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: November 3, 2010

RE: Carlisle Industrial Brake and Friction / 017-28881-00021

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

Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures
FNPER.dot12/03/07

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Federally Enforceable State Operating Permit Renewal

OFFICE OF AIR QUALITY

Carlisle Industrial Brake and Friction
1441 Holland Street
Logansport, Indiana 46947

(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.: F017-28881-00021	
Issued by: Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: November 3, 2010 Expiration Date: November 3, 2020

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary friction materials manufacturing plant.

Source Address:	1441 Holland Street, Logansport, Indiana 46947
General Source Phone Number:	574-753-6391
SIC Code:	3292, 3299
County Location:	Cass
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

The source consists of the following permitted emission units:

(a) One (1) extrusion operations area, constructed in 1975, with a maximum capacity of 210 pounds per hour of non-asbestos brake pads and clutch linkings, equipped with three (3) extruders, collectively identified as EU-01, exhausting through stacks 202, 203 and 204, and six (6) steam heated dry-out ovens (using steam generated by boilers B-1 and B-2), collectively identified as EU-02, exhausting through stacks 213, 214, 215, 216, 217 and 218.

(b) One (1) adhesive application area, identified as EU-03, with a maximum capacity of 810 pounds of brake parts per hour, consisting of the following operations:

(1) Two (2) roll coating machines, identified as 110 and 111, constructed in 1975, for applying adhesives to non-metallic friction materials with rolling application techniques, with a maximum capacity of 3.3 pounds of VOC per hour, with emissions exhausting to stacks 210 and 211, respectively.

(2) One (1) adhesive spray booth, constructed in 1996, for applying adhesive to non-metallic, resin-bonded, non-asbestos friction material and metal backing plates with low pressure spray application techniques, with a maximum capacity of 1.2 pounds of VOC per hour, with emissions exhausting to stack 209.

(3) One (1) roll coating machine, identified as RC-1, constructed in 1998, for applying adhesives to non-metallic friction materials with rolling application techniques, with a maximum capacity of 6.8 pounds of VOC per hour, with emissions exhausting to stack 212.

(4) One dipcoater, constructed in 1975, for applying adhesives to the metal backings of brake parts, using dip application techniques, with a maximum capacity of less than 2.1 pounds of VOC per hour, with emissions exhausting inside the building. This emission unit is an insignificant activity.

(5) One (1) hand roll coater, constructed in 1994, for applying adhesives to the metal backings of brake parts, using hand rolling application techniques, with a maximum capacity of less than 0.2 pounds of VOC per hour, with emissions exhausting inside the building.

(c) One (1) natural gas fired boiler, constructed in 1972, identified as B-1, with a maximum capacity of 20.9 MMBtu per hour, and exhausting to stack B-1.

(d) One (1) natural gas fired boiler, constructed in 1975, identified as B-2, with a maximum capacity of 16.7 MMBtu per hour, and exhausting to stack B-2.

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

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) MMBtu/hr; including one (1) 0.65 MMBtu per hour, natural gas fired oven identified as OV-19.

(b) Activities with emissions equal to or less than 5 pounds per hour or 25 pounds per day of PM10 and PM, including:

(1) One (1) dry sander, identified as S-6, constructed in 1994, having a maximum process weight of 360 pounds of paper or 80 pounds of cork per hour with particulate emissions controlled by baghouse BH-7. [326 IAC 6-3-2]

(2) Two (2) horizontal mills, identified as HM-1 and HM-2, constructed in 1994, each having a maximum process weight of 21.6 pounds of paper or 4.8 pounds of cork per hour, with particulate emissions controlled by baghouse BH-7. [326 IAC 6-3-2]

(3) Grinding, sawing, sanding, routing, milling and pressing operations, each with a maximum process weight of 360 pounds per hour, with particulate emissions controlled by six bag filters (BH-1 through BH-6). [326 IAC 6-3-2]

(c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-3-2]

(d) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

(e) Propane or liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than six (6) MMBtu/hr.

(f) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.

(g) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;

(h) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.

(i) Machining where an aqueous cutting coolant continuously floods the machining interface.

(l) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(j) Heat exchanger and repair.

(k) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any product process.

(l) Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling tower.

(m) A laboratory as defined in 326 IAC 2-7-1(21)(D).

(n) Two (2) fixed-roof, above ground storage tanks, each with a capacity of 10,500 gallons and used to store VOC.

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, F017-28881-00021, 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:
(1) it contains a certification by an "authorized individual", as defined by 326 IAC 2-1.1-1(1),

and

(2) 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.

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 F017-28881-00021 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised, or 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.

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 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.13 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.14 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.15 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.16 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.17 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 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) One (1) extrusion operations area, constructed in 1975, with a maximum capacity of 210 pounds per hour of non-asbestos brake pads and clutch linkings, equipped with three (3) extruders, collectively identified as EU-01, exhausting through stacks 202, 203 and 204, and six (6) steam heated dry-out ovens (using steam generated by boilers B-1 and B-2), collectively identified as EU-02, exhausting through stacks 213, 214, 215, 216, 217 and 218.

(b) One (1) adhesive application area, identified as EU-03, with a maximum capacity of 810 pounds of brake parts per hour, consisting of the following operations:

(1) Two (2) roll coating machines, identified as 110 and 111, constructed in 1975, for applying adhesives to non-metallic friction materials with rolling application techniques, with a maximum capacity of 3.3 pounds of VOC per hour, with emissions exhausting to stacks 210 and 211, respectively.

(2) One (1) adhesive spray booth, constructed in 1996, for applying adhesive to non-metallic, resin-bonded, non-asbestos friction material and metal backing plates with low pressure spray application techniques, with a maximum capacity of 1.2 pounds of VOC per hour, with emissions exhausting to stack 209.

(3) One (1) roll coating machine, identified as RC-1, constructed in 1998, for applying adhesives to non-metallic friction materials with rolling application techniques, with a maximum capacity of 6.8 pounds of VOC per hour, with emissions exhausting to stack 212.

(4) One dipcoater, constructed in 1975, for applying adhesives to the metal backings of brake parts, using dip application techniques, with a maximum capacity of less than 2.1 pounds of VOC per hour, with emissions exhausting inside the building. This emission unit is an insignificant activity.

(5) One (1) hand roll coater, constructed in 1994, for applying adhesives to the metal backings of brake parts, using hand rolling application techniques, with a maximum capacity of less than 0.2 pounds of VOC per hour, with emissions exhausting inside the building.

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

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

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

Pursuant to 326 IAC 2-8-4, the Permittee shall limit the usage of VOC and HAP as follows:

(a) The total VOC delivered to the extrusion operations (EU-01) and the adhesive operations (EU-03), including cleanup solvents, shall be limited to less than ninety-nine (99) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(b) The total single HAP delivered to the extrusion operations are (EU-01) and the adhesive application operations (EU-03), including cleanup solvents, shall be limited to less than

nine and six-tenths (9.6) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(c) The total HAPs delivered to the extrusion operations are (EU-01) and the adhesive application operations (EU-03), including cleanup solvents, shall be limited to less than twenty-four and six-tenths (24.6) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Combined with VOC and HAP emissions from other emission units at this source, these limits will ensure that source-wide emissions of VOC, a single HAP and any combination of HAPs do not exceed one hundred (100), ten (10), and twenty-five (25) tons per year, respectively. Compliance with these limits will render the requirements of 326 IAC 2-7, National Emission Standards for Hazardous Air Pollutants for Friction Materials Manufacturing Facilities 40 CFR 63, Subpart QQQQQ; and National Emission Standards for Miscellaneous Metal Parts and Products Surface Coating Operations 40 CRF 63, Subpart MMMM and 326 IAC 2-2 (for VOC) not applicable.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

The usage of volatile organic compounds (VOC) at the Roll Coater (RC-1) facility shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Compliance with this limit will render the requirements of 326 8-1-6 not applicable to the roll coater (RC-1) facility.

