



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

**Michael R. Pence**  
Governor

**Carol S. Comer**  
Commissioner

To: Interested Parties

Date: May 20, 2016

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

Source Name: Bendix Commercial Vehicle Systems

Permit Level: Exemption

Permit Number: 069 - 36704 - 00080

Source Location: 1230 Sabine Street, Huntington, IN

Type of Action Taken: Initial Permit

## **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 matter referenced above. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

The final decision is available on the IDEM website at: <http://www.in.gov/apps/idem/caats/>  
To view the document, select Search option 3, then enter permit 36704.

If you would like to request a paper copy of the permit document, please contact IDEM's central file room:

Indiana Government Center North, Room 1201  
100 North Senate Avenue, MC 50-07  
Indianapolis, IN 46204  
Phone: 1-800-451-6027 (ext. 4-0965)  
Fax (317) 232-8659

*(continues on next page)*

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.



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May 20, 2016

Blake Tippmann  
Bendix Commercial Vehicle Systems, LLC  
1805 Riverfork Drive  
Huntington, IN, 46750

Re: Exempt Construction and Operation Status,  
E069-36704-00080

Dear Blake Tippmann:

The application from Bendix Commercial Vehicle Systems, LLC, received on January 13, 2016, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that the following stationary truck brake shoe remanufacturing operation located at 1230 Sabine Street, Huntington, IN 46750 is classified as exempt from air pollution permit requirements:

- (a) One (1) abrasive cleaning operation, identified as EP-5, consisting of the following:
  - (1) One (1) abrasive blaster unit #1, constructed in 2014, equipped with two (2) blasting wheels, with a combined maximum throughput of 44 pounds of steel shot per hour and 6,942 pounds of brake shoes per hour, using cartridge filters as control, and exhausting to stack S-05a.
  - (2) One (1) abrasive blaster unit #2, constructed in 2014, equipped with two (2) blasting wheels, with a combined maximum throughput of 44 pounds of steel shot per hour and 6,942 pounds of brake shoes per hour, using cartridge filters as control, and exhausting to stack S-05b.
- (b) One (1) surface coating operation, identified as EP-6, constructed in 2014, with a maximum throughput of 500 metal brake shoes per hour, using a dip coating application method, using no controls, and exhausting indoors.
- (c) One (1) parts washer, identified as Belt Washer, constructed in 2014, equipped with a natural gas-fired heater, identified as EP-1, with a maximum heat input capacity of 2.5 MMBtu per hour. This parts washer uses non-halogenated solvents containing no VOC or HAPs.
- (d) One (1) parts washer, identified as Paint Prep Dip, constructed in 2014, equipped with an electric heater. This parts washer uses non-halogenated solvents containing no VOC or HAPs.
- (e) One (1) natural gas-fired paint drying oven, identified as EP-2, constructed in 2014, with a maximum heat input capacity of 0.75 MMBtu per hour.
- (f) Eight (8) natural gas-fired air handler units, identified as EP-3, constructed prior to 2009, with a total combined maximum heat input capacity of 4.589 MMBtu per hour.
- (g) One (1) pyrolysis cleaning oven, identified as EP-4, constructed in 2014, for removing coatings, oils, greases, and other organic material from used brake shoes/pads at a maximum removal rate of 38 pounds per hour, with a primary chamber equipped natural gas-fired burner with a with a maximum heat input capacity of 0.43 MMBtu per hour and a secondary chamber equipped natural gas-fired afterburner with a maximum heat input capacity of 0.195 MMBtu per hour as control, and exhausting to stack S-04.
- (h) Paved roads and parking lots.

The following conditions shall be applicable:

1. 326 IAC 5-1 (Opacity Limitations)  
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this exemption:
  - (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.
2. 326 IAC 6-4 (Fugitive Dust Emissions Limitations)  
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.
3. 326 IAC 8-2-9 (Miscellaneous Metal Coating)  
Pursuant to 326 IAC 8-2-9(c), for the surface coating of miscellaneous metal parts and products in the surface coating operation (EP-6), the source shall not cause, allow, or permit the discharge into the atmosphere of any VOC in excess of the following:
  - (A) Fifty-two hundredths (0.52) kilogram per liter (four and three-tenths (4.3) pounds per gallon) of coating, excluding water, delivered to a coating applicator that applies clear coatings. A clear coating is a coating that:
    - (i) lacks color or opacity; and
    - (ii) is transparent and uses the undercoat as a reflectant base or undertone color.
  - (B) Forty-two hundredths (0.42) kilogram per liter (three and five-tenths (3.5) pounds per gallon) of coating excluding water, delivered to a coating applicator in a coating application system that is air dried or forced warm air dried at temperatures up to ninety (90) degrees Celsius (one hundred ninety-four (194) degrees Fahrenheit).
  - (C) Forty-two hundredths (0.42) kilogram per liter (three and five-tenths (3.5) pounds per gallon) of coating, excluding water, delivered to a coating applicator that applies extreme performance coatings. Extreme performance coatings are coatings designed for exposure to:
    - (i) temperatures consistently above ninety-five (95) degrees Celsius;
    - (ii) detergents;
    - (iii) abrasive or scouring agents;
    - (iv) solvents;
    - (v) corrosive atmospheres;
    - (vi) outdoor weather at all times; or

(vii) similar environmental conditions.

- (D) Thirty-six hundredths (0.36) kilogram per liter (three (3) pounds per gallon) of coating, excluding water, delivered to a coating applicator for all other coatings and coating application systems.

Based on the MSDS submitted by the source and calculations made, the dip coating surface coating operation can comply with this requirement.

