**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**
*We Protect Hoosiers and Our Environment.*
100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

**Michael R. Pence**
*Governor*

**Thomas W. Easterly**
*Commissioner*

TO: Interested Parties / Applicant

DATE: June 19, 2013

RE: Raybestos Powertrain / 153-33157-00015

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

# Notice of Decision – Approval

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 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires 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 from 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-AM.dot 6/13/2013

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**Michael R. Pence**
*Governor*

**Thomas W. Easterly**
*Commissioner*

Brent Bell
Raybestos Powertrain
P O Box 267
Sullivan, Indiana 47882-0267

June 19, 2013

Re: 153-33157-00015
Seventh Administrative Amendment to
F153-20733-00015

Dear Brent Bell:

Raybestos Powertrain was issued a Federally Enforceable State Operating Permit (FESOP) Renewal No. F153-20733-00015 on July 5, 2005 for a stationary automotive clutch plates and transmission parts manufacturing source located at 609 E Chaney St and 110 Industrial Park, Sullivan Indiana 47882. On May 3, 2013, the Office of Air Quality (OAQ) received an application from the source requesting to remove the adhesive coating line RM1200.

1. Pursuant to 326 IAC 2-8-10(a)(2)(B), this change to the permit is considered an administrative amendment because the permit is amended to change descriptive information concerning the source or an emissions unit, where the revision will not trigger a new application requirement.

   See Appendix A for the revised limited PTE of the source after the removal of the adhesive coating line RM1200.

Pursuant to the provisions of 326 IAC 2-8-10, the permit is hereby administratively amended as follows with the deleted language as ~~strikeouts~~ and new language **bolded**:

A.3 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:

...

~~(e) One (1) adhesive coating line, identified as RM1200, approved for construction in 2008, capable of coating 36.0 steel friction cores per hour. The adhesive is applied through a roll coater and then dried in a natural gas fired drying oven, identified as RM1201, rated at 1.2 million British thermal units per hour (MMBtu/hr). VOC and HAP emissions are controlled by a natural gas fired catalytic oxidation unit rated at 1.0 million British thermal units per hour (MMBtu/hr), identified as E6022, before exhausting through stack S12.~~

(~~f~~**e**) Two (2) etching lines, identified as M2002 and M2027, capable of etching a total of 10,200 steel plates per hour, and having a maximum usage of 4 pounds of acid per hour. PM and PM10 emissions from these emission units are controlled by a packed tower scrubber before exhausting through stack S1.

(~~g~~**f**) Two (2) O.D. sanders, identified as M2010.1 and M2010.2, capable of sanding a total of 11,400 bonded assemblies per hour. PM and PM10 emissions from these emission units are controlled by baghouse M2024 before exhausting through stack S6.

(~~h~~g) Two (2) opposed disk grinders, identified as M2048 and M2049, capable of grinding a total of 19,000 friction assemblies per hour. PM and PM10 emissions from these emission units are controlled by baghouse M2024 before exhausting through stack S6.

(~~i~~h) One (1) heavy duty friction line, approved for construction in 2008, with a maximum capacity of 2,700.0 pounds per hour (lbs/hr), using one (1) fabric filter baghouse as control, identified as B1018, exhausting to stack S11 and consisting of the following;

(1) One (1) ID Grinder, identified as RM1210;

(2) One (1) OD Grinder, identified as RM1211;

(3) One (1) Blanchard Grinder, identified as RM1215;

(4) One (1) Mattison Grinder, identified as RM1216; and

(5) One (1) Mill Groover, identified as RM1220.

(~~j~~i) Two (2) opposed disk sanders, identified as M2048.1 and M2048.2, approved for construction in 2009, with a maximum capacity of 4000 pieces per hour each, using baghouse M2024 as control, and exhausting to stack S6;

(~~k~~j) One (1) high speed groover, identified as M2051, approved for construction in 2009, with a maximum capacity of 2000 pieces per hour, using baghouse M2024 as control, and exhausting to stack S6;

(~~l~~k) One (1) tree city groover, identified as M2055, approved for construction in 2009, with a maximum capacity of 6000 pieces per hour, using baghouse M2024 as control, and exhausting to stack S6; and

(~~m~~l) One (1) RUK groover, identified as M2053, approved for construction in 2009, with a maximum capacity of 2500 pieces per hour, using baghouse M2024 as control and exhausting to stack S6.

(~~n~~m) One (1) Laser Cutter LC1, installed in 2011, with a maximum capacity of 300 inches per minute, with particulate emissions controlled by dust collector, DC-4, exhausting inside.

...

SECTION D.1 FACILITY OPERATION CONDITIONS

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

...

~~(e) One (1) adhesive coating line, identified as RM1200, approved for construction in 2008, capable of coating 36.0 steel friction cores per hour. The adhesive is applied through a roll coater and then dried in a natural gas fired drying oven, identified as RM1201, rated at 1.2 million British thermal units per hour (MMBtu/hr). VOC and HAP emissions are controlled by a natural gas fired catalytic oxidation unit rated at 1.0 million British thermal units per hour (MMBtu/hr), identified as E6022, before exhausting through stack S12.~~

...

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

D.1.1 Miscellaneous Metal Coating Operations [326 IAC 8-2-9]

(a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), volatile organic compound (VOC) emissions from the coatings delivered to RM2002, RM5020, M2003,

**and** M2028 ~~and RM1200~~ shall be limited to 3.5 pounds of VOC per gallon of coating, less water, for coatings that are air dried or forced warm air dried.

...

(c) Pursuant to 326 IAC 8-1-2(c), the overall efficiency of the capture systems and control devices shall be no less than the equivalent calculated by the following equation:

...

~~(3) The overall efficiency of catalytic oxidation unit E6022, controlling emissions from adhesive coating line RM1200, shall be greater than or equal to 84.84% to comply with 326 IAC 8-1-2(c). However, this requirement is superseded by a more stringent requirement specified in D.1.2(c).~~

D.1.2 VOC and HAP Emission Limitations [326 IAC 2-8]

...

~~(c) The Permittee shall operate catalytic oxidation unit E6022, to control emissions from adhesive coating line RM1200, at 85% control efficiency, at a minimum.~~

...

Compliance Determination Requirements

D.1.4 Compliance Methods

...

~~(c) The Permittee shall vent emissions from adhesive coating line RM1200 and drying oven RM1201 to catalytic oxidation unit E6022.~~

D.1.5 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

Compliance stack tests shall be performed for each of the ~~three (3)~~ **two (2)** catalytic oxidation units at least once every five (5) years from the date of the previous valid compliance demonstration. The stack tests shall be performed utilizing Method 25 (40 CFR 60, Appendix A), or other methods as approved by the Commissioner.

...

SECTION D.2 FACILITY OPERATION CONDITIONS

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

(~~f~~**e**) Two (2) etching lines, identified as M2002 and M2027, capable of etching a total of 10,200 steel plates per hour, and having a maximum usage of 4 pounds of acid per hour. PM and $PM_{10}$ emissions from these emission units are controlled by a packed tower scrubber before exhausting through stack S1.

(~~g~~**f**) Two (2) O.D. sanders, identified as M2010.1 and M2010.2, capable of sanding a total of 11,400 bonded assemblies per hour. PM and $PM_{10}$ emissions from these emission units are controlled by baghouse M2024 before exhausting through stack S6.

(~~h~~**g**) Two (2) opposed disk grinders, identified as M2048 and M2049, capable of grinding a total of 19,000 friction assemblies per hour. PM and $PM_{10}$ emissions from these emission units are controlled by baghouse M2024 before exhausting through stack S6.

(~~i~~**h**) One (1) heavy duty friction line, approved for construction in 2008, with a maximum capacity of 2,700.0 pounds per hour (lbs/hr), using one (1) fabric filter baghouse as control, identified as B1018, exhausting to stack S11 and consisting of the following;

(1) One (1) ID Grinder, identified as RM1210;

(2) One (1) OD Grinder, identified as RM1211;

(3) One (1) Blanchard Grinder, identified as RM1215;

(4) One (1) Mattison Grinder, identified as RM1216; and

(5) One (1) Mill Groover, identified as RM1220;

(~~j~~**i**) Two (2) opposed disk sanders, identified as M2048.1 and M2048.2, approved for construction in 2009, with a maximum capacity of 4000 pieces per hour each, using baghouse M2024 as control, and exhausting to stack S6;

(~~k~~**j**) One (1) high speed groover, identified as M2051, approved for construction in 2009, with a maximum capacity of 2000 pieces per hour, using baghouse M2024 as control, and exhausting to stack S6;

(~~l~~**k**) One (1) tree city groover, identified as M2055, approved for construction in 2009, with a maximum capacity of 6000 pieces per hour, using baghouse M2024 as control, and exhausting to stack S6; and

(~~m~~**l**) One (1) RUK groover, identified as M2053, approved for construction in 2009, with a maximum capacity of 2500 pieces per hour, using baghouse M2024 as control and exhausting to stack S6.

