



# 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](http://www.idem.IN.gov)

TO: Interested Parties / Applicant

DATE: October 7, 2010

RE: Dexter Axle Company / 113-29356-00008

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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Mr. Larry Parks  
Dexter Axle Company  
P.O. Box 108  
Albion, IN 46701

October 7, 2010

Re: 113-29356-00008  
First Significant Revision to  
F113-26682-00008

Dear Mr. Parks:

Dexter Axle Company was issued a Federally Enforceable State Operating Permit (FESOP) Renewal No. F113-26682-00008 on November 25, 2008 for a stationary brake and axle component manufacturing plant located at 500 South Seventh Street, Albion, Indiana. On June 14, 2010, the Office of Air Quality (OAQ) received an application from the source relating to the construction and operation of a new axle production line, which will consist of an electrostatic paint booth and flash tunnel. In addition, the source requested to construct and operate a new magnet dip coating line. The source requested to limit the VOC emissions from the new paint booth under the existing FESOP limit of 62.65 tons of VOC per year. Finally, the source requested to decrease the existing PM and PM10 limit for spray booth (EU-15) from 24.9 tons per year to 24.42 tons per year. Pursuant to the provisions of 326 IAC 2-8-11.1, these changes to the permit are required to be reviewed in accordance with the Significant Permit Revision (SPR) procedures of 326 IAC 2-8-11.1(f). Pursuant to the provisions of 326 IAC 2-8-11.1, a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document (TSD).

The following construction conditions are applicable to the proposed project:

1. General Construction Conditions  
The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit  
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the significant permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Attached please find the entire revised permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Brian Williams, of my staff, at 317-234-5375 or 1-800-451-6027, and ask for extension 4-5375.

Sincerely,



Iryn Calilung, Section Chief  
Permits Branch  
Office of Air Quality

Attachments: Technical Support Document and revised permit

IC/BMW

cc: File - Noble County  
Noble County Health Department  
U.S. EPA, Region V  
Compliance and Enforcement Branch  
Billing, Licensing and Training Section



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

**Dexter Axle Company  
500 South Seventh Street  
Albion, Indiana 46701**

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

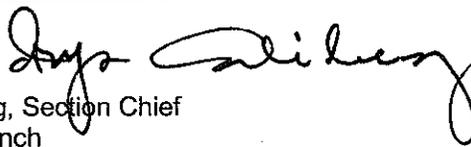
**The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. It shall not be a defense for the Permittee in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

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

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

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

Administrative Amendment No.:113-27395-00008, issued on February 13, 2009

Significant Permit Revision No.: F113-29356-00008	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: October 7, 2010  Expiration Date: November 25, 2018

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## SECTION A SOURCE SUMMARY

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

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

---

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

Source Address:	500 South Seventh Street, Albion, Indiana 46701
General Source Phone Number:	(574) 266 7356
SIC Code:	3799
County Location:	Noble
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) One (1) shoe dip tank constructed in 1974, identified as EU-06, exhausting to Stack 6, nominal capacity: 2,034 brake shoes per hour.
- (b) One (1) metal backing plate dip tank, identified as EU-07, constructed in 2000, exhausting to Stack 7, nominal capacity: 923 metal backing plates per hour.
- (c) One (1) spray paint booth constructed in 1969, identified as EU-11, equipped with five (5) high volume low pressure (HVL) spray guns and dry filters to control particulate overspray, exhausting to Stack 11, nominal capacity: 429 metal brake parts per hour.
- (d) One (1) spray paint booth constructed in 1973, identified as EU-12, equipped with ten (10) high volume low pressure (HVL) spray guns and dry filters to control particulate overspray, exhausting to Stack 12, nominal capacity: 429 metal brake parts per hour.
- (e) One (1) spray paint booth, identified as EU-15, equipped with eleven (11) high volume low pressure (HVL) spray guns and dry filters to control particulate overspray, exhausting to Stack 15, nominal capacity: 429 metal brake parts per hour.
- (f) One (1) Axle Production Line, constructed in 2009, with a maximum capacity of 106 steel axles per hour, consisting of the following:
  - (1) One (1) electrostatic paint booth, identified as ESB-1, consisting of two (2) spray guns using electrostatic air atomized spray application, with particulate emissions controlled by dry filters, and exhausting to stack ESB-1S.
  - (2) One (1) flash tunnel, identified as FT-1, with particulate emissions controlled by dry filters, and exhausting to stack FT-1S.

- (g) One (1) Axle Production Line, approved for construction in 2010, with a maximum capacity of 106 steel axles per hour, consisting of the following:
  - (1) One (1) electrostatic paint booth, identified as ESB-2, consisting of two (2) spray guns using electrostatic air atomized spray application, with particulate emissions controlled by dry filters, and exhausting to stack ESB-S2.
  - (2) One (1) flash tunnel, identified as FT-2, with particulate emissions controlled by dry filters, and exhausting to stack FT-S2.
- (h) One (1) adhesive application and curing process, constructed in 2007, identified as ACO-2, equipped with one (1) natural gas-fired adhesive oven, exhausting to Stack 17, nominal capacity: 1,580 brake linings per hour, nominal heat input capacity: 2 million British thermal units per hour.
- (i) One (1) natural gas-fired cure oven, constructed in 2007, identified as CO-1, exhausting to Stack 16, nominal capacity: 1,580 brake linings per hour, nominal heat input capacity: 2 million British thermal units per hour;
- (j) One (1) covered conveyor system, identified as EU-2, constructed in 2007, with particulate matter controlled by baghouse VFR-2 and exhausting to the indoors, which conveys dry frictional material to mixer (EU-1) at a nominal capacity of 535 pounds per hour and consisting of the following emission units:
  - (1) Seven (7) frictional dry material feed bins, constructed in 2007, identified as HML-1, HML-2, HML-3, HML-4, HML-5, HML-6, and TS-1, with particulate matter controlled by cartridge dust filter RVF-1 and exhausting to the indoors, nominal capacity: 172 pounds per hour total;
  - (2) Three (3) bulk bag feed bins, constructed in 2007, identified as BBS-1, BBS-2, and BBS-3, with particulate matter controlled by baghouse DCF-3 and exhausting to the indoors, nominal capacity: 253 pounds per hour total;
  - (3) One (1) bag dump station, construct in 2007, identified as BDS-1, with particulate matter controlled by cartridge dust filter BVF-4 and exhausting to the indoors, nominal capacity: 37 pounds per hour;
  - (4) One (1) fiberglass blowing system, constructed in 2007, identified as RM-1, with particulate matter controlled by baghouse VFR-2 and exhausting to the indoors, nominal capacity: 73 pounds per hour;
- (k) One (1) mixer, constructed in 2007, identified as EU-1, with particulate matter controlled by baghouse VFR-2 and exhausting to the indoors, nominal capacity: 640 pounds per hour;
- (l) One (1) grinding system, constructed in 1975, identified as EU-14, equipped with six (6) grinders and dry filters for particulate control, exhausting inside, nominal capacity: 1,800 pounds of friction material per hour.

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

This stationary source also includes the following insignificant activities:

- (a) Natural gas-fired combustion sources, nominally rated at 57.53 million British thermal units per hour total, consisting of the following:

- (1) Five (5) air makeup units, nominal heat input capacity: 5.00 million British thermal units per hour each;
- (2) Eight (8) heaters/air conditioners, nominal heat input capacity: 0.475 million British thermal units per hour each;
- (3) Twenty-five (25) natural gas-fired space heaters, nominal heat input capacity: 0.150 million British thermal units per hour each;
- (4) Three (3) bonders, nominal heat input capacity: 0.800 million British thermal units per hour each;
- (5) Five (5) parts washers, nominal heat input capacity: 0.650 million British thermal units per hour each;
- (6) One (1) parts washer, nominal heat input capacity: 0.880 million British thermal units per hour;
- (7) One (1) parts washer, nominal heat input capacity: 1.80 million British thermal units per hour;
- (8) One (1) parts washer, nominal heat input capacity: 4.80 million British thermal units per hour;
- (9) Three (3) office furnaces, nominal heat input capacity: 0.080 million British thermal units per hour each;
- (10) One (1) natural gas-fired boiler, constructed in 2007, exhausting to Stack 18, nominal heat input capacity: 0.16 million British thermal units per hour; and
- (11) Four (4) natural gas-fired heaters, constructed in 2007, nominal heat input capacity: 0.475 million British thermal units per hour each.
- (12) One (1) natural gas-fired Building 1 parts washer, with a nominal heat input capacity of 0.8 million British thermal units per hour. This washer uses a non-VOC and a non-HAP spray cleaner.
- (13) One (1) natural gas-fired Building 2 parts washer, with a nominal heat input capacity of 1.8 million British thermal units per hour. This washer uses a non-VOC and a non-HAP spray cleaner.
- (14) Eight (8) natural gas-fired Building 2 heating and air conditioning units, each are nominally rated at 0.175 million British thermal units per hour for a nominal total of 1.4 million British thermal units per hour.
- (15) One (1) steel hardening oven, identified as OI-1, approved for construction in 2009, exhausting to Stack OI-1, nominal heat input capacity: 0.80 million British thermal units per hour.
- (16) Nineteen (19) natural gas-fired Building 4 heating and air conditioning units, approved for construction in 2009, identified as UH1 through UH15, each is nominally rated at 0.25 million British thermal units per hour for a nominal total of 4.75 million British thermal units per hour.

- (b) Three (3) metal inert gas (MIG) welding stations, using L50 welding wire, nominal capacity: 6.00 pounds of welding wire per hour each.
- (c) Eleven (11) gas metal arc welding (GMAW) welding stations, each with a maximum welding wire usage rate of 4.54 pounds per hour (GMAW Wire Type ER70S) and exhausting within the building.
- (d) Grinding and machining operation controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, consisting of the following:
  - (1) One (1) bullard system, consisting of three (3) bullard machines, equipped with dry filters for particulate control, nominal capacity: 85 parts (3,443 pounds) per hour.
- (e) One magnet dip coating line, identified as MDC-1, exhausting to Stack MDC-1S, nominal capacity: 700 magnets per hour.
- (f) Paved and unpaved roads and parking lots with public access.

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

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

## SECTION B GENERAL CONDITIONS

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

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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)]

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- (a) This permit, F113-26682-00008, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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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]

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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)]

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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)]

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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)]

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- (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.
- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

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

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

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

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

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

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

The Permittee shall implement the PMPs.

(b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

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

The Permittee shall implement the PMPs.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The

PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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

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

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, or Northern Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or  
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)  
Facsimile Number: 317-233-6865  
Northern Regional Office phone: (574) 245-4870; fax: (574) 245-4877.

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

Indiana Department of Environmental Management  
Compliance 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]**

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

- (1) incorporated as originally stated,
- (2) revised, or
- (3) deleted.

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

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

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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]**

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- (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)]**

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- (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]**

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- (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]**

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- (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]**

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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]**

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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]**

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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]**

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

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

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

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

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- (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.9 Performance Testing [326 IAC 3-6]**

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

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

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

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

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

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

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

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

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

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

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

- (a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
  - (1) initial inspection and evaluation;
  - (2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or
  - (3) any necessary follow-up actions to return operation to normal or usual manner of operation.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
  - (1) monitoring results;
  - (2) review of operation and maintenance procedures and records; and/or
  - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall record the reasonable response steps taken.

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

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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

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

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- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (b) The address for report submittal is:  
  
Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

## **Stratospheric Ozone Protection**

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

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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) shoe dip tank constructed in 1974, identified as EU-06, exhausting to Stack 6, nominal capacity: 2,034 brake shoes per hour.
- (b) One (1) metal backing plate dip tank, identified as EU-07, constructed in 2000, exhausting to Stack 7, nominal capacity: 923 metal backing plates per hour.
- (c) One (1) spray paint booth constructed in 1969, identified as EU-11, equipped with five (5) high volume low pressure (HVLP) spray guns and dry filters to control particulate overspray, exhausting to Stack 11, nominal capacity: 429 metal brake parts per hour.
- (d) One (1) spray paint booth constructed in 1973, identified as EU-12, equipped with ten (10) high volume low pressure (HVLP) spray guns and dry filters to control particulate overspray, exhausting to Stack 12, nominal capacity: 429 metal brake parts per hour.
- (e) One (1) spray paint booth, identified as EU-15, equipped with eleven (11) high volume low pressure (HVLP) spray guns and dry filters to control particulate overspray, exhausting to Stack 15, nominal capacity: 429 metal brake parts per hour.
- (f) One (1) Axle Production Line, constructed in 2009, with a maximum capacity of 106 steel axles per hour, consisting of the following:
  - (1) One (1) electrostatic paint booth, identified as ESB-1, consisting of two (2) spray guns using electrostatic air atomized spray application, with particulate emissions controlled by dry filters, and exhausting to stack ESB-1S.
  - (2) One (1) flash tunnel, identified as FT-1, with particulate emissions controlled by dry filters, and exhausting to stack FT-1S.
- (g) One (1) Axle Production Line, approved for construction in 2010, with a maximum capacity of 106 steel axles per hour, consisting of the following:
  - (1) One (1) electrostatic paint booth, identified as ESB-2, consisting of two (2) spray guns using electrostatic air atomized spray application, with particulate emissions controlled by dry filters, and exhausting to stack ESB-S2.
  - (2) One (1) flash tunnel, identified as FT-2, with particulate emissions controlled by dry filters, and exhausting to stack FT-S2.

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

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

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

The total VOC usage for the one (1) shoe dip tank (EU-06), one (1) metal backing plate dip tank (EU-07), five (5) spray paint booths (EU-11, EU-12, EU-15, ESB-1, and ESB-2), and one adhesive application and curing process (ACO-2) (Section D.2), shall not exceed 62.65 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with this limit, combined with the potential emissions of VOC from all other emission

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

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

Pursuant to 326 IAC 8-2-9, the owner or operator shall not allow the discharge into the atmosphere VOC from the one (1) metal backing plate dip tank, identified as EU-07, and three (3) spray paint booths, identified as EU-15, ESB-1, and ESB-2, in excess of three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, delivered to the applicator for air dried or forced warm air dried coatings.

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

Pursuant to 326 IAC 8-2-9(f), work practices shall be used to minimize VOC emissions from mixing operations, storage tanks, and other containers, and handling operations for coatings, thinners, cleaning materials, and waste materials. Work practices shall include, but not limited to, the following:

- (a) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.
- (b) Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials.
- (c) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.
- (d) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.
- (e) Minimize VOC emissions from the cleaning application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

#### D.1.4 Particulate Matter (PM) and Particulate Matter Less Than Ten and Two and Five Tenths Microns (PM<sub>10</sub> and PM<sub>2.5</sub>) [326 IAC 2-8-4] [326 IAC 2-2]

Pursuant to 326 IAC 2-8-4 and in order to render the requirements of 326 IAC 2-2 not applicable, the Permittee shall comply with the following:

- (a) The input of solids to spray paint booth EU-15 shall not exceed 97.68 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This is equivalent to 24.42 tons of PM, PM<sub>10</sub>, and PM<sub>2.5</sub> per year, each.
- (b) The transfer and control efficiency at spray paint booth EU-15 shall not be less than 50%, each.

Compliance with these limits, combined with the potential PM, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions from all other emission units at this source, shall limit the source-wide potential to emit PM, PM<sub>10</sub>, and PM<sub>2.5</sub> to less than two hundred fifty (250) tons per year and one hundred (100) tons per year, respectively, and render the requirements of 326 IAC 2-2 (PSD) and 326 IAC 2-7 (Part 70 Permits) not applicable.

#### D.1.5 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the five (5) spray paint booths (EU-11, EU-12, EU-15, EBS-1, and ESB-2) shall be controlled by dry filters, and the Permittee shall operate the

control device in accordance with manufacturer (s) specifications.

#### D.1.6 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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A Preventive Maintenance Plan is required for EU-11, EU-12, EU-15, ESB-1, and ESB-2 as well as any 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.1.7 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]

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

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

#### D.1.8 Monitoring

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- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (Stacks 11, 12, 15, and ESB-1S, and ESB-S2) while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

#### D.1.9 Record Keeping Requirements

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- (a) To document the compliance status with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC requirement and content limits established in Conditions D.1.1 and D.1.2. Records necessary to demonstrate compliance shall be available no later than 30 days of the end of each compliance period.
  - (1) The VOC content of each coating material and solvent used.
  - (2) The amount of coating material and solvent less water used on a monthly basis.