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

- (A) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.
  - (B) Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials.
  - (C) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.
  - (D) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.
  - (E) Minimize VOC emissions from the cleaning of application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.
4. 326 IAC 6-2 (Particulate Emissions Limitations for Sources of Indirect Heat)  
Pursuant to 326 IAC 6-2-4(a), the particulate emissions from the natural gas-fired parts washer heater (EP-1) shall not exceed six-tenths (0.6) pound per million Btu heat input (lb/MMBtu).
5. 326 IAC 4-2-2 (Incinerators)  
Pursuant to 326 IAC 4-2-2 (Incinerators), the source shall comply with the following for the pyrolysis cleaning oven (EP-4):
- (1) All incinerators shall comply with the following requirements:
    - (A) Consist of primary and secondary chambers or the equivalent.
    - (B) Be equipped with a primary burner unless burning only wood products.
    - (C) Comply with 326 IAC 5-1 and 326 IAC 2.
    - (D) Be maintained, operated, and burn waste in accordance with the manufacturer's specifications or an operation and maintenance plan as specified in subsection (3).
    - (E) Not emit particulate matter in excess of one (1) of the following:
      - (i) Three-tenths (0.3) pound of particulate matter per one thousand (1,000) pounds of dry exhaust gas under standard conditions corrected to fifty

- percent (50%) excess air for incinerators with a maximum solid waste capacity of greater than or equal to two hundred (200) pounds per hour.
- (ii) Five-tenths (0.5) pound of particulate matter per one thousand (1,000) pounds of dry exhaust gas under standard conditions corrected to fifty percent (50%) excess air for incinerators with solid waste capacity less than two hundred (200) pounds per hour.
- (F) If any of the requirements of subdivisions (A) through (E) are not met, then the owner or operator shall stop charging the incinerator until adjustments are made that address the underlying cause of the deviation.
- (2) An incinerator is exempt from subsection (1)(E) if subject to a more stringent particulate matter emission limit in 40 CFR 52 Subpart P\*, State Implementation Plan for Indiana.
- (3) An owner or operator developing an operation and maintenance plan pursuant to subsection (1)(D) must comply with the following:
- (A) The operation and maintenance plan must be designed to meet the particulate matter emission limitation specified in subsection (1)(E) and include the following:
    - (i) Procedures for receiving, handling, and charging waste.
    - (ii) Procedures for incinerator startup and shutdown.
    - (iii) Procedures for responding to a malfunction.
    - (iv) Procedures for maintaining proper combustion air supply levels.
    - (v) Procedures for operating the incinerator and associated air pollution control systems.
    - (vi) Procedures for handling ash.
    - (vii) A list of wastes that can be burned in the incinerator.
  - (B) Each incinerator operator shall review the plan before initial implementation of the operation and maintenance plan and annually thereafter.
  - (C) The operation and maintenance plan must be readily accessible to incinerator operators.
  - (D) The owner or operator of the incinerator shall notify the department, in writing, thirty (30) days after the operation and maintenance plan is initially developed pursuant to this section.
- (4) The owner or operator of the incinerator must make the manufacturer's specifications or the operation and maintenance plan available to the department upon request.

This exemption supersedes SSOA No. S069-33967-00080, issued on January 17, 2014.

A copy of the Exemption 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 Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or

otherwise modify the source. If you have any questions on this matter, please contact Dominic Williams, OAQ, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana, 46204-2251, at 317-234-6555 or at 1-800-451-6027 (ext 4-6555).

Sincerely,



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

NB/DW

cc: File - Huntington County  
Huntington County Health Department  
Compliance and Enforcement Branch

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

Technical Support Document (TSD) for a SSOA Transitioning to an  
Exemption

<b>Source Description and Location</b>
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<b>Source Name:</b>	<b>Bendix Commercial Vehicle Systems, LLC</b>
<b>Source Location:</b>	<b>1230 Sabine Street, Huntington, IN 46750</b>
<b>County:</b>	<b>Huntington</b>
<b>SIC Code:</b>	<b>3714 (Motor Vehicle Parts and Accessories)</b>
<b>Exemption No.:</b>	<b>E069-36704-00080</b>
<b>Permit Reviewer:</b>	<b>Dominic Williams</b>

On January 13, 2016, the Office of Air Quality (OAQ) received an application from Bendix Commercial Vehicle Systems, LLC related to the transition of a SSOA to an Exemption for its existing stationary truck brake shoe remanufacturing operation.

<b>Existing Approvals</b>
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The source has been operating under previous approvals including, but not limited to, the following:

- (a) SSOA No. S069-27474-00080, issued on February 24, 2009.
- (b) SSOA No. S069-33967-00080, issued on January 17, 2014. This SSOA superseded SSOA No. S069-27474-00080.

Due to this application, the source is transitioning from a SSOA to an Exemption.

<b>County Attainment Status</b>
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The source is located in Huntington County.

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard. <sup>1</sup>
PM <sub>2.5</sub>	Unclassifiable or attainment effective April 5, 2005, for the annual PM <sub>2.5</sub> standard.
PM <sub>2.5</sub>	Unclassifiable or attainment effective December 13, 2009, for the 24-hour PM <sub>2.5</sub> standard.
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.

<sup>1</sup>Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.  
Unclassifiable or attainment effective April 5, 2005, for PM<sub>2.5</sub>.

- (a) **Ozone Standards**  
Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. Huntington County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (b) **PM<sub>2.5</sub>**  
Huntington County has been classified as attainment for PM<sub>2.5</sub>. Therefore, direct PM<sub>2.5</sub>, SO<sub>2</sub>, and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) **Other Criteria Pollutants**  
Huntington County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

### **Fugitive Emissions**

The fugitive emissions of criteria pollutants, hazardous air pollutants, and greenhouse gases are counted toward the determination of 326 IAC 2-1.1-3 (Exemptions) applicability.

### **Background and Description of Emission Units and Pollution Control Equipment**

The Office of Air Quality (OAQ) has reviewed an application, submitted by Bendix Commercial Vehicle Systems, LLC on January 13, 2016, relating to the transition of a SSOA to an Exemption for its existing stationary truck brake shoe remanufacturing operation.

The source consists of the following existing emission units:

- (a) One (1) abrasive cleaning operation, identified as EP-5, consisting of the following:
  - (1) One (1) abrasive blaster unit #1, constructed in 2014, equipped with two (2) blasting wheels, with a combined maximum throughput of 44 pounds of steel shot per hour and 6,942 pounds of brake shoes per hour, using cartridge filters as control, and exhausting to stack S-05a.
  - (2) One (1) abrasive blaster unit #2, constructed in 2014, equipped with two (2) blasting wheels, with a combined maximum throughput of 44 pounds of steel shot per hour and 6,942 pounds of brake shoes per hour, using cartridge filters as control, and exhausting to stack S-05b.
- (b) One (1) surface coating operation, identified as EP-6, constructed in 2014, with a maximum throughput of 500 metal brake shoes per hour, using a dip coating application method, using no controls, and exhausting indoors.
- (c) One (1) parts washer, identified as Belt Washer, constructed in 2014, equipped with a natural gas-fired heater, identified as EP-1, with a maximum heat input capacity of 2.5 MMBtu per hour. This parts washer uses non-halogenated solvents containing no VOC or HAPs.
- (d) One (1) parts washer, identified as Paint Prep Dip, constructed in 2014, equipped with an electric heater. This parts washer uses non-halogenated solvents containing no VOC or HAPs.
- (e) One (1) natural gas-fired paint drying oven, identified as EP-2, constructed in 2014, with a maximum heat input capacity of 0.75 MMBtu per hour.
- (f) Eight (8) natural gas-fired air handler units, identified as EP-3, constructed prior to 2009, with a total combined maximum heat input capacity of 4.589 MMBtu per hour.
- (g) One (1) pyrolysis cleaning oven, identified as EP-4, constructed in 2014, for removing coatings, oils, greases, and other organic material from used brake shoes/pads at a maximum removal rate of 38 pounds per hour, with a primary chamber equipped natural gas-fired burner with a with a maximum heat input capacity of 0.43 MMBtu per hour and a secondary chamber equipped

natural gas-fired afterburner with a maximum heat input capacity of 0.195 MMBtu per hour as control, and exhausting to stack S-04.