(~~n~~**m**) One (1) Laser Cutter LC1, installed in 2011, with a maximum capacity of 300 inches per minute, with particulate emissions controlled by dust collector, DC-4, exhausting inside

...

...

**Additional Changes**

IDEM, OAQ made the additional revisions to the permit as described below in order to update the language to match the most current version of the applicable rule, to eliminate redundancy within the permit, and to provide clarification regarding the requirements of these conditions.

2. On October 27, 2010, The Indiana Air Pollution Control Board issued revisions to 326 IAC 2. These revisions resulted in changes to the rule sites listed in the permit. These changes are not changes to the underlining provisions. The change is only to site of these rules in Section B - Operation Flexibility. IDEM, OAQ has clarified the rule sites for the Preventive Maintenance Plan.

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

...

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

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) ~~through (d)~~ **and (c)** without a prior permit revision, if each of the following conditions is met:

...

(5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b) ~~through (d)~~ **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)(2), (c)(1), and (d)~~.

(b) Emission Trades [326 IAC 2-8-15(~~c~~**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(~~c~~**b**).

(c) Alternative Operating Scenarios [326 IAC 2-8-15(~~d~~**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.

...

3. IDEM, OAQ has clarified the Permittee's responsibility with regards to record keeping.

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

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. **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 operation conditions as existing at the time of sampling or measurement.**

...

4. IDEM, OAQ has clarified the interaction of the Quarterly Deviation and Compliance Monitoring Report and the Emergency Provisions.

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

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. **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.

...

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: | Raybestos Powertrain |
| Source Address: | 609 East Chaney Street, Sullivan, Indiana 47882, and<br>110 Industrial Drive, Sullivan, Indiana 47882 |
| FESOP Permit No.: | F153-20733-00015 |

Months: _____ to _____ Year: _____

Page 1 of 2

| |
|---|
| This report shall be submitted quarterly based on a calendar year. **Proper notice submittal under Section B - Emergency Provisions satisfies the report requirements of paragraph (1) 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. |
| ☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD. |
| ☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD |

...

5. IDEM, OAQ has decided to clarify Condition D.2.7 Parametric Monitoring.

D.2.7 Parametric Monitoring

(a) The Permittee shall record the pressure drop across baghouse M2024 at least once per day when any of the disk grinders, sanders, or groovers is in operation. ~~and venting to the atmosphere.~~ When for any one reading, the pressure drop across the baghouse is outside the **normal** range**, the Permittee shall take reasonable response. The normal range for this unit is a pressure drop between** ~~of~~ 0.4 to 3.5 inches of water **unless a different upper-bound or lower-bound value for this range is determined during the latest stack test.** ~~or range established during latest stack test, the Permittee shall take reasonable response.~~ Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response shall be considered a deviation from this permit.

(b) The Permittee shall record the pressure drop across baghouse B1018 at least once per day when any of the heavy duty friction line equipment is in operation. ~~and venting to the atmosphere.~~ When for any one reading, the pressure drop across the baghouse is outside the range**, the Permittee shall take reasonable response. The normal range for this unit is a pressure drop between** ~~of~~ 0.5 to 6.0 inches of water **unless a different upper-bound or lower-bound value for this** ~~or~~ range ~~established~~ **is**

**determined** during latest stack test~~,~~ **.** ~~the Permittee shall take reasonable response.~~ Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response shall be considered a deviation from this permit.

...

6. IDEM, OAQ has updated Condition D.2.8 Broken or Failed Bag Detection

D.2.8 Broken or Failed Bag Detection

In the event that bag failure has been observed:

~~(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.~~

**(a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).**

~~(b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).~~

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

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

...

7. IDEM, OAQ has clarified the requirements of Conditions D.1.3 and D.2.3 (Preventive Maintenance Plan).

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

A Preventive Maintenance Plan is required for the**se**~~is~~ facilit**ies**~~y~~ and the**ir** control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

...

D.2.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan is required for the**se**~~is~~ facilit**ies**~~y~~ and the**ir** control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

...

All other conditions of the permit shall remain unchanged and in effect. Attached please find the entire revised permit.

A copy of the permit is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/. 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

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Marcia Earl of my staff at 317-233-0863 or 1-800-451-6027, and ask for extension 3-0863.

Sincerely,

Nathan C. Bell, Section Chief
Permits Branch
Office of Air Quality

Attachments: Updated Permit

NB/me

cc: File - Sullivan County
Sullivan County Health Department
U.S. EPA, Region V
Compliance and Enforcement Branch

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**Michael R. Pence**
*Governor*

**Thomas W. Easterly**
*Commissioner*

# Federally Enforceable State Operating Permit (FESOP) Renewal
# OFFICE OF AIR QUALITY

## Raybestos Powertrain
## 609 East Chaney Street, Sullivan, Indiana 47882
## and
## 110 Industrial Drive, Sullivan, Indiana 47882

(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.
This permit also addresses certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-8-11.1, applicable to those conditions

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. F153-20733-00015 | |
|---|---|
| Issued by: Original signed by<br>Paul Dubenetzky, Branch Chief,<br>Office of Air Quality | Issuance Date: July 05, 2005<br><br>Expiration Date: July 05, 2015 |

First Significant Permit Revision No. 153-25848-00015, issued on May 30, 2008
First Administrative Amendment No. 153-26623-00015, issued on June 17, 2008
Second Administrative Amendment No. 153-26938-00015, issued on September 18, 2008
Third Administrative Amendment No. 153-27804-00015, issued June 19, 2009
Second Significant Permit Revision No. 153-28183-00015, issued September 17, 2009
Fourth Administrative Amendment No. 153-28542-00015, issued October 08, 2009
Fifth Administrative Amendment No. 153-29830-00015, issued March 24, 2011
Sixth Administrative Amendment No. 153-30657-00015, issued July 26,2011

| Seventh Administrative Amendment No. 153-33157-00015 | |
|---|---|
| Issued by:<br><br>Nathan C. Bell, Section Chief<br>Permits Branch, Office of Air Quality | Issuance Date: June 19, 2013<br><br>Expiration Date: July 05, 2015 |

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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.4 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 automotive clutch plate and transmission part manufacturing facility.

| | |
|---|---|
| Source Address: | 609 East Chaney Street, Sullivan, Indiana 47882 and<br>110 Industrial Drive, Sullivan, Indiana 47882 |
| General Source Phone Number: | 812-268-0322 |
| SIC Code: | 3714 (Motor Vehicle Parts and Accessories) |
| County Location: | Sullivan |
| Source Location Status: | Attainment for all criteria pollutants |
| Source Status: | Federally Enforceable State Operating Permit Program<br>Minor Source, under PSD Rules<br>Minor Source, Section 112 of the Clean Air Act<br>Not 1 of 28 Source Categories |

### A.2 Source Definition

The Raybestos Powertrain, LLC facilities located at 609 E Chaney Street and 110 Industrial Drive, Sullivan Indiana are considered one source and shall be referred to as Plant 1 and Plant 2, respectively.

### A.3 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:

Plant 1:

(a) One (1) adhesive coating line, identified as RM2002, capable of coating 625 torque rings per hour or 110 friction band pads per hour. The adhesive is applied through a curtain coater. VOC and HAP emissions are controlled by a natural gas fired catalytic oxidation unit rated at 1.0 million British thermal units per hour (MMBtu/hr), identified as RE6001, before exhausting through stack S10.

(b) One (1) yarn saturation line, identified as RM5020. The adhesive is applied through a dip coater. VOC emissions from the yarn saturation line are controlled by catalytic oxidation unit RE6001 before exhausting through stack S10.

(c) One (1) natural gas fired drying oven rated at 2.0 million Btu per hour. VOC and HAP emissions are controlled by catalytic oxidation unit RE6001 before exhausting through stack S10.