- (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
- (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
  - (3) The cleanup solvent usage for each month;
  - (4) The total VOC usage for each month; and
  - (5) The weight of VOC emitted for each compliance period.
- (b) To document the compliance status with Condition D.1.4, the Permittee shall maintain records of the input of solids to EU-15 each month.
- (c) To document the compliance status with Condition D.1.8, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections.
- (d) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

#### D.1.10 Reporting Requirements

A quarterly summary of the information to document the compliance status with Conditions D.1.1 and D.1.4 shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require the certification that meet the requirements of 326 IAC 2-8-5(a)(1) by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

## SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (h) One (1) adhesive application and curing process, constructed in 2007, identified as ACO-2, equipped with one (1) natural gas-fired adhesive oven, exhausting to Stack 17, nominal capacity: 1,580 brake linings per hour, nominal heat input capacity: 2 million British thermal units per hour.
- (i) One (1) natural gas-fired cure oven, constructed in 2007, identified as CO-1, exhausting to Stack 16, nominal capacity: 1,580 brake linings per hour, nominal heat input capacity: 2 million British thermal units per hour;
- (j) One (1) covered conveyor system, identified as EU-2, constructed in 2007, with particulate matter controlled by baghouse VFR-2 and exhausting to the indoors, which conveys dry frictional material to mixer (EU-1) at a nominal capacity of 535 pounds per hour and consisting of the following emission units:
  - (1) Seven (7) frictional dry material feed bins, constructed in 2007, identified as HML-1, HML-2, HML-3, HML-4, HML-5, HML-6, and TS-1, with particulate matter controlled by cartridge dust filter RVF-1 and exhausting to the indoors, nominal capacity: 172 pounds per hour total;
  - (2) Three (3) bulk bag feed bins, constructed in 2007, identified as BBS-1, BBS-2, and BBS-3, with particulate matter controlled by baghouse DCF-3 and exhausting to the indoors, nominal capacity: 253 pounds per hour total;
  - (3) One (1) bag dump station, construct in 2007, identified as BDS-1, with particulate matter controlled by cartridge dust filer BVF-4 and exhausting to the indoors, nominal capacity: 37 pounds per hour;
  - (4) One (1) fiberglass blowing system, constructed in 2007, identified as RM-1, with particulate matter controlled by baghouse VFR-2 and exhausting to the indoors, nominal capacity: 73 pounds per hour;
- (k) One (1) mixer, constructed in 2007, identified as EU-1, with particulate matter controlled by baghouse VFR-2 and exhausting to the indoors, nominal capacity: 640 pounds per hour;

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

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

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

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

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

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

255.43 tons of resin per twelve (12) consecutive month period with compliance determined at the end of each month.

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

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

#### **D.2.3 Record Keeping Requirements**

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- (a) To document the compliance status with Condition D.2.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC content and VOC emission limitations established in Condition D.4.1. Records necessary to demonstrate compliance shall be available no later than 30 days of the end of each compliance period.
- (1) The VOC content of each coating material and solvent used.
  - (2) The amount of coating material and solvent less water used on a monthly basis.
    - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
    - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
  - (3) The cleanup solvent usage for each month;
  - (4) The total VOC usage for each month; and
  - (5) The weight of VOC emitted for each compliance period.
- (b) To document the compliance status with Condition D.2.2, the Permittee shall maintain records of the total resin usage for each month. Records maintained for resin usage shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limitations established in Condition D.2.2. Records necessary to demonstrate compliance shall be available no later than 30 days of the end of each compliance period.
- (c) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

#### **D.2.4 Reporting Requirements**

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A quarterly summary of the information to document the compliance status with Conditions D.2.1 and D.2.2(b) shall be not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require the certification that meet the requirements of 326 IAC 2-8-5(a)(1) by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

## SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

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

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

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

#### D.3.1 Particulate Matter Less Than Ten and Two and Five Tenths Microns ( $PM_{10}$ and $PM_{2.5}$ ) [326 IAC 2-8-4] [326 IAC 2-2]

The  $PM_{10}$  and  $PM_{2.5}$  emission rates from the one (1) grinding system, identified as EU-14, shall not exceed 12.0 pounds per hour, each. Compliance with this limit, combined with the potential  $PM_{10}$  and  $PM_{2.5}$  emissions from all other emission units at this source, shall limit the source-wide potential to emit  $PM_{10}$  and  $PM_{2.5}$  to less than one hundred (100) tons per year, each and render the requirements of 326 IAC 2-2 (PSD) and 326 IAC 2-7 (Part 70 Permits) not applicable.

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

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

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

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

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

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

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

A Preventive Maintenance Plan is required for the one (1) grinding system, identified as EU-14 and its control device. 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.3.4 Particulate Control

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

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

- (a) For any change or modification that causes the exhaust from the one (1) grinding system, identified as EU-14 to vent to the outside atmosphere, not later than one hundred eighty (180) days after the change or modification, in order to demonstrate compliance with

Condition D.3.1, the Permittee shall perform PM testing on EU-14 utilizing methods as approved by the commissioner. When venting to the outside atmosphere, this testing shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

- (b) For any change or modification that causes the exhaust from the one (1) grinding system, identified as EU-14 to vent to the outside atmosphere, not later than 180 days of after promulgation of the new or revised condensable PM test method(s) referenced in the U.S. EPA's Final Rule for Implementation of the New Source Review (NSR) Program for Particulate Matter Less Than 2.5 Micrometers (PM<sub>2.5</sub>), signed May 8th, 2008, in order to demonstrate compliance with Condition D.3.1, the Permittee shall perform PM<sub>2.5</sub> and PM<sub>10</sub> testing on the exhaust for EU-14 utilizing methods as approved by the Commissioner. When venting to the outside atmosphere, the test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing when venting to the outside atmosphere, shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition. PM<sub>10</sub> and PM<sub>2.5</sub> includes filterable and condensable PM.

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

##### **D.3.6 Monitoring**

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- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the dry filters. To monitor the performance of the dry filters, weekly observations shall be made of the visible emissions from the one (1) grinding system, identified as EU-14, when exhausting to the outside atmosphere. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.
- (b) The Permittee shall implement an operator-training program.
- (1) All operators that perform grinding operations using grinding equipment shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained upon issuance of FESOP 113-26682-00008 if training was not completed within the last twelve (12) months. All new operators shall be trained within thirty (30) days of hiring or transfer.
- (2) Training shall include proper filter alignment, filter inspection on a daily basis, maintenance, and trouble shooting practices. The training program shall be written and include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within one (1) hour for inspection by IDEM, OAQ.
- (3) All operators shall be given refresher training annually.

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

### **D.3.7 Record Keeping Requirements**

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- (a) To document the compliance status with Condition D.3.6(a), the Permittee shall maintain records of the results of the inspections required under Condition D.3.6(a).
  
- (b) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

#### SECTION D.4 EMISSIONS UNIT OPERATION CONDITIONS

##### Insignificant Activities:

- (a) Source-wide natural gas-fired combustion, nominally rated at 57.53 million British thermal units per hour total, consisting of the following:
- (1) Five (5) air makeup units, nominal heat input capacity: 5.00 million British thermal units per hour each;
  - (2) Eight (8) heaters/air conditioners, nominal heat input capacity: 0.475 million British thermal units per hour each;
  - (3) Twenty-five (25) natural gas-fired space heaters, nominal heat input capacity: 0.150 million British thermal units per hour each;
  - (4) Three (3) bonders, nominal heat input capacity: 0.800 million British thermal units per hour each;
  - (5) Five (5) parts washers, nominal heat input capacity: 0.650 million British thermal units per hour each;
  - (6) One (1) parts washer, nominal heat input capacity: 0.880 million British thermal units per hour;
  - (7) One (1) parts washer, nominal heat input capacity: 1.80 million British thermal units per hour;
  - (8) One (1) parts washer, nominal heat input capacity: 4.80 million British thermal units per hour;
  - (9) Three (3) office furnaces, nominal heat input capacity: 0.080 million British thermal units per hour each;
  - (10) One (1) natural gas-fired boiler, approved for construction in 2007, exhausting to Stack 18, nominal heat input capacity: 0.16 million British thermal units per hour; and
  - (11) Four (4) natural gas-fired heaters, approved for construction in 2007, nominal heat input capacity: 0.475 million British thermal units per hour each.
  - (12) One (1) natural gas-fired Building 1 parts washer, with a nominal heat input capacity of 0.8 million British thermal units per hour. This washer uses a non-VOC and a non-HAP spray cleaner.
  - (13) One (1) natural gas-fired Building 2 parts washer, with a nominal heat input capacity of 1.8 million British thermal units per hour. This washer uses a non-VOC and a non-HAP spray cleaner.
  - (14) Eight (8) natural gas-fired Building 2 heating and air conditioning units, each are nominally rated at 0.175 million British thermal units per hour for a nominal total of 1.4 million British thermal units per hour.
  - (15) One (1) steel hardening oven, identified as OI-1, approved for construction in 2009,

- exhausting to Stack OI-1, nominal heat input capacity: 0.80 million British thermal units per hour.
- (16) Nineteen (19) natural gas-fired Building 4 heating and air conditioning units, approved for construction in 2009, identified as UH1 through UH15, each is nominally rated at 0.25 million British thermal units per hour for a nominal total of 4.75 million British thermal units per hour.
- (b) Three (3) metal inert gas (MIG) welding stations, using L50 welding wire, nominal capacity: 6.00 pounds of welding wire per hour each.
- (c) Eleven (11) gas metal arc welding (GMAW) welding stations, each with a maximum welding wire usage rate of 4.54 pounds per hour (GMAW Wire Type ER70S) and exhausting within the building.
- (d) Grinding and machining operation controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, consisting of the following:
- (1) One (1) bullard system, consisting of three (3) bullard machines, equipped with dry filters for particulate control, nominal capacity: 85 parts (3,443 pounds) per hour.
- (e) One magnet dip coating line, identified as MDC-1, exhausting to Stack MDC-1S, nominal capacity: 700 magnets per hour.
- (f) Paved and unpaved roads and parking lots with public access.
- (The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

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

#### **D.4.1 Particulate [326 IAC 6-2-4]**

Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating), the particulate emissions from the boiler shall in no case exceed 0.6 pounds of particulate matter per million British thermal units heat input.

#### **D.4.2 Particulate [326 IAC 6-3-2]**

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

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

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

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

### **Compliance Determination Requirements**

#### **D.4.3 Particulate Control**

In order to comply with Condition D.4.2, the dry filters for particulate control shall be in operation

and control emissions from the insignificant bullard system at all times that the insignificant bullard system is in operation.

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

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

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

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

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify)\_\_\_\_\_
- Report (specify)\_\_\_\_\_
- Notification (specify)\_\_\_\_\_
- Affidavit (specify)\_\_\_\_\_
- Other (specify)\_\_\_\_\_

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

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE 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: Dexter Axle Company  
Source Address: 500 South Seventh Street, Albion, Indiana 46701  
FESOP Permit No.: F113-26682-00008

**This form consists of 2 pages**

**Page 1 of 2**

- |  |
|--|
| <p><input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none"><li>• 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</li><li>• 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</li></ul> |
|--|

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 <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

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

**FESOP Quarterly Report**

Source Name: Dexter Axle Company  
Source Address: 500 South Seventh Street, Albion, Indiana 46701  
FESOP Permit No.: F113-26682-00008  
Facility: Spray Paint Booth (EU-15)  
Parameter: Input of solids  
Limit: Not to exceed 97.68 tons per twelve consecutive month period with compliance determined at the end of each month, equivalent to 24.42 tons of PM, PM<sub>10</sub>, and PM<sub>2.5</sub> per year each.

YEAR: \_\_\_\_\_

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

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

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

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

**FESOP Quarterly Report**

Source Name: Dexter Axle Company  
Source Address: 500 South Seventh Street, Albion, Indiana 46701  
FESOP Permit No.: F113-26682-00008  
Facility: One (1) adhesive application and curing process (ACO-2), one (1) shoe dip tank (EU-06), one (1) metal backing plate dip tank (EU-07), and five (5) spray paint booths (EU-11, EU-12, EU-15, ESB-1, and ESB-2)  
Parameter: VOC Usage  
Limit: Not to exceed 62.65 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: \_\_\_\_\_

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

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

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

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

**FESOP Quarterly Report**

Source Name: Dexter Axle Company  
Source Address: 500 South Seventh Street, Albion, Indiana 46701  
FESOP Permit No.: F113-26682-00008  
Facility: One (1) Natural Gas-Fired Cure Oven (CO-1)  
Parameter: Resin Usage  
Limit: Not to exceed 255.43 tons of resin per twelve (12) consecutive month period,  
with compliance determined at the end of each month.

YEAR: \_\_\_\_\_

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

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

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

**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: Dexter Axle Company  
Source Address: 500 South Seventh Street, Albion, Indiana 46701  
FESOP Permit No.: F113-26682-00008

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Page 1 of 2

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

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

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

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

Addendum to the Technical Support Document (ATSD) for a  
Significant Permit Revision to a Federally Enforceable State Operating  
Permit (FESOP)

**Source Background and Description**

<b>Source Name:</b>	<b>Dexter Axle Company</b>
<b>Source Location:</b>	<b>500 South Seventh Street, Albion, Indiana 46701</b>
<b>County:</b>	<b>Noble</b>
<b>SIC Code:</b>	<b>3714</b>
<b>Operation Permit No.:</b>	<b>F 113-26682-00008</b>
<b>Operation Permit Issuance Date:</b>	<b>November 25, 2008</b>
<b>Significant Permit Revision No.:</b>	<b>113-29356-00008</b>
<b>Permit Reviewer:</b>	<b>Brian Williams</b>

On September 3, 2010, the Office of Air Quality (OAQ) had a notice published in The News-Sun, Kendallville, Indiana, stating that Dexter Axle Company had applied for a significant permit revision to construct and operate a new axle production line, which will consist of a new electrostatic paint booth and flash tunnel. In addition, Dexter Axle Company has requested to construct and operate a new magnet dip coating line. The notice also stated that the OAQ proposed to issue a significant permit revision to a FESOP for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

**Comments and Responses**

On September 13, 2010, Dana Armstrong of DECA Environmental & Associates, Inc. submitted comments on behalf of Dexter Axle Company to IDEM, OAQ on the draft FESOP.

The Technical Support Document (TSD) is used by IDEM, OAQ for historical purposes. IDEM, OAQ does not make any changes to the original TSD, but the Permit will have the updated changes. The comments and revised permit language are provided below with deleted language as ~~strikeouts~~ and new language **bolded**.

**Comment 1:**

Dexter Axle Company has reviewed the current emission units at the source and determined that various emission unit descriptions in the insignificant activities section of the permit are incorrect. Therefore, please update Sections A.3 and D.4 as follows:

- ...
- A.3 Insignificant Activities [326 IAC 2-7-1(21)][~~326 IAC 2-8-3(c)(3)(I)~~]
- 
- ...
- (a) Natural gas-fired combustion sources, nominally rated at ~~45.23~~ **57.53** million British thermal units per hour total, consisting of the following:
- (1) ~~Three~~ **Five (35)** air makeup units, nominal heat input capacity: 5.00 million British thermal units per hour each;
- ...
- (5) ~~Three~~ **Five (35)** parts washers, nominal heat input capacity: 0.650 million British

thermal units per hour each;

...

- (16) ~~Fifteen~~ **Nineteen (159)** natural gas-fired Building 4 heating and air conditioning units, approved for construction in 2009, identified as UH1 through UH1**59**, each is nominally rated at 0.25 million British thermal units per hour for a nominal total of ~~34.75~~ million British thermal units per hour.

...

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

- (1) One (1) bullard system, consisting of ~~eight~~ **three (83)** bullard machines, equipped with dry filters for particulate control, nominal capacity: 85 parts (3,443 pounds) per hour.

...

#### SECTION D.4 EMISSIONS UNIT OPERATION CONDITIONS

##### Insignificant Activities:

- (a) Source-wide natural gas-fired combustion, nominally rated at ~~40.72~~ **57.53** million British thermal units per hour total, consisting of the following:
- (1) ~~Three~~ **Five (35)** air makeup units, nominal heat input capacity: 5.00 million British thermal units per hour each;
- ...
- (5) ~~Three~~ **Five (35)** parts washers, nominal heat input capacity: 0.650 million British thermal units per hour each;
- ...
- (16) ~~Fifteen~~ **Nineteen (159)** natural gas-fired Building 4 heating and air conditioning units, approved for construction in 2009, identified as UH1 through UH1**59**, each is nominally rated at 0.25 million British thermal units per hour for a nominal total of ~~34.75~~ million British thermal units per hour.
- ...
- (d) Grinding and machining operation controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, consisting of the following:
- (1) One (1) bullard system, consisting of ~~eight~~ **three (83)** bullard machines, equipped with dry filters for particulate control, nominal capacity: 85 parts (3,443 pounds) per hour.
- ...

#### Response to Comment 1:

IDEM agrees with the recommended changes, since the permit should reflect the actual number of insignificant natural gas combustion units currently at the source. The permit has been revised as requested above. The natural gas combustion potential to emit calculations have been updated since the maximum heat input capacity at the source has increased (see Appendix A to ATSD). As a result, the limited potential to emit of the entire source has been revised to reflect the increase in emissions from natural gas combustion.