- (h) Paved roads and parking lots.

**Enforcement Issues**

There are no pending enforcement actions related to this source.

**Emission Calculations**

See Appendix A of this TSD for detailed emission calculations.

**Permit Level Determination – Exemption**

The following table reflects the unlimited potential to emit (PTE) of the entire source before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Process/ Emission Unit	Potential To Emit of the Entire Source (tons/year)								
	PM	PM10*	PM2.5*	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP
Abrasive Cleaning Operation Unit #1 (EP-5)	0.77	0.66	0.66	-	-	-	-	-	-
Abrasive Cleaning Operation Unit #2 (EP-5)	0.77	0.66	0.66	-	-	-	-	-	-
Dip Coating Surface Coating Operation (EP-6)	0.00	0.00	0.00	-	-	5.26	-	-	-
Belt Washer	0.00	0.00	0.00	-	-	0.00	-	0.00	0.00
Paint Prep Dip Washer	0.00	0.00	0.00	-	-	0.00	-	0.00	0.00
Natural Gas Combustion (EP-1 through EP-4)	0.07	0.28	0.28	0.02	3.63	0.20	3.05	0.07	0.07 Hexane
Pyrolysis Cleaning Oven (EP-4)	0.58	0.58	0.58	0.21	0.25	0.25	0.83	-	-
Paved Roads	0.18	0.04	0.01	-	-	-	-	-	-
<b>Total PTE of Entire Source</b>	<b>2.37</b>	<b>2.22</b>	<b>2.19</b>	<b>0.23</b>	<b>3.88</b>	<b>5.71</b>	<b>3.89</b>	<b>0.07</b>	<b>0.07 Hexane</b>
Exemptions Levels	< 5	< 5	< 5	< 10	< 10	< 10	< 25	< 25	< 10
Registration Levels	< 25	< 25	< 25	< 25	< 25	< 25	< 100	< 25	< 10

\*Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a regulated air pollutant".

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of all regulated criteria pollutants are less than the levels listed in 326 IAC 2-1.1-3(e)(1). Therefore, the source is subject to the provisions of 326 IAC 2-1.1-3 (Exemptions).
- (b) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.

<b>Federal Rule Applicability Determination</b>
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New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standard (NSPS) for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc (326 IAC 12), are not included in the exemption, because the eleven (11) natural gas-fired units at this source are each not considered a steam generating unit as defined by 40 CFR 60.41c.
- (b) The requirements of the New Source Performance Standards (NSPS) for Incinerators, 40 CFR 60, Subpart E (326 IAC 12), are not included in the permit, because the pyrolysis cleaning oven does not burn solid waste as described in §60.51(b). The pyrolysis cleaning oven applies heat to remove/decompose coatings, oils, greases, and other organic material from used brake shoes/pads with the resulting organic vapor combusted in the secondary chamber.
- (c) The requirements of the New Source Performance Standards (NSPS) for Large Municipal Waste Combustors for Which Construction is Commenced after December 20, 1989 and on or before September 20, 1994, 40 CFR 60, Subpart Ea (326 IAC 12), are not included in the exemption, since the pyrolysis cleaning oven does not combust municipal waste as described in §60.51a. The pyrolysis cleaning oven applies heat to remove/decompose coatings, oils, greases, and other organic material from used brake shoes/pads with the resulting organic vapor combusted in the secondary chamber.
- (d) The requirements of the New Source Performance Standards (NSPS) for Large Municipal Waste Combustors for Which Construction is Commenced after September 20, 1994, or for Which Modification or Reconstruction is commenced after June 19, 1996, 40 CFR 60, Subpart Eb (326 IAC 12), are not included in the exemption, since the pyrolysis cleaning oven does not combust municipal waste as described in §60.51b. The pyrolysis cleaning oven applies heat to remove/decompose coatings, oils, greases, and other organic material from used brake shoes/pads with the resulting organic vapor combusted in the secondary chamber.
- (e) The requirements of the New Source Performance Standards (NSPS) for Hospital/Medical/Infectious Waste Incinerators for Which Construction is Commenced after January 20, 1996, 40 CFR 60, Subpart Ec (326 IAC 12), are not included in the exemption, since the pyrolysis cleaning oven does not combust "medical/infectious waste" as described in §60.51c. The pyrolysis cleaning oven applies heat to remove/decompose coatings, oils, greases, and other organic material from used brake shoes/pads with the resulting organic vapor combusted in the secondary chamber.
- (f) The requirements of the New Source Performance Standard for Surface Coating of Metal Furniture, 40 CFR 60, Subpart EE (326 IAC 12), are not included in the exemption, since this source does not coat metal furniture as described in §60.310(a).
- (g) The requirements of the New Source Performance Standard for Automobile and Light Duty Truck Surface Coating Operations, 40 CFR 60, Subpart MM (326 IAC 12), are not included in the exemption, since this source does not coat automobiles or light duty trucks as described in §60.390(a).
- (h) The requirements of the New Source Performance Standard for Pressure Sensitive Tape and Label Surface Coating Operations, 40 CFR 60, Subpart RR (326 IAC 12), are not included in the exemption, since this source does not coat sensitive tape or label materials as described in §60.440(a).
- (i) The requirements of the New Source Performance Standard for Industrial Surface Coating: Large Appliances, 40 CFR 60.450, Subpart SS (326 IAC 12), are not included in the exemption, since this source does not coat large appliances as described in §60.450(a).