(d) Two (2) adhesive coating lines, identified as M2003 and M2028, which are capable of coating a total of 10,200 steel friction cores per hour. The adhesive is applied through roll coater. VOC and HAP emissions are controlled by a natural gas fired catalytic oxidation unit rated at 1.5 million British thermal units per hour (MMBtu/hr), identified as E6003, before exhausting through stack S2.

(e) Two (2) etching lines, identified as M2002 and M2027, capable of etching a total of 10,200 steel plates per hour, and having a maximum usage of 4 pounds of acid per hour. PM and PM10 emissions from these emission units are controlled by a packed tower scrubber before exhausting through stack S1.

(f) Two (2) O.D. sanders, identified as M2010.1 and M2010.2, capable of sanding a total of 11,400 bonded assemblies per hour. PM and PM10 emissions from these emission units are controlled by baghouse M2024 before exhausting through stack S6.

(g) Two (2) opposed disk grinders, identified as M2048 and M2049, capable of grinding a total of 19,000 friction assemblies per hour. PM and PM10 emissions from these emission units are controlled by baghouse M2024 before exhausting through stack S6.

(h) One (1) heavy duty friction line, approved for construction in 2008, with a maximum capacity of 2,700.0 pounds per hour (lbs/hr), using one (1) fabric filter baghouse as control, identified as B1018, exhausting to stack S11 and consisting of the following;

(1) One (1) ID Grinder, identified as RM1210;

(2) One (1) OD Grinder, identified as RM1211;

(3) One (1) Blanchard Grinder, identified as RM1215;

(4) One (1) Mattison Grinder, identified as RM1216; and

(5) One (1) Mill Groover, identified as RM1220.

(i) Two (2) opposed disk sanders, identified as M2048.1 and M2048.2, approved for construction in 2009, with a maximum capacity of 4000 pieces per hour each, using baghouse M2024 as control, and exhausting to stack S6;

(j) One (1) high speed groover, identified as M2051, approved for construction in 2009, with a maximum capacity of 2000 pieces per hour, using baghouse M2024 as control, and exhausting to stack S6;

(k) One (1) tree city groover, identified as M2055, approved for construction in 2009, with a maximum capacity of 6000 pieces per hour, using baghouse M2024 as control, and exhausting to stack S6; and

(l) One (1) RUK groover, identified as M2053, approved for construction in 2009, with a maximum capacity of 2500 pieces per hour, using baghouse M2024 as control and exhausting to stack S6.

(m) One (1) Laser Cutter LC1, installed in 2011, with a maximum capacity of 300 inches per minute, with particulate emissions controlled by dust collector, DC-4, exhausting inside.

Plant 2:

(n) One (1) Natural Gas-fired Washer, identified as EU-1, installed in 2006, with a maximum heat input of 0.30 MMBtu/hr, exhausting to Stack 13.

(o) Four (4) Small Timesaver Sanders, identified as EU-2, installed in 2006, with a combined maximum throughput of 20 feet per minute or 3000 tons of metal per year, with particulate emissions controlled by dust collector, DC-1, exhausting to Stack 14.

(p) Four (4) Large Timesaver Sanders, identified as EU-3, installed in 2006, with a combined maximum capacity of 30 feet per minute or 4500 tons of metal per year, with particulate emissions controlled by dust collector, DC-2, exhausting to Stack 15.

(q) One (1) Timesaver Sander, identified as EU-4, using a wet process, installed in 2006, with a maximum capacity of 8 feet per minute or 1200 tons of metal per year, with particulate emissions uncontrolled, exhausting inside the building.

(r) Laser Cutters, collectively identified as EU-5, and consisting of the following:

(a) Two (2) Laser Cutters, installed in 2006, with a maximum capacity of 300 inches per minute, with particulate emissions controlled by dust collector, DC-3, exhausting to Stack 16.

(b) One (1) Laser Cutter, installed in 2010, with a maximum capacity of 300 inches per minute, with particulate emissions controlled by dust collector, DC-3, exhausting to Stack 16.

A.4 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:

Plant 1:

(a) Various natural gas-fired heaters, burners, and ovens, including the incinerators with a total heat input capacity of 6.5 million Btu per hour.

(b) Various natural gas-fired space heaters, identified as ID5, with a combined maximum heat input capacity of 16 million British thermal units per hour (MMBtu/hr).

(c) Combustion source flame safety purging on startup.

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

(e) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughput less than 12,000 gallons.

(f) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

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

(h) Degreasing operations that do not exceed 145 gallons per 12 months, and are not subject to 326 IAC 20-6.

(i) Cleaners and solvents characterized as follows:

(1) Having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38 degrees C (100 F) or;

(2) Having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20 degrees C (680 F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

(j) The following equipment related to manufacturing activities not resulting in the emissions of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

(k) Closed loop heating and cooling systems.

(l) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.

(m) Any operation using aqueous solutions containing less than 1% by weight of VOC excluding HAP.

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

(o) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as bag filter or cyclone.

(p) Paved and unpaved roads and parking lots with public access.

(q) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks and fluid handling equipment.

(r) On-site fire and emergency response training approved by the department.

(s) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying and woodworking operations.

(t) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees C).

(u) A laboratory, as defined in 326 IAC 2-7-1(20)(C).

(v) Other activities, not previously identified, with emissions equal to or less than the insignificant thresholds:

(1) Three (3) induction bonders, identified as M2033, M2045 and M2046, with a total rate of 1,800 pounds of clutch per hour, venting to stack S3.

(2) Two (2) rotary bonders, identified as M2008, with a rate of 270 pounds per hour and M2009 with a rate of 230 pounds per hour, venting to stack S4 and stack S5, respectively.

(3) S-11 Bonding oven.

(4) S-7 Electric batch oven.

(5) One (1) degreaser, identified as RM6012, with two (2) compartments. One compartment has a capacity of 336 gallons of liquid wash and the other compartment has capacity of 336 gallons of liquid rinse. The degreaser has a 1.8 million Btu per hour liquid heater and 0.8 million Btu per hour dryer.

(6) Fugitive - steel blanking (die lubricant, rust prevention application).

(7) Two (2) paper blanking facilities, identified as M5001 and M5002, with a total capacity of 290 friction paper per hour, and 11,000 paper rings per hour. Particulate matter emissions are controlled by a cyclone before exhausting through stack S9.

Plant 2:

(w) Four (4) gear presses, installed in 2006, with a maximum combined capacity of 376 sheets per minute, with emissions uncontrolled, exhausting inside the building.

(x) Three (3) grinders, installed in 2006, with a maximum combined capacity of 60 cores per hour, with emissions uncontrolled, exhausting inside the building.

(y) One (1) laser marker, installed in 2006, with a maximum capacity of 10 pieces per minute, with emissions uncontrolled, exhausting inside the building.

(z) Four (4) small electric furnaces, installed in 2006, with emissions uncontrolled, exhausting inside the building.

(aa) One (1) oil dip tank, installed in 2006, with a maximum capacity of 30 gallons of oil, with emissions uncontrolled, exhausting inside the building.

(bb) Several gear shaping and grinding operations, installed in 2006, all using wet processes, with emissions uncontrolled, exhausting inside the building.

(cc) One (1) milling process, installed in 2006, with a maximum capacity of 300 revolutions per minute, with emissions uncontrolled, exhausting inside the building.

(dd) One (1) chiller, installed in 2006, with a maximum capacity of 13 gallons per minute, with emissions uncontrolled, exhausting inside the building.

(ee) One (1) citric acid dip tank, installed in 2006, with a maximum capacity of 700 gallons, containing a 90% water to 10% citric acid solution, with emissions uncontrolled, exhausting inside the building.

## A.5 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) for 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, F153-20733-00015, 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. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent 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) If required by specific condition(s) in Section D of this permit, 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.

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

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

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

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

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly

signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

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

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

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

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

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

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

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

(A) A description of the emergency;

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

(C) Corrective actions taken.

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

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

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

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

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

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

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

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

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

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

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

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

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

(a) All terms and conditions of permits established prior to F153-27804-00015 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) 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 Advanced Source Modification Approval [326 IAC 2-8-4(11)] [326 IAC 2-1.1-9]

(a) The requirements to obtain a permit modification under 326 IAC 2-8-11.1 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3.

(b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction, work is suspended for a continuous period of one (1) year or more.

B.24 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

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

**SECTION C** **SOURCE OPERATION CONDITIONS**

Entire Source

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

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

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

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

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

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

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

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

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

C.3 Opacity [326 IAC 5-1]

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

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

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A,

Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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

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

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

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

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

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

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

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

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

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

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

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

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

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

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management
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 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval 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 ninety (90) days after the date of issuance of this permit.