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Revision (tons/year)								
	PM	PM10*	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC**	CO	Total HAPs	Worst Single HAP
Shoe Dip (EU-6)	negl.	negl.	negl.	0	0	62.65	0	0.32	0.32 Formaldehyde
Backing Dip Tank (EU-7)	negl.	negl.	negl.	0	0		0	negl.	negl.
Spray Booth (EU-11)	2.24	2.24	2.24	0	0		0	negl.	negl.
Spray Booth (EU-12)	2.24	2.24	2.24	0	0		0	negl.	negl.
Spray Booth (EU-15)	24.42	24.42	24.42	0	0		0	negl.	negl.
Electrostatic Paint Booth (ESB-1)	2.48	2.48	2.48	0	0		0	0.01	0.01 Xylene
Electrostatic Paint Booth (ESB-2)	2.48	2.48	2.48	0	0		0	0.01	0.01 Xylene
Adhesive Application and Curing Process (ACO-2)	0	0	0	0	0		0	0.99	0.83 Phenol
Cure Oven (CO-1)	0	0	0	0	0	24.9	0	3.05	1.52 Ethyl Benzene
Magnet Dip Coating (MDC-1)	0	0	0	0	0	2.55	0	0	0
Covered Conveyor System (EU-02)	1.17	1.17	1.17	0	0	0	0	0	0
Mixer (EU-1)	1.40	1.40	1.40	0	0	0	0	0	0
Grinding (EU-14)	16.73	52.56	52.56	0	0	0	0	0	0
Natural Gas Combustion	0.451	<del>1.64</del> 2.05	<del>1.64</del> 2.05	0.136	<del>21.56</del> 26.95	1.4948	<del>18.11</del> 22.64	0.451	0.349 Hexane
MIG Welding	3.08	3.08	3.08	0	0	0	0	0.073	negl.
Bullard System	12.82	1.28	1.28	0	0	0	0	0	0
Total PTE of Entire Source	69.4657	<del>94.99</del> 95.39	<del>94.99</del> 95.39	0.136	<del>21.56</del> 26.95	<del>91.29</del> 91.58	<del>18.11</del> 22.64	<del>4.86</del> 4.97	1.52
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA
Emission Offset/ Nonattainment NSR Major Source Thresholds	NA	NA	NA	NA	NA	NA	NA	NA	NA

negl. = negligible  
 \* Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".  
 \*\* The total combined VOC emissions from EU-06, EU-07, EU-11, EU-12, EU-15, ESB-1, ESB-2, and ACO-2 shall not exceed 62.65 tons per year.

<b>Additional Changes</b>
---------------------------

IDEM, OAQ has decided to make additional revisions to the permit as described below, with deleted language as ~~strikeouts~~ and new language **bolded**.

- (a) On November 3, 2009, the requirements of 326 IAC 8-2-9(f) were revised. Therefore, Condition D.1.3 has been revised to incorporate the new requirements.

...

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

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

**Pursuant to 326 IAC 8-2-9(f), work practices shall be used to minimize VOC emissions from mixing operations, storage tanks, and other containers, and handling operations for coatings, thinners, cleaning materials, and waste materials. Work practices shall include, but not limited to, the following:**

- (a) **Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.**
- (b) **Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials.**
- (c) **Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.**
- (d) **Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.**
- (e) **Minimize VOC emissions from the cleaning application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.**

...

- (b) Upon further review, IDEM has determined that the 0.16 MMBtu/hr natural gas-fired boiler is subject to 326 IAC 6-2-4 because it was constructed after September 21, 1983. Pursuant to 326 IAC 6-2-4, particulate emissions from indirect heating facilities, which were constructed after September 21, 1983, with a total source operating capacity less than 10 MMBtu/hr, shall not exceed 0.6 lb/MMBtu heat input. The boiler has a potential to emit 0.0019 lbs/MMBtu. As a result, Section D.4 has been revised to include a new condition, which contains the requirements of 326 IAC 6-2-4.

...

**D.4.1 Particulate [326 IAC 6-2-4]**

**Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating), the particulate emissions from the boiler shall in no case exceed 0.6 pounds of particulate matter per million British thermal units heat input.**

**D.4.12 Particulate [326 IAC 6-3-2]**

...

**D.4.23 Particulate Control**

In order to comply with Condition D.4.42, the dry filters for particulate control shall be in operation and control emissions from the insignificant bullard system at all times that the insignificant bullard system is in operation.

...

- (c) The emission calculations found in Appendix A to the TSD have been revised because the permit number was incorrect (see Appendix A to the ATSD). The emission calculations have been revised as follows:

Permit Number: 113-289356-00008

<b>IDEM Contact</b>
---------------------

- (a) Questions regarding this proposed FESOP can be directed to Brian Williams 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) 234-5375 or toll free at 1-800-451-6027 extension 4-5375.
- (b) A copy of the permit 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](http://www.idem.in.gov)

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

**Company Name:** Dexter Axle Company  
**Address City IN Zip:** 500 South Seventh Street, Albion, IN 46701  
**Permit Number:** 113-29356-00008  
**Reviewer:** Brian Williams

Uncontrolled Emissions (Tons/Yr)																		
Pollutant	Combustion	CO-1	ACO-2	Surface Coating					ESB-1 & FT-1	ESB-2 & FT-2	MDC-1	Grinding	Welding	Covered Conveyor	Mixer	Bullard System	Unpaved Roads (Fugitive) <sup>(3)</sup>	Total PTE
				EU-06	EU-07	EU-11	EU-12	EU-15										
PM	0.51	-	-	0.00	0.00	27.95	27.95	27.95	24.77	24.77	0.00	275.94	3.08	1.17	1.40	128.20	21.63	543.69
PM10	2.05	-	-	0.00	0.00	27.95	27.95	27.95	24.77	24.77	0.00	275.94	3.08	1.17	1.40	12.82	5.51	429.85
PM2.5	2.05	-	-	0.00	0.00	27.95	27.95	27.95	24.77	24.77	0.00	275.94	3.08	1.17	1.40	12.82	0.55	429.85
VOC	1.48	76.24	16.50	26.25	24.50	6.69	6.69	6.69	55.45	55.45	2.55	-	-	-	-	-	-	278.49
NOx	26.95	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	26.95
SO2	0.16	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.16
CO	22.64	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	22.64
Single HAP	0.49	1.52	-	0.32	-	-	-	-	0.01	0.01	-	-	0.00	-	-	-	-	1.52
Combined HAPs	0.51	3.05	0.99	0.32	-	-	-	-	0.01	0.01	-	-	0.07	-	-	-	-	4.97

Ethyl Benzene

Controlled Emissions (Tons/Yr)																		
Pollutant	Combustion	CO-1	ACO-2	Surface Coating					ESB-1 & FT-1	ESB-2 & FT-2	MDC-1	Grinding	Welding	Covered Conveyor	Mixer	Bullard System	Unpaved Roads (Fugitive) <sup>(3)</sup>	Total PTE
				EU-06	EU-07	EU-11	EU-12	EU-15										
PM	0.51	-	-	0.00	0.00	2.24	2.24	24.42	2.48	2.48	0.00	0.03	3.08	0.00	0.00	12.82	10.81	50.29
PM10	2.05	-	-	0.00	0.00	2.24	2.24	24.42	2.48	2.48	0.00	0.03	3.08	0.00	0.00	1.28	2.76	40.29
PM2.5	2.05	-	-	0.00	0.00	2.24	2.24	24.42	2.48	2.48	0.00	0.03	3.08	0.00	0.00	1.28	0.28	40.29
VOC	1.48	76.24	16.50	26.25	24.50	6.69	6.69	6.69	55.45	55.45	2.55	-	-	-	-	-	-	278.49
NOx	26.95	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	26.95
SO2	0.16	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.16
CO	22.64	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	22.64
Single HAP	0.49	1.52	-	0.32	-	-	-	-	0.01	0.01	-	-	0.00	-	-	-	-	1.52
Combined HAPs	0.51	3.05	0.99	0.32	-	-	-	-	0.01	0.01	-	-	0.07	-	-	-	-	4.97

Ethyl Benzene

Limited PTE (Tons/Yr)																		
Pollutant	Combustion	CO-1	ACO-2	Surface Coating					ESB-1 & FT-1	ESB-2 & FT-2	MDC-1	Grinding	Welding	Covered Conveyor	Mixer	Bullard System	Unpaved Roads (Fugitive) <sup>(3)</sup>	Total PTE
				EU-06	EU-07	EU-11	EU-12	EU-15										
PM <sup>(2)</sup>	0.51	-	-	0.00	0.00	2.24	2.24	24.42	2.48	2.48	0.00	16.73	3.08	1.17	1.40	12.82	10.81	69.57
PM10 <sup>(2)</sup>	2.05	-	-	0.00	0.00	2.24	2.24	24.42	2.48	2.48	0.00	52.56	3.08	1.17	1.40	1.28	2.76	95.39
PM2.5	2.05	-	-	0.00	0.00	2.24	2.24	24.42	2.48	2.48	0.00	52.56	3.08	1.17	1.40	1.28	0.28	95.39
VOC <sup>(1)</sup>	1.48	24.90	-	-	-	-	-	62.65	-	-	2.55	-	-	-	-	-	-	91.58
NOx	26.95	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	26.95
SO2	0.16	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.16
CO	22.64	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	22.64
Single HAP	0.49	1.52	0.83	0.32	-	-	-	-	0.01	0.01	-	-	0.00	-	-	-	-	1.52
Combined HAPs	0.51	3.05	0.99	0.32	-	-	-	-	0.01	0.01	-	-	0.07	-	-	-	-	4.97

Ethyl Benzene

**Note:**  
(1) Emission Units EU-06, EU-07, EU-11, EU-12, EU-15, ESB-1, ESB-2, and ACO-2 have a combined limited potential to emit after issuance of 62.65 tons per year VOC  
(2) Condition D.1.4 of the permit limits the input of solids to EU-15 to 97.68 tons per twelve (12) consecutive month period with compliance determined at the end of each month, which is the equivalent to 24.42 tons of Particulate per year, based on a minimum transfer efficiency and minimum control efficiency of fifty percent (50%).  
(3) Fugitive Emissions are not counted toward the determination of Part 70 or PSD applicability.  
Assumed: PM10 = PM2.5

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

**Company Name:** Dexter Axle Company  
**Address City IN Zip:** 500 South Seventh Street, Albion, IN 46701  
**Permit Number:** 113-29356-00008  
**Reviewer:** Brian Williams

**Heat Input Capacity**

MMBtu/hr

25.00  
3.80  
3.75  
2.40  
3.25  
0.88  
1.80  
4.80  
0.24  
0.16  
1.90  
0.80  
1.80  
1.40  
4.75  
0.80

57.53

**Potential Throughput**

MMCF/yr

219.0  
33.3  
32.9  
21.0  
28.5  
7.7  
15.8  
42.0  
2.1  
1.4  
16.6  
7.0  
15.8  
12.3  
41.6  
7.0

504.0

Emission Units

(5) air make-up units @ 5.0 MMBtu each  
 (8) heaters/air conditioners @ 0.475 MMBtu each  
 (25) space heaters @ 0.15 MMBtu each  
 (3) bonders @ 0.8 MMBtu each  
 (5) parts washers @ 0.65 MMBtu each  
 (1) parts washer @ 0.88 MMBtu  
 (1) parts washer @ 1.8 MMBtu  
 (1) parts washer @ 4.8 MMBtu  
 (3) office furnaces @ 0.08 MMBtu each  
 (1) boiler @ 0.16 MMBtu  
 (4) heaters @ 0.475 MMBtu each  
 (1) building 1 parts washer @ 0.8 MMBtu  
 (1) building 2 parts washer @ 1.8 MMBtu  
 (8) building 2 heating/air conditioning units @ 0.175 MMBtu each  
 (19) building 4 space heaters @ 0.25 MMBtu each  
 (1) steel hardening oven @ 0.80 MMBtu

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.48	1.92	0.15	25.20	1.39	21.17

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

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

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

(SUPPLEMENT D 3/98)

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

See page 3 for HAPs emissions calculations.

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

**Company Name:** Dexter Axle Company  
**Address City IN Zip:** 500 South Seventh Street, Albion, IN 46701  
**Permit Number:** 113-29356-00008  
**Reviewer:** Brian Williams

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	5.292E-04	3.024E-04	1.890E-02	4.536E-01	8.567E-04

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	1.260E-04	2.772E-04	3.528E-04	9.575E-05	5.292E-04

Methodology is the same as page 2.

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

**Appendix A: Emissions Calculations**

**VOC and HAPs**

**From Cure Oven (CO-1)**

**Company Name:** Dexter Axle Company  
**Address City IN Zip:** 500 South Seventh Street, Albion, IN 46701  
**Permit Number:** 113-29356-00008  
**Reviewer:** Brian Williams

Potential to Emit (Unlimited)												
Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of resin less water	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year
Carbolite Resin	7.5	20.00%	0.0%	20.0%	0.0%	0.00%	0.007335	1580.000	1.502	17.41	417.77	76.24
									<b>Total</b>	<b>17.41</b>	<b>417.77</b>	<b>76.24</b>

**METHODOLOGY**

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

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

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

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

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

**Methodology:**

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

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

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

**Company Name:** Dexter Axle Company  
**Address City IN Zip:** 500 South Seventh Street, Albion, IN 46701  
**Permit Number:** 113-29356-00008  
**Reviewer:** Brian Williams

**Heat Input Capacity**

MMBtu/hr  
 2.00

**Potential Throughput**

MMCF/yr  
 17.5

Emission Units

(1) cure oven CO1 @ 2.0 MMBtu

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

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

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

**Methodology:**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

See page 6 for HAPs emissions calculations.

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

**Company Name:** Dexter Axle Company  
**Address City IN Zip:** 500 South Seventh Street, Albion, IN 46701  
**Permit Number:** 113-29356-00008  
**Reviewer:** Brian Williams

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

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

Methodology is the same as page 5.

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

**Appendix A: Emissions Calculations  
VOC and HAPs  
From Adhesive Oven (ACO-2)**

**Company Name: Dexter Axle Company  
Address City IN Zip: 500 South Seventh Street, Albion, IN 46701  
Permit Number: 113-29356-00008  
Reviewer: Brian Williams**

Potential to Emit (Unlimited)												
Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hr)	Pounds VOC per gallon of coating less water	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year
Adhesive	8.1	52.00%	0.0%	52.0%	0.0%	0.00%	0.000565	1580.000	4.22	3.77	90.41	16.50
<b>Total</b>										<b>3.77</b>	<b>90.41</b>	<b>16.50</b>

**METHODOLOGY**

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

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

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

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

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

**METHODOLOGY**

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

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

**Company Name:** Dexter Axle Company  
**Address City IN Zip:** 500 South Seventh Street, Albion, IN 46701  
**Permit Number:** 113-29356-00008  
**Reviewer:** Brian Williams

**Heat Input Capacity**

<b>MMBtu/hr</b>
2.00

**Potential Throughput**

<b>MMCF/yr</b>
17.5

**Emission Units**

(1) adhesive application & curing process ACO2 @ 2.0 MMBtu

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

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

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

**Methodology:**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

See page 9 for HAPs emissions calculations.

**Appendix A: Emissions Calculations**

**Natural Gas Combustion Only**

**From Adhesive Oven (ACO-2)**

**HAPs Emissions**

**Company Name: Dexter Axle Company**

**Address City IN Zip: 500 South Seventh Street, Albion, IN 46701**

**Permit Number: 113-29356-00008**

**Reviewer: Brian Williams**

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

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

Methodology is the same as page 8.

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

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

**Company Name: Dexter Axle Company  
Address City IN Zip: 500 South Seventh Street, Albion, IN 46701  
Permit Number: 113-29356-00008  
Reviewer: Brian Williams**

Potential to Emit of Existing Units (Unlimited)																		
Material	Density (lbs/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (units/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (pounds per hour)	Potential VOC (pounds per day)	Potential VOC (tons per year)	Uncontrolled Particulate PTE (tons/yr)	Controlled Particulate PTE (tons/yr)*	lbs VOC/gal solids	Transfer Efficiency	PM Control Efficiency
<b>Shoe Dip Tank EU-06</b>																		
BSL 79-30	7.05	70.35%	61.99%	8.4%	0.00%	0.00%	0.005	2034	0.59	0.59	5.99	144	26.3	0.00	0.00	N/A	100.00%	92.00%
<b>Backing Dip Tank EU-07</b>																		
Black Backing	8.61	68.42%	56.69%	11.73%	0.00%	0.00%	0.006	923	1.01	1.01	5.6	134	24.5	0.00	0.00	N/A	100.00%	92.00%
<b>Spray Booth EU-11</b>																		
Black (water based)	11.38	53.80%	52.29%	1.51%	0.00%	37.14%	0.0055	429	0.17	0.17	0.41	9.7	1.8	13.58	1.09	0.46	75.00%	92.00%
Tan (water based)	12.12	41.50%	40.16%	1.34%	0.00%	42.0%	0.0065	429	0.162	0.162	0.45	10.9	1.98	21.65	1.73	0.39	75.00%	92.00%
Red Enamel (water based)	11.58	42.50%	41.06%	1.44%	0.00%	43.2%	0.0065	429	0.167	0.167	0.46	11.2	2.04	20.33	1.63	0.39	75.00%	92.00%
Red Oxide (water based)	12.28	43.00%	41.63%	1.37%	0.00%	41.0%	0.0085	429	0.168	0.168	0.61	14.7	2.69	27.95	2.24	0.41	75.00%	92.00%
Blue Lacquer (water based)	8.43	76.84%	63.65%	13.2%	0.00%	22.7%	0.0032	429	1.11	1.11	1.53	36.6	6.69	2.93	0.23	4.90	75.00%	92.00%
<b>Spray Booth EU-12</b>																		
Black Enamel (water based)	11.38	53.80%	52.29%	1.51%	0.00%	37.14%	0.0055	429	0.17	0.17	0.41	9.7	1.8	13.58	1.09	0.46	75.00%	92.00%
Tan (water based)	12.12	41.50%	40.16%	1.34%	0.00%	42.0%	0.0065	429	0.162	0.162	0.45	10.9	1.98	21.65	1.73	0.39	75.00%	92.00%
Red Enamel (water based)	11.58	42.50%	41.06%	1.44%	0.00%	43.2%	0.0065	429	0.167	0.167	0.46	11.2	2.04	20.33	1.63	0.39	75.00%	92.00%
Red Oxide (water based)	12.28	43.00%	41.63%	1.37%	0.00%	41.0%	0.0085	429	0.168	0.168	0.61	14.7	2.69	27.95	2.24	0.41	75.00%	92.00%
Blue Lacquer (water based)	8.43	76.84%	63.65%	13.2%	0.00%	22.7%	0.0032	429	1.11	1.11	1.53	36.6	6.69	2.93	0.23	4.90	75.00%	92.00%
<b>Spray Booth EU-15*</b>																		
Black Enamel (water based)	11.38	53.80%	52.29%	1.51%	0.00%	37.14%	0.0055	429	0.17	0.17	0.41	9.7	1.8	13.58	1.09	0.46	75.00%	92.00%
Tan (water based)	12.12	41.50%	40.16%	1.34%	0.00%	42.0%	0.0065	429	0.162	0.162	0.45	10.9	1.98	21.65	1.73	0.39	75.00%	92.00%
Red Enamel (water based)	11.58	42.50%	41.06%	1.44%	0.00%	43.2%	0.0065	429	0.167	0.167	0.46	11.2	2.04	20.33	1.63	0.39	75.00%	92.00%
Red Oxide (water based)	12.28	43.00%	41.63%	1.37%	0.00%	41.0%	0.0085	429	0.168	0.168	0.61	14.7	2.69	27.95	24.42	0.41	75.00%	92.00%
Blue Lacquer (water based)	8.43	76.84%	63.65%	13.2%	0.00%	22.7%	0.0032	429	1.11	1.11	1.53	36.6	6.69	2.93	0.23	4.90	75.00%	92.00%
<b>Potential to Emit</b>											<b>Total:</b>	<b>16.17</b>	<b>387.99</b>	<b>70.81</b>	<b>83.85</b>	<b>28.89</b>		

**Notes:**

\* Condition D.1.4 of the permit limits the input of solids to EU-15 to 97.68 tons per twelve (12) consecutive month period with compliance determined at the end of each month, which is the equivalent to 24.42 tons of Particulate per year, based on a minimum transfer efficiency and minimum control efficiency of fifty percent (50%).

