	3.40	0.054	1.287	0.235	0.01	0.27	0.05	50%	Spray, Metal
Oakite Cleaner / Rust Preventative 5200007	165	1.000	165.00	5000	6.62	90.00%	0.00%	90.00%	0.00%	5.00%	5.96	5.96	0.197	4.719	0.861	0.01	0.26	0.05	50%	Spray, Metal
Loctite 271	148	0.066	9.77	5000	9.16	0.82%	0.00%	0.82%	0.00%	99.18%	0.08	0.08	0.000	0.004	0.001			NA	NA	bottle, metal
Loctite 518	86	0.013	1.14	5000	9.16	4.00%	0.00%	4.00%	0.00%	96.00%	0.37	0.37	0.000	0.002	0.000			NA	NA	bottle, metal
Loctite 680	92	0.066	6.07	5000	9.16	4.22%	0.00%	4.22%	0.00%	95.78%	0.39	0.39	0.000	0.011	0.002			NA	NA	bottle, metal
Loctite 277	125	0.066	8.25	5000	9.16	0.71%	0.00%	0.71%	0.00%	99.29%	0.07	0.07	0.000	0.003	0.000			NA	NA	bottle, metal
Loctite 222MS	55	0.066	3.63	5000	8.75	0.19%	0.00%	0.19%	0.00%	99.80%	0.02	0.02	0.000	0.000	0.000			NA	NA	bottle, metal
Loctite 242	36	0.066	2.38	5000	9.16	4.48%	0.00%	4.48%	0.00%	95.52%	0.41	0.41	0.000	0.005	0.001			NA	NA	bottle, metal
Loctite 5699 Grey Silicone RTV Caulk	141	0.079	11.18	5000	12.50	3.31%	0.00%	3.31%	0.00%	96.69%	0.41	0.41	0.001	0.022	0.004			NA	NA	extrusion, metal
Fastball Degreaser (Warsaw)	624	0.250	156.00	5000	7.91	96.25%	85.25%	11.00%	85.25%	3.75%	5.90	0.87	0.027	0.652	0.119			NA	NA	bottle, metal
TAP Magic Cutting Fluid	36	0.125	4.50	5000	10.87	98.92%	0%	98.90%	0	1.08%	10.75	10.75	0.010	0.232	0.042			NA	NA	bottle, metal
Krylon Toughcoat Semiflat Black 3725	168	0.094	15.79	5000	6.51	88.00%	34.00%	47.28%	40.72%	12.00%	5.19	3.08	0.010	0.233	0.043	0.00	0.03	0.01	50%	spray, metal
Multan Marking Green Paint 39SY201	60	0.133	8.00	5000	7.50	10.00%	0%	10%	0	90.00%	0.75	0.75	0.001	0.029	0.005	0.01	0.13	0.02	50%	bottle, metal
WD40	165	1.000	165.00	5000	6.81	49.50%	0%	49.50%	0	26.00%	3.37	3.37	0.111	2.670	0.487	0.06	1.36	0.25	50%	spray, metal
CRC Brakleen	600	0.148	89.04	5000	8.91	90.00%	0.00%	90.00%	0.00%	0.00%	8.02	8.02	0.143	3.427	0.625	0.01	0.19	0.03	50%	spray, metal
Domino I-270BK Inkjet Printing Ink	12	0.218	2.62	5000	7.26	90.00%	0.00%	90.00%	0.00%	10.00%	6.53	6.53	0.003	0.082	0.015			NA	NA	Rollcoat, paper
Domino M-270 Make Up	12	0.218	2.62	5000	6.78	100.00%	0%	100%	0	0.00%	6.78	6.78	0.004	0.085	0.016			NA	NA	Rollcoat, paper
PPG AquaCron 880 (Latex Edge Paint)	50	1.000	50.00	5000	8.41	72.00%	0%	72%	0	24.44%	6.06	6.06	0.061	1.453	0.265			NA	NA	Rollcoat, metal
Totals														19.53	3.56	0.09	2.24	0.41		

