



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
Toll Free (800) 451-6027
www.idem.IN.gov

TO: Interested Parties / Applicant

DATE: December 28, 2012

RE: Parker Hannifin Corporation, ESD / 085-32110-00046

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

Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures
FNPER.dot12/03/07



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Federally Enforceable State Operating Permit Renewal OFFICE OF AIR QUALITY

**Parker Hannifin Corporation, ESD
501 South Sycamore St
Syracuse, Indiana 46567**

(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.: F085-32110-00046	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: December 28, 2012 Expiration Date: December 28, 2022

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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 mechanical rubber products manufacturing source.

Source Address:	501 South Sycamore St, Syracuse, Indiana 46567
General Source Phone Number:	(574) 528-9561
SIC Code:	3061 (Molded, Extruded, and Lathe-Cut Mechanical Rubber Goods)
County Location:	Kosciusko
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) Three (3) adhesive spray booths for coating metal surfaces (metal inserts), constructed in 2008, using high volume low pressure (HVLP) coating application method, each with a maximum capacity of 2 gallons of coating per hour, equipped with replaceable filters as control, and exhausting to its respective stack, identified as ST228 through ST230.
- (b) Two (2) adhesive dipping booths for coating metal surfaces (metal inserts), constructed in 2008, each with a maximum capacity of 2 gallons of coating per hour, and both exhausting to stack, identified as ST231.

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

This stationary source also includes the following insignificant activities:

- (a) One (1) extrusion and warm-up mills, constructed in 1994, with a maximum capacity of 190 lbs of uncured rubber per hour, using no controls and exhausting inside and consisting of:
 - (1) one (1) 4 1/2 inch extruder .
 - (2) two (2) 2500 psi barwell performer.
 - (3) two (2) 3000 psi barwell performer.
 - (4) four (4) 60 inch warm-up mills.
- (b) One (1) cured rubber molding process, with a maximum capacity of 357 lbs of cured rubber per hour, constructed in 1994 and modified in 2007, using no controls, exhausting inside the building and consisting of:

- (1) one (1) casket gasket presses.
 - (2) two (2) injection processes.
 - (3) twelve (12) single mold , injection presses, constructed in 2007.
 - (4) thirty-six (36) single mold, hydraulic vacuum presses, constructed in 2007 and one (1) constructed in 2011.
 - (5) fifty-four (54) single mold, non-vacuum mini hydraulic presses, constructed in 2007 and modified in 2012.
- (c) One (1) recure process, constructed in 1994 and modified in 2007 and 2011, with a maximum capacity of 96 lbs of cured rubber per hour, using no controls and exhausting inside the building consisting of:
- (1) six (6) electric recure ovens.
 - (2) three (3) electric roll dryers.
 - (3) three (3) cryogenic media deflashers.
 - (4) two (2) part washers using non VOC and Non HAP containing detergent.
- (d) Thirteen (13) natural gas fired combustion units (space heaters), with a total maximum rated capacity of 9.73 MMBtu/hr.
- (e) Three (3) natural gas-fired Precision ovens, identified as ovens 17900, 17911 and 17912, to post-cure rubber products, each with a maximum production capacity of 11.01 pounds of rubber products per hour, each with a rated capacity of 0.3 MMBtu/hr.
- (f) Three (3) self-contained blasters, blasting metal surfaces (metal inserts), constructed in 2008, each with maximum blast rate 0.05 pound per hour, equipped with cyclone, using aluminum oxide as a blast media, and exhausting inside the building.
- (g) Paved roads and parking lots with public access.

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

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

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, F085-32110-00046, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

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

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

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

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

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

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

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

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

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

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

- (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)]

- (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]

- (a) All terms and conditions of permits established prior to F085-32110-00046 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised, or

(3) deleted.

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

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

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

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

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

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

(1) That this permit contains a material mistake.

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

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

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

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

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

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

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

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

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

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

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

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) and (c) 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)(1) and (c). 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)(1) and (c).

- (b) Emission Trades [326 IAC 2-8-15(b)]
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(b).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(c)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

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

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

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

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

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

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

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

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

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

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

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

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM) and greenhouse gases (GHGs), 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.
- (4) The potential to emit greenhouse gases (GHGs) from the entire source shall be limited to less than one hundred thousand (100,000) tons of CO₂ equivalent emissions (CO₂e) 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 one hundred (100) tons per twelve (12) consecutive month period.

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

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

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

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

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

C.7 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 by using ambient air quality modeling pursuant to 326 IAC 1-7-4.

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
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]

- (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]

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

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

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

Unless otherwise specified in this permit, 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)]

- (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]

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

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

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

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

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

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

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

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

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

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following:
- (AA) All calibration and maintenance records.
 - (BB) All original strip chart recordings for continuous monitoring instrumentation.
 - (CC) Copies of all reports required by the FESOP.
- Records of required monitoring information include the following:
- (AA) The date, place, as defined in this permit, and time of sampling or measurements.
 - (BB) The dates analyses were performed.
 - (CC) The company or entity that performed the analyses.
 - (DD) The analytical techniques or methods used.
 - (EE) The results of such analyses.
 - (FF) The operating conditions as existing at the time of sampling or measurement.

These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

- (b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

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

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

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

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

Stratospheric Ozone Protection

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

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) Three (3) adhesive spray booths for coating metal surfaces (metal inserts), constructed in 2008, using high volume low pressure (HVLP) coating application method, each with a maximum capacity of 2 gallons of coating per hour, equipped with replaceable filters as control, and exhausting to its respective stack, identified as ST228 through ST230.
- (b) Two (2) adhesive dipping booths for coating metal surfaces (metal inserts), constructed in 2008, each with a maximum capacity of 2 gallons of coating per hour, and both exhausting to stack, identified as ST231.

(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) Limitations [326 IAC 8-2-9] [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 and in order to render 326 IAC 8-2-9 not applicable, the VOC input, including coatings, dilution solvents, and cleaning solvents, to the three (3) adhesive spray booths and the two (2) adhesive dipping booths, shall be limited to less than 15 pounds per day, each.