- (j) The requirements of the New Source Performance Standard for Metal Coil Surface Coating, 40 CFR 60.460, Subpart TT (326 IAC 12), are not included in the exemption, since this source does not coat metal coils as described in §60.460(a).
- (k) The requirements of the New Source Performance Standard for the Beverage Can Surface Coating Industry, 40 CFR 60.490, Subpart WW (326 IAC 12), are not included in the exemption, since this source does not coat beverage cans as described in §60.490(a).
- (l) The requirements of the New Source Performance Standard for Magnetic Tape Coating Facilities, 40 CFR 60.710, Subpart SSS (326 IAC 12), are not included in the exemption, since this source does not coat magnetic tape as defined in §60.711(a)(13).
- (m) The requirements of the New Source Performance Standard for Industrial Surface Coating: Surface Coating of Plastic Parts for Business Machines, 40 CFR 60.720, Subpart TTT (326 IAC 12), are not included in the exemption, since this source does not coat plastic parts for business machines as defined in §60.721(a).
- (n) The requirements of the New Source Performance Standards (NSPS) for Small Municipal Waste Combustion Units for Which Construction is Commenced After August 30, 1999 or for Which Modification or Reconstruction is Commenced After June 6, 2001, 40 CFR 60, Subpart AAAA (326 IAC 12), are not included in the exemption, since the pyrolysis cleaning oven does not combust municipal solid waste as defined in §60.1465. The pyrolysis cleaning oven applies heat to remove/decompose coatings, oils, greases, and other organic material from used brake shoes/pads with the resulting organic vapor combusted in the secondary chamber.
- (o) The requirements of New Source Performance Standard (NSPS) for Commercial and Industrial Solid Waste Incineration Units for Which Construction is Commenced After November 30, 1999 or for Which Modification or Reconstruction is Commenced on or After June 1, 2001, 40 CFR 60, Subpart CCCC (326 IAC 12), are not included in the exemption, since the pyrolysis cleaning oven does not burn "commercial or industrial waste" as defined in §60.2265. The pyrolysis cleaning oven applies heat to remove/decompose coatings, oils, greases, and other organic material from used brake shoes/pads with the resulting organic vapor combusted in the secondary chamber.
- (p) The requirements of the New Source Performance Standards (NSPS) for Other Solid Waste Incineration Units for Which Construction is Commenced After December 9, 2004 or for Which Modification or Reconstruction is commenced on or After June 16, 2006, 40 CFR 60, Subpart EEEE (326 IAC 12), are not included in the exemption, since the pyrolysis cleaning oven does not burn municipal solid waste or institutional waste as defined in §60.2977. The pyrolysis cleaning oven applies heat to remove/decompose coatings, oils, greases, and other organic material from used brake shoes/pads with the resulting organic vapor combusted in the secondary chamber.
- (q) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this exemption.

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

- (r) The requirements of the National Emission Standard for Hazardous Air Pollutants (NESHAP), 40 CFR 63, Subpart T, for Halogenated Solvent Cleaning (326 IAC 20-6) are not included in the exemption, because the two (2) parts washers (Belt Washer and Paint Prep Dip Washer) do not use halogenated solvents.
- (s) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-14, 40 CFR Part 63, Subpart JJ (Wood Furniture Manufacturing Operations) are not included in the exemption, since this source does not coat wood furniture and is not a major source of HAPs as defined in 40 CFR Part 63, Subpart A, §63.2.

- (t) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP): Surface Coating of Automobiles and Light-Duty Trucks, Subpart IIII (326 IAC 20-85) are not included in the exemption, since this source does not coat new automobile or new light-duty truck bodies or body parts for new automobiles or new light-duty trucks and is not located at a plant site that is a major source of HAPs as defined in 40 CFR Part 63, Subpart A, §63.2.
- (u) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP): Surface Coating of Metal Cans, Subpart KKKK (326 IAC 20-86) are not included in the exemption, since this source does not coat metal cans and is not located at a plant site that is a major source of HAPs as defined in 40 CFR Part 63, Subpart A, §63.2.
- (v) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-80, 40 CFR Part 63, Subpart MMMM (Surface Coating of Miscellaneous Metal Parts and Products) are not included in the exemption, since this source is not a major source of HAPs as defined in 40 CFR Part 63, Subpart A, §63.2.
- (w) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP): Surface Coating of Large Appliances, Subpart NNNN (326 IAC 20-63) are not included in the exemption, since this source does not coat large appliances and is not located at a plant site that is a major source of HAPs as defined in 40 CFR Part 63, Subpart A, §63.2.
- (x) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-81, 40 CFR 63, Subpart PPPP (Surface Coating of Plastic Parts and Products) are not included in the exemption, since this source is not a major source of HAPs as defined in 40 CFR Part 63, Subpart A, §63.2.
- (y) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP): Surface Coating of Wood Building Products, Subpart QQQQ (326 IAC 20-79), are not included in the exemption, since this source does not coat wood building products and is not located at a plant site that is a major source of HAPs as defined in 40 CFR Part 63, Subpart A, §63.2.
- (z) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP): Surface Coating of Metal Furniture, Subpart RRRR (326 IAC 20-78), are not included in the exemption, since this source does not coat metal furniture and is not located at a plant site that is a major source of HAPs as defined in 40 CFR Part 63, Subpart A, §63.2.
- (aa) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP): Surface Coating of Metal Coil, Subpart SSSS (326 IAC 20-64), are not included in the exemption, since this source does not coat metal coil and is not located at a plant site that is a major source of HAPs as defined in 40 CFR Part 63, Subpart A, §63.2.
- (bb) The requirements of the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD (326 IAC 20-95) are not included in the exemption, because this source is not a major source of HAPs.
- (cc) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63, Subpart HHHHHH, are not included in the exemption, because this source does not include facilities that conduct paint stripping operations that involve the use of chemical strippers that contain methylene chloride (MeCl), in the removal of dried paint, this source does not contain autobody refinishing operations that encompass motor vehicle and mobile equipment spray-applied surface coating operations, and this source does not perform spray application of coatings containing compounds of chromium, lead, manganese, nickel, or cadmium to a plastic and/or metal substrate.

- (dd) The requirements of the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63, Subpart JJJJJJ, are not included in the exemption, since the eleven (11) natural gas-fired units are each not considered a boiler, as defined by 40 CFR 63.11237.
- (ee) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this exemption.