**Methodology:**

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

**Appendix A: Emission Calculations  
HAP Emissions  
From Surface Coating Operations**

**Company Name:** Dexter Axle Company  
**Address City IN Zip:** 500 South Seventh Street, Albion, IN 46701  
**Permit Number:** 113-29356-00008  
**Reviewer:** Brian Williams

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

**Methodology:**

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

**Appendix A: Emissions Calculations  
VOCs, Particulate, HAPs  
From Surface Coating Operations  
Electrostatic Paint Booth ESB-1 and Flash Tunnel FT-1**

**Company Name: Dexter Axle Company  
Address City IN Zip: 500 South Seventh Street, Albion, IN 46701  
Permit Number: 113-29356-00008  
Reviewer: Brian Williams**

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

Operation and Material*	Primary Type of Surface Coated	Density (lb/gal)	Weight % Volatile (H2O & Organics)	Weight % Water + Non-VOCs	Weight % Solids	Weight % VOCs	Volume % Water + Non-VOCs	Volume % Solids	Usage (gal/unit)	Maximum Capacity (unit/hr)	Maximum Usage (gal/day)	Maximum Usage (lb/hr)	Pounds VOC per gallon of coating less water and non-	Pounds VOC per gallon of coating	PTE VOC (lb/hr)	PTE VOC (lb/day)	PTE VOC (tons/yr)	PTE PM/PM10/PM2.5 (lb/hr)	PTE PM/PM10/PM2.5 (tons/yr)	lb VOC per gal solids	Transfer Efficiency	Control Efficiency
Z Shield 7900	Metal	10.76	33.0%	3.0%	67.0%	30.0%	3.90%	56.0%	0.0370	106.0	94.13	42.20	3.36	3.23	12.66	303.85	55.45	5.65	24.77	5.76	80%	90.0%

\* Transfer efficiency of electrostatic application conservatively estimated at 80%

<b>Total Uncontrolled Potential to Emit (PTE) =</b>	<b>12.66</b>	<b>303.85</b>	<b>55.45</b>	<b>5.65</b>	<b>24.77</b>
<b>Total Controlled Potential to Emit (PTE) =</b>	<b>12.66</b>	<b>303.85</b>	<b>55.45</b>	<b>0.57</b>	<b>2.48</b>

**Methodology:**

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

**Hazardous Air Pollutants (HAPs)**

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

**Methodology:**

HAPS emission rate (tons/yr) = [PTE of VOC (tons/yr)] \* Weight % HAP  
 \*Z Shield 7900 contains 0.5% Aromatic 100 (CAS No. 64742-95-6), which is conservatively estimated to consist of 5% xylene, based on 40 CFR 63. Therefore, Z Shield 7900 will have a xylene content of (0.5%)(5.0%) = 0.025% by weight

**Appendix A: Emissions Calculations  
VOCs, Particulate, HAPs  
From Surface Coating Operations  
Electrostatic Paint Booth ESB-2 and Flash Tunnel FT-2**

**Company Name: Dexter Axle Company  
Address City IN Zip: 500 South Seventh Street, Albion, IN 46701  
Permit Number: 113-29356-00008  
Reviewer: Brian Williams**

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

Operation and Material*	Primary Type of Surface Coated	Density (lb/gal)	Weight % Volatile (H2O & Organics)	Weight % Water + Non-VOCs	Weight % Solids	Weight % VOCs	Volume % Water + Non-VOCs	Volume % Solids	Usage (gal/unit)	Maximum Capacity (unit/hr)	Maximum Usage (gal/day)	Maximum Usage (lb/hr)	Pounds VOC per gallon of coating less water and non-VOCs	Pounds VOC per gallon of coating	PTE VOC (lb/hr)	PTE VOC (lb/day)	PTE VOC (tons/yr)	PTE PM/PM10/PM2.5 (lb/hr)	PTE PM/PM10/PM2.5 (tons/yr)	lb VOC per gal solids	Transfer Efficiency	Control Efficiency
Z Shield 7900	Metal	10.76	33.0%	3.0%	67.0%	30.0%	3.90%	56.0%	0.0370	106.0	94.13	42.20	3.36	3.23	12.66	303.85	55.45	5.65	24.77	5.76	80%	90.0%

\* Transfer efficiency of electrostatic application conservatively estimated at 80%

<b>Total Uncontrolled Potential to Emit (PTE) =</b>	<b>12.66</b>	<b>303.85</b>	<b>55.45</b>	<b>5.65</b>	<b>24.77</b>
<b>Total Controlled Potential to Emit (PTE) =</b>	<b>12.66</b>	<b>303.85</b>	<b>55.45</b>	<b>0.57</b>	<b>2.48</b>

**Methodology:**

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

**Hazardous Air Pollutants (HAPs)**

Operation and Material	PTE of VOC (tons/yr)	Weight % Xylene*	PTE of Xylene (tons/yr)
Z Shield 7900	55.45	0.025%	0.014
<b>TOTAL (tons/year)</b>		<b>0.014</b>	

**Methodology:**

HAPS emission rate (tons/yr) = [PTE of VOC (tons/yr)] \* Weight % HAP  
 \*Z Shield 7900 contains 0.5% Aromatic 100 (CAS No. 64742-95-6), which is conservatively estimated to consist of 5% xylene, based on 40 CFR 63. Therefore, Z Shield 7900 will have a xylene content of (0.5%)\*(5.0%) = 0.025% by weight

**Appendix A: Emissions Calculations**  
**VOCs**  
**From Magnet Dip Coating Line (MDC-1)**

**Company Name: Dexter Axle Company**  
**Address City IN Zip: 500 South Seventh Street, Albion, IN 46701**  
**Permit Number: 113-29356-00008**  
**Reviewer: Brian Williams**

Material	Density (lbs/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (units/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (pounds per hour)	Potential VOC (pounds per day)	Potential VOC (tons per year)	Uncontrolled Particulate PTE (tons/yr)	lbs VOC/gal solids	Transfer Efficiency
Fine-L-Kote AR*	7.48	62.89%	0.00%	62.89%	0.00%	0.00%	1.77E-04	700	4.70	4.70	0.58	14.0	2.55	0.00	NA	100.00%

**Methodology**

\*Fine-L-Kote AR consists of 3 parts Fine-L-Kote AR and 1 part Fine-L-Kote Conformal Coating Thinner.

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

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

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

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

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

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

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

**Appendix A: Emissions Calculations  
Particulate Emissions From Grinding**

**Company Name: Dexter Axle Company  
Address City IN Zip: 500 South Seventh Street, Albion, IN 46701  
Permit Number: 113-29356-00008  
Reviewer: Brian Williams**

**Shoe Grinding Systems**

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

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

**Methodology:**

The Percentage Capacity Collected is based on the amount of non-asbestos material processed through the grinding system

Potential to Emit PM and PM-10 Before Controls (lbs/hr) = Capacity (lbs/hr) \* Percentage (%) Capacity Collected

Potential to Emit PM and PM-10 Before Controls (tons/yr) = Potential to Emit PM and PM-10 (lbs/hr) \* (1 ton/2,000 lbs) \* (8,760 hrs/yr)

Potential to Emit PM and PM-10 After Controls (tons/yr) = Potential to Emit PM and PM-10 Before Controls (tons/yr) \* (1 - Control Efficiency %)

Asbestos has been replaced with Friction Material at this Emission Unit.

Friction Material does not contain any HAPs

**Appendix A: Emissions Calculations**  
**Emissions from Welding**

**Company Name: Dexter Axle Company**  
**Address City IN Zip: 500 South Seventh Street, Albion, Indiana 46701**  
**Permit Number: 113-29356-00008**  
**Reviewer: Brian Williams**

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	EMISSION FACTORS * (lb pollutant / lb electrode)				EMISSIONS (lb/hr)				TOTAL HAPS (lb/hr)
			PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
WELDING											
Metal Inert Gas (MIG)(L50)	3	6	0.0241	0.000034		0.00001	0.434	0.0006	0.000	0.0002	0.001
Gas Metal Arc Welding (GMAW) (ER70)	11	4.54	0.0054	0.000318	0.000001	0.000001	0.270	0.0159	0.000	0.0000	0.016
<b>EMISSION TOTALS</b>							<b>PM = PM10</b>	<b>Mn</b>	<b>Ni</b>	<b>Cr</b>	<b>Total HAPs</b>
Potential Emissions lbs/hr							0.703	0.0165	0.000	0.0002	0.017
Potential Emissions lbs/day							16.9	0.396	0.00	0.006	0.403
Potential Emissions tons/year							<b>3.08</b>	0.0722	0.000	0.0010	<b>0.073</b>

**Methodology:**

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

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

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

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

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

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

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

**Company Name:** Dexter Axle Company  
**Address City IN Zip:** 500 South Seventh Street, Albion, Indiana 46701  
**Permit Number:** 113-29356-00008  
**Reviewer:** Brian Williams

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

**Methodology:**

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

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

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

<sup>b</sup>US EPA has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions

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

**Company Name:** Dexter Axle Company  
**Address City IN Zip:** 500 South Seventh Street, Albion, Indiana 46701  
**Permit Number:** 113-29356-00008  
**Reviewer:** Brian Williams

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

**Methodology:**

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

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

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

<sup>b</sup>US EPA has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions

**Appendix A: Emissions Calculations  
Particulate Emissions From Bullard System**

**Company Name: Dexter Axle Company  
Address City IN Zip: 500 South Seventh Street, Albion, Indiana 46701  
Permit Number: 113-29356-00008  
Reviewer: Brian Williams**

**Insignificant Machining**

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

**Methodology:**

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

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

**Company Name:** Dexter Axle Company  
**Address City IN Zip:** 500 South Seventh Street, Albion, Indiana 46701  
**Permit Number:** 113-29356-00008  
**Reviewer:** Brian Williams

**Unpaved Roads**

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

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

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

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

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

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor,  $E_{ext} = E * [(365 - P)/365]$

Mitigated Emission Factor,  $E_{ext} = E * [(365 - P)/365]$   
 where P =  days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)

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

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

**Note:**

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

**Methodology:**

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

**Abbreviations:**

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

## Indiana Department of Environmental Management Office of Air Quality

### Technical Support Document (TSD) for a Significant Permit Revision to a Federally Enforceable State Operating Permit (FESOP)

#### Source Description and Location

<b>Source Name:</b>	<b>Dexter Axle Company</b>
<b>Source Location:</b>	<b>500 South Seventh Street, Albion, Indiana 46701</b>
<b>County:</b>	<b>Noble</b>
<b>SIC Code:</b>	<b>3714</b>
<b>Operation Permit No.:</b>	<b>F 113-26682-00008</b>
<b>Operation Permit Issuance Date:</b>	<b>November 25, 2008</b>
<b>Significant Permit Revision No.:</b>	<b>113-29356-00008</b>
<b>Permit Reviewer:</b>	<b>Brian Williams</b>

On June 14, 2010, the Office of Air Quality (OAQ) received an application from Dexter Axle Company related to a modification to an existing brake and axle component manufacturing plant.

#### Existing Approvals

The source was issued FESOP Renewal No. 113-26682-00008 on November 25, 2008. The source has since received Administrative Amendment No. 113-27395-00008, issued on February 13, 2009.

#### County Attainment Status

The source is located in Noble County.

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard. <sup>1</sup>
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Not designated.
<sup>1</sup> Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for PM <sub>2.5</sub> .	

- (a) **Ozone Standards**  
 Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Noble County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM<sub>2.5</sub>**  
 Noble County has been classified as attainment for PM<sub>2.5</sub>. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM<sub>2.5</sub> 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 PM10 emissions as a surrogate for PM<sub>2.5</sub> emissions until 326 IAC 2-2 is revised.

- (c) Other Criteria Pollutants  
 Noble County has been classified as attainment or unclassifiable in Indiana for all other criteria air 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.

**Status of the Existing Source**

The table below summarizes the potential to emit of the entire source, prior to the proposed revision, after consideration of all enforceable limits established in the effective permits:

Process/ Emission Unit	Potential To Emit of the Entire Source Prior to Revision (tons/year)								
	PM	PM10	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP
Shoe Dip (EU-6)	negl.	negl.	negl.	0	0	62.65	0	0.32	0.32 Formaldehyde
Backing Dip Tank (EU-7)	negl.	negl.	negl.	0	0		0	negl.	negl.
Spray Booth (EU-11)	2.24	2.24	2.24	0	0		0	negl.	negl.
Spray Booth (EU-12)	2.24	2.24	2.24	0	0		0	negl.	negl.
Spray Booth (EU-15)	24.9	24.9	24.9	0	0		0	negl.	negl.
Electrostatic Paint Booth (ESB-1)	2.48	2.48	2.48	0	0		0	0.01	0.01 Xylene
Adhesive Application and Curing Process (ACO-2)	0	0	0	0	0	0	0.99	0.83 Phenol	
Cure Oven (CO-1)	0	0	0	0	0	24.9	0	3.05	1.52 Ethyl Benzene
Covered Conveyor System (EU-02)	1.17	1.17	1.17	0	0	0	0	0	0
Mixer (EU-1)	1.40	1.40	1.40	0	0	0	0	0	0
Grinding (EU-14)	16.73	52.56	52.56	0	0	0	0	0	0
Natural Gas Combustion	0.41	1.64	1.64	0.13	21.56	1.19	18.11	0.41	0.39 Hexane
MIG Welding	3.08	3.08	3.08	0	0	0	0	0.073	negl.
Bullard System	12.82	1.28	1.28	0	0	0	0	0	0

Process/ Emission Unit	Potential To Emit of the Entire Source Prior to Revision (tons/year)								
	PM	PM10	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP
<b>Total PTE of Entire Source</b>	<b>67.47</b>	<b>92.99</b>	<b>92.99</b>	<b>0.13</b>	<b>21.56</b>	<b>88.74</b>	<b>18.11</b>	<b>4.85</b>	<b>1.52</b>
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA
Emission Offset/ Nonattainment NSR Major Source Thresholds	NA	NA	NA	NA	NA	NA	NA	NA	NA

negl. = negligible  
 These emissions are based upon Appendix A of FESOP Administrative Amendment No.: 113-27395-00008, issued on February 13, 2009.

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).
- (b) This existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because the unlimited potential to emit HAPs are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

**Description of Proposed Revision**

The Office of Air Quality (OAQ) has reviewed an application, submitted by Dexter Axle Company on June 14, 2010, relating to the construction and operation of a new axle production line, which will consist of a new electrostatic paint booth and flash tunnel. In addition, the source has requested to construct and operate a new magnet dip coating line. The source has requested to limit the VOC emissions from the new paint booth under the existing FESOP limit of 62.65 tons of VOC per year. In addition, the source has requested to decrease the existing PM and PM10 limit for spray booth (EU-15) from 24.9 tons per year to 24.42 tons per year.