Compliance with this limit shall limit the potential to emit VOC from the three (3) adhesive spray booths and the two (2) adhesive dipping booths to less than 15 lbs per day and render 326 IAC 8-2-9 (Miscellaneous metal and plastic coating operations) and 326 IAC 2-7 (Part 70 Permits) not applicable.

D.1.2 Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4][326 IAC 2-4.1-1]

Pursuant to 326 IAC 2-8-4, and in order to render the requirements of 326 IAC 2-4.1 and 326 IAC 2-7 (Part 70 Permit Program) not applicable, the Permittee shall comply with the following:

- (a) The input of any single HAP, including coatings, dilution solvents, and cleaning solvents, to the three (3) adhesive spray booths and the two (2) adhesive dipping booths shall be limited to less than 9.9 tons per twelve (12) consecutive month period, with compliance determined at the end of each month; and
- (b) The input of any combination of HAPs, including coatings, dilution solvents, and cleaning solvents, to the three (3) adhesive spray booths and the two (2) adhesive dipping booths shall be limited to less than 24.4 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limitations combined with potential to emit HAP from all other emission units, shall limit the source wide emissions of each single HAP to less than ten (10) tons per twelve (12) consecutive month period and total HAPs to less than twenty-five (25) tons per twelve (12) consecutive month period, and render 326 IAC 2-4.1 (Major Source of Hazardous Air Pollutants) and 326 IAC 2-7 (Part 70 Permit Program) not applicable

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

Pursuant to 326 IAC 6-3-2(d), particulate from the three (3) adhesive spray booths 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.

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

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

Compliance Determination Requirements

D.1.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC and HAP limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC 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.1.6 Particulate Matter (PM)

In order to comply with condition D.1.3, the dry filters for PM control shall be in operation and control emissions from the three (3) adhesive spray booths at all times that the adhesive spray booths are in operation.

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

D.1.7 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 adhesive spray booths stacks ST228 through ST230 while 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) Inspections shall be performed once per calendar month of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. During periods of inclement weather, these inspections shall be performed as weather permits. 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 of this permit 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.

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

D.1.8 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (2) below for each booth. Records maintained for (1) through (2) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limit established in Conditions D.1.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) The VOC content of each coating material and solvent used less water.
 - (2) The amount of coating material and solvent used on a daily basis.

- (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) The source shall maintain daily records showing that each surface coating booth actual VOC is less than 15 lbs per day, each.
- (b) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) and (2) below. Records maintained for (1) and (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP emission limits established in Conditions D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The amount and HAP content of each coating material and solvent used. Records shall include inventory records and Material Safety Data Sheets (MSDS) necessary to verify the type and amount used.
 - (2) The single and combined HAP usage for each month and compliance period.
- (c) To document the compliance status with Condition D.1.7, the Permittee shall maintain a log of weekly overspray observations and daily and monthly inspections. If rooftop inspections were not performed for any month due to inclement weather, the Permittee shall make a record of the type(s) of inclement weather and an explanation of why the inclement weather made rooftop access unsafe.
- (d) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

D.1.9 Reporting Requirements

A quarterly summary of the information to document the compliance status with Conditions D.1.1 and D.1.2 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, no 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 by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

Source Name: Parker Hannifin Corporation, ESD
Source Address: 501 South Sycamore St, Syracuse, Indiana 46567
FESOP Permit No.: F085-32110-00046

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

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

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

Source Name: Parker Hannifin Corporation, ESD
Source Address: 501 South Sycamore St, Syracuse, Indiana 46567
FESOP Permit No.: F085-32110-00046

This form consists of 2 pages

Page 1 of 2

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

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

FESOP VOC Usage Quarterly Report Form (Submit Report Quarterly)

Source Name: Parker Hannifin Corporation, ESD
 Source Address: 501 South Sycamore Street, Syracuse, Indiana 46567
 FESOP Permit No.: F085-32110-00046
 Facility: Five (5) Adhesive Coating Booths
 Parameter: VOC usage
 Limit: Less than fifteen (15) pounds per day for each booth

Month: _____ Year: _____

VOC Usage (pounds/day)											
Day	Spray Booth 1	Spray Booth 2	Spray Booth 3	Dipping Booth 1	Dipping Booth 2	Day	Spray Booth 1	Spray Booth 2	Spray Booth 3	Dipping Booth 1	Dipping Booth 2
1						17					
2						18					
3						19					
4						20					
5						21					
6						22					
7						23					
8						24					
9						25					
10						26					
11						27					
12						28					
13						29					
14						30					
15						31					
16											

- No deviation occurred in this month.
- Deviation/s occurred in this month.
 Deviation has been reported on _____

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

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

FESOP Single HAP Usage Quarterly Report Form

Source Name: Parker Hannifin Corporation, ESD
Source Address: 501 South Sycamore Street, Syracuse, Indiana 46567
FESOP Permit No.: F085-32110-00046
Facility: Five (5) Adhesive Coating Booths
Parameter: Total Single HAP Usage
Limit: Less than 9.8 tons per twelve (12) consecutive months

Quarter: _____ Year: _____

	Column 1	Column 2	Column 1 + Column 2
Month	Single HAP Usage this Month (tons)	Single HAP Usage Previous 11 Months (tons)	Single HAP Usage 12 Month Total (tons)
Month 1			
Month 2			
Month 3			

- No deviation occurred in any month during this quarter.
- Deviation/s occurred in this month.
Deviation has been reported on _____

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

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

FESOP Combined HAPs Usage Quarterly Report Form

Source Name: Parker Hannifin Corporation, ESD
 Source Address: 501 South Sycamore Street, Syracuse, Indiana 46567
 FESOP Permit No.: F085-32110-00046
 Facility: Five (5) Adhesive Coating Booths
 Parameter: Combined HAPs Usage
 Limit: Less than 24.4 tons per twelve (12) consecutive months

Quarter: _____ Year: _____

	Column 1	Column 2	Column 1 + Column 2
Month	Combined HAP Usage this Month (tons)	Combined HAP Usage Previous 11 Months (tons)	Combined HAP Usage 12 Month Total (tons)
Month 1			
Month 2			
Month 3			