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

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 preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.1.4 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants [326 IAC 8-1-2][326 IAC 8-1-4]

Compliance with the VOC and HAP usage and content limitations contained in conditions D.1.1, and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC and HAP 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.

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

D.1.5 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits established in Conditions D.2.1 and D.2.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

(1) The amount, VOC content and HAP content of each extrusion material, adhesive and solvent used on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(2) The total VOC usage for each month.

(3) The total single HAP usage for each month.

(4) The total usage of a combination of HAPs for each month.

(5) The weight of VOCs and HAPs emitted for each compliance period.

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

D.1.6 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by an “authorized individual” as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 FACILITY OPERATION CONDITIONS

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

(c) One (1) natural gas fired boiler, constructed in 1972, identified as B-1, with a maximum capacity of 20.9 MMBtu per hour, and exhausting to stack B-1.

(d) One (1) natural gas fired boiler, constructed in 1975, identified as B-2, with a maximum capacity of 16.7 MMBtu per hour, and exhausting to stack B-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.2.1 (Particulate Emissions Limitations for Sources of Indirect Heating) [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3(e), particulate emissions from indirect heating (Boilers B-1 and B-2) shall be limited to 0.6 pounds per MMBtu heat input.

SECTION D.3 FACILITY OPERATION CONDITIONS

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

Insignificant Activities:

(a) Activities with emissions equal to or less than five (5) pounds per hour or twenty-five (25) pounds per day of PM10 and PM, including:

(1) One (1) dry sander, identified as S-6, constructed in 1994, having a maximum process weight of 360 pounds of paper or 80 pounds of cork per hour with particulate emissions controlled by baghouse BH-7. [326 IAC 6-3-2]

(2) Two (2) horizontal mills, identified as HM-1 and HM-2, constructed in 1994, each having a maximum process weight of 21.6 pounds of paper or 4.8 pounds of cork per hour, with particulate emissions controlled by baghouse BH-7. [326 IAC 6-3-2]

(3) Grinding, sawing, sanding, routing, milling and pressing operations, each with a maximum process weight of 360 pounds per hour, with particulate emissions controlled by six bag filters (BH-1 though BH-6). [326 IAC 6-3-2]

(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.3.1 Particulate Emission Limitations [326 IAC 6-3]

Pursuant to 326 IAC 6-3-2:

(a) The particulate emissions from the dry sander (S-6) and the horizontal mills (HM-01 and HM-02) shall not exceed 1.3 pounds per hour each when operating at a maximum process weight of 360 pounds per hour.

(b) The particulate emissions from the insignificant grinding, sawing, sanding, routing, milling and pressing operations shall not exceed 1.3 pounds per hour each when operating at a maximum process weight of 360 pounds per hour.

(c) The particulate emissions from the grinding, sawing, sanding, routing, milling and pressing operations shall not exceed 0.551 pounds per hour, when operating at a maximum process weight of less than 100 pounds per hour.

The pound per hour limitations listed above 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:

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

Compliance Determination Requirements

D.3.2 Particulate Control

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), and in order to comply with Condition D.3.1, the bag filters and baghouses (BH-1 through BH-7) for the particulate control shall be in operation and control emissions from the dry sander (S-6), horizontal mills (HM-1, HM-2), and the insignificant grinding, sawing, sanding, routing, milling and pressing operations at all times that these facilities are in operation

Compliance Monitoring Determination

D.3.3 Visible Emissions Notations

(a) Daily visible emission notations of baghouses BH-1 through BH-7 shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

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

D.3.4 Record Keeping Requirement

(a) To document compliance with Condition D.3.3, the Permittee shall maintain daily records of the visible emissions notations of the baghouse stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notation (i.e. the process did not operate that day).

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

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Carlisle Industrial Brake and Friction
Source Address: 1441 Holland Street, Logansport, Indiana 46947
FESOP Permit No.: F017-28881-00021

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: Carlisle Industrial Brake and Friction
Source Address: 1441 Holland Street, Logansport, Indiana 46947
FESOP Permit No.: F017-28881-00021

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

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

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

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

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

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

Form Completed by:_____

Title / Position:_____

Date:_____

Phone: _____

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

FESOP Quarterly Report

Source Name: Carlisle Industrial Brake and Friction
Source Address: 1441 Holland Street, Logansport, Indiana 46497
FESOP Permit No.: F017-28881-00021
Facility: Extrusion (EU-01) and Adhesive Application (EU-03) Operations
Parameter: Usage of Volatile Organic Compounds (VOC)
Limit: Less than twenty-four (99) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

QUARTER: _____ MONTH: _____ YEAR: _____

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

☐ No deviation occurred in this quarter.

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

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

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH

FESOP Quarterly Report

Source Name: Carlisle Industrial Brake and Friction
Source Address: 1441 Holland Street, Logansport, Indiana 46947
FESOP Permit No.: F017-28881-00021
Facility: Extrusion (EU-01) and Adhesive Application (EU-03) Operations
Parameter: Single HAP
Limit: Less than nine and six-tenths (9.6) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

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

☐ No deviation occurred in this quarter.

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

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

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH

FESOP Quarterly Report

Source Name: Carlisle Industrial Brake and Friction
Source Address: 1441 Holland Street, Logansport, Indiana 46947
FESOP Permit No.: F017-28881-00021
Facility: Extrusion (EU-01) and Adhesive Application (EU-03) Operations
Parameter: Combination of HAPs
Limit: Less than twenty-four and six tenths (24.6) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

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

☐ No deviation occurred in this quarter.

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

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

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH

FESOP Quarterly Report

Source Name: Carlisle Industrial Brake and Friction
Source Address: 1441 Holland Street, Logansport, Indiana 46947
FESOP Permit No.: F017-28881-00021
Facility: Roll Coater Operation (RC-1)
Parameter: VOC Usage (326 IAC 8-1-6 limit)
Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

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

☐ No deviation occurred in this quarter.

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

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

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: Carlisle Industrial Brake and Friction
Source Address: 1441 Holland Street, Logansport, Indiana 46947
FESOP Permit No.: F017-28881-00021

Months: _____ **to** _____ **Year:** _____
Page 1 of 2

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".

□ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

□ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:	**Duration of Deviation:**

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:	**Duration of Deviation:**

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Page 2 of 2

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:	**Carlisle Industrial Brake and Friction**
Source Location:	**1441 Holland Street, Logansport, IN 46947**
County:	**Cass**
SIC Code:	**3292**
Permit Renewal No.:	**F017-28881-00021**
Permit Reviewer:	**Deborah Cole**

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Carlisle Industrial Brake and Friction relating to the operation of a stationary, non-asbestos, resin bonded friction materials manufacturing plant**.** On January 14, 2010, Carlisle Industrial Brake and Friction submitted an application to the OAQ requesting to renew its operating permit. Carlisle Industrial Brake and Friction was issued a Federally Enforceable State Operating Permit No.: F017-21262-00021 on October 17, 2005. This FESOP was a transition FESOP from their original Title V Permit, issued on November 16, 2000.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units:

(a) One (1) extrusion operations area, constructed in 1975, with a maximum capacity of 210 pounds per hour of resin-bonded, non-asbestos brake pads and clutch linkings, equipped with three (3) extruders, collectively identified as EU-01, exhausting through stacks 202, 203 and 204, and six (6) steam heated dry-out ovens (using steam generated by boilers B-1 and B-2), collectively identified as EU-02, exhausting through stacks 213, 214, 215, 216, 217 and 218.