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

(c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

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

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

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

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

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall 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.17 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. 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 operation conditions as existing at the time of sampling or measurement.

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

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. 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) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. 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.19 Compliance with 40 CFR 82 and 326 IAC 22-1

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

## SECTION D.1 FACILITY OPERATION CONDITIONS

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

(a) One (1) adhesive coating line, identified as RM2002, capable of coating 625 torque rings per hour or 110 friction band pads per hour. The adhesive is applied through a curtain coater. VOC and HAP emissions are controlled by a natural gas fired catalytic oxidation unit rated at 1.0 million British thermal units per hour (MMBtu/hr), identified as RE6001, before exhausting through stack S10.

(b) One (1) yarn saturation line, identified as RM5020. The adhesive is applied through a dip coater. VOC emissions from the yarn saturation line are controlled by catalytic oxidation unit RE6001 before exhausting through stack S10.

(c) One (1) natural gas fired drying oven rated at 2.0 million Btu per hour. VOC and HAP emissions are controlled by catalytic oxidation unit RE6001 before exhausting through stack S10.

(d) Two (2) adhesive coating lines, identified as M2003 and M2028, which are capable of coating a total of 10,200 steel friction cores per hour. The adhesive is applied through roll coater. VOC and HAP emissions are controlled by a natural gas fired catalytic oxidation unit rated at 1.5 million British thermal units per hour (MMBtu/hr), identified as E6003, before exhausting through stack S2.

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

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

D.1.1 Miscellaneous Metal Coating Operations [326 IAC 8-2-9]

(a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), volatile organic compound (VOC) emissions from the coatings delivered to RM2002, RM5020, M2003, and M2028 shall be limited to 3.5 pounds of VOC per gallon of coating, less water, for coatings that are air dried or forced warm air dried.

(b) Pursuant to 326 IAC 8-1-2(b), the VOC emissions shall be limited to no greater than the equivalent emissions, expressed as pounds of VOC per gallon of coating solids, allowed in (a). This equivalency is determined by the following equation:

$$E = L / (1 – (L/D))$$

Where:
L = Applicable emission limit in pounds of VOC per gallon of coating.
D = Density of VOC in coating in pounds per gallon of VOC.
E = Equivalent limit in pounds of VOC per gallon of coating solids as applied.

A solvent density of 7.36 pounds of VOC per gallon shall be used to determine equivalent pounds of VOC per gallon of solids for the applicable emission limit. For an emission limit of 3.5 pounds of VOC per gallon of coating, this equation provides an equivalent emission limit of 6.67 pounds of VOC per gallon of solids.

(c) Pursuant to 326 IAC 8-1-2(c), the overall efficiency of the capture systems and control devices shall be no less than the equivalent calculated by the following equation:

$$O = (V – E) / V * 100$$

Where:

V = The actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content of all coatings, as applied to the subject coating line as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids as applied.

E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.

O = Equivalent overall efficiency of the capture system and control device as a percentage.

(1) The overall efficiency of catalytic oxidation unit RE6001, to comply with 326 IAC 8-1-2(c), shall be as follows:

(A) when controlling emissions from adhesive coating line RM2002:

(i) for adhesive coating of Band Pads, shall be greater than or equal to 81.38%;

(ii) for adhesive coating of Torque Rings, shall be greater than or equal to 81.35%; and

(B) when controlling emissions from yarn saturation line RM5020, shall be greater than or equal to 32.28%.

However, this requirement is superseded by a more stringent requirement specified in D.1.2(a).

(2) The overall efficiency of catalytic oxidation unit E6003, controlling emissions from adhesive coating lines M2003 and M2028, shall be greater than or equal to 80.15% to comply with 326 IAC 8-1-2(c). However, this requirement is superseded by a more stringent requirement specified in D.1.2(b).

D.1.2 VOC and HAP Emission Limitations [326 IAC 2-8]

(a) The Permittee shall operate catalytic oxidation unit RE6001, to control emissions from adhesive coating line RM2002 and yarn saturation line RM5020, at 85% control efficiency, at a minimum.

(b) The Permittee shall operate catalytic oxidation unit E6003, to control emissions from adhesive coating lines M2003 and M2028, at 85% control efficiency, at a minimum.

Compliance with these limits, combined with the potential to emit of VOCs and HAPs from all other emission units at this source, shall limit the source-wide total potential to emit of VOCs 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)), and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP) not applicable.

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

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

**Compliance Determination Requirements**

D.1.4 Compliance Methods

Pursuant to 326 IAC 8-1-2(a), the Permittee shall comply with the requirements of 326 IAC 8-2-9 using catalytic incineration.

(a) The Permittee shall vent emission units RM2002 and RM5020 and the drying oven to catalytic oxidation unit RE6001.

(b) The Permittee shall vent emission units M2003 and M2028 to catalytic oxidation unit E6003.

D.1.5 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

Compliance stack tests shall be performed for each of the two (2) catalytic oxidation units at least once every five (5) years from the date of the previous valid compliance demonstration. The stack tests shall be performed utilizing Method 25 (40 CFR 60, Appendix A), or other methods as approved by the Commissioner.

D.1.6 Capture System

The volatile organic compound (VOC) capture systems for each of the adhesive coating lines shall meet the criteria of a permanent total enclosure. Permanent total enclosure is defined as a permanently installed enclosure that completely surrounds a source of emissions such that all VOC emissions are captured and contained for discharge through a control device:

(a) Natural Draft Opening (NDO) is defined as any permanent opening in the enclosure that remains open during operation of the facility and is not connected to a duct in which a fan is installed. Any NDO shall be at least four (4) equivalent opening diameters from each VOC emitting point.

(b) The total area of all NDOs shall not exceed five (5) percent of the surface area of the enclosure's four walls, floor, and ceiling.

(c) The average facial velocity (FV) of air through all NDOs shall be at least 3,600 m/hr (200 fpm). The direction of air through all NDOs shall be into the enclosure.

(d) All access doors and windows whose areas are not included in condition (b) and are not included in the calculation in condition (c) shall be closed during routine operation of the process.

(e) All VOC emissions must be captured and contained for discharge through a control device.

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

D.1.7 Continuous Monitoring System Required

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the catalytic oxidation units for measuring operating temperature. The output of this system shall be recorded as an hourly average. The Permittee shall take appropriate response whenever the hourly average temperature is below the minimum. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. An hourly average temperature that is below the minimum is not a deviation from this permit. Failure to take response shall be considered a deviation from this permit.

(b) The Permittee shall determine the hourly average temperature from the most recent valid stack test that demonstrates compliance with limits in Condition D.1.1.

(c) The Permittee shall take appropriate response whenever the hourly average temperature is below the hourly average temperature as observed during the compliant stack test. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. An hourly average temperature that is below the hourly average temperature as observed during the compliant stack test is not a deviation from this permit. Failure to take response shall be considered a deviation from this permit.

D.1.8 Parametric Monitoring

(a) The Permittee shall determine fan amperage or duct pressure from the most recent valid stack test that demonstrates compliance with limits in Condition D.1.1.

(b) The duct pressure or fan amperage shall be observed at least once per day when the catalytic oxidation units are operation. When for any one reading, the duct pressure or fan amperage is outside the normal range as established in most recent compliant stack test, the Permittee shall take reasonable response. Section C -Response to Excursions or Exceedances - contains the Permittee's obligation with regard to the reasonable response steps required by this condition.. A reading that is outside the range as established in the most recent compliant stack test is not a deviation from this permit. Failure to take response shall be considered a deviation from this permit.

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

D.1.9 Record Keeping Requirements

(a) To document the compliance status with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC and HAP emission limits:

(1) The amount, VOC content and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

(2) The total VOC and HAP usage for each month.

(3) The weight of VOC and HAP emitted for each compliance period.

(4) The continuous temperature records for the catalytic oxidation units.

(5) Records of the duct pressure and fan amperage.

(b) To document the compliance status with Condition D.1.5, the Permittee shall maintain a copy of the compliance stack test results which established the operating temperature, fan amperage, and duct velocity that correspond to the required minimum control efficiency.

(c) Section C - General Record Keeping Requirements, of this permit contains the Permittee’s obligations with regard to the records required by this condition.