- No deviation occurred in any month during this quarter.
- Deviation/s occurred in this month.
 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: Parker Hannifin Corporation, ESD
 Source Address: 501 South Sycamore St, Syracuse, Indiana 46567
 FESOP Permit No.: F085-32110-00046

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

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Indiana Department of Environmental Management
Office of Air Quality

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

Source Background and Description

Source Name:	Parker Hannifin Corporation, ESD
Source Location:	501 South Sycamore Street, Syracuse, IN 46567
County:	Kosciusko
SIC Code:	3061 (Molded, Extruded, and Lathe-Cut Mechanical Rubber Goods)
Permit Renewal No.:	F 085-32110-00046
Permit Reviewer:	Bruce Farrar

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Parker Hannifin Corporation, ESD relating to the operation of a stationary mechanical rubber products manufacturing plant. On July 13, 2012, Parker Hannifin Corporation, ESD submitted an application to the OAQ requesting to renew its operating permit. Parker Hannifin Corporation, ESD was issued a FESOP F085-25817-00046 on May 2, 2008.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units:

- (a) Three (3) adhesive spray booths for coating metal surfaces (metal inserts), constructed in 2008, using high volume low pressure (HVLP) coating application method, each with a maximum capacity of 2 gallons of coating per hour, equipped with replaceable filters as control, and exhausting to its respective stack, identified as ST228 through ST230.
- (b) Two (2) adhesive dipping booths for coating metal surfaces (metal inserts), constructed in 2008, each with a maximum capacity of 2 gallons of coating per hour, and both exhausting to stack, identified as ST231.

Insignificant Activities

The source also consists of the following insignificant activities:

- (a) One (1) extrusion and warm-up mills, constructed in 1994, with a maximum capacity of 190 lbs of uncured rubber per hour, using no controls and exhausting inside and consisting of:
 - (1) one (1) 4 1/2 inch extruder .
 - (2) two (2) 2500 psi barwell performer.
 - (3) two (2) 3000 psi barwell performer.
 - (4) four (4) 60 inch warm-up mills.
- (b) One (1) cured rubber molding process, with a maximum capacity of 357 lbs of cured rubber per hour, constructed in 1994 and modified in 2007, using no controls, exhausting inside the building and consisting of:

- (1) one (1) casket gasket presses.
 - (2) two (2) injection processes.
 - (3) twelve (12) single mold , injection presses, constructed in 2007.
 - (4) thirty-six (36) single mold, hydraulic vacuum presses, constructed in 2007 and one (1) constructed in 2011.
 - (5) fifty-four (54) single mold, non-vacuum mini hydraulic presses, constructed in 2007 and modified in 2012.
- (c) One (1) recure process, constructed in 1994 and modified in 2007 and 2011, with a maximum capacity of 96 lbs of cured rubber per hour, using no controls and exhausting inside the building consisting of:
- (1) six (6) electric recure ovens.
 - (2) three (3) electric roll dryers.
 - (3) three (3) cryogenic media deflashers.
 - (4) two (2) part washers using non VOC and Non HAP containing detergent.
- (d) Thirteen (13) natural gas fired combustion units (space heaters), with a total maximum rated capacity of 9.73 MMBtu/hr.
- (e) Three (3) natural gas-fired Precision ovens, identified as ovens 17900, 17911 and 17912, to post-cure rubber products, each with a maximum production capacity of 11.01 pounds of rubber products per hour, each with a rated capacity of 0.3 MMBtu/hr.
- (f) Three (3) self-contained blasters, blasting metal surfaces (metal inserts), constructed in 2008, each with maximum blast rate 0.05 pound per hour, equipped with cyclone, using aluminum oxide as a blast media, and exhausting inside the building.
- (g) Paved roads and parking lots with public access.

Existing Approvals

The source was issued FESOP No. 085-25817-00046 on May 2, 2008.

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

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Kosciusko County.

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

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

(a) Ozone Standards

Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Kosciusko County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) PM_{2.5}

Kosciusko County has been classified as attainment for PM_{2.5}. On May 8, 2008, U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM_{2.5} emissions. These rules became effective on July 15, 2008. On May 4, 2011 the air pollution control board issued an emergency rule establishing the direct PM_{2.5} significant level at ten (10) tons per year. This rule became effective, June 28, 2011.. Therefore, direct PM_{2.5} and SO₂ emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.

(c) Other Criteria Pollutants

Kosciusko County has been classified as attainment or unclassifiable in Indiana for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

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

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Unrestricted Potential Emissions	
Pollutant	Tons/year
PM	18.9
PM ₁₀	19.17
PM _{2.5}	19.17
SO ₂	0.03
VOC	321.62
CO	3.91
NO _x	4.66
GHGs as CO ₂ e	5,621
Single HAP	>10
Total HAP	>25

HAPs	tons/year
Xylene	269.7
MIBK	250.9
Methanol	155.0
Toluene	83.5
Trichloroethylene	82.6
Ethyl Benzene	31.8
Naphtha	82.6
Ethyl Benzene	22.2
Tetrachloroethylene	2.1
Total	270.20

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

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC is equal to or greater than 100 tons per year. However, the Permittee has agreed to limit the source's VOC emissions to less than Title V levels, therefore the Permittee will be issued a FESOP Renewal.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all other criteria pollutants are less than 100 tons per year.
- (c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of GHGs is less than one hundred thousand (100,000) tons of CO₂ equivalent emissions (CO₂e) per year.
- (d) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. However, the Permittee has agreed to limit the source's single HAP emissions and total HAP emissions below Title V levels. Therefore, the Permittee will be issued a FESOP Renewal.