Compliance Assurance Monitoring (CAM)

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

<b>State Rule Applicability Determination</b>
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The following state rules are applicable to the source:

- (a) 326 IAC 2-1.1-3 (Exemptions)  
Exemption applicability is discussed under the Permit Level Determination – Exemption section above.
- (b) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))  
The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.
- (c) 326 IAC 2-6 (Emission Reporting)  
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (d) 326 IAC 5-1 (Opacity Limitations)  
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this exemption:
  - (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
  - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (e) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)  
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.
- (f) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)  
The source is not subject to the requirements of 326 IAC 6-5, because the source does not have potential fugitive particulate emissions greater than 25 tons per year. Therefore, 326 IAC 6-5 does not apply.

- (g) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)  
Each of the emission units at this source is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from each emission unit is less than twenty-five (25) tons per year.
- (h) 326 IAC 12 (New Source Performance Standards)  
See Federal Rule Applicability Section of this TSD.
- (i) 326 IAC 20 (Hazardous Air Pollutants)  
See Federal Rule Applicability Section of this TSD.

Abrasive Cleaning Operation (EP-5)

- (j) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)  
Pursuant to 326 IAC 6-3-1(b)(14), the requirements of 326 IAC 6-3-2 are not applicable to the one (1) abrasive cleaning operation (EP-5), since each of the abrasive blaster units (#1 and #2) has potential particulate emissions of less than five hundred fifty-one thousandths (0.551) pound per hour.

Dip Coating Surface Coating Operation (EP-6)

- (k) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)  
The surface coating operation (EP-6) is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions are less than twenty-five (25) tons per year.
- (l) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)  
Pursuant to 326 IAC 6-3-1(b)(5), the surface coating operation (EP-6) is not subject to the requirements of 326 IAC 6-3-2, since it uses dip coating application which specifically exempts and since it does not emit particulate emissions (i.e., does not use spray application).
- (m) 326 IAC 8-2-9 (Miscellaneous Metal Coating)  
Pursuant to 326 IAC 8-2-1 and 326 IAC 8-2-9, the requirements of 326 IAC 8-2-9 are applicable to all facilities, considered existing after January 1, 1980, located in any county and that have potential emissions of greater than 25 tons of VOC per year; or for which construction commenced after July 1, 1990, located in any county, that perform surface coating on metal parts or products under the SIC code of major groups #33, #34, #35, #36, #37, #38, and #39, and that have actual emissions greater than fifteen (15) pounds of VOC per day before add-on controls. This source coats metal parts and products under SIC code 3714 (Motor Vehicle Parts and Accessories).
  - (1) The surface coating operation (EP-6), is subject to the requirements of 326 IAC 8-2-9, since each booth was constructed after July 1, 1990, located in any county, and it has potential VOC emissions of greater than fifteen (15) pounds of VOC per day before add-on controls.

Pursuant to 326 IAC 8-2-9(c), for the surface coating of miscellaneous metal parts and products in the surface coating operation (EP-6), the source shall not cause, allow, or permit the discharge into the atmosphere of any VOC in excess of the following:

- (A) Fifty-two hundredths (0.52) kilogram per liter (four and three-tenths (4.3) pounds per gallon) of coating, excluding water, delivered to a coating applicator that applies clear coatings. A clear coating is a coating that:
  - (i) lacks color or opacity; and
  - (ii) is transparent and uses the undercoat as a reflectant base or undertone color.

- (B) Forty-two hundredths (0.42) kilogram per liter (three and five-tenths (3.5) pounds per gallon) of coating excluding water, delivered to a coating applicator in a coating application system that is air dried or forced warm air dried at temperatures up to ninety (90) degrees Celsius (one hundred ninety-four (194) degrees Fahrenheit).
- (C) Forty-two hundredths (0.42) kilogram per liter (three and five-tenths (3.5) pounds per gallon) of coating, excluding water, delivered to a coating applicator that applies extreme performance coatings. Extreme performance coatings are coatings designed for exposure to:
  - (i) temperatures consistently above ninety-five (95) degrees Celsius;
  - (ii) detergents;
  - (iii) abrasive or scouring agents;
  - (iv) solvents;
  - (v) corrosive atmospheres;
  - (vi) outdoor weather at all times; or
  - (vii) similar environmental conditions.
- (D) Thirty-six hundredths (0.36) kilogram per liter (three (3) pounds per gallon) of coating, excluding water, delivered to a coating applicator for all other coatings and coating application systems.

Based on the MSDS submitted by the source and calculations made, the dip coating surface coating operation can comply with this requirement.

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

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

Parts Washers (Belt Washer and Paint Prep Dip Washer)

- (n) 326 IAC 8-3 (Organic Solvent Degreasing Operations)  
 Pursuant to 326 IAC 8-3-1(d)(1)(B) and 326 IAC 8-3-1(d)(2)(C), the requirements of 326 IAC 8-3 do not apply to the two (2) parts washers (Belt Washer and Paint Prep Dip Washer), since the parts washers use solvents containing less than one percent (1%) VOC by weight and are not located in Clark, Floyd, Lake, or Porter County.

Natural Gas Combustion (EP-1 through EP-3)

- (o) 326 IAC 6-2 (Particulate Emissions Limitations for Sources of Indirect Heat)  
 The requirements of 326 IAC 6-2 do not apply to the nine (9) natural gas-fired units (EP-2 and EP-3), since each is not a source of indirect heat.

The natural gas-fired parts washer heater (EP-1) is a source of indirect heating, and was constructed after September 21, 1983. Therefore, pursuant to 326 IAC 6-2-1(d), the requirements of 326 IAC 6-2-4 are applicable.

The natural gas-fired parts washer heater (EP-1) must comply with the PM emission limitation of 326 IAC 6-2-4, based on the following equation:

$$Pt = (1.09)/(Q^{0.26})$$

Where:

Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input.

Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

Pursuant to 326 IAC 6-2-4(a), for Q less than 10 MMBtu/hr, Pt shall not exceed 0.6 lb/MMBtu heat input.

The PM limits are calculated based on the total source capacity at the time that each unit was installed. Therefore, the Pt for each unit is calculated as follows:

Unit ID	Maximum Heat Input Capacity (MMBtu/hr)	Construction Date	Total Source Maximum Operating Capacity (Q) (MMBtu/hr)	326 IAC 6-2-4 Emission Limit (Pt) (lbs/MMBtu)
EP-1	2.5	2014	2.5	0.60

Based on Appendix A and AP-42, the potential to emit PM from the one (1) natural gas-fired parts washer heater (EP-1) are calculated as follows:

$$1.90 \text{ lb PM/MMCF} \times 1 \text{ MMCF}/1,020 \text{ MMBtu} = 0.00186 \text{ lb PM/MMBtu}$$

Therefore the natural gas-fired parts washer heater (EP-1) is able to comply with this rule without the use of a control device.