## SECTION D.2 FACILITY OPERATION CONDITIONS

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

(e) Two (2) etching lines, identified as M2002 and M2027, capable of etching a total of 10,200 steel plates per hour, and having a maximum usage of 4 pounds of acid per hour. PM and $PM_{10}$ emissions from these emission units are controlled by a packed tower scrubber before exhausting through stack S1.

(f) Two (2) O.D. sanders, identified as M2010.1 and M2010.2, capable of sanding a total of 11,400 bonded assemblies per hour. PM and $PM_{10}$ emissions from these emission units are controlled by baghouse M2024 before exhausting through stack S6.

(g) Two (2) opposed disk grinders, identified as M2048 and M2049, capable of grinding a total of 19,000 friction assemblies per hour. PM and $PM_{10}$ emissions from these emission units are controlled by baghouse M2024 before exhausting through stack S6.

(h) One (1) heavy duty friction line, approved for construction in 2008, with a maximum capacity of 2,700.0 pounds per hour (lbs/hr), using one (1) fabric filter baghouse as control, identified as B1018, exhausting to stack S11 and consisting of the following;

(1) One (1) ID Grinder, identified as RM1210;

(2) One (1) OD Grinder, identified as RM1211;

(3) One (1) Blanchard Grinder, identified as RM1215;

(4) One (1) Mattison Grinder, identified as RM1216; and

(5) One (1) Mill Groover, identified as RM1220;

(i) Two (2) opposed disk sanders, identified as M2048.1 and M2048.2, approved for construction in 2009, with a maximum capacity of 4000 pieces per hour each, using baghouse M2024 as control, and exhausting to stack S6;

(j) One (1) high speed groover, identified as M2051, approved for construction in 2009, with a maximum capacity of 2000 pieces per hour, using baghouse M2024 as control, and exhausting to stack S6;

(k) One (1) tree city groover, identified as M2055, approved for construction in 2009, with a maximum capacity of 6000 pieces per hour, using baghouse M2024 as control, and exhausting to stack S6; and

(l) One (1) RUK groover, identified as M2053, approved for construction in 2009, with a maximum capacity of 2500 pieces per hour, using baghouse M2024 as control and exhausting to stack S6.

(m) One (1) Laser Cutter LC1, installed in 2011, with a maximum capacity of 300 inches per minute, with particulate emissions controlled by dust collector, DC-4, exhausting inside

Plant 2

(r) Laser Cutters, collectively identified as EU-5, and consisting of the following:

(a) Two (2) Laser Cutters, installed in 2006, with a maximum capacity of 300 inches per minute, with particulate emissions controlled by dust collector, DC-3, exhausting to Stack 16.

(b) One (1) Laser Cutter, installed in 2010, with a maximum capacity of 300 inches per minute, with particulate emissions controlled by dust collector, DC-3, exhausting to Stack 16.

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

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

D.2.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate for process weight rates up to 60,000 pounds per hour shall be accomplished by use of the following equation:

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

(a) For etching lines M2002 and M2027, with a process weight rate of 0.51 tons per hour, the equation provides an emission limit of 2.61 pounds per hour.

(b) For O.D. sanders M2010.1 and M2010.2, with a process weight rate of 0.57 tons per hour, the equation provides an emission limit of 2.81 pounds per hour.

(c) For opposed disk grinders M2048 and M2049, with a process weight rate of 0.95 tons per hour, the equation provides an emission limit of 3.96 pounds per hour.

(d) For heavy duty friction line, including; RM1210, RM1211, RM1215, RM1216, and RM1220, with a process weight rate of 1.35 tons per hour, the equation provides an emission limit of 5.01 pounds per hour.

(e) For O.D. sander, M2048.1, with a process weight rate of 1.66 tons per hour, the equation provides an emission limit of 1.58 pounds per hour.

(f) For O.D. sander, M2048.2, with a process weight rate of 1.66 tons per hour, the equation provides an emission limit of 1.58 pounds per hour.

(g) For High Speed Groover, M2051, with a process weight rate of 0.12 tons per hour, the equation provides an emission limit of 4.34 pounds per hour.

(h) For Tree Groover, M2055, with a process weight rate of 0.36 tons per hour, the equation provides an emission limit of 9.20 pounds per hour.

(i) For RUK Groover, M2053, with a process weight rate of 0.15 tons per hour, the equation provides an emission limit of 5.04 pounds per hour.

(j) For each laser cutter, with a process weight rate of 0.15 tons per hour, the equation provides an emission limit of 5.04 pounds per hour.

(k) For laser cutter LC1, with a process weight rate of 0.15 tons per hour, the equation provides an emission limit of 5.04 pounds per hour.

D.2.2 PM, $PM_{10}$ and HAP Emission Limitations [326 IAC 2-8] [326 IAC 2-2]

(a) Hydrochloric acid mist emissions from etching lines M2002 and M2027 shall not exceed 0.45 pounds per hour.

(b) PM and PM10 emissions from Baghouse M2024, controlling O.D. sanders M2010.1 and M2010.2, opposed disk grinders M2048 and M2049, O.D. sanders M2048.1 and M2048.2, High Speed Groover M2051, Tree Groover M2055, and RUK Groover M2053, shall not exceed 14.17 pounds per hour.

(c) PM and PM10 emissions from Baghouse B1018, controlling the heavy duty friction line, including; RM1210, RM1211, RM1215, RM1216 and RM1220, shall not exceed 5.01 pounds per hour.

Compliance with the limitations established in this condition shall render 326 IAC 2-7 (Part 70) and 326 IAC 2-2 (PSD) as not applicable for PM, $PM_{10}$ and HAP emissions.

D.2.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

**Compliance Determination Requirements**

D.2.4 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

(a) In order to demonstrate compliance with Condition D.2.2, the Permittee shall perform PM/PM10 testing for the baghouse M2024 , no later than 60 days after achieving the maximum production from units M2048.1, M2048.2, M2051, M2055, and M2053, but not later than 180 days after initial startup of these units. These tests shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition. PM10 includes filterable and condensable PM10.

(b) The Permittee shall perform PM and PM10 testing on each of the baghouse B1018, at least once every five (5) years from the date of the previous valid compliance demonstration, utilizing Methods 201 or 201A and 202 (40 CFR 51, Appendix M) or other methods as approved by the Commissioner. PM10 includes filterable and condensible PM10.

D.2.5 Particulate Control

(a) In order to comply with Conditions D.2.1 (j) and (k), the dust collectors DC-3 and DC-4, associated with the laser cutting operations to control particulate emissions, shall be in operation at all times that the units are in operation.

(b) In the event that DC-3 and DC-4 failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

D.2.6 Visible Emissions Notations

(a) Visible emission notations of each of the baghouses, M2024 and B1018, stack exhaust shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

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

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

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

(e) If abnormal emissions are observed, the Permittee shall take reasonable response. 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.

D.2.7 Parametric Monitoring

(a) The Permittee shall record the pressure drop across baghouse M2024 at least once per day when any of the disk grinders, sanders, or groovers is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range, the Permittee shall take reasonable response. The normal range for this unit is a pressure drop between 0.4 to 3.5 inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response shall be considered a deviation from this permit.

(b) The Permittee shall record the pressure drop across baghouse B1018 at least once per day when any of the heavy duty friction line equipment is in operation. When for any one reading, the pressure drop across the baghouse is outside the range, the Permittee shall take reasonable response. The normal range for this unit is a pressure drop between 0.5 to 6.0 inches of water unless a different upper-bound or lower-bound value for this range is determined during latest stack test. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months.

D.2.8 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately

until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

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

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

D.2.9 Record Keeping Requirements

(a) To document the compliance status with Condition D.2.6, the Permittee shall maintain records of daily visible emission notations of each of the baghouses, M2024 and B1018. The Permittee shall include in each daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the process did not operate that day).

(b) To document the compliance status with Condition D.2.7, the Permittee shall maintain daily records of the pressure drop across each of the baghouses, M2024 and B1018. The Permittee shall include in each daily record when the pressure drop is not taken and the reason for the lack of visible emission notation (e.g., the process did not operate that day).

(c) Section C - General Record Keeping Requirements, of this permit contains the Permittee's obligations with regard to the records required by this condition.