(b) One (1) adhesive application area, identified as EU-03, with a maximum capacity of 810 pounds of brake parts per hour, consisting of the following operations:

(1) Two (2) roll coating machines, identified as 110 and 111, constructed in 1975, for applying adhesives to non-metallic friction materials with rolling application techniques, with a maximum capacity of 3.3 pounds of VOC per hour, with emissions exhausting to stacks 210 and 211, respectively.

(2) One (1) adhesive spray booth, constructed in 1996, for applying adhesive to non-metallic, resin-bonded, non-asbestos friction material and metal backing plates with low pressure spray application techniques, with a maximum capacity of 1.2 pounds of VOC per hour, with emissions exhausting to stack 209.

(3) One (1) roll coating machine, identified as RC-1, constructed in 1998, for applying adhesives to non-metallic friction materials with rolling application techniques, with a maximum capacity of 6.8 pounds of VOC per hour, with emissions exhausting to stack 212.

(4) One dipcoater, constructed in 1975, for applying adhesives to the metal backings of brake parts, using dip application techniques, with a maximum capacity of less than 2.1 pounds of VOC per hour, with emissions exhausting inside the building. This emission unit is an insignificant activity.

(5) One (1) hand roll coater, constructed in 1994, for applying adhesives to the metal backings of brake parts, using hand rolling application techniques, with a maximum capacity of less than 0.2 pounds of VOC per hour, with emissions exhausting inside the building.

(c) One (1) natural gas fired boiler, constructed in 1972, identified as B-1, with a maximum capacity of 20.9 MMBtu per hour, and exhausting to stack B-1.

(d) One (1) natural gas fired boiler, constructed in 1975, identified as B-2, with a maximum capacity of 16.7 MMBtu per hour, and exhausting to stack B-2.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted emission units operating at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) MMBtu/hr; including one (1) 0.65 MMBtu per hour, natural gas fired oven identified as OV-19.

(b) Activities with emissions equal to or less than 5 pounds per hour or 25 pounds per day of PM10 and PM, including:

(1) One (1) dry sander, identified as S-6, constructed in 1994, having a maximum process weight of 360 pounds of paper or 80 pounds of cork per hour with particulate emissions controlled by baghouse BH-7. [326 IAC 6-3-2]

(2) Two (2) horizontal mills, identified as HM-1 and HM-2, constructed in 1994, each having a maximum process weight of 21.6 pounds of paper or 4.8 pounds of cork per hour, with particulate emissions controlled by baghouse BH-7. [326 IAC 6-3-2]

(3) Grinding, sawing, sanding, routing, milling and pressing operations, each with a maximum process weight of 360 pounds per hour, with particulate emissions controlled by six bag filters (BH-1 through BH-6). [326 IAC 6-3-2]

(c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-3-2]

(d) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

(e) Propane or liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than six (6) MMBtu/hr.

(f) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.

(g) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;

(h) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.

(i) Machining where an aqueous cutting coolant continuously floods the machining interface.

(l) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(j) Heat exchanger and repair.

(k) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any product process.

(l) Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling tower.

(m) A laboratory as defined in 326 IAC 2-7-1(21)(D).

(n) Two (2) fixed-roof, above ground storage tanks, each with a capacity of 10,500 gallons and used to store VOC.

Existing Approvals

There have been no additional permit approvals for this source since the issuance of the FESOP (F017-21262-00021) on October 17, 2005.

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

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Cass County.

Pollutant	Designation
SO_2	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O_3	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard.[1]
PM_{10}	Unclassifiable effective November 15, 1990.
NO_2	Cannot be classified or better than national standards.
Pb	Not designated.

[1]Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.
Unclassifiable or attainment effective April 5, 2005, for PM2.5.

(a) Ozone Standards

Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) 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 NO_x emissions are considered when evaluating the rule applicability relating to ozone. Cass County has been designated as

attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) Cass County has been classified as attainment for $PM_{2.5}$. On May 8, 2008, U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for $PM_{2.5}$ emissions. These rules became effective on July 15, 2008. Indiana has three years from the publication of these rules to revise its PSD rules, 326 IAC 2-2, to include those requirements. The May 8, 2008 rule revisions require IDEM to regulate PM_{10} emissions as a surrogate for $PM_{2.5}$ emissions until 326 IAC 2-2 is revised.

(c) Other Criteria Pollutants
Cass County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

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

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Unrestricted Potential Emissions	
Pollutant	Tons/year
PM	21.90
PM_{10}	21.90
$PM_{2.5}$	21.58
SO_2	0.10
NO_x	16.8
VOC	341.32
CO	14.07

HAPs	**tons/year**
Toluene	265.06
Phenol	2.72
MEK	62.21
Formaldehyde	0.5
Chlorobenzene	0
Total	**330.49**

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of volatile organic compounds (VOC) is equal to or greater than 100 tons per year. However, the Permittee has agreed to limit the source's VOC emissions to less than Title V levels. Therefore the Permittee 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 equal to or greater 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 equal to or greater than twenty-five (25) tons per year. However, the Permittee has agreed to limit the source's single HAP emissions and total HAP emissions below Title V levels. Therefore, the Permittee will be issued a FESOP Renewal.

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.

		Potential to Emit (tons/year)						
Process/emission unit	PM	PM_{10}*	$PM_{2.5}$	SO_2	NOx	VOC	CO	HAPs
Extrusion Operation (EU1 and EU2)						Less than 99[a]		Single: Less than 9.6 Combination: Less than 24.6
Adhesive Application Operation (EU-03) Roll Coating Machine 111								
Adhesive Application Operation (EU-03) Roll Coating Machine RC-1								
Adhesive Application Operation (EU-03) Adhesive Spray Booth								
Adhesive Application Operation (EU-03) Dip Coater								
Adhesive Application Operation (EU-03) Hand Roll Coater								
Natural Gas Fired Boiler (B-1)	0.70	0.70	0.52	0.05	9.15	0.50	7.69	0.17
Natural Gas Fired Boiler (B-2)	0.56	0.56	0.42	0.04	7.31	0.40	6.14	0.13
Oven (OV-19)	0.02	0.02	0.02	0.00	0.28	0.02	0.24	0.005
Dry Sander (S-6) and the Horizontal Mills (HM-1 and HM-2)	39.8[b]	39.8[b]	39.8[b]					
Grinding (BH-1)								
Sawing (BH-2)								
Sanding (BH-3)								
Routing (BH-4)								
Milling								
Pressing								
Total PTE of Entire Source	**41.08**	**41.08**	**40.76**	**0.09**	**16.74**	**Less than 100**	**14.07**	**Single: Less than 9.6 Combination: Less than 24.6**
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA

*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". U.S. EPA has directed states to regulate PM 10 emissions as surrogate for PM 2.5 emissions.

(a) Emissions of VOC, a single HAP and a combination of HAPs from the Extrusion Operation (EU1 and EU2) and the Adhesive Application Operation (EU3) are limited under 326 IAC 2-8.

(b) Particulate emissions listed in the table for the dry sander, grinding, sawing, sanding, routing, milling, pressing, cutting soldering, and welding are the **allowable** emissions under 326 IAC 6-3-2.