Potential to Emit After Issuance

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

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Renewal (tons/year)									
	PM	PM ₁₀ *	PM _{2.5} **	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e	Total HAPs	Worst Single HAP
Adhesive Spray Booth 1	4.24	4.24	4.24	-	-	13.70 ***	-	-	Less than 9.8	Less than 24.4
Adhesive Spray Booth 2	4.24	4.24	4.24	-	-		-	-		
Adhesive Spray Booth 3	4.24	4.24	4.24	-	-		-	-		
Adhesive Dipping Booth 1	-	-	-	-	-		-	-		
Adhesive Dipping Booth 2	-	-	-	-	-		-	-		
Self-Contained Blaster#1	2.03	2.03	2.03	-	-		-	-	-	-
Self-Contained Blaster#2	2.03	2.03	2.03	-	-		-	-	-	-
Self-Contained Blaster#3	2.03	2.03	2.03	-	-		-	-	-	-
Rubber Curing Ovens	0.01	0.03	0.03	2.37E-03	0.39	1.89	0.33	475.92	0.042	0.16
Rubber Extrusion	-	-	-	-	-	0.63	-	-	-	0.26
Combustion	0.08	0.32	0.32	0.03	4.26	0.23	3.58	5,145	0.077	0.080
Total PTE of Entire Source	18.90	19.17	19.17	0.03	4.66	16.45	3.91	5,621	<9.9	24.90
Title V Major Source Thresholds	NA	100	100	100	100	100	100	100,000 CO ₂ e	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	100,000 CO ₂ e	NA	NA
Emission Offset/ Nonattainment NSR Major Source Thresholds	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

*Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM₁₀), not particulate matter (PM), is considered as a "regulated air pollutant".
 **PM_{2.5} listed is direct PM_{2.5}.
 *** VOC emissions are limited to 15 pounds per day for each of the surface coating booths. This limit will exempt the adhesive coating booths from the requirements of 326 IAC 8-2-9.

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC is equal to or greater than 100 tons per year. However, the Permittee has agreed to limit the source's VOC emissions to less than Title V levels, therefore the Permittee will be issued a FESOP Renewal.

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

The source has taken an enforceable limit for VOC which restricts the actual VOC emissions (including coatings, dilution solvents, and cleaning solvents) from each surface coating booth (three (3) spray and two (2) dip) to less than 15 pounds per day. The VOC emissions from each booth, including coatings, dilution solvents, and cleaning solvents, shall not exceed fifteen (15) pounds per day.

This is an existing requirement.

- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all other criteria pollutants are less than 100 tons per year.
- (c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of GHGs is less than one hundred thousand (100,000) tons of CO₂ equivalent emissions (CO₂e) per year.
- (d) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. However, the Permittee has agreed to limit the source's single HAP emissions and total HAP emissions below Title V levels. Therefore, the Permittee will be issued a FESOP Renewal.

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

- (1) The total single HAP emissions from all surface coating booths (three (3) spray and two (2) dip) (including coatings, dilution solvents, and cleaning solvents), to the surface coating operations) shall be less than 9.8 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (2) The combined HAPs emissions from all surface coating booths (three (3) spray and two (2) dip) (including coatings, dilution solvents, and cleaning solvents, to the surface coating operations) shall be less than 24.4 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

These are existing requirements.

Compliance with these limits, combined with the potential to emit of VOC, single HAP and combined HAPs from all other emission units at this source, shall limit the source-wide total potential to emit of VOC to less than 100 tons per 12 consecutive month period, any single HAP to less than ten (10) tons per 12 consecutive month period, and total HAPs to less than twenty-five (25) tons per 12 consecutive month period and shall render 326 IAC 2-7 (Part 70 Permits), 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), 326 IAC 2-3 (Emission Offset), and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP) not applicable.

Federal Rule Applicability

- (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.

New Source Performance Standards (NSPS)

- (b) The requirements of the NSPS for Surface Coating of Metal Furniture, 40 CFR 60, Subpart EE (326 IAC 12), are still not included in the permit, because the surface coating operations at the source do not include metal furniture.
- (c) The requirements of the NSPS for Automobile and Light Duty Truck Surface Coating Operations, 40 CFR 60, Subpart MM (326 IAC 12), are still not included in the permit, because the source is not automobile or light-duty truck assembly plant.

- (d) The requirements of the NSPS for Industrial Surface Coating: Large Appliances, 40 CFR 60, Subpart SS (326 IAC 12), are still not included in the permit, because the surface coating operations at the source do not include any large appliances.
- (e) The requirements of the NSPS for Metal Coil Surface Coating, 40 CFR 60, Subpart TT (326 IAC 12), are still not included in the permit, because the surface coating operations at the source do not include metal coils.
- (f) The requirements of the NSPS for Beverage Can Surface Coating Industry, 40 CFR 60, Subpart WW (326 IAC 12), are still not included in the permit, because the surface coating operations at the source do not include beverage cans.
- (g) The requirements of the NSPS for Magnetic Tape Coating Facilities, 40 CFR 60, Subpart SSS (326 IAC 12), are still not included in the permit, because the surface coating operations at the source do not include magnetic tape.
- (h) The requirements of the NSPS for Industrial Surface Coating: Surface Coating of Plastic Parts for Business Machines , 40 CFR 60, Subpart TTT (326 IAC 12), are still not included in the permit, because the surface coating operations at the source do not include plastic parts for business machines.
- (i) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (j) The requirements of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products (40 CFR 63.3880, Subpart MMMM (4M)) are not included for this proposed revision, because this source is not a major source for HAPs.
- (k) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP): Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, Subpart HHHHHH (6H) are not included in the permit, because the surface coating operations at the source do not include: paint stripping operations using methylene chloride (MeCl), autobody refinishing operations, or spray application of coatings containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd).
- (l) The requirements of the National Emission Standards for Hazardous Air Pollutants for Area Source Standards for Nine Metal Fabrication and Finishing Source Categories (40 CFR 63, Subpart XXXXXX (6X)), are not included for this proposed revision, because this source's SIC is not listed.
- (m) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit renewal.

State Rule Applicability - Entire Source

- (a) 326 IAC 2-6 (Emission Reporting)
This source is not subject to 326 IAC 2-6 (Emission Reporting) because it is not required to have an operating permit pursuant to 326 IAC 2-7 (Part 70); it is not located in Lake, Porter, or LaPorte County, and its potential to emit lead is less than 5 tons per year. Therefore, this rule does not apply.

- (b) 326 IAC 5-1 (Opacity Limitations)
This source is subject to the opacity limitations specified in 326 IAC 5-1-2(1)
- (c) 326 IAC 6.5 PM Limitations Except Lake County
This source is not subject to 326 IAC 6.5 because it is not located in one of the following counties: Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne.
- (d) 326 IAC 6.8 PM Limitations for Lake County
This source is not subject to 326 IAC 6.8 because it is not located in Lake County.
- (e) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
The source is not subject to the requirements of 326 IAC 6-5, because the potential fugitive particulate emissions are less than 25 tons per year.