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
# OFFICE OF AIR QUALITY

## FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Raybestos Powertrain
Source Address: 609 East Chaney Street, Sullivan, Indiana 47882, and
110 Industrial Drive, Sullivan, Indiana 47882
FESOP Permit No.: F153-20733-00015

**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: Raybestos Powertrain
Source Address: 609 East Chaney Street, Sullivan, Indiana 47882, and
110 Industrial Drive, Sullivan, Indiana 47882
FESOP Permit No.: F153-20733-00015

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

□ This is an emergency as defined in 326 IAC 2-7-1(12)

- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance and Enforcement Branch); 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<br>Describe: |
| Type of Pollutants Emitted: TSP, PM-10, $SO_2$, VOC, $NO_X$, CO, Pb, other: |
| Estimated amount of pollutant(s) emitted during emergency: |
| Describe the steps taken to mitigate the problem: |
| Describe the corrective actions/response steps taken: |
| Describe the measures taken to minimize emissions: |
| If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value: |

Form Completed by:_____

Title / Position:_____

Date:_____

Phone: _____

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

Source Name: Raybestos Powertrain
Source Address: 609 East Chaney Street, Sullivan, Indiana 47882, and
110 Industrial Drive, Sullivan, Indiana 47882
FESOP Permit No.: F153-20733-00015

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

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B - Emergency provisions satisfies the report requirements of paragraph (1) 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".

☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

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

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

| | |
|---|---|
| **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: _____

**Appendix A: Emissions Calculations**
**Summary Before Amendment**



**Company Name:** Raybestos Powertrain
**Address City IN Zip:** 609 E Chaney Street and 110 Industrial Park Drive, Sullivan, IN 47882
**Administrative Amendment FESOP Permit No.:** 153-33157-00015
**Reviewer:** Marcia Earl
**Date:** May 2013

**Uncontrolled/ Unlimited**

| Emission Unit | PM (tons/yr) | PM10 (tons/yr) | PM2.5 (tons/yr) | SO2 (tons/yr) | NOx (tons/yr) | VOC (tons/yr) | CO (tons/yr) | GHGs (tons/yr) | Total HAP (tons/yr) | Single Worst HAP (tons/yr) | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| Adhesive Coating (RM2002, M2003, M2028, RM1200) | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 436.79 | 0.00 | 0.00 | 26.03 | 13.66 | toluene |
| Yarn Saturation (RM5020) | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 6.67 | 0.00 | 0.00 | 1.13 | 1.00 | phenol |
| Existing Grinding and Sanding | 468.71 | 468.71 | 468.71 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | --- |
| Etching Operations | 6.20 | 6.20 | 6.20 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 6.20 | 6.20 | HCl |
| NG Combustion | 0.22 | 0.88 | 0.88 | 0.07 | 11.61 | 0.64 | 9.75 | 14013 | 0.21 | 0.20 | hexane |
| EU-1 | 0.00 | 0.01 | 0.01 | 0.00 | 0.13 | 0.01 | 0.11 | 0.00 | negl. | negl. | hexane |
| EU-2 | 0.02 | 0.02 | 0.02 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | --- |
| EU-3 | 0.01 | 0.01 | 0.01 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | --- |
| EU-4 | 3.41 | 3.41 | 3.41 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | --- |
| EU-5 | 6.64 | 6.64 | 6.64 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | --- |
| Chaney LC1 laser | 2.21 | 2.21 | 2.21 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | --- |
| M2048.1 | 67.21 | 67.21 | 67.21 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | --- |
| M2048.2 | 67.21 | 67.21 | 67.21 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | --- |
| M2051 | 22.79 | 22.79 | 22.79 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | --- |
| M2055 | 68.37 | 68.37 | 68.37 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | --- |
| M2053 | 28.49 | 28.49 | 28.49 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | --- |
| **Total** | **741.49** | **742.16** | **742.16** | **0.07** | **11.74** | **444.11** | **9.86** | **14013** | **33.57** | **13.66** | **toluene** |

**Controlled/ Limited**

| Emission Unit | PM (tons/yr) | PM10 (tons/yr) | PM2.5 (tons/yr) | SO2 (tons/yr) | NOx (tons/yr) | VOC (tons/yr) | CO (tons/yr) | GHGs (tons/yr) | Total HAP (tons/yr) | Single Worst HAP (tons/yr) | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| Adhesive Coating (RM2002, M2003, M2028, RM1200) | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 58.04 | 0.00 | 0.00 | 3.87 | 2.05 | phenol |
| Yarn Saturation (RM5020) | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 1.00 | 0.00 | 0.00 | 0.17 | 0.15 | phenol |
| Existing Grinding and Sanding | 51.59 | 51.59 | 51.59 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | --- |
| Etching Operations | 1.97 | 1.97 | 1.97 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 1.97 | 1.97 | HCl |
| NG Combustion | 0.22 | 0.88 | 0.88 | 0.07 | 11.04 | 0.64 | 9.78 | 14013 | 0.16 | 0.20 | hexane |
| EU-1 | 0.00 | 0.01 | 0.01 | 0.00 | 0.13 | 0.01 | 0.11 | 0.00 | negl. | negl. | hexane |
| EU-2 | 0.02 | 0.02 | 0.02 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | --- |
| EU-3 | 0.02 | 0.02 | 0.02 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | --- |
| EU-4 | 0.01 | 0.01 | 0.01 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | --- |
| EU-5 | 6.64 | 6.64 | 6.64 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | --- |
| Chaney LC1 laser | 2.21 | 2.21 | 2.21 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | --- |
| M2048.1 * | 6.90 | 6.90 | 6.90 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | --- |
| M2048.2 * | 6.90 | 6.90 | 6.90 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | --- |
| M2051 * | 4.30 | 4.30 | 4.30 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | --- |
| M2055 * | 9.10 | 9.10 | 9.10 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | --- |
| M2053 * | 5.04 | 5.04 | 5.04 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | --- |
| **Total** | **94.92** | **95.58** | **95.58** | **0.07** | **11.17** | **59.69** | **9.89** | **14013** | **6.17** | **2.20** | **phenol** |

* Particulate Emssions are limited pursuant to 326 IAC 6-3, use of a baghouse is required for all sanders and groovers to comply with this limit

**Appendix A: Emissions Calculations**
**Summary After Amendment**



**Company Name:** Raybestos Powertrain
**Address City IN Zip:** 609 E Chaney Street and 110 Industrial Park Drive, Sullivan, IN 47882
**Administrative Amendment FESOP Permit No.:** 153-33157-00015
**Reviewer:** Marcia Earl
**Date:** May 2013

**Uncontrolled/ Unlimited**

| Emission Unit | PM (tons/yr) | PM10 (tons/yr) | PM2.5 (tons/yr) | SO2 (tons/yr) | NOx (tons/yr) | VOC (tons/yr) | CO (tons/yr) | **GHGs (tons/yr) | Total HAP (tons/yr) | Single Worst HAP (tons/yr) | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| Adhesive Coating (RM2002) | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 200.91 | 0.00 | 0.00 | 16.39 | 13.66 | phenol |
| Adhesive Coating (M2003/M2028) | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 49.86 | 0.00 | 0.00 | 3.07 | 2.83 | methanol |
| Yarn Saturation (RM5020) | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 6.67 | 0.00 | 0.00 | 1.13 | 1.00 | phenol |
| Existing Grinding and Sanding | 468.71 | 468.71 | 468.71 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | --- |
| Etching Operations | 6.20 | 6.20 | 6.20 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 6.20 | 6.20 | HCl |
| NG Combustion | 0.22 | 0.89 | 0.89 | 0.07 | 11.72 | 0.64 | 9.85 | 14,153 | 0.22 | 0.21 | hexane |
| EU-1 | 0.00 | 0.01 | 0.01 | 0.00 | 0.13 | 0.01 | 0.11 | 0.00 | negl. | negl. | hexane |
| EU-2 | 0.02 | 0.02 | 0.02 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | --- |
| EU-3 | 0.01 | 0.01 | 0.01 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | --- |
| EU-4 | 3.41 | 3.41 | 3.41 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | --- |
| EU-5 | 6.64 | 6.64 | 6.64 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | --- |
| Chaney LC1 laser | 2.21 | 2.21 | 2.21 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | --- |
| M2048.1 | 67.21 | 67.21 | 67.21 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | --- |
| M2048.2 | 67.21 | 67.21 | 67.21 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | --- |
| M2051 | 22.79 | 22.79 | 22.79 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | --- |
| M2055 | 68.37 | 68.37 | 68.37 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | --- |
| M2053 | 28.49 | 28.49 | 28.49 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | --- |
| **Total** | **741.50** | **742.18** | **742.18** | **0.07** | **11.85** | **258.09** | **9.96** | **14,153** | **27.01** | **14.66** | **phenol** |