The following is a list of the new emission units and pollution control devices:

- (a) One Axle Production Line, approved for construction in 2010 with a maximum capacity of 106 steel axles per hour, consisting of the following:
  - (1) One (1) electrostatic paint booth, identified as ESB-2, consisting of two (2) spray guns using electrostatic air atomized spray application, with particulate emissions controlled by dry filters, and exhausting to stack ESB-S2.
  - (2) One (1) flash tunnel, identified as FT-2, with particulate emissions controlled by dry filters, and exhausting to stack FT-S2.
- (b) Insignificant activities consisting of the following:
  - (1) One magnet dip coating line, identified as MDC-1, exhausting to Stack MDC-1S, nominal capacity: 700 magnets per hour.

**Enforcement Issues**

There are no pending enforcement actions related to this revision.

**Emission Calculations**

See Appendix A of this TSD for detailed emission calculations.

**Permit Level Determination – FESOP Revision**

The following table is used to determine the appropriate permit level under 326 IAC 2-8.11.1. This table reflects the PTE before controls of the proposed revision. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Process/ Emission Unit	PTE of Proposed Revision (tons/year)								
	PM	PM10*	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP
ESB-2 and FT-2	24.77	24.77	24.77	0	0	55.45	0	0.01	0.01 Xylene
MDC-1	0	0	0	0	0	2.55	0	0	0
Total PTE of Proposed Revision	24.77	24.77	24.77	0	0	58.00	0	0.01	0.01

negl. = negligible  
 \* Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".

This FESOP is being revised through a FESOP Significant Permit Revision pursuant to 326 IAC 2-8-11.1(f)(1)(E)(iv), because the revision involves the construction of an emission unit with the potential to emit (PTE) greater than 25 tons of VOC per year. In addition, this FESOP is being revised through a FESOP Significant Permit Revision pursuant to 326 IAC 2-8-11.1(g)(2) because it involves adjustment to the existing source-wide emissions limitations to maintain the FESOP status of the source (see PTE of the Entire Source After The Issuance of the FESOP Revision Section).

**PTE of the Entire Source After Issuance of the FESOP Revision**

The table below summarizes the potential to emit of the entire source reflecting adjustment of existing limits, with updated emissions shown as **bold** values and previous emissions shown as ~~strikethrough~~ values.

Process/ Emission Unit	Potential To Emit of the Entire Source to accommodate the Proposed Revision (tons/year)								
	PM	PM10*	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC**	CO	Total HAPs	Worst Single HAP
Shoe Dip (EU-6)	negl.	negl.	negl.	0	0	62.65	0	0.32	0.32 Formaldehyde
Backing Dip Tank (EU-7)	negl.	negl.	negl.	0	0		0	negl.	negl.
Spray Booth (EU-11)	2.24	2.24	2.24	0	0		0	negl.	negl.
Spray Booth (EU-12)	2.24	2.24	2.24	0	0		0	negl.	negl.
Spray Booth (EU-15)	24.9 <b>24.42</b>	24.9 <b>24.42</b>	24.9 <b>24.42</b>	0	0		0	negl.	negl.
Electrostatic Paint Booth (ESB-1)	2.48	2.48	2.48	0	0		0	0.01	0.01 Xylene
<b>Electrostatic Paint Booth (ESB-2)</b>	<b>2.48</b>	<b>2.48</b>	<b>2.48</b>	<b>0</b>	<b>0</b>		<b>0</b>	<b>0.01</b>	<b>0.01 Xylene</b>
Adhesive Application and Curing Process (ACO-2)	0	0	0	0	0		0	0.99	0.83 Phenol
Cure Oven (CO-1)	0	0	0	0	0	24.9	0	3.05	1.52 Ethyl Benzene
<b>Magnet Dip Coating (MDC-1)</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>2.55</b>	<b>0</b>	<b>0</b>	<b>0</b>
Covered Conveyor System (EU-02)	1.17	1.17	1.17	0	0	0	0	0	0
Mixer (EU-1)	1.40	1.40	1.40	0	0	0	0	0	0
Grinding (EU-14)	16.73	52.56	52.56	0	0	0	0	0	0
Natural Gas Combustion	0.41	1.64	1.64	0.13	21.56	1.19	18.11	0.41	0.39 Hexane
MIG Welding	3.08	3.08	3.08	0	0	0	0	0.073	negl.
Bullard System	12.82	1.28	1.28	0	0	0	0	0	0
Total PTE of Entire Source	<del>67.47</del> <b>69.46</b>	<del>92.99</del> <b>94.99</b>	<del>92.99</del> <b>94.99</b>	0.13	21.56	<del>88.74</del> <b>91.29</b>	18.11	<b>4.856</b>	1.52
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA
Emission Offset/ Nonattainment NSR Major Source Thresholds	NA	NA	NA	NA	NA	NA	NA	NA	NA

negl. = negligible  
 \* Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".  
 \*\* The total combined VOC emissions from EU-06, EU-07, EU-11, EU-12, EU-15, ESB-1, ESB-2, and ACO-2 shall not exceed 62.65 tons per year.

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

above table, with bold text un-bolded and strikethrough text deleted)

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Revision (tons/year)								
	PM	PM10*	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC**	CO	Total HAPs	Worst Single HAP
Shoe Dip (EU-6)	negl.	negl.	negl.	0	0	62.65	0	0.32	0.32 Formaldehyde
Backing Dip Tank (EU-7)	negl.	negl.	negl.	0	0		0	negl.	negl.
Spray Booth (EU-11)	2.24	2.24	2.24	0	0		0	negl.	negl.
Spray Booth (EU-12)	2.24	2.24	2.24	0	0		0	negl.	negl.
Spray Booth (EU-15)	24.42	24.42	24.42	0	0		0	negl.	negl.
Electrostatic Paint Booth (ESB-1)	2.48	2.48	2.48	0	0		0	0.01	0.01 Xylene
Electrostatic Paint Booth (ESB-2)	2.48	2.48	2.48	0	0		0	0.01	0.01 Xylene
Adhesive Application and Curing Process (ACO-2)	0	0	0	0	0		0	0.99	0.83 Phenol
Cure Oven (CO-1)	0	0	0	0	0	24.9	0	3.05	1.52 Ethyl Benzene
Magnet Dip Coating (MDC-1)	0	0	0	0	0	2.55	0	0	0
Covered Conveyor System (EU-02)	1.17	1.17	1.17	0	0	0	0	0	0
Mixer (EU-1)	1.40	1.40	1.40	0	0	0	0	0	0
Grinding (EU-14)	16.73	52.56	52.56	0	0	0	0	0	0
Natural Gas Combustion	0.41	1.64	1.64	0.13	21.56	1.19	18.11	0.41	0.39 Hexane
MIG Welding	3.08	3.08	3.08	0	0	0	0	0.073	negl.
Bullard System	12.82	1.28	1.28	0	0	0	0	0	0
<b>Total PTE of Entire Source</b>	<b>69.46</b>	<b>94.99</b>	<b>94.99</b>	<b>0.13</b>	<b>21.56</b>	<b>91.29</b>	<b>18.11</b>	<b>4.86</b>	<b>1.52</b>
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA
Emission Offset/ Nonattainment NSR Major Source Thresholds	NA	NA	NA	NA	NA	NA	NA	NA	NA
negl. = negligible * Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". ** The total combined VOC emissions from EU-06, EU-07, EU-11, EU-12, EU-15, ESB-1, ESB-2, and ACO-2 shall not exceed 62.65 tons per year.									

(a) FESOP Status

This revision 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 still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP).

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP), the source shall comply with the following:

- (1) The total VOC usage for the one (1) shoe dip tank (EU-06), one (1) metal backing plate dip tank (EU-07), five (5) spray paint booths (EU-11, EU-12, EU-15, ESB-1, and ESB-2), and one adhesive application and curing process (ACO-2), shall not exceed 62.65 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (2) The input of solids to spray paint booth EU-15 shall not exceed 97.68 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This is equivalent to 24.42 tons of PM10 and PM2.5 per year, each.
- (3) The transfer and control efficiency at spray paint booth EU-15 shall not be less than 50%, each.
- (4) The PM2.5 emission rate from the one (1) grinding system, identified as EU-14, shall not exceed 12.0 pounds per hour.

Due to this revision the existing VOC limit was revised to include the new paint booth (ESB-2). In addition, the existing PM10 limit for spray paint booth EU-15 was decreased from 24.9 tons per year to 24.42 tons per year. Finally, PM2.5 emission limits were included for the spray paint booth EU-15 and the grinding system EU-14. The source shall continue to comply with all other applicable requirements and permit conditions as contained in FESOP Renewal No: 113-26682-00008, issued on November 25, 2008.

Compliance with these limits, combined with the potential to emit PM10, PM2.5, and VOC from all other emission units at this source, shall limit the source-wide total potential to emit of PM10, PM2.5, and VOC to less than 100 tons per 12 consecutive month period, each, and shall render 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

(b) PSD Minor Source

This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit of all attainment regulated pollutants from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the source shall comply with the following:

- (1) The input of solids to spray paint booth EU-15 shall not exceed 97.68 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This is equivalent to 24.42 tons of PM10 and PM2.5 per year, each.
- (2) The transfer and control efficiency at spray paint booth EU-15 shall not be less than 50%, each.

Due to this revision the existing PM limit for spray paint booth EU-15 was decreased from 24.9

tons per year to 24.42 tons per year. The source shall continue to comply with all other applicable requirements and permit conditions as contained in FESOP Renewal No: 113-26682-00008, issued on November 25, 2008.

Compliance with these limits, combined with the potential to emit PM from all other emission units at this source, shall limit the source-wide total potential to emit of PM to less than 250 tons per 12 consecutive month period and shall render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

#### **Federal Rule Applicability Determination**

##### New Source Performance Standards (NSPS)

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included for this proposed revision.

##### National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (a) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63.11169, Subpart HHHHHH (326 IAC 20-80), are not included in the permit for the electrostatic paint booth (ESB-2) and magnet dip coat line (MDC-1) because the source does not perform paint stripping operations that involve the use of chemical strippers that contain methylene chloride (MeCl), autobody refinishing operations that encompass motor vehicle and mobile equipment spray-applied surface coating operations, and spray application of coatings containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd), to any part or product made of metal or plastic, or combinations of metal and plastic that are not motor vehicles or mobile equipment.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included for this proposed revision.

##### 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 Determination**

The following state rules are applicable to the proposed revision:

- (a) 326 IAC 2-8-4 (FESOP)  
This revision 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 still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP). See PTE of the Entire Source After Issuance of the FESOP Revision Section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))  
This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit of all attainment regulated pollutants from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply. See PTE of the Entire Source After Issuance of the FESOP Revision Section above.

- (c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))  
The proposed revision is not subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs from the entire source is less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.
- (d) 326 IAC 2-6 (Emission Reporting)  
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (e) 326 IAC 5-1 (Opacity Limitations)  
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
  - (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
  - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (f) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)  
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.

#### Electrostatic Paint Booth

- (a) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)  
Pursuant to 326 IAC 6-3-2(d), particulate from the electrostatic paint booth (ESB-2) shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (b) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)  
This rule requires all facilities constructed after January 1, 1980, which have potential VOC emission rates of 25 or more tons per year, and which are not otherwise regulated by other provisions of 326 IAC 8, to reduce VOC emissions using Best Available Control Technology (BACT). The electrostatic paint booth (ESB-2) is not subject to the requirements of 326 IAC 8-1-6, because ESB-2 is subject to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations).
- (c) 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations)  
The electrostatic paint booth (ESB-2) will be constructed after July 1, 1990, has actual emissions of greater than fifteen (15) pounds of VOC per day before add-on controls, and coats metal parts or products under the Standard Industrial Classification Code of major group #37. Therefore, the electrostatic paint booth (ESB-2) is subject to the requirements of 326 IAC 8-2-9 and the VOC content of the coatings applied to this facility shall be limited as follows:
  - (1) The source shall not allow the discharge into the atmosphere VOC from the electrostatic paint booth (ESB-2) in excess of three and five tenths (3.5) pounds VOC per gallon of coating, excluding water, as delivered to the applicator for air dried or forced warm air dried coatings.

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

Based on the MSDS submitted by the Permittee, the VOC content of the coating delivered by the one (1) electrostatic paint booth (ESB-2) is in compliance with the requirements above.

- (d) There are no other 326 IAC 8 Rules that are applicable to the electrostatic paint booth (ESB-2)
- (e) 326 IAC 12 (New Source Performance Standards)  
See Federal Rule Applicability Section of this TSD.
- (f) 326 IAC 20 (Hazardous Air Pollutants)  
See Federal Rule Applicability Section of this TSD.

Magnet Dip Coating Line

- (a) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)  
Pursuant to 326 IAC 6-3-1(b)(5), surface coating operations using dip coating are exempt from the requirements of 326 IAC 6-3. Therefore, the magnet dip coating line (MDC-1) is not subject the requirements of 326 IAC 6-3.
- (b) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)  
The proposed revision is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from the magnet dip coating line (MDC-1) is less than twenty-five (25) tons per year.
- (c) 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations)  
The magnet dip coating line (MDC-1) will be constructed after July 1, 1990 and coats metal parts or products under the Standard Industrial Classification Code of major group #37. However, the magnet dip coating line (MDC-1) has potential and actual VOC emissions less than fifteen (15) pounds per day before add-on controls, Therefore, the magnet dip coating line (MDC-1) is not subject to the requirements of 326 IAC 8-2-9
- (d) 326 IAC 12 (New Source Performance Standards)  
See Federal Rule Applicability Section of this TSD.
- (e) 326 IAC 20 (Hazardous Air Pollutants)  
See Federal Rule Applicability Section of this TSD.

The source shall continue to comply with all other applicable requirements and permit conditions as contained in FESOP Renewal No: 113-26682-00008, issued on November 25, 2008.

<b>Compliance Determination, Monitoring and Testing Requirements</b>
--

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

Emission Unit/Control	Operating Parameters	Frequency
Electrostatic Paint Booth (ESB-2)	Dry Filter	Once per day
	Overspray Observations	Once per week
	Stack Exhaust Observations	Once per month

- (b) There are no testing requirements as a result of this revision. The source shall continue to comply with the applicable requirements and permit conditions as contained in FESOP Renewal No: 113-26682-00008, issued on November 25, 2008

<b>Proposed Changes</b>
-------------------------

- (a) The following changes listed below are due to the proposed revision. Deleted language appears as ~~strike~~through text and new language appears as **bold** text:
- (1) The emission unit descriptions in Sections A.2, D.1, D.2, and D.3 have been revised to due to the addition of the new axle production line.
  - (2) Sections A.3 and D.4 have been revised to include an emission unit description for the new magnet dip coating line.
  - (3) In order to render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable, the existing VOC limit in Condition D.1.1 has been revised to include the new electrostatic paint booth (ESB-2).
  - (4) The new electrostatic paint booth (ESB-2) is subject to the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations). Therefore, Conditions D.1.2, D.1.3, and D.1.7 (previously Condition D.1.8) have been revised to include this unit.
  - (5) The new electrostatic paint booth (ESB-2) is subject to the requirements of 326 IAC 6-3-2(d). Therefore, Condition D.1.5 (previously Condition D.1.6) has been revised to include new requirements applicable to this unit.
  - (6) Condition D.1.6 (previously Condition D.1.7) has been revised because the source is required to have a preventative maintenance plan for the new electrostatic paint booth (ESB-2).
  - (7) Due to the addition of the new emission units, the existing limit of solids input to spray paint booth EU-15 in Condition D.1.4 have been decreased from 99.6 tons per year to 97.68 tons per year. Therefore, the limited potential to emit PM and PM10 has decreased from 24.9 tons per year to 24.42 tons per year. In addition, Condition D.1.4 has been revised to include a PM2.5 emission limit.
  - (8) The existing compliance monitoring requirements in Condition D.1.8 (previously Condition D.1.9) have been revised to include the new electrostatic paint booth (ESB-2).
  - (9) The existing FESOP Quarterly reports have been revised to reflect the changes to the emission limits in Section D.1 of the permit.

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

---

- ...  
...  
...  
(f) One **(1)** Axle Production Line, ~~approved for construction~~**ed** in 2009, with a maximum capacity of 106 steel axles per hour, consisting of the following:
- (g) **One (1) Axle Production Line, approved for construction in 2010, with a maximum capacity of 106 steel axles per hour, consisting of the following:**
- (1) **One (1) electrostatic paint booth, identified as ESB-2, consisting of two (2) spay guns using electrostatic air atomized spray application, with particulate emissions controlled by dry filters, and exhausting to stack**

**ESB-S2.**

**(2) One (1) flash tunnel, identified as FT-2, with particulate emissions controlled by dry filters, and exhausting to stack FT-S2.**

- (gh) One (1) adhesive application and curing process, constructed in 2007, identified as ACO-2, equipped with one (1) natural gas-fired adhesive oven, exhausting to Stack 17, nominal capacity: 1,580 brake linings per hour, nominal heat input capacity: 2 million British thermal units per hour.
- (hi) One (1) natural gas-fired cure oven, constructed in 2007, identified as CO-1, exhausting to Stack 16, nominal capacity: 1,580 brake linings per hour, nominal heat input capacity: 2 million British thermal units per hour;
- (ij) One (1) covered conveyor system, identified as EU-2, constructed in 2007, with particulate matter controlled by baghouse VFR-2 and exhausting to the indoors, which conveys dry frictional material to mixer (EU-1) at a nominal capacity of 535 pounds per hour and consisting of the following emission units:  
...
- (jk) One (1) mixer, constructed in 2007, identified as EU-1, with particulate matter controlled by baghouse VFR-2 and exhausting to the indoors, nominal capacity: 640 pounds per hour;
- (kl) One (1) grinding system, constructed in 1975, identified as EU-14, equipped with six (6) grinders and dry filters for particulate control, exhausting inside, nominal capacity: 1,800 pounds of friction material per hour.