- (p) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)  
 The ten (10) natural gas-fired units are each not subject to the requirements of 326 IAC 6-3, since each is not a "manufacturing process" as defined by 326 IAC 6-3-1.5.

Pyrolysis Cleaning Oven (EP-4)

(q) 326 IAC 4-2-2 (Incinerators)

The pyrolysis cleaning oven (EP-4) is subject to the requirements of 326 IAC 4-2-2, because it meets the definition of incinerator in 326 IAC 1-2-34 and is not subject to any of the rules identified in 326 IAC 4-2-1(b)(2). Pursuant to 326 IAC 4-2-2(b), the pyrolysis cleaning oven is subject to 326 IAC 4-2-2(a)(5) since it is not subject to a more stringent particulate matter emission limit in 40 CFR 52 Subpart P\*, State Implementation Plan for Indiana.

Note: IDEM, OAQ considers pyrolysis cleaning ovens as a form of incineration subject to 326 IAC 4-2. 326 IAC 1-2-34 defines "incinerator" as an engineered apparatus that burns waste substances with controls on combustion factors including, but not limited to temperature, retention time, and air. During the pyrolysis cleaning process within the oven, metal parts coated with dried paint, oils, greases, and other organic material are heated for a specified time and at a specified oven temperature to the point where the organic material is thermally degraded, with any smoke (particulate matter and VOC) controlled by the secondary chamber/afterburner. 326 IAC does not define the terms "burns" or "waste substances". For the pyrolysis cleaning ovens, IDEM OAQ has determined that the organic material being removed from metal parts by pyrolysis are considered "waste substances" being "burned", and the temperature and pyrolysis time within the primary chamber, and the exhaust gas retention time and combustion air flow rate within the secondary chamber/afterburner are considered "controls on combustion factors".

Pursuant to 326 IAC 4-2-2 (Incinerators), the source shall comply with the following for the pyrolysis cleaning oven (EP-4):

- (1) All incinerators shall comply with the following requirements:
  - (A) Consist of primary and secondary chambers or the equivalent.
  - (B) Be equipped with a primary burner unless burning only wood products.
  - (C) Comply with 326 IAC 5-1 and 326 IAC 2.
  - (D) Be maintained, operated, and burn waste in accordance with the manufacturer's specifications or an operation and maintenance plan as specified in subsection (3).
  - (E) Not emit particulate matter in excess of one (1) of the following:
    - (i) Three-tenths (0.3) pound of particulate matter per one thousand (1,000) pounds of dry exhaust gas under standard conditions corrected to fifty percent (50%) excess air for incinerators with a maximum solid waste capacity of greater than or equal to two hundred (200) pounds per hour.
    - (ii) Five-tenths (0.5) pound of particulate matter per one thousand (1,000) pounds of dry exhaust gas under standard conditions corrected to fifty percent (50%) excess air for incinerators with solid waste capacity less than two hundred (200) pounds per hour.
  - (F) If any of the requirements of subdivisions (A) through (E) are not met, then the owner or operator shall stop charging the incinerator until adjustments are made that address the underlying cause of the deviation.
- (2) An incinerator is exempt from subsection (1)(E) if subject to a more stringent particulate matter emission limit in 40 CFR 52 Subpart P\*, State Implementation Plan for Indiana.

- (3) An owner or operator developing an operation and maintenance plan pursuant to subsection (1)(D) must comply with the following:
  - (A) The operation and maintenance plan must be designed to meet the particulate matter emission limitation specified in subsection (1)(E) and include the following:
    - (i) Procedures for receiving, handling, and charging waste.
    - (ii) Procedures for incinerator startup and shutdown.
    - (iii) Procedures for responding to a malfunction.
    - (iv) Procedures for maintaining proper combustion air supply levels.
    - (v) Procedures for operating the incinerator and associated air pollution control systems.
    - (vi) Procedures for handling ash.
    - (vii) A list of wastes that can be burned in the incinerator.
  - (B) Each incinerator operator shall review the plan before initial implementation of the operation and maintenance plan and annually thereafter.
  - (C) The operation and maintenance plan must be readily accessible to incinerator operators.
  - (D) The owner or operator of the incinerator shall notify the department, in writing, thirty (30) days after the operation and maintenance plan is initially developed pursuant to this section.
- (4) The owner or operator of the incinerator must make the manufacturer's specifications or the operation and maintenance plan available to the department upon request.
- (r) 326 IAC 11-6 (Hospital/Medical/Infectious Waste Incinerators)  
Pursuant to 326 IAC 11-6, the pyrolysis cleaning oven (EP-4) is not subject to the requirements of 326 IAC 11-6, because it is not a hospital/medical/ infectious waste incinerator.
- (s) 326 IAC 11-7 (Emission Limitations for Municipal Waste Combustors)  
Pursuant to 326 IAC 11-7, the pyrolysis cleaning oven (EP-4) is not subject to the requirements of 326 IAC 11-7, since it is not a municipal waste combustor and is exempted from this rule under 326 IAC 11-7-1(b)(4). Pursuant to 326 IAC 11-7-1(b)(4), any materials recovery facility that combusts waste for the primary purpose of recovering metals is exempt from 326 IAC 11-7.
- (t) 326 IAC 11-8 (Commercial and Industrial Solid Waste Incineration Units)  
Pursuant to 326 IAC 11-8, the pyrolysis cleaning oven (EP-4) is not subject to the requirements of 326 IAC 11-8, because it is not considered a commercial and industrial solid waste incineration (CISWI) unit as defined 40 CFR 60.2875 and is exempted from this rule under 326 IAC 11-8-1(b)(8). Pursuant to 326 IAC 11-8-1(b)(8), any materials recovery facility that combusts waste for the primary purpose of recovering metals is exempt from 326 IAC 11-8.  
  
Pursuant to the definitions under 40 CFR 60.2875, a commercial and industrial solid waste incineration (CISWI) unit does not include any of the fifteen types of units described in 40 CFR 60.2555. Pursuant to 40 CFR 60.2555(h), materials recovery units that combust waste for the primary purpose of recovering metals are not considered commercial and industrial solid waste incineration (CISWI) units.

### Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on January 13, 2016. Additional information was received on May 3, 2016.

The operation of this source shall be subject to the conditions of the attached proposed Exemption No. E069-36704-00080. The staff recommends to the Commissioner that this Exemption be approved.