**Controlled/ Limited**

| Emission Unit | PM (tons/yr) | PM10 (tons/yr) | PM2.5 (tons/yr) | SO2 (tons/yr) | NOx (tons/yr) | VOC (tons/yr) | CO (tons/yr) | GHGs (tons/yr) | Total HAP (tons/yr) | Single Worst HAP (tons/yr) | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| Adhesive Coating (RM2002) | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 30.14 | 0.00 | 0.00 | 2.46 | 2.05 | phenol |
| Adhesive Coating (M203,M2028) | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 7.48 | 0.00 | 0.00 | 0.46 | 0.43 | methanol |
| Yarn Saturation (RM5020) | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 1.00 | 0.00 | 0.00 | 0.17 | 0.15 | phenol |
| Existing Grinding and Sanding | 51.59 | 51.59 | 51.59 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | --- |
| Etching Operations | 1.97 | 1.97 | 1.97 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 1.97 | 1.97 | HCl |
| NG Combustion | 0.22 | 0.89 | 0.89 | 0.07 | 11.72 | 0.64 | 9.85 | 14153 | 0.22 | 0.20 | hexane |
| EU-1 | 0.00 | 0.01 | 0.01 | 0.00 | 0.13 | 0.01 | 0.11 | 0.00 | negl. | negl. | hexane |
| EU-2 | 0.02 | 0.02 | 0.02 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | --- |
| EU-3 | 0.02 | 0.02 | 0.02 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | --- |
| EU-4 | 0.01 | 0.01 | 0.01 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | --- |
| EU-5 | 6.64 | 6.64 | 6.64 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | --- |
| Chaney LC1 laser | 2.21 | 2.21 | 2.21 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | --- |
| M2048.1 * | 6.90 | 6.90 | 6.90 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | --- |
| M2048.2 * | 6.90 | 6.90 | 6.90 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | --- |
| M2051 * | 4.30 | 4.30 | 4.30 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | --- |
| M2055 * | 9.10 | 9.10 | 9.10 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | --- |
| M2053 * | 5.04 | 5.04 | 5.04 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | --- |
| **Total** | **94.92** | **95.59** | **95.59** | **0.07** | **11.85** | **39.27** | **9.96** | **14,153** | **5.28** | **2.20** | **phenol** |

* Particulate Emssions are limited pursuant to 326 IAC 6-3, use of a baghouse is required for all sanders and groovers to comply with this limit

**Appendix A: Emissions Calculations**
**Revised Emission Units Only**
**Adhesive Coating Operations - RM2002**
**Catalytic Oxidizer RE6001**

**Company Name:** Raybestos Powertrain
**Address City IN Zip:** 609 E Chaney Street and 110 Industrial Park Drive, Sullivan, IN 47882
**Administrative Amendment FESOP Permit No.:** 153-33157-00015
**Reviewer:** Marcia Earl
**Date:** May 2013

| Material | Density (Lb/Gal) | Weight % Volatile ($H_2O$ & Organics) | Weight % Water | Weight % Organics | Volume % Water | Volume % Non-Volatiles (solids) | Gal of Mat. (gal/unit) | Maximum (unit/hour) | Pounds VOC per gallon of coating less water | Pounds VOC per gallon of coating | Potential VOC pounds per hour | Potential VOC pounds per day | Potential VOC tons per year | Particulate Potential (ton/yr) | lb VOC/gal solids | Transfer Efficiency |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Band Pads** | | | | | | | | | | | | | | | | |
| Adhesive: PL700 | 7.60 | 73.55% | 0.00% | 73.55% | 0.00% | 22.00% | 0.07460 | 110 | 5.59 | 5.59 | 45.87 | 1100.88 | 200.91 | 0.00 | 25.41 | 100% |
| Total for Band Pads | | | | | | | | | | | 45.87 | 1100.88 | 200.91 | 0.00 | | |
| **Torque Rings** | | | | | | | | | | | | | | | | |
| Adhesive: PL700 | 7.60 | 73.55% | 0.00% | 73.55% | 0.00% | 22.00% | 0.00560 | 625 | 5.59 | 5.59 | 19.56 | 469.54 | 85.69 | 0.00 | 25.41 | 100% |
| Total for Torque Rings | | | | | | | | | | | 19.56 | 469.54 | 85.69 | 0.00 | | |

State VOC and PM Potential Emissions

| | | | | |
|---|---|---|---|---|
| "Worst Case" Uncontrolled Emissions = | 45.87 | 1100.88 | 200.91 | 0.00 |
| Catalytic Oxidizer RE6001 Control Efficiency = | | | 85.0% | |
| **Total "Worst Case" VOC Emissions after controls/limits (tons/yr) =** | | | **30.14** | |
| **326 IAC 2-8 FESOP VOC Emission Limitation (lbs/hr) =** | | | **45.87** | |

**METHODOLOGY**
Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used
326 IAC 2-8 FESOP VOC Emission Limitation (lbs/hr) = "Worst Case" Uncontrolled VOC Emissions (lb/hr) * 1 - Control Efficiency

| Material | Density (Lb/Gal) | Gallons of Material (gal/unit) | Maximum (unit/hour) | Weight % Formaldehyde | Weight % Phenol | Emissions Formaldehyde (ton/yr) | Emissions Phenol (ton/yr) |
|---|---|---|---|---|---|---|---|
| **Band Pads** | | | | | | | |
| Adhesive: PL700 | 7.60 | 0.07460 | 110 | 1.00% | 5.00% | 2.73 | 13.66 |
| Total for Band Pads | | | | | | 2.73 | 13.66 |
| **Torque Rings** | | | | | | | |
| Adhesive: PL700 | 7.60 | 0.00560 | 625 | 1.00% | 5.00% | 1.17 | 5.83 |
| Total for Torque Rings | | | | | | 1.17 | 5.83 |

State HAP Potential Emissions

| | | | | |
|---|---|---|---|---|
| **Worst Case Uncontrolled HAP Emissions (ton/yr) =** | **2.73** | **13.66** | **Total** | **16.39** |
| Catalytic Oxidizer Control Efficiency = | 85.0% | | | |
| **"Worst Case" HAP Emissions after controls/limits (tons/yr) =** | **0.41** | **2.05** | **Total** | **2.46** |
| **326 IAC 2-8 FESOP VOC Emission Limitation (lbs/hr) =** | | | | **0.56** |

**METHODOLOGY**
HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * (8760 hrs/yr) * (1 ton/2000 lbs)
326 IAC 2-8 FESOP HAP Emissions (lbs/hr) = "Worst Case" HAP Emissions after controls/limits (tons/yr) * (1 yr/8760 hrs) * (2000lbs/1 ton)

**Appendix A: Emissions Calculations**
**Revised Emission Units Only**
**Adhesive Coating Operations - M2003/M2028**
**Catalytic Oxidizer E6003**

**Company Name:** Raybestos Powertrain
**Address City IN Zip:** 609 E Chaney Street and 110 Industrial Park Drive, Sullivan, IN 47882
**Administrative Amendment FESOP Permit No.:** 153-33157-00015
**Reviewer:** Marcia Earl
**Date:** May 2013

| Material | Density (Lb/Gal) | Weight % Volatile ($H_20$ & Organics) | Weight % Water | Weight % Organics | Volume % Water | Volume % Non-Volatiles (solids) | Gal of Mat. (gal/unit) | Maximum (unit/hour) | Pounds VOC per gallon of coating less water | Pounds VOC per gallon of coating | Potential VOC pounds per hour | Potential VOC pounds per day | Potential VOC tons per year | Particulate Potential (ton/yr) | lb VOC/gal solids | Transfer Efficiency |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| R84048/Ethanol | 7.5 | 76.00% | 1.6% | 74.4% | 1.4% | 16.60% | 0.00020 | 10200.000 | 5.66 | 5.58 | 11.38 | 273.20 | 49.86 | 0.00 | 33.61 | 100% |

State VOC and PM Potential Emissions

"Worst Case" Uncontrolled Emissions = 11.38 273.20 49.86 0.00
Catalytic Oxidizer E6003 Control Efficiency = 85.0%
**Total VOC Emissions after controls/limits (tons/yr) = 7.48**