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

---

- (e) **One magnet dip coating line, identified as MDC-1, exhausting to Stack MDC-1S, nominal capacity: 700 magnets per hour.**
- (ef) Paved and unpaved roads and parking lots with public access.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (f) One (1) Axle Production Line, approved for construction in 2009, with a maximum capacity of 106 steel axles per hour, consisting of the following:  
...
- (g) **One (1) Axle Production Line, approved for construction in 2010, with a maximum capacity of 106 steel axles per hour, consisting of the following:**
  - (1) **One (1) electrostatic paint booth, identified as ESB-2, consisting of two (2) spray guns using electrostatic air atomized spray application, with particulate emissions controlled by dry filters, and exhausting to stack ESB-S2.**
  - (2) **One (1) flash tunnel, identified as FT-2, with particulate emissions controlled by dry filters, and exhausting to stack FT-S2.**

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

---

The total VOC usage for the one (1) shoe dip tank (EU-06), one (1) metal backing plate dip tank (EU-07), ~~four~~ **five (45)** spray paint booths (EU-11, EU-12, EU-15, and ESB-1, and **ESB-2**), and one adhesive application and curing process (ACO-2) (Section D.2), shall not exceed 62.65 tons

per twelve (12) consecutive month period with compliance determined at the end of each month.

...

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

Pursuant to 326 IAC 8-2-9, the owner or operator shall not allow the discharge into the atmosphere VOC from the one (1) metal backing plate dip tank, identified as EU-07, and ~~two three (23)~~ spray paint booths, identified as EU-15, ~~and~~ **ESB-1, and ESB-2**, in excess of three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, delivered to the applicator for air dried or forced warm air dried coatings.

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

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

**D.1.4 Particulate Matter (PM) and Particulate Matter Less Than Ten and Two and Five Tenths Microns (PM<sub>10</sub> and PM<sub>2.5</sub>) [326 IAC 2-8-11.1 (d)(5)(E)] [326 IAC 2-8-4] [326 IAC 2-2]**

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

**Pursuant to 326 IAC 2-8-4 and in order to render the requirements of 326 IAC 2-2 not applicable, the Permittee shall comply with the following:**

- (a) The input of solids to spray paint booth EU-15 shall not exceed 97.68 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This is equivalent to 24.42 tons of PM, PM10, and PM2.5 per year, each.**
- (b) The transfer and control efficiency at spray paint booth EU-15 shall not be less than 50%, each.**

Compliance with these limits, combined with the potential PM, ~~and~~ PM10, ~~and~~ **PM2.5** emissions from all other emission units at this source, shall limit the source-wide potential to emit PM, ~~and~~ PM10, ~~and~~ **PM2.5** to less than two hundred fifty (250) tons per year and one hundred (100) tons per year, respectively, and render the requirements of 326 IAC 2-2 (PSD) and 326 IAC 2-7 (Part 70 Permits) not applicable.

...

**D.1.65 Particulate [326 IAC 6-3-2(d)]**

Pursuant to 326 IAC 6-3-2(d), particulate from the ~~four~~ **five (45)** spray paint booths (EU-11, EU-12, EU-15, ~~and~~ **ESB-1, and ESB-2**) shall be controlled by dry filters, and the Permittee shall operate the control device in accordance with manufacturer (s) specifications.

**D.1.76 Preventive Maintenance Plan [326 IAC 2-8-4(9)]**

~~A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for EU-11, EU-12, EU-15, and ESB-1, and ESB-2 as well as any control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.~~

**D.1.87 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]**

Compliance with the VOC requirements for all surface coating operations as well as the content limitation for EU-07, EU-15, ~~and~~ **ESB-1, and ESB-2** contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM,

OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.98 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (Stacks 11, 12, 15, ~~and~~ **ESB-1S, and ESB-S2**) while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps. ~~in accordance with Section C - Response to Excursions or Exceedances~~ **contains the Permittee's obligation with regard to the reasonable response steps required by this condition.** Failure to take response steps ~~in accordance with Section C - Response to Excursions or Exceedances,~~ shall be considered a deviation from this permit.

...  
SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (gh) One (1) adhesive application and curing process, constructed in 2007, identified as ACO-2, equipped with one (1) natural gas-fired adhesive oven, exhausting to Stack 17, nominal capacity: 1,580 brake linings per hour, nominal heat input capacity: 2 million British thermal units per hour.
- (hi) One (1) natural gas-fired cure oven, constructed in 2007, identified as CO-1, exhausting to Stack 16, nominal capacity: 1,580 brake linings per hour, nominal heat input capacity: 2 million British thermal units per hour;
- (ij) One (1) covered conveyor system, identified as EU-2, constructed in 2007, with particulate matter controlled by baghouse VFR-2 and exhausting to the indoors, which conveys dry frictional material to mixer (EU-1) at a nominal capacity of 535 pounds per hour and consisting of the following emission units:
- ...  
(jk) One (1) mixer, constructed in 2007, identified as EU-1, with particulate matter controlled by baghouse VFR-2 and exhausting to the indoors, nominal capacity: 640 pounds per hour;

...  
SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

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

...  
SECTION D.4 EMISSIONS UNIT OPERATION CONDITIONS

- ...  
(e) **One magnet dip coating line, identified as MDC-1, exhausting to Stack MDC-1S, nominal capacity: 700 magnets per hour.**
- (ef) Paved and unpaved roads and parking lots with public access.

...  
FESOP Quarterly Report

...  
Mailing Address: PO Box 108, Albion, Indiana 46701  
FESOP Permit No.: F113-4717226682-00008

Facility: One (1) adhesive application and curing process (ACO-2), one (1) shoe dip tank (EU-06), one (1) metal backing plate dip tank (EU-07), and ~~four~~ **five (45)** spray paint booths (EU-11, EU-12, EU-15, ~~and~~ ESB-1, ~~and~~ **ESB-2**)

...

FESOP Quarterly Report

...

Mailing Address: ~~P.O. Box 108, Albion, Indiana, 46704~~

...

Limit: Not to exceed ~~99.6~~ **97.68** tons per twelve consecutive month period with compliance determined at the end of each month, equivalent to ~~24.942~~ tons of PM, ~~and~~ PM<sub>10</sub>, ~~and~~ **PM<sub>2.5</sub>** per year each.

...

(b) Upon further review, IDEM, OAQ has decided to make the following changes to the permit. Deleted language appears as ~~strikethrough~~ text and new language appears as **bold** text:

- (1) IDEM, OAQ has decided to remove all references to the source mailing address. IDEM, OAQ will continue to maintain records of the mailing address.
- (2) IDEM has begun implementing a new procedure and will no longer list the name or title of the Authorized Individual (A.I.) in the permit document.
- (3) For clarity, IDEM has changed references to the general conditions: "*in accordance with Section B*", "*in accordance with Section C*", or other similar language, to "**Section C ... contains the Permit tee's obligations with regard to the records required by this condition.**"
- (4) IDEM has decided that the phrases "*no later than*" and "*not later than*" are clearer than "*within*" in relation to the end of a timeline. Therefore, all timelines have been switched to "*no later than*" or "*not later than*" except for the timelines in Section B - Emergency Provisions because the underlying rule states for these conditions to specify "*within*."
- (5) Section B -Duty to Provide Information has been revised.
- (6) IDEM, OAQ has decided to clarify Section B - Certification to be consistent with the rule.
- (7) IDEM has decided to clarify what rule requirements a certification needs to meet. IDEM has decided to remove the last sentence dealing with the need for certification from the forms because the Conditions requiring the forms already address this issue.
- (8) IDEM, OAQ has decided to clarify Section B - Preventive Maintenance Plan to be consistent with the rule.
- (9) IDEM is revising Section B - Emergency Provisions to delete paragraph (h). 326 IAC 2-8-4(3) (C) (ii) allows that deviations reported under an independent requirement do not have to be included in the Quarterly Deviation and Compliance Monitoring Report.
- (10) IDEM has decided to state which rule establishes the authority to set a deadline for the Permittee to submit additional information. Therefore, Section B - Permit Renewal has been revised.
- (11) IDEM has decided to reference 326 IAC 2 in Section B-Source Modification Requirements, rather than specific construction rule.
- (12) IDEM has added 326 IAC 5-1-1 to the exception clause of Section C - Opacity, since 326 IAC 5-1-1 does list exceptions.

- (13) IDEM has revised Section C - Incineration to more closely reflect the two underlying rules.
- (14) IDEM has removed the first paragraph of Section C - Performance Testing because specific testing conditions elsewhere in the permit will specify the timeline and procedures.
- (15) IDEM has removed Section C - Monitoring Methods. The conditions that require the monitoring or testing, if required, state what methods shall be used.
- (16) IDEM has revised Section C - Compliance Monitoring. The reference to recordkeeping has been removed because other conditions already address recordkeeping. The voice of the condition has been changed to clearly indicate that it is the Permittee that must follow the requirements of the condition.
- (17) IDEM has revised Section C - Response to Excursions or Exceedances. The introduction sentence has been added to clarify that it is only when an excursion or exceedance is detected that the requirements of this condition need to be followed. The word "excess" was added to the last sentence of paragraph (a) because the Permittee only has to minimize excess emissions. The middle of paragraph (b) has been deleted as it was duplicative of paragraph (a). The phrase "or are returning" was added to subparagraph (b)(2) as this is an acceptable response assuming the operation or emission unit does return to normal or its usual manner of operation. The phrase "within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable" was replaced with "normal or usual manner of operation" because the first phrase is just a limited list of the second phrase. The recordkeeping required by paragraph (e) was changed to require only records of the response because the previously listed items are required to be recorded elsewhere in the permit.
- (18) IDEM has revised Section C - Actions Related to Noncompliance Demonstrated by a Stack Test. The requirements to take response steps and minimize excess emissions have been removed because Section C - Response to Excursions or Exceedances already requires response steps related to exceedances and excess emissions minimization. The start of the timelines was switched from "the receipt of the test results" to "the date of the test." There was confusion if the "receipt" was by IDEM, the Permittee, or someone else. Since the start of the timelines has been moved up, the length of the timelines was increased. The new timelines require action within a comparable timeline; and the new timelines still ensure that the Permittee will return to compliance within a reasonable timeframe.
- (19) The voice of paragraph (b) of Section C - General Record Keeping Requirements has been change to clearly indicate that it is the Permittee that must follow the requirements of the paragraph.
- (20) IDEM, OAQ has decided that having a separate condition for the reporting of deviations is unnecessary. Therefore, IDEM has removed Section B - Deviation form Permit Requirements and Conditions and added the requirements of that condition to Section C - General Reporting Requirements. Paragraph (d) of Section C - General Reporting Requirements has been removed because IDEM already states the timeline and certification needs of each report in the condition requiring the report.
- (21) IDEM has decided to simplify the referencing in Section C - Compliance with 40 CFR 82 and 326 IAC 22-1.
- (22) Upon further review, spray paint booths EU-11, EU-12, EU-15, and ESB-1 are not subject to the requirements of 326 IAC 6-3-2(e). Pursuant to 326 IAC 6-3-2(a), any manufacturing process listed in subsections (b) through (d) shall follow the work practices

and control technologies contained therein. All other manufacturing processes subject to this rule shall calculate emission limitations according to requirements in subsection (e). The existing spray paint booths are subject to the requirements of 326 IAC 6-3-2(d). Therefore, Condition D.1.5 has been removed from the permit.

- (23) Condition D.3.1 has been revised to include a PM2.5 emission limit.
- (24) IDEM has decided to clarify Section D.3 - Testing Requirements.
- (25) The word "status" has been added to Section D - Record Keeping and Reporting Requirements. The Permittee has the obligation to document the compliance status. The wording has been revised to properly reflect this.
- (26) The phrase "of this permit" has been added to the paragraph of the Quarterly Deviation and Compliance Monitoring Report to match the underlying rule.

Mailing Address: \_\_\_\_\_ P.O. Box 108, Albion, Indiana, 46704

...

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

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

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

- (a) ~~This permit, F113-26682-00008, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.~~
- (b) ~~If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.~~

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

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

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

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

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

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

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

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

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

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

- ~~(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.~~
- ~~(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.~~

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

- ~~(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an "authorized individual" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.~~
- ~~(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.~~
- ~~(c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).~~

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

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

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

- ~~(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.~~
- ~~(c) The annual compliance certification report shall include the following:~~
- ~~(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;~~
  - ~~(2) The compliance status;~~
  - ~~(3) Whether compliance was continuous or intermittent;~~

- ~~(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and~~
- ~~(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.~~

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

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

---

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

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

---

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

- ~~(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;~~
- ~~(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and~~
- ~~(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.~~

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

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

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

---

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

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

- ~~(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;~~
- ~~(2) The permitted facility was at the time being properly operated;~~

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

~~(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and Northern Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;~~

~~Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or~~

~~Telephone Number: 317-233-0178 (ask for Compliance Section)~~

~~Facsimile Number: 317-233-6865~~

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

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

~~Indiana Department of Environmental Management~~

~~Compliance Branch, Office of Air Quality~~

~~100 North Senate Avenue~~

~~MC 61-53 IGCN 1003~~

~~Indianapolis, Indiana 46204-2251~~

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

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

~~(A) A description of the emergency;~~

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

~~(C) Corrective actions taken.~~

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

~~(1) incorporated as originally stated,~~

~~(2) revised, or~~

~~(3) deleted.~~

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

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

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

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

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

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

Indianapolis, Indiana 46204-2254

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

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

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

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

---

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

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

- ~~(1) That this permit contains a material mistake.~~
- ~~(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.~~
- ~~(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]~~

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

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

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

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

~~Request for renewal shall be submitted to:~~

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2254

- (b) ~~A timely renewal application is one that is:~~
- (1) ~~Submitted at least nine (9) months prior to the date of the expiration of this permit; and~~
  - (2) ~~If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.~~
- (c) ~~If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.~~

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

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

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2254

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

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

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

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- (a) ~~The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) through (d) without a prior permit revision, if each of the following conditions is met:~~
- (1) ~~The changes are not modifications under any provision of Title I of the Clean Air Act;~~
  - (2) ~~Any approval required by 326 IAC 2-8-11.1 has been obtained;~~

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

~~(4) The Permittee notifies the:~~

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

~~and~~

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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- ~~(a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.~~
- ~~(b) Failure to pay may result in administrative enforcement action or revocation of this permit.~~
- ~~(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.~~

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

- ~~(a) The requirements to obtain a permit modification under 326 IAC 2-8-11.1 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3.~~
- ~~(b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction, work is suspended for a continuous period of one (1) year or more.~~

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

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

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

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

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

- (a) This permit, F113-26682-00008, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-3-3. 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)]**

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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)]**

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- (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.
- (d) 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)]**

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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)]**

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(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, or Northern Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;**

**Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or**

**Telephone Number: 317-233-0178 (ask for Office of Air Quality,  
Compliance and Enforcement Branch)  
Facsimile Number: 317-233-6865  
Northern Regional Office phone: (574) 245-4870; fax: (574) 245-4877.**

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

**Indiana Department of Environmental Management  
Compliance 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]**

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- (a) All terms and conditions of permits established prior to F113-26682-00008 and issued pursuant to permitting programs approved into the state implementation plan have been either:
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (4) 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)]**

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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]**

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- (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)]**

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- (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]**

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- (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]**

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- (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]**

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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]**

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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]**

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- (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]**

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- (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]**

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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.

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

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~~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]~~

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

~~(a) Pursuant to 326 IAC 2-8:~~

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

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

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

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

### ~~G.3 Opacity [326 IAC 5-1]~~

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

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

### ~~G.4 Open Burning [326 IAC 4-1] [IC 13-17-9]~~

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

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

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

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

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

~~C.7 — Stack Height [326 IAC 1-7]~~

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

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

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

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

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

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

~~(A) — Asbestos removal or demolition start date;~~

~~(B) — Removal or demolition contractor; or~~

~~(C) — Waste disposal site.~~

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

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

~~All required notifications shall be submitted to:~~

~~Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-52 IGCN 1003  
Indianapolis, Indiana 46204-2254~~

~~The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers~~

~~and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

~~(e) Procedures for Asbestos Emission Control~~

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

~~(f) Demolition and Renovation~~

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

~~(g) Indiana Licensed Asbestos Inspector~~

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

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

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

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

~~Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2254~~

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

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

~~(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.~~

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

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~~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.~~

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

~~(b) — The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by~~

~~excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:~~

- ~~(1) initial inspection and evaluation;~~
- ~~(2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or~~
- ~~(3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.~~

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

- ~~(1) monitoring results;~~
- ~~(2) review of operation and maintenance procedures and records; and/or~~
- ~~(3) inspection of the control device, associated capture system, and the process.~~

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

~~(e) The Permittee shall maintain the following records:~~

- ~~(1) monitoring data;~~
- ~~(2) monitor performance data, if applicable; and~~
- ~~(3) corrective actions taken.~~

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

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

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

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

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

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

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

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

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

- ~~(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~
- ~~(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2254~~
- ~~(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.~~
- ~~(d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~
- ~~(e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.~~

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

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

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

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

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**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]**

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**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]**

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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]**

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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]**

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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]**

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

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

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

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

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- (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.