State Rule Applicability – Individual Facilities

Three (3) Adhesive Spray Booths

- (e) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2 (d), particulate from the three (3) adhesive spray booths shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

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

- (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

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

- (f) 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations)
The three (3) adhesive spray booths perform a metal coating process on a commercial and industrial machinery and equipment. In addition, the adhesive spray booths were constructed after July 1, 1990 and each has actual VOC emissions greater than 15 pounds per day. Therefore, the three (3) spray booths are subject to 326 IAC 8-2-9.

However, the source has taken enforceable limit for VOC which restricts actual VOC emissions from each of the adhesive spray booths to a level below less than 15 pounds per day. The Permittee shall comply with the following condition:

The total input usage of volatile organic compounds (VOC) at each adhesive spray booth, including coatings, dilution solvents, and cleaning solvents, shall be limited to less than 15 pounds per day.

Compliance with the above limit shall render the requirements of 326 IAC 8-2-9 not applicable to the adhesive spray booths at the source.

Two (2) Adhesive Dipping Booths

- (g) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(5), the two (2) adhesive dipping booths are not subject to 326 IAC 6-3, because they use a dip coating process to apply the coating.
- (h) 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations)
The two (2) adhesive dipping booths perform a metal coating process on a commercial and industrial machinery and equipment. In addition, the adhesive dipping booths were constructed after July 1, 1990 and each has actual VOC emissions greater than 15 pounds per day. Therefore, the two (2) adhesive dipping booths are subject to 326 IAC 8-2-9.

However, the source has taken enforceable limit for VOC which restricts actual VOC emissions from each of the adhesive dipping booths to less than 15 pounds per day. The Permittee shall comply with the following condition:

The total input usage of volatile organic compounds (VOC) at each adhesive dipping booth, including coatings, dilution solvents, and cleaning solvents, shall be limited to less than 15 pounds per day.

Compliance with the above limit shall render the requirements of 326 IAC 8-2-9 not applicable to the two (2) adhesive dipping booths at the source.

Three (3) self-contained blasters.

- (i) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(14), the three (3) self-contained blasters are not subject to 326 IAC 6-3-2, because the uncontrolled PTE from the three (3) self-contained blasters are less than 0.551 pounds per hour, each.

Rubber Curing (Precision Ovens)

- (j) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(14), the three (3) precision ovens are not subject to 326 IAC 6-3-2, because uncontrolled PTE from the three (3) precision ovens are less than 0.551 pounds per hour, each.
- (k) 326 IAC 7-1.1-1 (Sulfur Dioxide Emission Limitations)
Pursuant to 326 IAC 7-1.1-1(1) the three (3) precision ovens are not subject to this rule because the potential and the actual emissions for Sulfur Dioxide is less than 25 tons per year and 10 pounds per hour, for each.
- (l) There are no 326 IAC 8 Rules that are applicable to the facility.

Compliance Determination and Monitoring Requirements

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

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

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

Emission Unit / Control	Parameter	Frequency	Range	Excursions and Exceedances
adhesive spray booths / Filter	Filter Placement, Integrity, and Loading	Daily	Normal - Abnormal	Response Steps
	Overspray Observations	Weekly	Normal - Abnormal	Response Steps
	Coating Emissions	Monthly	Normal - Abnormal	Response Steps

This monitoring condition is necessary because the filters for the three (3) spray booths must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations).

- (b) Testing is not required for the rubber extruding operation because, although it uses an alternative emission factor (because AP-42 lists no emission factor for this process), the emission factor is similar to other emission factors accepted by the EPA from the Rubber Manufacturers Association. Also the emissions from the rubber extruding operation requirements would meet the exemption threshold.

Recommendation

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

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

An application for the purposes of this review was received on July 13, 2012.

Conclusion

The operation of this mechanical rubber products manufacturing plant shall be subject to the conditions of the attached FESOP Renewal No. 085-32110-00046.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Bruce Farrar 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) 234-5401 or toll free at 1-800-451-6027 extension 4-5401.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>

- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

Appendix A: Emissions Calculations
Source-wide uncontrolled and controlled potential emissions

Company Name: Parker Hannifin Corporation, ESD
Address City IN Zip: 501 South Sycamore Street, Syracuse, IN 46567
Permit Number: F085-32110-00046
Reviewer: Bruce Farrar
Date: July 13, 2012

Process/Emission Unit	Uncontrolled Potential Emissions (tons/yr)									
	PM	PM10	PM2.5	SO2	NOX	VOC	CO	GHGs as CO ₂ e	Single HAP	Combined HAPs
Spray Booth 1	4.24	4.24	4.24	-	-	63.78	-	-	31.01	53.94
Spray Booth 2	4.24	4.24	4.24	-	-	63.78	-	-	31.01	53.94
Spray Booth 3	4.24	4.24	4.24	-	-	63.78	-	-	31.01	53.94
Dipping Booth 1	-	-	-	-	-	63.78	-	-	31.01	53.94
Dipping Booth 2	-	-	-	-	-	63.78	-	-	31.01	53.94
Self-Contained Blaster#1	2.03	2.03	2.03	-	-	-	-	-	-	-
Self-Contained Blaster#2	2.03	2.03	2.03	-	-	-	-	-	-	-
Self-Contained Blaster#3	2.03	2.03	2.03	-	-	-	-	-	-	-
Rubber Curing (Precision Ovens)	0.01	0.03	0.03	2.37E-03	0.39	1.89	0.33	476	0.042	0.158
Rubber Extrusion	-	-	-	-	-	0.63	-	-	0.258	0.258
Combustion	0.08	0.32	0.32	0.03	4.26	0.23	3.58	5,145	0.077	0.080
Total	18.90	19.17	19.17	0.03	4.66	321.62	3.91	5,621	155.04	270.20