(a) FESOP Status
This renewal to an existing Title V minor stationary source will not change the minor status because the potential to emit criteria pollutants from the entire source will be limited to less than the Title V major source threshold levels. Therefore, the source will be subject to the provisions of 326 IAC 2-8 – Federally Enforceable State Operating Permit Program (FESOP).

Federal Rule Applicability

New Source Performance Standards

(a) The requirements of the New Source Performance Standards for Fossil-Fuel-Fired Steam Generators (326 IAC 12, 40 CFR 60, Subpart D) are not included in this permit for the two (2) natural gas-fired boilers because the maximum heat input of these boilers is less than 250 MMBtu/hour.

(b) The requirements of the New Source Performance Standards for Electric Utility Steam Generating Units (326 IAC 12, 40 CFR 60, Subpart Da) are not included in this permit for the two (2) natural gas-fired boilers because these boilers are not electric utility steam generating units.

(c) The requirements of the New Source Performance Standards for Industrial-Commercial-Institutional Steam Generating Units (326 IAC 12, 40 CFR 60, Subpart Db) are not included in this permit for the two (2) natural gas-fired boilers because these boilers have a heat input capacity less than 100 MMBtu/hour.

(d) The requirements of the New Source Performance Standards for Small Industrial-Commercial-Institutional Steam Generating Units (326 IAC 12, 40 CFR 60, Subpart Dc) are not included in this permit for the two (2) natural gas-fired boilers. These boilers were constructed prior to June 9, 1989.

(e) The requirements of the New Source Performance Standards for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978 (326 IAC 12, 40 CFR 60, Subpart K); Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984 (326 IAC 12, 40 CFR 60, Subpart Ka) and the 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, Subpart Kb) are not included in this permit for the VOC storage tanks because these tanks have storage capacities of 10,500 gallons (39.7 cubic meters), which is less than the 40,000 gallon applicability thresholds for Subpart K and Ka and less than the 19,813 gallon applicability threshold for Subpart Kb. In addition, the solvent used in these tanks does not meet the definition of petroleum liquid as defined in 40 CFR 60.111 (Subpart K) and 40 CFR 60.111a (Subpart Ka).

(f) There are no New Source Performance Standards (NSPS) included in this permit renewal for this source.

National Emissions Standards for Hazardous Air Pollutants (NESHAP)

(g) The requirements of the National Emission Standards for Hazardous Air Pollutants for Friction Materials Manufacturing Facilities (40 CFR 63, Subpart QQQQQ) are not included in this permit for this source because the source has accepted federally enforceable limits prior to the October 18, 2005 compliance date for this rule, which limits the amount of hazardous air pollutants (HAPs) emitted such that the amount of any single HAP emitted is limited to

less than ten (10) tons per year and the amount of any combination of HAPs is limited to less than twenty-five (25) tons per year.

(h) The requirements of the National Emission Standards for Miscellaneous Metal Parts and Products Surface Coating Operations (40 CFR 63, Subpart MMMM) are not included in this permit for this source because the source has accepted federally enforceable limits prior to the January 2, 2007 compliance date for this rule, which limits the amount of hazardous air pollutants (HAPs) emitted such that the amount of any single HAP emitted is limited to less than ten (10) tons per year and the amount of any combination of HAPs is limited to less than twenty-five (25) tons per year.

(i) The requirements of the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD would have been applicable to the two (2) natural gas fired boilers (B-1, B-2). However, on June 8, 2007, the United States Court of Appeals for the District of Columbia Circuit in NRDC v. EPA, No. 04-1386, vacated in its entirety the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD. Additionally, since the state rule at 326 IAC 20-95 incorporated the requirements of NESHAP 40 CFR, Subpart DDDD by reference, the requirements of 326 IAC 20-95 are no longer applicable.

(j) 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)

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

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)
The VOC emissions are limited to less than 100 tons/year under 326 IAC 2-8 (FESOP). This limit also renders 326 IAC 2-2 not applicable.

326 IAC 2-3 Emission Offset
The requirements of 326 IAC 2-3 are not applicable to this source because the source is located in an attainment county.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAPs)
The requirements of 326 IAC 2-4.1 are not applicable to the facility identified as the Extrusion Operation (EU-1) because it was constructed prior to July 27, 1997.

The requirements of 326 IAC 2-4.1 are not applicable to the facilities in the Adhesive Application Operation identified as the adhesive spray booth, the roll coating machine 110 and roll coating machine 111, the dip coater, and the hand roll coater because they were constructed prior to July 27, 1997.

The requirements of 326 IAC 2-4.1 are not applicable to the facility identified as the roll coating machine RC-1 even though it was constructed after July 27, 1997. The potential to emit of this facility is less than ten (10) tons per year of a single HAP and less than twenty-five (25) tons per year of a combination of HAPs.

326 IAC 2-6 (Emission Reporting)
The requirements of 326 IAC 2-6 (Emission Reporting) are not applicable to this source because it is located in Cass 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 5 tons per year.

326 IAC 2-8-4 (FESOP)
The unrestricted potential emissions of VOC from the source exceed one hundred (100) tons per year. The unrestricted potential emissions of a single HAP from the source exceed ten (10) tons per year. The unrestricted potential emissions of a combination of HAPs from the source exceed twenty-five (25) tons per year. Pursuant to 326 IAC 2-8-4, and in order to limit the source-wide emissions of VOC, a single HAP and any combination of HAPs to less than one-hundred (100), ten (10), and twenty-five (25) tons per year, respectively, the Permittee shall limit the usage of VOC and HAP as follows:

(a) The total VOC delivered to the extrusion operations area (EU-01) and the adhesive application operations (EU-03), including cleanup solvents, shall be limited to less than ninety-nine (99) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Combined with other VOC emissions at the source, this will limit source-wide VOC emissions to less than 100 tons per year.

(b) The total single HAP delivered to the extrusion operations area (EU-01) and the adhesive application operations (EU-03), including cleanup solvents, shall be limited to less than nine and six tenths (9.6) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This will limit source-wide emissions of a single HAP to less than ten (10) tons per year.

(c) The total HAPs delivered to the extrusion operations area (EU-01) and the adhesive application operations (EU-03), including cleanup solvents, shall be limited to less than twenty-four and six tenths (24.6) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Combined with other HAP emissions at the source, this will limit source-wide emissions of any combination of HAPs to less than twenty-five (25) tons per year.

Compliance with the limitations makes the requirements of 326 IAC 2-7 (Part 70 Program) not applicable.

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)
Pursuant to 326 IAC 6-4, (Fugitive Dust Emissions) 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.

State Rule Applicability – Individual Facilities

Extrusion Operations (EU-1 and EU-2))

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
The requirements of 326 IAC 6-3-2 do not apply to the extrusion operation (EU-1 and EU-2)

because the operation of the extrusion machine does not result in the formation of airborne particulate matter.

326 IAC 8-1-6 (New Facilities, General Reduction Requirements)
The requirements of 326 IAC 8-1-6 do not apply to the extrusion operation (EU-01 and EU-02)) because it was constructed in 1975 which is prior to the applicability date of January 1, 1980.

326 IAC 8-6 (Organic Solvent Emission Limitations)
The requirements of 326 IAC 8-6 do not apply to the extrusion operation (EU-1 and EU-2) because the source commenced operation after October 7, 1974 but prior to the applicability date of January 1, 1980 and is located in Cass County. The unlimited potential to emit VOC from the extrusion operation (EU-1 and EU-2) is greater than 100 tons per year. However, the source has limited the usage of solvent in the extrusion operation (EU-1 and EU-2) to less than 100 tons per year.