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

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- (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.

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

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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.

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

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

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- (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.
- (c) 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.**

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

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

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

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

- (a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.**
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:**
  - (1) initial inspection and evaluation;**
  - (2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or**
  - (3) any necessary follow-up actions to return operation to normal or usual manner of operation.**
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:**
  - (1) monitoring results;**
  - (2) review of operation and maintenance procedures and records; and/or**
  - (3) inspection of the control device, associated capture system, and the process.**
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.**
- (e) The Permittee shall record the reasonable response steps taken.**

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

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- (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).**

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

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

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

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- (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.**

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

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

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

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

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

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

~~...~~  
~~D.1.98 Monitoring~~

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (Stacks 11, 12, 15, ~~and ESB-1S, and ESB-S2~~) while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps. ~~in accordance with Section C - Response to Excursions or Exceedances~~ **contains the Permittee's obligation with regard to the reasonable response steps required by this condition.** Failure to take response steps ~~in accordance with Section C - Response to Excursions or Exceedances,~~ shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps. ~~in accordance with Section C - Response to Excursions or Exceedances~~ **contains the Permittee's obligation with regard to the reasonable response steps required by this condition.** Failure to take response steps ~~in accordance with Section C - Response to Excursions or Exceedances,~~ shall be considered a deviation from this permit.

~~D.1.409 Record Keeping Requirements~~

- (a) To document **the compliance status** with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC requirement and content limits established in Conditions D.1.1 and D.1.2. Records necessary to demonstrate compliance shall be available ~~within~~ **no later than** 30 days of the end of each compliance period.
- ~~...~~
- (b) To document **the compliance status** with Condition D.1.4, the Permittee shall maintain records of the input of solids to EU-15 each month.
- (c) To document **the compliance status** with Condition D.1.98, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections.

- (d) ~~All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit.~~ **Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.**

#### D.1.140 Reporting Requirements

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A quarterly summary of the information to document **the compliance status** with Conditions D.1.1 and D.1.4 shall be submitted ~~to the address listed in Section C – General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within~~ **not later than** thirty (30) days after the end of the quarter being reported. **Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition.** The report submitted by the Permittee does require the certification **that meet the requirements of 326 IAC 2-8-5(a)(1)** by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

...

#### D.2.3 Record Keeping Requirements

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(a) To document **the compliance status** with Condition D.2.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC content and VOC emission limitations established in Condition D.4.1. Records necessary to demonstrate compliance shall be available ~~within~~ **no later than** 30 days of the end of each compliance period.

...

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

(c) ~~All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit.~~ **Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.**

#### D.2.4 Reporting Requirements

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A quarterly summary of the information to document **the compliance status** with Conditions D.2.1 and D.2.2(b) shall be submitted ~~to the address listed in Section C – General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within~~ **not later than** thirty (30) days after the end of the quarter being reported. **Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition.** The report submitted by the Permittee does require the certification **that meet the requirements of 326 IAC 2-8-5(a)(1)** by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

...

#### D.3.1 Particulate Matter Less Than Ten **and Two and Five Tenths** Microns (PM<sub>10</sub> **and** PM<sub>2.5</sub>) [326 IAC 2-8-4] [326 IAC 2-2]

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The PM<sub>10</sub> **and** PM<sub>2.5</sub> emission rates from the one (1) grinding system, identified as EU-14, shall not exceed 12.0 pounds per hour, **each**. Compliance with this limit, combined with the potential PM<sub>10</sub> **and** PM<sub>2.5</sub> emissions from all other emission units at this source, shall limit the source-wide potential to emit PM<sub>10</sub> **and** PM<sub>2.5</sub> to less than one hundred (100) tons per year, **each** and render the requirements of 326 IAC 2-2 (PSD) and 326 IAC 2-7 (Part 70 Permits) not applicable.

...

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

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A Preventive Maintenance Plan, ~~in accordance with Section B – Preventive Maintenance Plan, of~~

~~this permit,~~ is required for **the** one (1) grinding system, identified as EU-14 and its control device.  
**Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.**

...

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

- (a) For any change or modification that causes the exhaust from the one (1) grinding system, identified as EU-14 to vent to the outside atmosphere, ~~within~~ **not later than** one hundred eighty (180) days after the change or modification, in order to demonstrate compliance with Condition D.3.1, the Permittee shall perform PM testing on EU-14 utilizing methods as approved by the commissioner. When venting to the outside atmosphere, **this testing shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.**
- (b) For any change or modification that causes the exhaust from the one (1) grinding system, identified as EU-14 to vent to the outside atmosphere, ~~within~~ **not later than** 180 days of ~~publication~~ **after promulgation** of the new or revised condensable PM test method(s) referenced in the U.S. EPA's Final Rule for Implementation of the New Source Review (NSR) Program for Particulate Matter Less Than 2.5 Micrometers (PM<sub>2.5</sub>), signed May 8th, 2008, in order to demonstrate compliance with Condition D.3.1, the Permittee shall perform PM<sub>2.5</sub> and PM<sub>10</sub> testing on the exhaust for EU-14 utilizing methods as approved by the Commissioner. When venting to the outside atmosphere, the test shall be repeated at least once every five (5) years from the date of the **most recent** valid compliance demonstration. Testing when venting to the outside atmosphere, shall be conducted in accordance with ~~Section C – Performance Testing~~ **the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition. PM10 and PM2.5 includes filterable and condensable PM.**

**D.3.6 Monitoring**

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

...

**D.3.7 Record Keeping Requirements**

- (a) To document **the** compliance **status** with Condition D.3.6(a), the Permittee shall maintain records of the results of the inspections required under Condition D.3.6(a).
- (b) ~~All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit.~~ **Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.**

...

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.

### Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on June 14, 2010.

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed FESOP Significant Revision No. 113-29356-00008. The staff recommends to the Commissioner that this FESOP Significant Revision be approved.

### IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Brian Williams 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) 234-5375 or toll free at 1-800-451-6027 extension 4-5375.
- (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.in.gov/idem](http://www.in.gov/idem)

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

**Company Name:** Dexter Axle Company  
**Address City IN Zip:** 500 South Seventh Street, Albion, IN 46701  
**Permit Number:** 113-28356-00008  
**Reviewer:** Brian Williams

Uncontrolled Emissions (Tons/Yr)																		
Pollutant	Combustion	CO-1	ACO-2	Surface Coating					ESB-1 & FT-1	ESB-2 & FT-2	MDC-1	Grinding	Welding	Covered Conveyor	Mixer	Bullard System	Unpaved Roads (Fugitive) <sup>(3)</sup>	Total PTE
				EU-06	EU-07	EU-11	EU-12	EU-15										
PM	0.41	-	-	0.00	0.00	27.95	27.95	27.95	24.77	24.77	0.00	275.94	3.08	1.17	1.40	128.20	21.63	543.58
PM10	1.64	-	-	0.00	0.00	27.95	27.95	27.95	24.77	24.77	0.00	275.94	3.08	1.17	1.40	12.82	5.51	429.44
PM2.5	1.64	-	-	0.00	0.00	27.95	27.95	27.95	24.77	24.77	0.00	275.94	3.08	1.17	1.40	12.82	0.55	429.44
VOC	1.19	76.24	16.50	26.25	24.50	6.69	6.69	6.69	55.45	55.45	2.55	-	-	-	-	-	-	278.19
NOx	21.56	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	21.56
SO2	0.13	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.13
CO	18.11	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	18.11
Single HAP	0.39	1.52	-	0.32	-	-	-	-	0.01	0.01	-	-	0.00	-	-	-	-	1.52
Combined HAPs	0.41	3.05	0.99	0.32	-	-	-	-	0.01	0.01	-	-	0.07	-	-	-	-	4.86

Ethyl Benzene

Controlled Emissions (Tons/Yr)																		
Pollutant	Combustion	CO-1	ACO-2	Surface Coating					ESB-1 & FT-1	ESB-2 & FT-2	MDC-1	Grinding	Welding	Covered Conveyor	Mixer	Bullard System	Unpaved Roads (Fugitive) <sup>(3)</sup>	Total PTE
				EU-06	EU-07	EU-11	EU-12	EU-15										
PM	0.41	-	-	0.00	0.00	2.24	2.24	24.42	2.48	2.48	0.00	0.03	3.08	0.00	0.00	12.82	10.81	50.19
PM10	1.64	-	-	0.00	0.00	2.24	2.24	24.42	2.48	2.48	0.00	0.03	3.08	0.00	0.00	1.28	2.76	39.88
PM2.5	1.64	-	-	0.00	0.00	2.24	2.24	24.42	2.48	2.48	0.00	0.03	3.08	0.00	0.00	1.28	0.28	39.88
VOC	1.19	76.24	16.50	26.25	24.50	6.69	6.69	6.69	55.45	55.45	2.55	-	-	-	-	-	-	278.19
NOx	21.56	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	21.56
SO2	0.13	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.13
CO	18.11	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	18.11
Single HAP	0.39	1.52	-	0.32	-	-	-	-	0.01	0.01	-	-	0.00	-	-	-	-	1.52
Combined HAPs	0.41	3.05	0.99	0.32	-	-	-	-	0.01	0.01	-	-	0.07	-	-	-	-	4.86

Ethyl Benzene

Limited PTE (Tons/Yr)																		
Pollutant	Combustion	CO-1	ACO-2	Surface Coating					ESB-1 & FT-1	ESB-2 & FT-2	MDC-1	Grinding	Welding	Covered Conveyor	Mixer	Bullard System	Unpaved Roads (Fugitive) <sup>(3)</sup>	Total PTE
				EU-06	EU-07	EU-11	EU-12	EU-15										
PM <sup>(2)</sup>	0.41	-	-	0.00	0.00	2.24	2.24	24.42	2.48	2.48	0.00	16.73	3.08	1.17	1.40	12.82	10.81	69.46
PM10 <sup>(2)</sup>	1.64	-	-	0.00	0.00	2.24	2.24	24.42	2.48	2.48	0.00	52.56	3.08	1.17	1.40	1.28	2.76	94.99
PM2.5	1.64	-	-	0.00	0.00	2.24	2.24	24.42	2.48	2.48	0.00	52.56	3.08	1.17	1.40	1.28	0.28	94.99
VOC <sup>(1)</sup>	1.19	24.90	-	-	-	-	-	62.65	-	-	2.55	-	-	-	-	-	-	91.29
NOx	21.56	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	21.56
SO2	0.13	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.13
CO	18.11	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	18.11
Single HAP	0.39	1.52	0.83	0.32	-	-	-	-	0.01	0.01	-	-	0.00	-	-	-	-	1.52
Combined HAPs	0.41	3.05	0.99	0.32	-	-	-	-	0.01	0.01	-	-	0.07	-	-	-	-	4.86

Ethyl Benzene

**Note:**  
(1) Emission Units EU-06, EU-07, EU-11, EU-12, EU-15, ESB-1, ESB-2, and ACO-2 have a combined limited potential to emit after issuance of 62.65 tons per year VOC  
(2) Condition D.1.4 of the permit limits the input of solids to EU-15 to 97.68 tons per twelve (12) consecutive month period with compliance determined at the end of each month, which is the equivalent to 24.42 tons of Particulate per year, based on a minimum transfer efficiency and minimum control efficiency of fifty percent (50%).  
(3) Fugitive Emissions are not counted toward the determination of Part 70 or PSD applicability.  
Assumed: PM10 = PM2.5

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

**Company Name:** Dexter Axle Company  
**Address City IN Zip:** 500 South Seventh Street, Albion, IN 46701  
**Permit Number:** 113-28356-00008  
**Reviewer:** Brian Williams

**Heat Input Capacity**

MMBtu/hr

15.00  
3.80  
3.75  
2.40  
1.95  
0.88  
1.80  
4.80  
0.24  
0.16  
1.90  
0.80  
1.80  
1.40  
3.75  
0.80

45.23

**Potential Throughput**

MMCF/yr

131.4  
33.3  
32.9  
21.0  
17.1  
7.7  
15.8  
42.0  
2.1  
1.4  
16.6  
7.0  
15.8  
12.3  
32.9  
7.0

396.2

Emission Units

(3) air make-up units @ 3.0 MMBtu each  
(8) heaters/air conditioners @ 0.475 MMBtu each  
(25) space heaters @ 0.15 MMBtu each  
(3) bonders @ 0.8 MMBtu each  
(3) parts washers @ 0.65 MMBtu each  
(1) parts washer @ 0.88 MMBtu  
(1) parts washer @ 1.8 MMBtu  
(1) parts washer @ 4.8 MMBtu  
(3) office furnaces @ 0.08 MMBtu each  
(1) boiler @ 0.16 MMBtu  
(4) heaters @ 0.475 MMBtu each  
(1) building 1 parts washer @ 0.8 MMBtu  
(1) building 2 parts washer @ 1.8 MMBtu  
(8) building 2 heating/air conditioning units @ 0.175 MMBtu each  
(15) building 4 space heaters @ 0.25 MMBtu each  
(1) steel hardening oven @ 0.80 MMBtu

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

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

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

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

(SUPPLEMENT D 3/98)

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

See page 3 for HAPs emissions calculations.

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

**Company Name:** Dexter Axle Company  
**Address City IN Zip:** 500 South Seventh Street, Albion, IN 46701  
**Permit Number:** 113-28356-00008  
**Reviewer:** Brian Williams

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

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	9.905E-05	2.179E-04	2.774E-04	7.528E-05	4.160E-04

Methodology is the same as page 2.

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

**Appendix A: Emissions Calculations**

**VOC and HAPs**

**From Cure Oven (CO-1)**

**Company Name:** Dexter Axle Company  
**Address City IN Zip:** 500 South Seventh Street, Albion, IN 46701  
**Permit Number:** 113-28356-00008  
**Reviewer:** Brian Williams

Potential to Emit (Unlimited)												
Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of resin less water	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year
Carbolite Resin	7.5	20.00%	0.0%	20.0%	0.0%	0.00%	0.007335	1580.000	1.502	17.41	417.77	76.24
									<b>Total</b>	<b>17.41</b>	<b>417.77</b>	<b>76.24</b>

**METHODOLOGY**

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

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

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

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

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

**Methodology:**

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

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

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

**Company Name:** Dexter Axle Company  
**Address City IN Zip:** 500 South Seventh Street, Albion, IN 46701  
**Permit Number:** 113-28356-00008  
**Reviewer:** Brian Williams

**Heat Input Capacity**

MMBtu/hr  
 2.00

**Potential Throughput**

MMCF/yr  
 17.5

Emission Units

(1) cure oven CO1 @ 2.0 MMBtu

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

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

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

**Methodology:**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

See page 6 for HAPs emissions calculations.

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

**Company Name:** Dexter Axle Company  
**Address City IN Zip:** 500 South Seventh Street, Albion, IN 46701  
**Permit Number:** 113-28356-00008  
**Reviewer:** Brian Williams

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

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

Methodology is the same as page 5.

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

**Appendix A: Emissions Calculations  
VOC and HAPs  
From Adhesive Oven (ACO-2)**

**Company Name: Dexter Axle Company  
Address City IN Zip: 500 South Seventh Street, Albion, IN 46701  
Permit Number: 113-28356-00008  
Reviewer: Brian Williams**

Potential to Emit (Unlimited)												
Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year
Adhesive	8.1	52.00%	0.0%	52.0%	0.0%	0.00%	0.000565	1580.000	4.22	3.77	90.41	16.50
<b>Total</b>										<b>3.77</b>	<b>90.41</b>	<b>16.50</b>

**METHODOLOGY**

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

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

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

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

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

**METHODOLOGY**

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

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

**Company Name:** Dexter Axle Company  
**Address City IN Zip:** 500 South Seventh Street, Albion, IN 46701  
**Permit Number:** 113-28356-00008  
**Reviewer:** Brian Williams

**Heat Input Capacity**

<b>MMBtu/hr</b>
2.00

**Potential Throughput**

<b>MMCF/yr</b>
17.5

**Emission Units**

(1) adhesive application & curing process ACO2 @ 2.0 MMBtu

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

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

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

**Methodology:**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

See page 9 for HAPs emissions calculations.

**Appendix A: Emissions Calculations**

**Natural Gas Combustion Only**

**From Adhesive Oven (ACO-2)**

**HAPs Emissions**

**Company Name: Dexter Axle Company**

**Address City IN Zip: 500 South Seventh Street, Albion, IN 46701**

**Permit Number: 113-28356-00008**

**Reviewer: Brian Williams**

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

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

Methodology is the same as page 8.