Process/Emission Unit	Limited/Controlled Potential Emissions (tons/yr)									
	PM	PM10	PM2.5	SO2	NOX	VOC*	CO	GHGs as CO ₂ e	Single HAP	Combined HAPs
Spray Booth 1	4.24	4.24	4.24	-	-	13.70	-	-	less than 9.8	24.40
Spray Booth 2	4.24	4.24	4.24	-	-		-	-		
Spray Booth 3	4.24	4.24	4.24	-	-		-	-		
Dipping Booth 1	-	-	-	-	-		-	-		
Dipping Booth 2	-	-	-	-	-		-	-		
Self-Contained Blaster#1	2.03	2.03	2.03	-	-	-	-	-	-	-
Self-Contained Blaster#2	2.03	2.03	2.03	-	-	-	-	-	-	-
Self-Contained Blaster#3	2.03	2.03	2.03	-	-	-	-	-	-	-
Rubber Curing (Precision Ovens)	0.01	0.03	0.03	2.37E-03	0.39	1.89	0.33	475.92	0.042	0.16
Rubber Extrusion	-	-	-	-	-	0.63	-	-	-	0.26
Combustion	0.08	0.32	0.32	0.03	4.26	0.23	3.58	5,145	0.077	0.080
Total	18.90	19.17	19.17	0.03	4.66	16.45	3.91	5,621	less than 10	24.90

Notes:

* VOC emissions are limited to 15 pounds per day for each of the surface coating booths. This limit will exempt the surfacecoating booths from the requirements of 326 IAC 8-2-9.

**Appendix A: Emissions Calculations
Surface Coating Booths**

**Company Name: Parker Hannifin Corporation, ESD
Address City IN Zip: 501 South Sycamore Street, Syracuse, IN 46567
Permit Number: F085-32110-00046
Reviewer: Bruce Farrar
Date: July 13, 2012**

VOC and PM Emissions from Single Booth

Adhesive/ Thinner	Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Gal of Mat. (gal/hr)*	Pounds VOC per gallon of material less water	Pounds of solids per gallon of material less water	Pounds VOC per gallon of material	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Uncontrolled Particulate Potential (ton/yr) Spray Booth	Controlled Particulate Potential (ton/yr) Spray Booth	Particulate Potential (ton/yr) Dipping Booth	Transfer Efficiency	
Adhesive	Chemlok 225x	8.5	75%	0%	75.0%	0%	1.14	6.38	2.13	6.38	7.27	174.42	31.83	4.24	0.42	0	60%	
Adhesive	Chemloc 205	8.1	76%	0%	76.0%	0%	1.14	6.16	1.94	6.16	7.02	168.43	30.74	3.88	0.39	0	60%	
Adhesive	Chemloc 256	8.4	77%	0%	76.5%	0%	1.14	6.40	1.96	6.40	7.29	174.98	31.93	3.92	0.39	0	60%	
Adhesive	Chemloc 233	9.5	78%	0%	78.0%	0%	1.14	7.37	2.08	7.37	8.40	201.67	36.80	4.15	0.42	0	60%	
Adhesive	Chemloc 607	6.9	85%	0%	85.0%	0%	1.14	5.89	1.04	5.89	6.72	161.16	29.41	2.08	0.21	0	60%	
Adhesive	Chemloc 5150	6.9	95%	0%	95.0%	0%	1.14	6.56	0.35	6.56	7.47	179.34	32.73	0.69	0.07	0	60%	
Adhesive	Thixon™ OSN2-EF	8.1	75%	0%	75.0%	0%	1.14	6.08	2.03	6.08	6.93	166.21	30.33	4.04	0.40	0	60%	
Thinner	p-xylene	7.2	100%	0%	100.0%	0%	0.86	7.16	0	7.16	6.16	147.78	26.97	0	0.00	0	60%	
Thinner	Methyl Isobutyl Ketone	6.7	100%	0%	100.0%	0%	0.86	6.66	0	6.66	5.73	137.46	25.09	0	0.00	0	60%	
											Worst case adhesive based on highest VOC content =	8.40	201.67	36.80	4.24	0.42		
											Worst case thinner based on highest VOC content =	6.16	147.78	26.97	0.00	0.00		
Potential Emissions from Single Booth											14.56	349.45	63.78	4.24	0.42			
Total Potential Emissions from five (5) Booths **											72.80	1747.26	318.88	12.73	1.27			

METHODOLOGY

Particulate Control Device: Dry Filter

Particulate Control Device Efficiency: 90%

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

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

Potential VOC Pounds per Hour = Pounds of VOC per Gallon material (lb/gal) * Gal of Material (gal/hour)

Potential VOC Pounds per Day = Potential VOC Pounds per Hour * (24 hr/day)

Potential VOC Tons per Year = Potential VOC Pounds per Hour * (8760 hr/yr) * (1 ton/2000 lbs)

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

Controlled Particulate Potential Tons per Year = Uncontrolled Particulate Potential Tons per Year x [1- (Filter Efficiency % / 100)]

* Each booth uses 2 gallons of coating per hour, 1.14 gallons of adhesive per hour and 0.86 gallons of thinner per hour (1.14+0.86 = 2.0)

** Only the 3 spray booths produce particulate, therefore for total particulate emissions only the 3 spray booths are used, instead of 5 total booths for VOC

**Appendix A: Emissions Calculations
Surface Coating Booths**

**Company Name: Parker Hannifin Corporation, ESD
Address City IN Zip: 501 South Sycamore Street, Syracuse, IN 46567
Permit Number: F085-32110-00046
Reviewer: Bruce Farrar
Date: July 13, 2012**