**326 IAC 2-8 FESOP VOC Emission Limitation (lbs/hr) = 11.38**

**METHODOLOGY**
Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
326 IAC 2-8 FESOP VOC Emission Limitation (lbs/hr) = "Worst Case" Uncontrolled VOC Emissions (lb/hr) * 1 - Control Efficiency

| Material | Density (Lb/Gal) | Gallons of Material (gal/unit) | Maximum (unit/hour) | Weight % Methanol | Weight % Formaldehyde | Emissions Methanol (ton/yr) | Emissions Formaldehyde (ton/yr) |
|---|---|---|---|---|---|---|---|
| R84048/Ethanol | 7.50 | 0.00020 | 10200 | 4.23% | 0.35% | 2.83 | 0.23 |

State HAP Potential Emissions

**"Worst Case" Uncontrolled Emissions: 2.83 0.23 Total 3.07**
Control Efficiency (ton/yr): 85.0%
**"Worst Case" Controlled HAP Emissions: 0.43 0.04 Total 0.46**

**326 IAC 2-8 FESOP VOC Emission Limitation (lbs/hr) = 0.11**

**METHODOLOGY**
HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs
326 IAC 2-8 FESOP HAP Emissions (lbs/hr) = "Worst Case" Controlled HAP Emissions (tons/yr) * (1 yr/8760 hrs) * (2000lbs/1 ton)

**Appendix A: Emissions Calculations**
**Revised Emission Units Only**
**Yarn Saturation Operations - RM5020**
**Catalytic Oxidizer RE6001**

**Company Name:** Raybestos Powertrain
**Address City IN Zip:** 609 E Chaney Street and 110 Industrial Park Drive, Sullivan, IN 47882
**Administrative Amendment FESOP Permit No.:** 153-33157-00015
**Reviewer:** Marcia Earl
**Date:** May 2013

**Estimate of uncontrolled PTE:**

| | | | | | |
|---|---|---|---|---|---|
| **VOC** | 0.04 ton/yr / (100% - 99.40% ) | = | **6.67 ton/yr** | | |
| **HAP** | 2% of VOC as Formaldehyde | | | 0.13 | ton/yr |
| | 15% of VOC as Phenol | | | 1.00 | ton/yr |
| | | | **Total:** | **1.13** | **ton/yr** |

*To maintain confidentiality, the actual HAP concentrations were not used.*
*The stated HAP concentrations should be considered as "worst-case" values.*

**Estimate of controlled PTE:**

| | | | | |
|---|---|---|---|---|
| **VOC** | 6.67 ton/yr * (100% - 85.00% ) = | **1.00** | **ton/yr** | |
| **HAP** | 2% of VOC as Formaldehyde | | 0.02 | ton/yr |
| | 15% of VOC as Phenol | | 0.15 | ton/yr |
| | | **Total:** | **0.17** | **ton/yr** |

**326 IAC 2-8 FESOP Emissions Limit**

| | | | |
|---|---|---|---|
| **VOC** | 1.00 ton/yr * (1 yr/8760 hrs) * (2000lbs/1 ton) = | **0.23** | **lbs/hr** |
| **HAP** | 0.17 ton/yr * (1 yr/8760 hrs) * (2000lbs/1 ton) = | **0.04** | **lbs/hr** |

**METHODOLOGY**
326 IAC 2-8 FESOP Emissions (lbs/hr) = Controlled Emissions (tons/yr) * (1 yr/8760 hrs) * (2000lbs/1 ton)

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

**Company Name:** Raybestos Powertrain
**Address City IN Zip:** 609 E Chaney Street and 110 Industrial Park Drive, Sullivan, IN 47882
**Administrative Amendment FESOP Permit No.:** 153-33157-00015
**Reviewer:** Marcia Earl
**Date:** May 2013

| Units | MMBtu/hr |
|---|---|
| RE6001 | 1.00 |
| Dryer | 2.00 |
| E6003 | 1.50 |
| EU-1 | 0.30 |
| ID5 | 16.00 |
| Insignificant | 6.50 |
| Total | 27.30 |

| Heat Input Capacity MMBtu/hr | HHV mmBtu/mmscf | Potential Throughput MMCF/yr |
|---|---|---|
| 27.30 | 1020 | 234.46 |

| | Pollutant | | | | | | |
|---|---|---|---|---|---|---|---|
| | PM* | PM10* | direct PM2.5* | SO2 | NOx | VOC | CO |
| Emission Factor in lb/MMCF | 1.90 | 7.60 | 7.60 | 0.60 | 100 **see below | 5.50 | 84 |
| Potential Emission in tons/yr | 0.22 | 0.89 | 0.89 | 0.07 | 11.72 | 0.64 | 9.85 |

NOTE: The natural gas combustion calculations have been revisited due to the removal of adhesive coating line RM1200, that includes natural gas-fired drying oven, identified at RM1201, rated at 1.2 MMBtu/hr and a natural gas-fired catalytic oxidation, identified as E6022, rated at 1.0 MMBtu/hr.

*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

**HAPS Calculations**

| | HAPs - Organics | | | | | |
|---|---|---|---|---|---|---|
| | Benzene | Dichlorobenzene | Formaldehyde | Hexane | Toluene | **Total - Organics** |
| Emission Factor in lb/MMcf | 2.10E-03 | 1.20E-03 | 7.50E-02 | 1.80E+00 | 3.40E-03 | |
| Potential Emission in tons/yr | 2.5E-04 | 1.4E-04 | 8.8E-03 | 0.21 | 4.0E-04 | **0.22** |

| | HAPs - Metals | | | | | |
|---|---|---|---|---|---|---|
| | Lead | Cadmium | Chromium | Manganese | Nickel | **Total - Metals** |
| Emission Factor in lb/MMcf | 5.00E-04 | 1.10E-03 | 1.40E-03 | 3.80E-04 | 2.10E-03 | |
| Potential Emission in tons/yr | 5.9E-05 | 0.0E+00 | 1.6E-04 | 4.5E-05 | 2.5E-04 | **3.5E-04** |
| | | | | | **Total HAPs** | **0.22** |
| | | | | | **Worst HAP** | **0.21** |

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

**Methodology**

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-0
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MME
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

**Greenhouse Gas Calculations**

| | Greenhouse Gas | | |
|---|---|---|---|
| | CO2 | CH4 | N2O |
| Emission Factor in lb/MMc | 120,000 | 2.3 | 2.2 |
| Potential Emission in tons/ | 14,068 | 0.3 | 0.3 |
| Summed Potential Emissions in tons/yr | 14,068 | | |
| CO2e Total in tons/yr | 14,153 | | |

**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
N2O Potential Emission ton/yr x N2O GWP (310).

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

**Michael R. Pence**
*Governor*

**Thomas W. Easterly**
*Commissioner*


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

TO: Brent Bell
Raybestos Powertrain
PO Box 267
Sullivan, Indiana 47882

DATE: June 19, 2013

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

SUBJECT: Final Decision
FESOP – Administrative Amendment
153-33157-00015

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:
Tim Pearson, GM / Raybestos Powertrain
Alic Bent/August Mack Environmental
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 6/13/2013

# Mail Code 61-53

| IDEM Staff | AWELLS 6/19/2013<br>Raybestos Powertrain 153-33157-00015 Final | | | AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING |
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| 1 | | Brent Bell Raybestos Powertrain PO Box 267 Sullivan IN 47882-0267 (Source CAATS) confirmed delivery | | | | | | | | | |
| 2 | | Tim Pearson GM Raybestos Powertrain PO Box 267 Sullivan IN 47882-0267 *(RO CAATS)* | | | | | | | | | |
| 3 | | Carlisle Town Council P.O. Box 277 Carlisle IN 47838 *(Local Official)* | | | | | | | | | |
| 4 | | Sullivan City Council and Mayors Office 32 N. Court St. Sullivan IN 47882 *(Local Official)* | | | | | | | | | |
| 5 | | Sullivan County Health Department 31 N Court Street Sullivan IN 47882-1509 *(Health Department)* | | | | | | | | | |
| 6 | | Sullivan County Commissioners 100 Courthouse Square Sullivan IN 47882-1593 *(Local Official)* | | | | | | | | | |
| 7 | | Mr. Richard Monday 545 E. Margaret Dr. Terre Haute IN 47801 *(Affected Party)* | | | | | | | | | |
| 8 | | Mr. Alic Bent August Mack Environmental, Inc. 1302 N Meridian St, Suite 300 Indianapolis IN 46202 *(Consultant)* | | | | | | | | | |
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