Adhesive Application Operations EU-3

Roll Coating Machines RC 110 and RC 111

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
The requirements of 326 IAC 6-3-2 do not apply to the two (2) roll coater machines, identified as roll coating 110 and roll coating 111, in the adhesive application operations because roll coating operation is exempt as specified in 326 IAC 6-3-1(b)(6).

326 IAC 8-2-9 (Surface Coating Emission Limitations: Miscellaneous Metal Coating)
The requirements of 326 IAC 8-2-9 do not apply to the roll coater machines identified as RC 110 and RC 111 because they were constructed before November 1, 1980, are located in Cass County and apply adhesives to non-metallic friction materials.

Roll Coating Machine RC-1

The requirements of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) do not apply to the roll coating machine identified as RC-1 because roll coating operation is exempt as specified in 326 IAC 6-3-1(b)(6).

326 IAC 8-1-6 (New Facilities, General Reduction Requirements)
The requirements of 326 IAC 8-1-6 do not apply to the roll coater machine (RC-1) which was constructed in 1998, after the applicability date of January 1, 1980, and does have the potential to emit VOC greater than 25 tons per year.

When this emission unit was constructed in 1998, the PTE for VOC was less than 25 tons per year so no limits on the usage of VOC were added to avoid the requirements of 326 IAC 8-1-6 (Best Available Control Technology (BACT). Although the potential to emit of VOC from this facility is now 29.4 tons per year, the actual emissions of VOC from this facility have never exceeded 25 tons per year. The Permittee has accepted a limit on the usage of VOC at the roll coater machine (RC-1) of less than 25 tons per twelve consecutive month period, with compliance determined at the end of each month. This limit shall make the requirements of 326 IAC 8-1-6 not applicable.

Adhesive Spray Booth

The requirements of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) do not apply to the adhesive spray booth in the adhesive application operation because the adhesive spray booth applies adhesives to non-metallic, resin-bonded, non-asbestos friction material and metal backing plates using a low pressure application method which does not result in the formation of air borne particulate.

The requirements of 326 IAC 8-1-6 (New Facilities, General Reduction Requirements) do not apply to the adhesive spray booth in the adhesive application operation even though it was constructed in 1996, which is after the applicability date of January 1, 1980, because the adhesive spray booth does not have the potential to emit VOC greater than 25 tons per year.

326 IAC 8-2-9 (Miscellaneous Coating Operations)
Pursuant to 326 IAC 8-2-1, the provisions of 326 IAC 8-2-9 apply to miscellaneous metal coating operations constructed after July 1, 1990, located in any county, and which have actual emissions of greater than fifteen (15) pounds per day before add-on controls. The potential to emit VOC from the adhesive spray booth is greater than fifteen (15) pounds per day. However, this source does not perform surface coating of farm machinery, small household appliances, office equipment, industrial machinery, or any other industrial category which coats metal parts or products under the SIC code of major groups #33, #34, #35, #36, #37, #38 or #39. Therefore, the requirements of 326 IAC 8-2-9 are not applicable to the adhesive spray booth.

Dip Coater

The requirements of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) do not apply to the dip coater in the adhesive application operations because dip coating operation is exempt as specified in 326 IAC 6-3-1(b)(5).

The requirements of 326 IAC 8-1-6 (New Facilities, General Reduction Requirements) do not apply to the dip coater in the adhesive application operation which was constructed in 1975, before the applicability date of January 1, 1980, and which does not have the potential to emit VOC greater than 25 tons per year.

326 IAC 8-2-9 (Surface Coating Emission Limitations: Miscellaneous Metal Coating)
The requirements of 326 IAC 8-2-9 do not apply to the dip coater even though this facility applies coating to metal because the facility was constructed before November 1, 1980 and is located in Cass County.

Hand Roll Coater

The requirements of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) do not apply to the hand roll coater because roll coating operation is exempt as specified in 326 IAC 6-3-1(b)(6).

326 IAC 8-1-6 (New Facilities, General Reduction Requirements)
The requirements of 326 IAC 8-1-6 do not apply to the hand roll coater which was constructed in 1994, after the applicability date of January 1, 1990, because the potential to emit of this facility is less than 25 tons per year.

The requirements of 326 IAC 8-2-9 (Surface Coating Emission Limitations: Miscellaneous Metal Coating) do not apply to the hand roll coater even though the facility was constructed after July 1, 1990 and applies surface coatings to metal parts. The facility has actual emissions of less than fifteen (15) pounds per day before add-on controls.

Boilers

326 IAC 6-2-3 (Particulate Emissions Limitations for Sources of Indirect Heating)
The 20.9 MMBtu/hr natural gas fired boiler (B-1), constructed in 1972 and the 16.7 MMBtu/hr natural gas fired boiler (B-2), constructed in 1975, are subject to 326 IAC 6-2-3 (Particulate Emissions Limitations for Sources of Indirect Heating). Pursuant to this rule, particulate emissions from indirect heating facilities existing and in operation prior to September 21, 1983 shall be limited by the following equation:

for the 20.9 MMBtu/hr boiler (constructed in 1972):

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}} = \frac{50 \times 0.67 \times 31}{76.5 \times 20.9^{0.75} \times 1^{0.25}} = 1.39 \text{ lb/MMBtu}$$

for the 16.7 MMBtu/hr boiler (constructed in 1975):

$$Pt = \frac{C \times a \times h}{} = \frac{50 \times 0.67 \times 33.5}{} = 0.82 \text{ lb/MMBtu}$$

$76.5 \times Q^{0.75} \times N^{0.25}$ $76.5 \times (20.9+16.7)^{0.75} \times 2^{0.25}$

Where

C = max ground level concentration (= 50 $\Phi m/m^3$)
Pt = emission rate limit (lbs/MMBtu)
Q = total source heat input capacity (MMBtu/hr)
N = number of stacks
a = plume rise factor = 0.67
h = stack height (ft)

Using the above equation, the allowable particulate emission rate for the 20.9 MMBtu/hr boiler (B-1) is 1.39 lbs per MMBtu heat input and the allowable particulate emission rate for the 16.7 MMBtu/hr boiler (B-2) is 0.82 pounds per MMBtu heat input which are both higher than the maximum of 0.6 pounds per MMBtu heat input allowed by 326 IAC 6-2-3(e).

Therefore, the allowable particulate emissions for the two boilers are each 0.6 pounds per MMBtu heat input

Insignificant Activities

Dry Sander (S-6) and Horizontal Mills (HM-1 and HM-2)
326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

(a) The particulate emissions from the dry sander and the horizontal mills (HM-1 and HM-2) shall not exceed 1.3 pounds per hour when operating at a maximum process weight of 360 pounds per hour.

The pound per hour limitation was calculated with the following equation:
Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

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

Based on Appendix A, the uncontrolled potential PM emission rate for the dry sander and the horizontal mills is:

0.64 ton/yr x 2000lbs/ton / 8760 hours/year = 0.146 lb/hr

The PM emissions from the dry sander and the horizontal mills are 0.146 lb/hour which is less than the allowable rate of 1.3 pounds per hour. Therefore, the dry sander is in compliance with this rule.

Grinding, Sawing, Sanding, Routing, Milling and Pressing Operations (BH-1 through BH-6)

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

(a) The particulate emissions from the insignificant grinding, sawing, sanding, routing, milling and pressing operations shall not exceed 1.3 pounds per hour **each** when operating at a maximum process weight of 360 pounds per hour.

The pound per hour limitation was calculated with the following equation:
Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

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

The emission rates in the following table are based upon information provided in Appendix A.