HAPs Emissions from Single Booth

Adhesive/ Thinner	Material	Density	Gal of Mat.	Weight %	Weight %	Weight %	Weight %	Weight %	Weight %	Weight %	Weight %	Weight %
		(Lb/Gal)	(gal/hr) *	MIBK	Xylene	Toluene	Ethyl Benzene	Tetrachloro ethylene	Methanol	Trichloro ethylene	Naphtha	
Adhesive	Chemlok 225x (Thinner)	8.5	1.14	0%	60.00%	0%	15.00%	1.00%	0%	0%	0%	0%
Adhesive	Chemloc 205 (Thinner MIBK)	8.1	1.14	0%	0%	0%	0%	0%	0%	0%	0%	0%
Adhesive	Chemloc 256 (Thinner)	8.4	1.14	0%	35.00%	40.00%	10.00%	0%	0%	0%	0%	0%
Adhesive	Chemloc 233 (Thinner)	9.5	1.14	0%	35.00%	0%	10.00%	0%	0%	35.00%	0%	0%
Adhesive	Chemloc 607	6.9	1.14	0%	0%	0%	0%	0%	80.00%	0%	0%	0%
Adhesive	Chemloc 5150	6.9	1.14	0%	0%	0%	0%	0%	90.00%	0%	0%	0%
Adhesive	Thixon™ OSN2 EF	8.1	1.14	0%	0%	40.00%	0%	0%	0%	0%	0%	11.00%
Thinner	p-xylene	7.2	0.86	0%	100%	0%	0%	0%	0%	0%	0%	0%
Thinner	Methyl Isobutyl Ketone (MIBK)	6.7	0.86	100.00%	0%	0%	0%	0%	0%	0%	0%	0%

MIBK Emissions	Xylene Emissions	Toluene Emissions	Ethyl Benzene Emissions	Tetrachloro ethylene Emissions	Methanol Emissions	Trichloro ethylene Emissions	Naphtha Emissions	Total HAP
(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)
0.0	25.5	0.0	6.4	0.4	0.0	0.0	0.0	32.3
0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0.0	14.6	16.7	4.2	0.0	0.0	0.0	0.0	35.5
0.0	16.5	0.0	4.7	0.0	0.0	16.5	0.0	37.7
0.0	0.0	0.0	0.0	0.0	27.7	0.0	0.0	27.7
0.0	0.0	0.0	0.0	0.0	31.0	0.0	0.0	31.0
0.0	0.0	16.2	0.0	0.0	0.0	0.0	4.4	20.6
0.0	27.0	0.0	0.0	0.0	0.0	0.0	0.0	27.0
25.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	25.1

Worst case adhesive based on highest Single HAP

content = 25.09 26.97 16.70 6.37 0.42 31.01 16.52 4.45

Worst case thinner based on highest HAP content =

25.09 26.97 0.00 0.00 0.00 0.00 0.00 0.00

Maximum Single HAP from each booth = 50.2 53.9 16.7 6.4 0.4 31.0 16.5 4.4

Maximum Single HAP from five (5) booths = 250.9 269.7 83.5 31.8 2.1 155.0 82.6 22.2

METHODOLOGY

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

* Each booth uses 2 gallons of coating per hour, 1.14 gallons of adhesive per hour and 0.86 gallons of thinner per hour (1.14+0.86 = 2.0).

Appendix A: Emissions Calculations

Company Name: Parker Hannifin Corporation, ESD
Address City IN Zip: 501 South Sycamore Street, Syracuse, IN 46567
Permit Number: F085-32110-00046
Reviewer: Bruce Farrar
Date: July 13, 2012

Rubber Curing Operation (three (3) Precision ovens, identified as ovens 17900, 17911 and 17912)

Compound	Emission Factors (lb of pollutant/lb of rubber)	Potential Emissions (tons/year)
1,1,1-Trichloroethane	8.89E-07	0.00013
1,1 Dichloromethane	5.40E-06	0.00078
1,3 Butadiene	5.90E-06	0.00085
2-Butanone	7.62E-06	0.00110
4-Methy-2-Pentanone	2.03E-05	0.00294
Acrolein	2.03E-05	0.00294
Acrylonitrile	2.89E-04	0.04181
Benzene	1.29E-05	0.00187
Carbon Disulfide	1.05E-04	0.01519
Carbonyl Sulfide	2.79E-04	0.04036
Chloroform	6.04E-07	0.00009
Chloromethane	8.89E-07	0.00013
Di-n-butylphthalate	2.20E-07	0.00003
Dibenzofuran	5.94E-08	0.00001
Dimethylphthalate	2.20E-07	0.00003
Ethylbenzene	1.51E-06	0.00022
Hexane	1.67E-05	0.00242
Isooctane	6.42E-06	0.00093
m-Xylene + p-Xylene	8.24E-06	0.00119
Methylene Chloride	4.13E-05	0.00597
O-Xylene	4.21E-06	0.00061
Phenol	1.31E-06	0.00019
Propylene Oxide	1.72E-04	0.02488
Styrene	1.60E-06	0.00023
Tetrachloroethane	3.49E-06	0.00050
Toluene	3.83E-05	0.00554
Single HAP	2.89E-04	4.18E-02
Combination HAPS	1.04E-03	1.51E-01
Total VOCs	1.29E-02	1.87

Methodology:

Emissions factors provided by the source (the source derived these emission factors from RMA (Rubber Manufacturers Association) data). Emission factor similar to other rubber compounds identified in AP-42.

Potential Emissions (tons/year) = Emissions rates (lb of pollutant/lb of rubber) X Maximum Total Throughput of three ovens (lb of rubber/hour) X 8760 (hrs) /2000 (pounds/ton)

Rubber Extrusion Operation

Compound	Emission Factor* (lb of pollutant/lb of rubber)	Potential Emissions tons/yr
Combination HAPS	2.27E-05	0.26
Total VOCs	5.50E-05	0.63

Emissions factor provided by the source. The source derived these emission rates from RMA (Rubber Manufacturers Association) data. Emission factor similar to other rubber compounds identified in AP-42.