### IDEM Contact

- (a) Questions regarding this proposed exemption can be directed to Dominic Williams at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-6555 or toll free at 1-800-451-6027 extension 4-6555.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at <http://www.in.gov/idem/6900.htm>.

**TSD Appendix A: Emissions Calculations  
Summary**

**Company Name: Bendix Commercial Vehicle Systems, LLC  
Source Address: 1230 Sabine St., Huntington, IN 46750  
Exemption Number: E069-36704-00080  
Reviewer: Dominic Williams**

**Unlimited/Uncontrolled PTE**

Process	Potential to Emit (tons/year)									
	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	NOx	VOC	CO	Total HAPs	Single Highest HAP	
Abrasive Cleaning Operation Unit #1 (EP-5)	0.77	0.66	0.66	-	-	-	-	-	-	-
Abrasive Cleaning Operation Unit #2 (EP-5)	0.77	0.66	0.66	-	-	-	-	-	-	-
Dip Coating Surface Coating Operation (EP-6)	0.00	0.00	0.00	-	-	5.26	-	-	-	-
Belt Washer*	0.00	0.00	0.00	-	-	0.00	-	0.00	0.00	-
Paint Prep Dip Washer*	0.00	0.00	0.00	-	-	0.00	-	0.00	0.00	-
Natural Gas Combustion (EP-1 through EP-4)	0.07	0.28	0.28	0.02	3.63	0.20	3.05	0.07	0.07	Hexane
Pyrolysis Cleaning Oven (EP-4)	0.58	0.58	0.58	0.21	0.25	0.25	0.83	-	-	-
Paved Roads	0.18	0.04	0.01	-	-	-	-	-	-	-
<b>Total:</b>	<b>2.37</b>	<b>2.22</b>	<b>2.19</b>	<b>0.23</b>	<b>3.88</b>	<b>5.71</b>	<b>3.89</b>	<b>0.07</b>	<b>0.07</b>	<b>Hexane</b>

**Controlled PTE**

Process	Potential to Emit (tons/year)									
	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	NOx	VOC	CO	Total HAPs	Single Highest HAP	
Abrasive Cleaning Operation Unit #1 (EP-5)	0.03	0.03	0.03	-	-	-	-	-	-	-
Abrasive Cleaning Operation Unit #2 (EP-5)	0.03	0.03	0.03	-	-	-	-	-	-	-
Dip Coating Surface Coating Operation (EP-6)	0.00	0.00	0.00	-	-	5.26	-	-	-	-
Belt Washer*	0.00	0.00	0.00	-	-	0.00	-	0.00	0.00	-
Paint Prep Dip Washer*	0.00	0.00	0.00	-	-	0.00	-	0.00	0.00	-
Natural Gas Combustion (EP-1 through EP-4)	0.07	0.28	0.28	0.02	3.63	0.20	3.05	0.07	0.07	Hexane
Pyrolysis Cleaning Oven (EP-4)	0.58	0.58	0.58	0.21	0.25	0.25	0.83	-	-	-
Paved Roads	0.18	0.04	0.01	-	-	-	-	-	-	-
<b>Total:</b>	<b>0.90</b>	<b>0.92</b>	<b>0.92</b>	<b>0.23</b>	<b>3.88</b>	<b>5.71</b>	<b>3.89</b>	<b>0.07</b>	<b>0.07</b>	<b>Hexane</b>

\*The belt washer and paint prep dip washer use caustic solutions that contain no VOC or HAPs. The Belt Washer is heated by a natural gas-fired heater (EP-1). The Paint Dip Wash is heated by an electric heater. Therefore, the only emissions from these units is the combustion of natural gas, which has been included in these calculations.

**Appendix A: Emission Calculations  
Abrasive Cleaning Operation  
EP-5 (Abrasive Blaster Unit #1)**

**Company Name:** Bendix Commercial Vehicle Systems, LLC  
**Source Address:** 1230 Sabine St., Huntington, IN 46750  
**Exemption Number:** E069-36704-00080  
**Reviewer:** Dominic Williams

**Table 1 - Emission Factors for Abrasives**

Abrasive	Emission Factor	
	lb PM / lb abrasive	lb PM <sub>10</sub> / lb PM
Sand	0.041	0.700
Grit	0.010	0.700
Steel Shot	0.004	0.860
Aluminum Oxide / Black Beauty	0.010	0.700

**CALCULATIONS**

		Steel Shot	
FR = Flow rate of actual abrasive (lb/hr) =		44	lb/hr (for 2 wheels)
w = fraction of time of wet blasting =		0	%
PM10 emission factor ratio for actual abrasive from Table 1 =		0.004	lb PM/ lb abrasive
PM10 emission factor ratio for actual abrasive from Table 1 =		0.86	lb PM10 / lb PM
Uncontrolled Emissions =		lb/hr	tons/yr
	PM	0.2	0.8
	PM10	0.2	0.7
	PM2.5	0.2	0.7
Emission Control Device Efficiency =		95.7%	
Controlled Emissions =		lb/hr	tons/yr
	PM	0.01	0.03
	PM10	0.01	0.03
	PM2.5	0.01	0.03

**METHODOLOGY**

Emission Factors from STAPPA/ALAPCO "Air Quality Permits", Vol. I, Section 3 "Abrasive Blasting" (1991 edition)  
 Potential to Emit (before control) = EF x FR x (1 - w/200) (where w should be entered in as a whole number (if w is 50%, enter 50))  
 Potential to Emit (after control) = [Potential to Emit (before control)] \* [1 - control efficiency]  
 Potential to Emit (tons/year) = [Potential to Emit (lbs/hour)] x [8760 hours/year] x [ton/2000 lbs]

**326 IAC 6-3-2 Allowable Emission Rate**

Process	Blasting Media Process Weight Rate (ton/hr)	Metal Throughput Process Weight Rate (ton/hr)	Total Process Weight Rate (ton/hr)	326 IAC 6-3-2 Limit (lb/hr)
EU002	0.04	3.47	3.52	9.52

**Appendix A: Emission Calculations  
Abrasive Cleaning Operation  
EP-5 (Abrasive Blaster Unit #2)**

**Company Name:** Bendix Commercial Vehicle Systems, LLC  
**Source Address:** 1230 Sabine St., Huntington, IN 46750  
**Exemption Number:** E069-36704-00080  
**Reviewer:** Dominic Williams