Emission Unit	Process Weight Rate		Uncontrolled PM emissions (lb/hour)	Allowable Emission Rate (lb/hour)
	(lbs/hr)	(tons/hr)		
Grinding BH1	360	0.18	1.20	1.3
Sawing BH-2	360	0.18	1.90	1.3
Sanding BH-3	360	0.18	0.18	1.3
Routing BH-4	360	0.18	0.58	1.3
Milling BH-5	360	0.18	0.42	1.3
Pressing BH-6	360	0.18	0.24	1.3

Based on information provided in Appendix A, the emission rate for the sawing operation is 1.9 lbs per hour. This exceeds the allowable emission rate of 1.3 lbs per hour.

Therefore, the bag filters shall be in operation at all times the grinding, sawing, routing, milling and pressing operations are in operation in order to comply with these limits.

(b) The particulate emissions from the brazing, cutting, soldering, and welding shall not exceed 0.551 pounds per hour, when operating at a maximum process weight of less than 100 pounds per hour.

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 dry sander and the insignificant grinding, sawing, sanding, routing, milling and pressing operations have applicable compliance monitoring conditions as specified below

Emission Unit/Control	Parameter	Frequency	Range	Excursions and Exceedances
Bag filters and Baghouses (BH-1 through BH-7)	Visible Emissions	Daily during normal daylight operations when exhausting to the outside	Normal-Abnormal	Response Steps

These monitoring conditions are necessary because the bag filters (BH-1 through BH-7) for dry sander and the insignificant grinding, sawing, sanding, routing, milling and pressing operations must operation properly to ensure compliance with 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes).

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 14, 2010.

Conclusion

The operation of this stationary friction materials manufacturing plant shall be subject to the conditions of the attached FESOP Renewal No. 017-28881-00021.

IDEM Contact

(a) Questions regarding this proposed permit can be directed to Deborah Cole 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) 234-5377 or toll free at 1-800-451-6027 extension 4-5377.

(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: Emissions Calculations
Summary Emissions

Company Name: Carlisle Industrial Brake and Friction
Address, City, Zip 1441 Holland Street, Logansport, IN 46947
Permit Number: 017-28881-00021
Reviewer: Deborah Cole
Date: 7/6/2010

POTENTIAL TO EMIT IN TONS PER YEAR - Criteria Pollutants

Emission Units	PM	PM10	PM2.5	SO_2	NOx	VOC	CO
Extrusion Operation (EU1)						267.04	
Adhesive Application Operation (EU3) Roll Coating Machine 110	-	-	-	-	-	14.37	-
Adhesive Application Operation (EU3) Roll Coating Machine 111	-	-	-	-	-	14.37	-
Adhesive Application Operation (EU3) Roll Coating Machine RC-1	-	-	-	-	-	29.51	-
Adhesive Application Operation (EU3) Adhesive Spray Booth	-	-	-	-	-	4.93	-
Adhesive Application Operation (EU3) Dip Coater	-	-	-	-	-	9.30	-
Adhesive Application Operation (EU3) Hand Roll Coater	-	-	-	-	-	0.88	-
Natural Gas Fired Boiler B-1	0.70	0.70	0.52	0.05	9.15	0.50	7.69
Natural Gas Fired Boiler B-2	0.56	0.56	0.42	0.04	7.31	0.40	6.14
Oven (OV-19)	0.02	0.02	0.02	0.00	0.31	0.02	0.26
Dry Sander (S-6), Horizontal Mills (HM1 and HM 2)	0.64	0.64	0.64	-	-	-	-
Grinding BH-1	5.26	5.26	5.26	-	-	-	-
Sawing BH-2	8.41	8.41	8.41	-	-	-	-
Sanding BH-3	0.82	0.82	0.82	-	-	-	-
Routing BH-4	2.56	2.56	2.56	-	-	-	-
Milling BH-5	1.88	1.88	1.88	-	-	-	-
Pressing BH-6	1.06	1.06	1.06	-	-	-	-
TOTALS	21.90	21.90	21.58	0.10	16.78	341.32	14.09

POTENTIAL TO EMIT IN TONS PER YEAR -HAPs

Emission Units	Toluene	Phenol	MEK	Formaldehyde	Chloro-benzene	Benzene	Dichloro-benzene	Hexane	Lead	Cadmium	Chromium	Manganese	Nickel
Extrusion Operation (EU1)	262.34	-	-	-	-	-	-	-	-	-	-	-	-
Adhesive Application Operation (EU3) Roll Coating Machine 110	0.59	0.59	12.02	0.12	-	-	-	-	-	-	-	-	-
Adhesive Application Operation (EU3) Roll Coating Machine 111	0.59	0.59	12.02	0.12	-	-	-	-	-	-	-	-	-
Adhesive Application Operation (EU3) Roll Coating Machine RC-1	0.84	0.84	26.82	0.17	-	-	-	-	-	-	-	-	-
Adhesive Application Operation (EU3) Adhesive Spray Booth	0.14	0.14	3.41	0.00	-	-	-	-	-	-	-	-	-
Adhesive Application Operation (EU3) Dip Coater	0.53	0.53	7.17	0.11	-	-	-	-	-	-	-	-	-
Adhesive Application Operation (EU3) Hand Roll Coater	0.03	0.03	0.76	0.01	-	-	-	-	-	-	-	-	-
Natural Gas Fired Boiler B-1	0.000311	-	-	0.006866	-	0.000192	0.000110	0.164776	0.000046	0.000101	0.000128	0.000035	0.000192
Natural Gas Fired Boiler B-2	0.000249	-	-	0.005486	-	0.000154	0.000088	0.131663	0.000037	0.000080	0.000102	0.000028	0.000154
Oven (OV-19)	0.000010	-	-	0.000230	-	0.000006	0.000004	0.005519	0.000002	0.000003	0.000004	0.000001	0.000006
Dry Sander (S-6)	-	-	-	-	-	-	-	-	-	-	-	-	-
Horizontal Mills (HM-1 and HM-2)	-	-	-	-	-	-	-	-	-	-	-	-	-
Grinding BH-1	-	-	-	-	-	-	-	-	-	-	-	-	-
Sawing BH-2	-	-	-	-	-	-	-	-	-	-	-	-	-
Sanding BH-3	-	-	-	-	-	-	-	-	-	-	-	-	-
Routing BH-4	-	-	-	-	-	-	-	-	-	-	-	-	-
Milling BH-5	-	-	-	-	-	-	-	-	-	-	-	-	-
Pressing BH-6	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Emissions (TPY) by HAP	**265.06**	**2.72**	**62.21**	**0.532306**	**0.000000**	**0.000352**	**0.000201**	**0.301957**	**0.000084**	**0.000185**	**0.000235**	**0.000064**	**0.000352**

Appendix A: Emission Calculations
VOC Emissions From Extrusion and Adhesive Application Operations

Company Name: Carlisle Industrial Brake and Friction
Address: 1441 Holland Street, Logansport, Indiana 46947
FESOP: 017-28881-00021
Reviewer: Deborah Cole
Date: July 6, 2010