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

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

**Company Name: Dexter Axle Company  
Address City IN Zip: 500 South Seventh Street, Albion, IN 46701  
Permit Number: 113-28356-00008  
Reviewer: Brian Williams**

Potential to Emit of Existing Units (Unlimited)																		
Material	Density (lbs/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (units/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (pounds per hour)	Potential VOC (pounds per day)	Potential VOC (tons per year)	Uncontrolled Particulate PTE (tons/yr)	Controlled Particulate PTE (tons/yr)*	lbs VOC/gal solids	Transfer Efficiency	PM Control Efficiency
<b>Shoe Dip Tank EU-06</b>																		
BSL 79-30	7.05	70.35%	61.99%	8.4%	0.00%	0.00%	0.005	2034	0.59	0.59	5.99	144	26.3	0.00	0.00	N/A	100.00%	92.00%
<b>Backing Dip Tank EU-07</b>																		
Black Backing	8.61	68.42%	56.69%	11.73%	0.00%	0.00%	0.006	923	1.01	1.01	5.6	134	24.5	0.00	0.00	N/A	100.00%	92.00%
<b>Spray Booth EU-11</b>																		
Black (water based)	11.38	53.80%	52.29%	1.51%	0.00%	37.14%	0.0055	429	0.17	0.17	0.41	9.7	1.8	13.58	1.09	0.46	75.00%	92.00%
Tan (water based)	12.12	41.50%	40.16%	1.34%	0.00%	42.0%	0.0065	429	0.162	0.162	0.45	10.9	1.98	21.65	1.73	0.39	75.00%	92.00%
Red Enamel (water based)	11.58	42.50%	41.06%	1.44%	0.00%	43.2%	0.0065	429	0.167	0.167	0.46	11.2	2.04	20.33	1.63	0.39	75.00%	92.00%
Red Oxide (water based)	12.28	43.00%	41.63%	1.37%	0.00%	41.0%	0.0085	429	0.168	0.168	0.61	14.7	2.69	27.95	2.24	0.41	75.00%	92.00%
Blue Lacquer (water based)	8.43	76.84%	63.65%	13.2%	0.00%	22.7%	0.0032	429	1.11	1.11	1.53	36.6	6.69	2.93	0.23	4.90	75.00%	92.00%
<b>Spray Booth EU-12</b>																		
Black Enamel (water based)	11.38	53.80%	52.29%	1.51%	0.00%	37.14%	0.0055	429	0.17	0.17	0.41	9.7	1.8	13.58	1.09	0.46	75.00%	92.00%
Tan (water based)	12.12	41.50%	40.16%	1.34%	0.00%	42.0%	0.0065	429	0.162	0.162	0.45	10.9	1.98	21.65	1.73	0.39	75.00%	92.00%
Red Enamel (water based)	11.58	42.50%	41.06%	1.44%	0.00%	43.2%	0.0065	429	0.167	0.167	0.46	11.2	2.04	20.33	1.63	0.39	75.00%	92.00%
Red Oxide (water based)	12.28	43.00%	41.63%	1.37%	0.00%	41.0%	0.0085	429	0.168	0.168	0.61	14.7	2.69	27.95	2.24	0.41	75.00%	92.00%
Blue Lacquer (water based)	8.43	76.84%	63.65%	13.2%	0.00%	22.7%	0.0032	429	1.11	1.11	1.53	36.6	6.69	2.93	0.23	4.90	75.00%	92.00%
<b>Spray Booth EU-15*</b>																		
Black Enamel (water based)	11.38	53.80%	52.29%	1.51%	0.00%	37.14%	0.0055	429	0.17	0.17	0.41	9.7	1.8	13.58	1.09	0.46	75.00%	92.00%
Tan (water based)	12.12	41.50%	40.16%	1.34%	0.00%	42.0%	0.0065	429	0.162	0.162	0.45	10.9	1.98	21.65	1.73	0.39	75.00%	92.00%
Red Enamel (water based)	11.58	42.50%	41.06%	1.44%	0.00%	43.2%	0.0065	429	0.167	0.167	0.46	11.2	2.04	20.33	1.63	0.39	75.00%	92.00%
Red Oxide (water based)	12.28	43.00%	41.63%	1.37%	0.00%	41.0%	0.0085	429	0.168	0.168	0.61	14.7	2.69	27.95	24.42	0.41	75.00%	92.00%
Blue Lacquer (water based)	8.43	76.84%	63.65%	13.2%	0.00%	22.7%	0.0032	429	1.11	1.11	1.53	36.6	6.69	2.93	0.23	4.90	75.00%	92.00%
<b>Potential to Emit</b>										<b>Total:</b>	<b>16.17</b>	<b>387.99</b>	<b>70.81</b>	<b>83.85</b>	<b>28.89</b>			

**Notes:**

\* Condition D.1.4 of the permit limits the input of solids to EU-15 to 97.68 tons per twelve (12) consecutive month period with compliance determined at the end of each month, which is the equivalent to 24.42 tons of Particulate per year, based on a minimum transfer efficiency and minimum control efficiency of fifty percent (50%).

**Methodology:**

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

**Appendix A: Emission Calculations  
HAP Emissions  
From Surface Coating Operations**

**Company Name:** Dexter Axle Company  
**Address City IN Zip:** 500 South Seventh Street, Albion, IN 46701  
**Permit Number:** 113-28356-00008  
**Reviewer:** Brian Williams

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

**Methodology:**

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

**Appendix A: Emissions Calculations**  
**VOCs, Particulate, HAPs**  
**From Surface Coating Operations**  
**Electrostatic Paint Booth ESB-1 and Flash Tunnel FT-1**

**Company Name:** Dexter Axle Company  
**Address City IN Zip:** 500 South Seventh Street, Albion, IN 46701  
**Permit Number:** 113-28356-00008  
**Reviewer:** Brian Williams

**Volatiles Organic Compounds (VOC) and Particulate Matter (PM)**

Operation and Material*	Primary Type of Surface Coated	Density (lb/gal)	Weight % Volatile (H2O & Organics)	Weight % Water + Non-VOCs	Weight % Solids	Weight % VOCs	Volume % Water + Non-VOCs	Volume % Solids	Usage (gal/unit)	Maximum Capacity (unit/hr)	Maximum Usage (gal/day)	Maximum Usage (lb/hr)	per gallon of coating less water and non-VOCs	Pounds VOC per gallon of coating	PTE VOC (lb/hr)	PTE VOC (lb/day)	PTE VOC (tons/yr)	PTE PM/PM10/PM2.5 (lb/hr)	PTE PM/PM10/PM2.5 (tons/yr)	lb VOC per gal solids	Transfer Efficiency	Control Efficiency
Z Shield 7900	Metal	10.76	33.0%	3.0%	67.0%	30.0%	3.90%	56.0%	0.0370	106.0	94.13	42.20	3.36	3.23	12.66	303.85	55.45	5.65	24.77	5.76	80%	90.0%

\* Transfer efficiency of electrostatic application conservatively estimated at 80%

<b>Total Uncontrolled Potential to Emit (PTE) =</b>	<b>12.66</b>	<b>303.85</b>	<b>55.45</b>	<b>5.65</b>	<b>24.77</b>
<b>Total Controlled Potential to Emit (PTE) =</b>	<b>12.66</b>	<b>303.85</b>	<b>55.45</b>	<b>0.57</b>	<b>2.48</b>

**Methodology:**

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

**Hazardous Air Pollutants (HAPs)**

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

**Methodology:**

HAPS emission rate (tons/yr) = [PTE of VOC (tons/yr)] \* Weight % HAP  
 \*Z Shield 7900 contains 0.5% Aromatic 100 (CAS No. 64742-95-6), which is conservatively estimated to consist of 5% xylene, based on 40 CFR 63. Therefore, Z Shield 7900 will have a xylene content of (0.5%)\*(5.0%) = 0.025% by weight

**Appendix A: Emissions Calculations  
VOCs, Particulate, HAPs  
From Surface Coating Operations  
Electrostatic Paint Booth ESB-2 and Flash Tunnel FT-2**

**Company Name:** Dexter Axle Company  
**Address City IN Zip:** 500 South Seventh Street, Albion, IN 46701  
**Permit Number:** 113-28356-00008  
**Reviewer:** Brian Williams

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

Operation and Material*	Primary Type of Surface Coated	Density (lb/gal)	Weight % Volatile (H2O & Organics)	Weight % Water + Non-VOCs	Weight % Solids	Weight % VOCs	Volume % Water + Non-VOCs	Volume % Solids	Usage (gal/unit)	Maximum Capacity (unit/hr)	Maximum Usage (gal/day)	Maximum Usage (lb/hr)	Pounds VOC per gallon of coating less water and non-VOCs	Pounds VOC per gallon of coating	PTE VOC (lb/hr)	PTE VOC (lb/day)	PTE VOC (tons/yr)	PTE PM/PM10/PM2.5 (lb/hr)	PTE PM/PM10/PM2.5 (tons/yr)	lb VOC per gal solids	Transfer Efficiency	Control Efficiency
Z Shield 7900	Metal	10.76	33.0%	3.0%	67.0%	30.0%	3.90%	56.0%	0.0370	106.0	94.13	42.20	3.36	3.23	12.66	303.85	55.45	5.65	24.77	5.76	80%	90.0%

\* Transfer efficiency of electrostatic application conservatively estimated at 80%

<b>Total Uncontrolled Potential to Emit (PTE) =</b>	<b>12.66</b>	<b>303.85</b>	<b>55.45</b>	<b>5.65</b>	<b>24.77</b>
<b>Total Controlled Potential to Emit (PTE) =</b>	<b>12.66</b>	<b>303.85</b>	<b>55.45</b>	<b>0.57</b>	<b>2.48</b>

**Methodology:**

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

**Hazardous Air Pollutants (HAPs)**

Operation and Material	PTE of VOC (tons/yr)	Weight % Xylene*	PTE of Xylene (tons/yr)
Z Shield 7900	55.45	0.025%	0.014
<b>TOTAL (tons/year)</b>		<b>0.014</b>	

**Methodology:**

HAPS emission rate (tons/yr) = [PTE of VOC (tons/yr)] \* Weight % HAP  
 \*Z Shield 7900 contains 0.5% Aromatic 100 (CAS No. 64742-95-6), which is conservatively estimated to consist of 5% xylene, based on 40 CFR 63. Therefore, Z Shield 7900 will have a xylene content of (0.5%)\*(5.0%) = 0.025% by weight

**Appendix A: Emissions Calculations  
VOCs  
From Magnet Dip Coating Line (MDC-1)**

**Company Name: Dexter Axle Company  
Address City IN Zip: 500 South Seventh Street, Albion, IN 46701  
Permit Number: 113-28356-00008  
Reviewer: Brian Williams**

Material	Density (lbs/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (units/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (pounds per hour)	Potential VOC (pounds per day)	Potential VOC (tons per year)	Uncontrolled Particulate PTE (tons/yr)	lbs VOC/gal solids	Transfer Efficiency
Fine-L-Kote AR*	7.48	62.89%	0.00%	62.89%	0.00%	0.00%	1.77E-04	700	4.70	4.70	0.58	14.0	2.55	0.00	NA	100.00%

**Methodology**

\*Fine-L-Kote AR consists of 3 parts Fine-L-Kote AR and 1 part Fine-L-Kote Conformal Coating Thinner.

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

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

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

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

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

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

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

**Appendix A: Emissions Calculations  
Particulate Emissions From Grinding**

**Company Name: Dexter Axle Company**  
**Address City IN Zip: 500 South Seventh Street, Albion, IN 46701**  
**Permit Number: 113-28356-00008**  
**Reviewer: Brian Williams**

**Shoe Grinding Systems**

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

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

**Methodology:**

The Percentage Capacity Collected is based on the amount of non-asbestos material processed through the grinding system

Potential to Emit PM and PM-10 Before Controls (lbs/hr) = Capacity (lbs/hr) \* Percentage (%) Capacity Collected

Potential to Emit PM and PM-10 Before Controls (tons/yr) = Potential to Emit PM and PM-10 (lbs/hr) \* (1 ton/2,000 lbs) \* (8,760 hrs/yr)

Potential to Emit PM and PM-10 After Controls (tons/yr) = Potential to Emit PM and PM-10 Before Controls (tons/yr) \* (1 - Control Efficiency %)

Asbestos has been replaced with Friction Material at this Emission Unit.

Friction Material does not contain any HAPs

**Appendix A: Emissions Calculations**  
**Emissions from Welding**

**Company Name: Dexter Axle Company**  
**Address City IN Zip: 500 South Seventh Street, Albion, Indiana 46701**  
**Permit Number: 113-28356-00008**  
**Reviewer: Brian Williams**

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	EMISSION FACTORS * (lb pollutant / lb electrode)				EMISSIONS (lb/hr)				TOTAL HAPS (lb/hr)
			PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
WELDING											
Metal Inert Gas (MIG)(L50)	3	6	0.0241	0.000034		0.00001	0.434	0.0006	0.000	0.0002	0.001
Gas Metal Arc Welding (GMAW) (ER70)	11	4.54	0.0054	0.000318	0.000001	0.000001	0.270	0.0159	0.000	0.0000	0.016
<b>EMISSION TOTALS</b>							<b>PM = PM10</b>	<b>Mn</b>	<b>Ni</b>	<b>Cr</b>	<b>Total HAPs</b>
Potential Emissions lbs/hr							0.703	0.0165	0.000	0.0002	0.017
Potential Emissions lbs/day							16.9	0.396	0.00	0.006	0.403
Potential Emissions tons/year							<b>3.08</b>	0.0722	0.000	0.0010	<b>0.073</b>

**Methodology:**

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

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

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

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

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

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

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

**Company Name:** Dexter Axle Company  
**Address City IN Zip:** 500 South Seventh Street, Albion, Indiana 46701  
**Permit Number:** 113-28356-00008  
**Reviewer:** Brian Williams

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

**Methodology:**

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

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

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

<sup>b</sup>US EPA has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions

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

**Company Name:** Dexter Axle Company  
**Address City IN Zip:** 500 South Seventh Street, Albion, Indiana 46701  
**Permit Number:** 113-28356-00008  
**Reviewer:** Brian Williams

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

**Methodology:**

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

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

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

<sup>b</sup>US EPA has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions

**Appendix A: Emissions Calculations  
Particulate Emissions From Bullard System**

**Company Name: Dexter Axle Company  
Address City IN Zip: 500 South Seventh Street, Albion, Indiana 46701  
Permit Number: 113-28356-00008  
Reviewer: Brian Williams**

**Insignificant Machining**

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

**Methodology:**

Weight Rate (tons/hr) = Capacity \* Weight of Part (lbs/part) = Weight Rate (lbs/hr) \* (1 ton/2000lbs)

Potential to Emit PM or PM10 Before Controls (tons/yr) = Weight Rate (tons/hr) \* PM or PM-10 Emission Factor (lbs/ton) \* (2000lbs/ton)

Potential to Emit PM and PM-10 After Controls (tons/yr) = Potential to Emit PM and PM-10 Before Controls (tons/yr) \* (1 - Control Efficiency %)

PM and PM-10 Emission Factors are from FIRES 6.23 SCC# 3-04-003-40 For Grinding and Machining of Gray Iron

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

**Company Name:** Dexter Axle Company  
**Address City IN Zip:** 500 South Seventh Street, Albion, Indiana 46701  
**Permit Number:** 113-28356-00008  
**Reviewer:** Brian Williams

**Unpaved Roads**

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

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

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

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

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

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor,  $E_{ext} = E * [(365 - P)/365]$

Mitigated Emission Factor,  $E_{ext} = E * [(365 - P)/365]$

where P =  days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)

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

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

**Note:**

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

**Methodology:**

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

**Abbreviations:**

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



# 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](http://www.idem.IN.gov)

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

TO: Larry Parks  
Dexter Axle Company  
P.O. Box 108  
Albion, IN 46701

DATE: October 7, 2010

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

SUBJECT: Final Decision  
Significant Permit Revision  
113-29356-00008

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

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

A copy of the final decision and supporting materials has also been sent via standard mail to:  
Dwight Busche (Plant Manager)  
Dana Armstrong (DECA Environmental & Associates, Inc.)  
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 11/30/07



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October 7, 2010

TO: Noble 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: Dexter Axle Company**  
**Permit Number: 113-29356-00008**

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

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

Enclosures  
Final Library.dot 11/30/07

# Mail Code 61-53

IDEM Staff	MIDENNEY 10/7/2010 Dexter Axle Company 113-29356-00008 (final)		Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Larry Parks Dexter Axle Company PO Box 108 Albion IN 46701 (Source CAATS) via confirmed delivery										
2		Dwight Busche Plant Mgr Dexter Axle Company PO Box 108 Albion IN 46701 (RO CAATS)										
3		Noble County Board of Commissioners 101 North Orange Street Albion IN 46701 (Local Official)										
4		Albion Town Council and Town Manager P.O. Box 27 Albion IN 46701 (Local Official)										
5		Noble Co Public Library 813 E. Main St Albion IN 46701-1089 (Library)										
6		Noble County Health Department 2090 N. State Rd 9, Suite C Albion IN 46701-9566 (Health Department)										
7		Mr. Steve Christman NISWMD 2320 W 800 S, P.O. Box 370 Ashley IN 46705 (Affected Party)										
8		Frederick & Iva Moore 6019 W 650 N Ligonier IN 46767 (Affected Party)										
9		Avilla Town Council and Town Manager P.o. Box 49 Avilla IN 46710 (Local Official)										
10		Dana Armstrong DECA Environmental & Associates, Inc. 410 1st Avenue NE Carmel IN 46032 (Consultant)										
11		Edward Moorhouse E.H. Moorhouse, Inc. 7th Street Park 411 South 7th Street Albion IN 46701 (Affected Party)										
12												
13												
14												
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