Coating / Material	% Chrome Cmpds	Chrome Cmpds (lb/hr)	Chrome Cmpds (ton/yr)	% Glycol Ethers	Glycol Ethers (lb/hr)	Glycol Ethers (ton/yr)	% Perchlor-ethylene	Perchlor-ethylene (lb/hr)	Perchlor-ethylene (ton/yr)	% Ethylene Glycol	Ethylene Glycol (lb/hr)	Ethylene Glycol (ton/yr)	% Aceto-nitrile	Aceto-nitrile (lb/hr)	Aceto-nitrile (ton/yr)	% Xylene *	Xylene (lb/hr)	Xylene (ton/yr)	% Methyl Alcohol	Methyl Alcohol (lb/hr)	Methyl Alcohol (ton/yr)	% Ethyl-benzene	Ethyl-benzene (lb/hr)	Ethyl-benzene (ton/yr)	% Toluene	Toluene (lb/hr)	Toluene (ton/yr)
CRC Super Degreaser													1.00%	0.002	0.009												
Marker Paint - Cambar				1.47%	0.002	0.008								0.000	0.000							0.000	0.000	0.000	11.27%	0.013	0.058
Oakite Cleaner / Rust Preventative 5200007					0.000	0.000								0.000	0.000	0.90%	0.002	0.009	0.00	0.000	0.000		0.000	0.000		0.000	0.000
Loctite 271					0.000	0.000								0.000	0.000		0.00	0.00		0.00	0.00		0.00	0.00		0.00	0.00
Loctite 518					0.000	0.000				4.00%	0.000	0.000		0.000	0.000		0.00	0.00		0.00	0.00		0.00	0.00		0.00	0.00
Loctite 680					0.000	0.000					0.000	0.000		0.000	0.000		0.00	0.00		0.00	0.00		0.00	0.00		0.00	0.00
Loctite 277					0.000	0.000					0.000	0.000		0.000	0.000		0.00	0.00		0.00	0.00		0.00	0.00		0.00	0.00
Loctite 222MS					0.000	0.000					0.000	0.000		0.000	0.000		0.00	0.00		0.00	0.00		0.00	0.00	0.00%	0.00	0.00
Loctite 242					0.000	0.000					0.000	0.000		0.000	0.000		0.00	0.00		0.00	0.00		0.00	0.00		0.00	0.00
Loctite 5699 Grey Silicone RTV Caulk					0.000	0.000					0.000	0.000		0.000	0.000		0.00	0.00		0.00	0.00		0.00	0.00		0.00	0.00
Fastball Degreaser (Warsaw)					0.000	0.000					0.000	0.000		0.000	0.000		0.00	0.00		0.00	0.00		0.00	0.00		0.00	0.00
TAP Magic Cutting Fluid					0.000	0.000					0.000	0.000		0.000	0.000		0.00	0.00		0.00	0.00		0.00	0.00		0.00	0.00
Krylon Toughcoat Semiflat Black 3725					0.000	0.000					0.000	0.000		0.000	0.000		0.00	0.00		0.00	0.00	0.10%	0.000	0.000	19.0%	0.004	0.017
Multan Marking Green Paint 39SY201					0.000	0.000					0.000	0.000		0.000	0.000		0.00	0.00		0.00	0.00		0.000	0.000		0.00	0.00
WD40					0.000	0.000		0.000	0.000		0.000	0.000		0.000	0.000		0.00	0.00		0.00	0.00		0.000	0.000		0.00	0.00
CRC Brakleen					0.000	0.000	95.00%	0.151	0.660		0.000	0.000		0.000	0.000		0.00	0.00		0.00	0.00		0.000	0.000	0.00%	0.00	0.00
Domino I-270BK Inkjet Printing Ink	10.000	0.038	0.166		0.000	0.000		0.000	0.000		0.000	0.000		0.000	0.000		0.00	0.00	1.00	0.004	0.017		0.000	0.000		0.00	0.00
Domino M-270 Make Up					0.000	0.000		0.000	0.000		0.000	0.000		0.000	0.000		0.00	0.00	1.00	0.004	0.016		0.000	0.000		0.00	0.00
PPG AquaCron 880 (Latex Edge Paint)					0.000	0.000		0.000	0.000		0.000	0.000		0.000	0.000	0.05%	0.00	0.00		0.000	0.000		0.000	0.000		0.00	0.00
Totals			0.17		0.00	0.01		0.15	0.66		0.00	0.00		0.000	0.01		0.000	0.01		0.01	0.03		0.00	0.00	0.30	0.02	0.08