Emissions Unit ID		Material	Density (lbs/gal)	Weight % Water	Weight % VOC	Weight % Solids	Application Rate (gal/unit)	Maximum Throughput (units/year)	PTE VOC (lbs/hour)	PTE VOC (tons/year)
Extrusion Operations (EU-01, EU-02)		S-1015*	7.39	0.0%	100%	0.0%	0.0275	2628000	61.0	267.04
		Toluene*	7.26	0.0%	100%	0.0%	0.0275	2628000	59.9	262.3
Adhesive Application (EU-03)	Roll Coater 110	PL-605-4	7.81	0.0%	65.0%	30.0%	0.0029	1051200	1.74	7.63
		MEK Cleaner	6.75	0.0%	100%	0.0%	0.0019	1051200	1.54	6.74
	Roll Coater 111	PL-605-4	7.81	0.0%	65.0%	30.0%	0.0029	1051200	1.74	7.63
		MEK Cleaner	6.75	0.0%	100%	0.0%	0.0019	1051200	1.54	6.74
	Roll Coater RC-1	PL-605-51	7.99	0.0%	56.0%	35.0%	0.0012	3504000	2.15	9.41
		MEK Cleaner	6.75	0.0%	100%	0.0%	0.0017	3504000	4.59	20.1
	Spray Booth	R-81005	8.25	1.9%	70.1%	21.9%	0.0017	525600	0.59	2.58
		MEK Cleaner	6.75	0.0%	100%	0.0%	0.0013	525600	0.53	2.34
	Dipcoater	PL-605-4	7.81	0.0%	65.0%	30.0%	0.0008	3504000	1.58	6.94
		MEK Cleaner	6.75	0.0%	100%	0.0%	0.0002	3504000	0.54	2.37
	Hand Rollcoater	PL-605-4	7.81	0.0%	65.0%	30.0%	0.0001	1576800	0.09	0.40
		MEK Cleaner	6.75	0.0%	100%	0.0%	0.0001	1576800	0.11	0.48
								PTE Totals (tons/year)		**340.400**

* Extrusion Operations EU-01 and EU-02 use either S-1015 or Toluene as solvent. Solvent S-1015 represents the worst case for VOC emissions.

METHODOLOGY
PTE VOC (tons/year) = Density (lbs/gal) x Weight % VOC x Application rate (gal/unit) x Throughput (units/hour) x 8760 (hours/year) x 1ton/2000 lbs

Appendix A: Emission Calculations
HAP Emissions From Extrusion and Adhesive Application Operations

Company Name: Carlisle Industrial Brake and Friction
Address: 1441 Holland Street, Logansport, Indiana 46947
FESOP: 017-28881-00021
Reviewer: Deborah Cole
Date: July 6, 2010

HAP Content

Emissions Unit ID		Material	Density (lbs/gal)	Maximum Usage (gal/unit)	Maximum Throughput (unit/year)	Weight % Toluene	Weight % Phenol	Weight % MEK	Weight % Formaldehyde	Weight % Chlorobenzene
Extrusion Operations (EU-01, EU-02)		S-1015*	7.39	0.0275	2628000	0.00%	0.00%	0.00%	0.00%	0.00%
		Toluene*	7.26	0.0275	2628000	100%	0.00%	0.00%	0.00%	0.00%
Adhesive Application (EU-03)	Roll Coater 110	PL-605-4	7.81	0.0029	1051200	5.00%	5.00%	45.0%	1.00%	0.00%
		MEK Cleaner	6.75	0.0019	1051200	0.00%	0.00%	100%	0.00%	0.00%
	Roll Coater 111	PL-605-4	7.81	0.0029	1051200	5.00%	5.00%	45.0%	1.00%	0.00%
		MEK Cleaner	6.75	0.0019	1051200	0.00%	0.00%	100%	0.00%	0.00%
	Roll Coater RC-1	PL-605-51	7.99	0.0012	3504000	5.00%	5.00%	40.0%	1.00%	0.00%
		MEK Cleaner	6.75	0.0017	3504000	0.00%	0.00%	100%	0.00%	0.00%
	Spray Booth	R-81005	8.25	0.0017	525600	3.89%	3.89%	29.1%	0.11%	24.4%
		MEK Cleaner	6.75	0.0013	525600	0.00%	0.00%	100%	0.00%	0.00%
	Dipcoater	PL-605-4	7.81	0.0008	3504000	5.00%	5.00%	45.0%	1.00%	0.00%
		MEK Cleaner	6.75	0.0002	3504000	0.00%	0.00%	100%	0.00%	0.00%
	Hand Rollcoater	PL-605-4	7.81	0.0001	1576800	5.00%	5.00%	45.0%	1.00%	0.00%
		MEK Cleaner	6.75	0.0001	1576800	0.00%	0.00%	100%	0.00%	0.00%

Potential to Emit of HAPs

Emissions Unit ID		Material	Density (lbs/gal)	Maximum Usage (gal/unit)	Maximum Throughput (unit/year)	PTE of Toluene (tons/year)	PTE of Phenol (tons/year)	PTE of MEK (tons/year)	PTE of Formaldehyde (tons/year)	PTE of Chlorobenzene (tons/year)
Extrusion Operations (EU-01, EU-02)		S-1015*	7.39	0.0275	2628000	0.0	0.00	0.00	0.00	0.00
		Toluene*	7.26	0.0275	2628000	262.3	0.00	0.00	0.00	0.00
Adhesive Application (EU-03)	Roll Coater 110	PL-605-4	7.81	0.0029	1051200	0.59	0.59	5.28	0.12	0.00
		MEK Cleaner	6.75	0.0019	1051200	0.00	0.00	6.74	0.00	0.00
	Roll Coater 111	PL-605-4	7.81	0.0029	1051200	0.59	0.59	5.28	0.12	0.00
		MEK Cleaner	6.75	0.0019	1051200	0.00	0.00	6.74	0.00	0.00
	Roll Coater RC-1	PL-605-51	7.99	0.0012	3504000	0.84	0.84	6.72	0.17	0.00
		MEK Cleaner	6.75	0.0017	3504000	0.00	0.00	20.1	0.00	0.00
	Spray Booth	R-81005	8.25	0.0017	525600	0.14	0.14	1.07	0.00	0.90
		MEK Cleaner	6.75	0.0013	525600	0.00	0.00	2.34	0.00	0.00
	Dipcoater	PL-605-4	7.81	0.0008	3504000	0.53	0.53	4.80	0.11	0.00
		MEK Cleaner	6.75	0.0002	3504000	0.00	0.00	2.37	0.00	0.00
	Hand Rollcoater	PL-605-4	7.81	0.0001	1576800	0.03	0.03	0.28	0.01	0.00
		MEK Cleaner	6.75	0.0001	1576800	0.00	0.00	0.48	0.00	0.00
					Totals	**265**	**2.72**	**62.2**	**0.52**	**0.90**

*- Extrusion Operations EU-01 and EU-02 use either S-1015 or Toluene as solvent. Toluene represents the worst case for HAP emissions. S-1015 contains no HAPs.

METHODOLOGY

PTE of HAP (tons/year) = Density (lbs/gal) x Max. Throughput (unit/hour) x Max. Usage (gal/unit) x Weight % HAP x 8760 (hours/year) x 1 ton/2000 lbs

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

Company Name: Carlisle Industrial Brake and Friction
Address: 1441 Holland Street, Logansport, Indiana 46947
FESOP: 017-28881-00021
Reviewer: Deborah Cole
Date: July 6, 2010

Emission Unit	Heat Input Capacity			Potential Throughput	
	MMBtu/hr			MMCF/yr	
NG Fired Boiler - B-1	20.9			183.1	
NG Fired Boiler - B-2	16.7			146.3	
Oven - OV-19	0.7			6.1	

	Pollutant						
Emission Factor in lb/MMCF	PM* 7.6	PM10* 7.6	PM2.5 5.7	SO2 0.6	NOx 100 **see below	VOC 5.5	CO 84
B-1	0.6957	0.6957	0.5218	0.0549	9.1542	0.5035	7.6895
B-2	0.5559	0.5559	0.4169	0.0439	7.3146	0.4023	6.1443
OV-19	0.0233	0.0233	0.0175	0.0018	0.3066	0.0169	0.2575

*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
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 1-03-0
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 2 for HAPs emissions calculations.