Methodology:

Throughput of Extruding Process (866 lbs of rubber/hour) X 8760 (hrs) /2000 (pounds/ton)

Appendix A: Emissions Calculations

Self-contained Shot Blasters

Company Name: Parker Hannifin Corporation, ESD
Address City IN Zip: 501 South Sycamore Street, Syracuse, IN 46567
Permit Number: F085-32110-00046
Reviewer: Bruce Farrar
Date: July 13, 2012

Emission Unit	Grain Loading (gr/scf)	Flow Rate (acfm)	PTE before Controls (tons/year)	PTE After Controls (tons/year)
#1	0.009	600	2.03	0.20
#2	0.009	600	2.03	0.20
#3	0.009	600	2.03	0.20
Total PM/PM10 =			6.08	0.61

Methodology:

Blast Media: Aluminum Oxide

Control Equipment: Cyclone

Control Equipment Efficiency: 90%

$$\text{uncontrolled PM (tons/year)} = (\text{gr/scf}) * (\text{acfm}) * 60 \text{ min/1hr} * (1\text{lb}/7000 \text{ gr}) * (8760 \text{ hr}/1 \text{ yr}) * (1 \text{ ton}/2000 \text{ lbs}) / (1 - \text{cyclone control efficiency \%})$$

$$\text{Potential Uncontrolled Emissions} = \text{Blast Rate (lb/hr)} * 8760 \text{ (hrs)} / 2000 \text{ (pounds/ton)}$$

$$\text{Potential Controlled Emissions} = \text{Potential Uncontrolled Emissions} * [1 - (\text{cyclone efficiency \%} / 100)]$$

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

Company Name: Parker Hannifin Corporation, ESD
Address City IN Zip: 501 South Sycamore Street, Syracuse, IN 46567
Permit Number: F085-32110-00046
Reviewer: Bruce Farrar
Date: July 13, 2012

Heat Input Capacity
MMBtu/hr

HHV
MMBtu
MMscf

Potential Throughput
MMCF/yr

0.9

7.9

Three (3) Precision ovens, identified as ovens 17900, 17911 and 17912

0.9

8

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100	5.5	84
					**see below		
Potential Emission in tons/yr	0.01	0.03	0.03	2.37E-03	0.39	0.02	0.33

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

PM2.5 emission factor is filterable and condensable PM2.5 combined.

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

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu

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

See page 7 for HAPs emissions calculations.

Appendix A: Emissions Calculations**Natural Gas Combustion Only****MM BTU/HR <100****HAPs Emissions****Company Name: Parker Hannifin Corporation, ESD****Address City IN Zip: 501 South Sycamore Street, Syracuse, IN 46567****Permit Number: F085-32110-00046****Reviewer: Bruce Farrar****Date: July 13, 2012**

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	8.278E-06	4.730E-06	2.957E-04	7.096E-03	1.340E-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	1.971E-06	4.336E-06	5.519E-06	1.498E-06	8.278E-06

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.

See Page 7 for Greenhouse Gas calculations.

Appendix A: Emissions Calculations**Natural Gas Combustion Only****MM BTU/HR <100****Greenhouse Gas Emissions****Company Name: Parker Hannifin Corporation, ESD****Address City IN Zip: 501 South Sycamore Street, Syracuse, IN 46567****Permit Number: F085-32110-00046****Reviewer: Bruce Farrar****Date: July 13, 2012**

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	473	0.01	0.01
Summed Potential Emissions in tons/yr	473		
CO2e Total in tons/yr	476		

Methodology

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.

Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.

Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.

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

CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N2O GWP (310).

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

Company Name: Parker Hannifin Corporation, ESD
Address City IN Zip: 501 South Sycamore Street, Syracuse, IN 46567
Permit Number: F085-32110-00046
Reviewer: Bruce Farrar
Date: July 13, 2012

Heat Input Capacity MMBtu/hr	HHV MMBtu	Potential Throughput MMCF/yr
9.73	85.2	Thirteen (13) natural gas fired space heaters
9.7	85	

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100	5.5	84
					**see below		
Potential Emission in tons/yr	0.08	0.32	0.32	0.03	4.26	0.23	3.58

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

PM2.5 emission factor is filterable and condensable PM2.5 combined.

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

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu

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

MM BTU/HR <100

HAPs Emissions

Company Name: Parker Hannifin Corporation, ESD
Address City IN Zip: 501 South Sycamore Street, Syracuse, IN 46567
Permit Number: F085-32110-00046
Reviewer: Bruce Farrar
Date: July 13, 2012

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	8.950E-05	5.114E-05	3.196E-03	7.671E-02	1.449E-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	2.131E-05	4.688E-05	5.966E-05	1.619E-05	8.950E-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. See Page 10 for Greenhouse Gas calculations.

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

Greenhouse Gas Emissions

Company Name: Parker Hannifin Corporation, ESD
Address City IN Zip: 501 South Sycamore Street, Syracuse, IN 46567
Permit Number: F085-32110-00046
Reviewer: Bruce Farrar
Date: July 13, 2012

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	5,114	0.10	0.09
Summed Potential Emissions in tons/yr	5,114		
CO2e Total in tons/yr	5,145		

Methodology

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.

Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.

Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.

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

CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N2O GWP (310).



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
Toll Free (800) 451-6027
www.idem.IN.gov

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

TO: Ronald Allen
Parker Hannifin Corporation, ESD
501 S Sycamore St
Syracuse, IN 46567-1529

DATE: December 28, 2012

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

SUBJECT: Final Decision
FESOP
085-32110-00046

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

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

A copy of the final decision and supporting materials has also been sent via standard mail to:
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 11/30/07



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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Toll Free (800) 451-6027
www.idem.IN.gov

December 28, 2012

TO: Syracuse Public Library

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

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

Applicant Name: Parker Hannifin Corporation
Permit Number: 085-32110-00046

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

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

Enclosures
Final Library.dot 11/30/07

Mail Code 61-53

IDEM Staff	CDENNY 12/28/2012 Parker Hannifin Corporation, ESD 085-32110-00416 (final)		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	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		Ronald Allen Parker Hannifin Corporation, ESD 501 S Sycamore St Syracuse IN 46567-1529 (Source CAATS)										
2		Kathy Miller GM Parker Hannifin Corporation, ESD 501 S Sycamore St Syracuse IN 46567-1529 (RO CAATS)										
3		Kosciusko County Board of Commissioners 100 W. Center St, Room 220 Warsaw IN 46580 (Local Official)										
4		Syracuse Public Library 115 East Main Street Syracuse IN 46567 (Library)										
5		Mr. Tim Thomas c/o Boilermakers Local 374 6333 Kennedy Ave. Hammond IN 46333 (Affected Party)										
6		Kosciusko County Health Department 100 W. Center Street, 3rd Floor Warsaw IN 46580-2877 (Health Department)										
7												
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9												
10												
11												
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