Total HAPs 0.96

METHODOLOGY

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

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

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

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

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

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

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

* Some coatings contain naphtha products which do not declare HAPs on the MSDS specifically related to that CAS, however, Table 3 to 40 CFR 63, Subpart IIII gives additional HAP information for coatings such as these and have been included here.

**Appendix A: Emissions Calculations
VOC and Particulate
From Platinum Line Touch Up Painting Operations - Insignificant Activity**

**Company Name: ArvinMeritor, Plainfield, IN
Address City IN Zip: 849 Whitaker Rd, Plainfield, IN
Permit No: 063-28866-00046
Reviewer: Janet Mobley**

Material	Estimated Max Daily Usage (gas)	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	PTE VOC (lb/hr)	PTE VOC (lb/day)	PTE VOC (ton/yr)	Uncontrolled/C controlled PM/PM10 (lb/hr)	Uncontrolled / Controlled PM/PM10 (lb/day)	Uncontrolled / Controlled PM/PM10 (ton/yr)	Transfer Efficiency	Method of Application & Surface, if applicable
PPG TrueFinish Q2365-9001	3.37	6.3	86.99%	18.0%	69.0%	17.3%	7.74%	3.37	0.140	5.28	4.37	0.613	14.72	2.686	0.060	1.39	0.25	50%	Spray, metal
													<15 lb/day, exempt		<25 lb/day, exempt				

This Touch Up Paint operation will be operated 24hr/day and 7 days/week
This coating contains no HAPs, therefore, no HAP calculations have been provided.

METHODOLOGY

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



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: Chris Hauke
ArvinMeritor
849 Whitaker Rd
Plainfield, IN 46168

DATE: August 18, 2010

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

SUBJECT: Final Decision
FESOP - Renewal
063 - 28866 - 00046

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:
Dwight Treen, Plant Mgr
Greg Towler Secor International, Inc.
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



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

August 18, 2010

TO: Plainfield Public Library

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

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

Applicant Name: ArvinMeritor
Permit Number: 063 - 28866 - 00046

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	LPOGOST 8/18/2010 ArvinMeritor 063 - 28866 - 00046 final)		Type of Mail: CERTIFICATE OF MAILING ONLY	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		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handling 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		Chris Hauke ArvinMeritor 849 Whitaker Rd Plainfield IN 46168 (Source CAATS) Via confirmed delivery									
2		Dwight Treen Plant Mgr ArvinMeritor 849 Whitaker Rd Plainfield IN 46168 (RO CAATS)									
3		Larry and Becky Bischoff 10979 North Smokey Row Road Mooresville IN 46158 (Affected Party)									
4		Hendricks County Commissioners 355 S Washington Danville IN 46122 (Local Official)									
5		Plainfield Public Library 1120 Stafford Rd Plainfield IN 46168-2230 (Library)									
6		Betty Bartley P.O. Box 149 Danville IN 46122 (Affected Party)									
7		Plainfield Town Council and Town Manager P.O. Box 65 Plainfield IN 46168 (Local Official)									
8		Hendricks County Health Department 355 S Washington Street, Suite 210 Danville IN 46122-1759 (Health Department)									
9		Mr. Greg Towler Secor International, Inc. 8770 Guion Road Suite B Indianapolis IN 46268 (Consultant)									
10		Kevin Carnes 1816 Beechwood Dr Lafayette IN 47905 (Affected Party)									
11											
12											
13											
14											
15											

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
---	--	--	--