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

Company Name: Carlisle Industrial Brake and Friction
Address: 1441 Holland Street, Logansport, Indiana 46947
FESOP: 017-28881-00021
Reviewer: Deborah Cole
Date: July 6, 2010

	HAPs - Organics				
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
B-1	0.000192	0.000110	0.006866	0.164776	0.000311
B-2	0.000154	0.000088	0.005486	0.131663	0.000249
OV-19	0.000006	0.000004	0.000230	0.005519	0.000010

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
B-1	0.000046	0.000101	0.000128	0.000035	0.000192
B-2	0.000037	0.000080	0.000102	0.000028	0.000154
OV-19	0.000002	0.000003	0.000004	0.000001	0.000006

Methodology is the same as page 1.

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: Emission Calculations
Particulate Emissions from Dry Sander, Horizontal Mills,
Insignificant Grinding, Sawing, Sanding, Routing, Milling and Pressing

Company Name: Carlisle Industrial Brake and Friction
Address: 1441 Holland Street, Logansport, Indiana 46947
FESOP: 017-28881-00021
Reviewer: Deborah Cole
Date: July 6, 2010

Emissions Unit/Baghouse ID	Air Flow Rate (acfm)	Outlet Grain Loading (grain/dscf)	Control Efficiency (%)	Uncontrolled PTE of PM/PM10 (lbs/hour)	Controlled PM Emissions (lbs/hr)	Uncontrolled PTE of PM/PM10 (ton/yr)	Controlled PTE of PM/PM10 (ton/yr)	Maximum Throughput Capacity (lbs/hr)	326 IAC 6-3-2 Allowable PM Emission Rate (lbs/hr)
Grinding BH-1	25,000	0.000056	99.0%	1.20	0.0120	5.26	0.053	360	1.3
Sawing BH-2	40,000	0.000056	99.0%	1.92	0.0192	8.41	0.084	360	1.3
Sanding BH-3	8,000	0.000027	99.0%	0.19	0.0019	0.82	0.008	360	1.3
Routing BH-4	8,000	0.000085	99.0%	0.58	0.0058	2.56	0.026	360	1.3
Milling BH-5	15,000	0.000033	99.0%	0.43	0.0043	1.88	0.019	360	1.3
Pressing BH-6	25,000	0.000011	99.0%	0.24	0.0024	1.06	0.011	360	1.3
Dry Sander (S-6), Horizontal Mills (HM-1, HM-2)	8,000	0.000021	99.0%	0.15	0.0015	0.64	0.006	360	1.3
Assume all PM is equal to PM10.			**Totals**	**4.71**	**0.0471**	**20.6**	**0.21**		

Methodology
PTE of PM/PM10 Controlled (tons/yr) = Flow Rate (acfm) x Outlet Grain Loading (gr/ascf) x 60 (min/hr) x 8760 (hr/yr) x 1/7000 (lb/gr) x 1 ton/2000 lbs
PTE of PM/PM10 Uncontrolled (tons/yr) = Flow Rate (acfm) x Outlet Grain Loading (gr/ascf) x 60 (min/hr) x 8760 (hr/yr) x 1/7000 (lb/gr) x 1 ton/2000 lbs x 1/(1-Control Eff. (%))
Allowable PM Emission Rate (lb/hr) = 4.1 x (Throughput (lbs/hr)/2000)^.67
Actual PM Emission Rate (lb/hr) = Flow Rate (acfm) x Outlet Grain Loading (gr/ascf) x 60 (min/hr) x 1/7000 (lb/gr)

326 IAC 6-3-2(e) Allowable Rate of Emissions

Unit ID		Process Rate	Process Weight Rate *	Allowable Emissions	Allowable Emissions
		(lbs/hr)	(tons/hr)	(lbs/hr)	(tons/year)
Grinding BH 1		360	0.18	1.30	5.69
Sawing BH2		360	0.18	1.30	5.69
Sanding		360	0.18	1.30	5.69
rounting		360	0.18	1.30	5.69
Milling		360	0.18	1.30	5.69
Pressing		360	0.18	1.30	5.69

Methodology
Allowable Emissions (E) (lb/hr) = 4.10(Process Weight Rate)^0.67
Allowable Emissions (tons/yr) = (Allowable Emissions (lb/hr)*8760)/2000

326 IAC 6-3-2(e) Allowable Rate of Emissions

Unit ID	Process Rate (materials throughput)	Process Weight Rate	Allowable PM Emissions	Allowable PM Emissions
	(lbs/hr)	(tons/hr)	(lbs/hr)	(tons/yr)
Horizontal Mills HM-1 and HM-2 (paper)	21.60	0.011	0.197	0.864

Methodology
Allowable Emissions (E) (lb/hr) = 4.10(Process Weight Rate)^0.67
Allowable Emissions (tons/yr) = (Allowable Emissions (lb/hr)*8760)/2000

326 IAC 6-3-2(e) Allowable Rate of Emissions

Unit ID	Process Rate (materials throughput)	Process Weight Rate	Allowable PM Emissions	Allowable PM Emissions
	(lbs/hr)	(tons/hr)	(lbs/hr)	(tons/yr)
Horizontal Mills HM-1 and HM-2 (cork)	4.80	0.002	0.072	0.316

Methodology
Allowable Emissions (E) (lb/hr) = 4.10(Process Weight Rate)^0.67
Allowable Emissions (tons/yr) = (Allowable Emissions (lb/hr)*8760)/2000

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: Noel Nixon
Carlisle Industrial Brake & Friction
1441 Holland Street
Logansport, IN 46947

DATE: November 3, 2010

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

SUBJECT: Final Decision
FESOP
017-28881-00021

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:
Samuel Johnson – Director of Ops
John Akin - ARCADIS
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.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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November 3, 2010

TO: Logansport Cass County Public Library

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

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

Applicant Name: **Carlisle Industrial Brake & Friction**
Permit Number: **017-28881-00021**

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	GHOTOPP 11/3/2010 Carlisle Industrial Brake & Friction 017-28881-00021 Final		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender	▶	Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: **CERTIFICATE OF MAILING ONLY**

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2		Samuel Johnson Director of Ops Carlisle Industrial Brake & Friction 1441 Holland St Logansport IN 46947 *(RO CAATS)*									
3		Mr. Charles L. Berger Berger & Berger, Attorneys at Law 313 Main Street Evansville IN 47700 *(Affected Party)*									
4		Mr. Harry D. DuVall P.O. Box 147 Idaville IN 47950 *(Affected Party)*									
5		Cass County Board of Commissioner 200 Court Park Logansport IN 46947 *(Local Official)*									
6		Cass County Health Department 1201 Michigan Ave Stre 230 Logansport IN 46947-1530 *(Health Department)*									
7		Logansport Cass Co Public Library 616 E Broadway Logansport IN 46947-3187 *(Library)*									
8		Logansport City Council and Mayors Office 601 Broadway Logansport IN 46947 *(Local Official)*									
9		Mr. Robert Kelley 2555 S 30th Street Lafayette IN 44909 *(Affected Party)*									
10		Jon Akin ARCADIS 251 East Ohio Street #800 Indianapolis IN 46204 *(Consultant)*									
11		Mr. Tim Thomas c/o Boilermakers Local 374 6333 Kennedy Ave. Hammond IN 46333 *(Affected Party)*									
12		Kurt Brandstatter Central Paving, Inc. P.O. Box 357 Logansport IN 46947 *(Affected Party)*									
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