**Table 1 - Emission Factors for Abrasives**

Abrasive	Emission Factor	
	lb PM / lb abrasive	lb PM <sub>10</sub> / lb PM
Sand	0.041	0.700
Grit	0.010	0.700
Steel Shot	0.004	0.860
Aluminum Oxide / Black Beauty	0.010	0.700

**CALCULATIONS**

		Steel Shot	
FR = Flow rate of actual abrasive (lb/hr) =		44	lb/hr (for 2 wheels)
w = fraction of time of wet blasting =		0	%
PM10 emission factor ratio for actual abrasive from Table 1 =		0.004	lb PM/ lb abrasive
PM10 emission factor ratio for actual abrasive from Table 1 =		0.86	lb PM10 / lb PM
Uncontrolled Emissions =		lb/hr	tons/yr
	PM	0.2	0.8
	PM10	0.2	0.7
	PM2.5	0.2	0.7
Emission Control Device Efficiency =		95.7%	
Controlled Emissions =		lb/hr	tons/yr
	PM	0.01	0.03
	PM10	0.01	0.03
	PM2.5	0.01	0.03

**METHODOLOGY**

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

Potential to Emit (before control) = EF x FR x (1 - w/200) (where w should be entered in as a whole number (if w is 50%, enter 50))

Potential to Emit (after control) = [Potential to Emit (before control)] \* [1 - control efficiency]

Potential to Emit (tons/year) = [Potential to Emit (lbs/hour)] x [8760 hours/year] x [ton/2000 lbs]

**326 IAC 6-3-2 Allowable Emission Rate**

Process	Blasting Media Process Weight Rate (ton/hr)	Metal Throughput Process Weight Rate (ton/hr)	Total Process Weight Rate (ton/hr)	326 IAC 6-3-2 Limit (lb/hr)
EU002	0.04	3.47	3.52	9.52

**TSD Appendix A: Emissions Calculations  
VOC and Particulate Emissions  
From Surface Coating Operations  
EP-6**

**Company Name: Bendix Commercial Vehicle Systems, LLC  
Source Address: 1230 Sabine St., Huntington, IN 46750  
Exemption Number: E069-36704-00080  
Reviewer: Dominic Williams**

**VOC and Particulate**

Unit	Material**	Density (lb/gal)	Weight % Volatile (H2O & Organics)	Weight % Water and Exempts	Weight % Organics	Volume % Water	Gal of Mat. (gal/unit)	Maximum (unit/hour)**	Maximum (gal/day)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (lb/hr)	Potential VOC (lb/day)	Potential VOC (ton/yr)	Particulate Potential (ton/yr)	Transfer Efficiency***
<b>Dip Coating Surface Coating Operation*</b>	Blue	10.008	65.00%	61.00%	4.00%	62.50%	0.0060	500.00	72.0	1.07	0.40	1.20	28.8	5.3	0.00	100%
	Black	10.008	71.30%	67.68%	3.62%	69.40%	0.0060	500.00	72.0	1.18	0.36	1.09	26.1	4.8	0.00	100%

\*The surface coating operation can only apply one coating at one time. Therefore, the worst case coating was used to calculate the potential to emit.

\*\*The two coatings used are BMS Water Based Dipping Enamel Bendix Reman Blue (Blue) and BMS Water Based Dipping Enamel Black (Black).

\*\*\*This source uses only dip coating.

<b>Worst Case Uncontrolled PTE Totals*</b>			
Potential VOC (lb/hr)	Potential VOC (lb/day)	Potential VOC (ton/yr)	Particulate Potential (ton/yr)
<b>1.20</b>	<b>28.82</b>	<b>5.26</b>	<b>0.00</b>

**Methodology**

Assume PM=PM10=PM2.5

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)

These coatings do not contain hazardous air pollutants (HAPs)

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

**Company Name:** Bendix Commercial Vehicle Systems, LLC  
**Source Address:** 1230 Sabine St., Huntington, IN 46750  
**Exemption Number:** E069-36704-00080  
**Reviewer:** Dominic Williams

Unit ID	Maximum Capacity MMBtu/hr
Belt Washer (EP-1)	2.5
Paint Dryer (EP-2)	0.75
FR-1 (EP-3)*	0.079
RTU-1 (EP-3)*	0.15
RTU-2 (EP-3)*	0.115
RTU-3 (EP-3)*	0.18
RTU-4 (EP-3)*	0.115
ARU-1 (EP-3)*	1.9
ARU-2 (EP-3)*	1.9
UH-1 (EP-3)*	0.15
Pyrolysis Cleaning Oven (EP-4)	0.43
Pyrolysis Afterburner (EP-4)	0.195
<b>Total:</b>	<b>8.464</b>

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
8.5	1020	72.7

\*These units are each Air Handler Units, and are collectively identified as EP-3.

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100	5.5	84
					**see below		
Potential Emission in tons/yr	0.07	0.28	0.28	0.02	3.63	0.20	3.05

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.  
 PM2.5 emission factor is filterable and condensable PM2.5 combined.

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

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

**Hazardous Air Pollutants (HAPs)**

	HAPs - Organics					Total - Organics
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	7.6E-05	4.4E-05	2.7E-03	0.07	1.2E-04	0.07

	HAPs - Metals					Total - Metals
	Lead	Cadmium	Chromium	Manganese	Nickel	
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	1.8E-05	4.0E-05	5.1E-05	1.4E-05	7.6E-05	2.0E-04
						<b>Total HAPs</b>
						<b>0.07</b>
						<b>Worst HAP</b>
						<b>0.07</b>

Methodology is the same as above.

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

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

**Appendix A: Emissions Calculations  
Pyrolysis Cleaning Oven and Afterburner (EP-4)**

**Company Name:** Bendix Commercial Vehicle Systems, LLC  
**Source Address:** 1230 Sabine St., Huntington, IN 46750  
**Exemption Number:** E069-36704-00080  
**Reviewer:** Dominic Williams

Potential Throughput  
lbs/hr  
38

Potential Throughput  
ton/yr  
166.44

	Pollutant						
	PM	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/ton	7.0	7.0	7.0	2.5	3.0	3.0	10.0
Potential Emissions in ton/yr	0.6	0.6	0.6	0.2	0.2	0.2	0.8

The worst case material removed from brake pads during trials conducted by this source was 19 lbs per hour. To provide the most conservative PTE, this has been increased by a factor of 2.

**Methodology**

Emission factors are from AP 42 (5th Edition 1/95) Table 2.1-12, Uncontrolled emission factors for industrial/commercial refuse combustors, multiple chambers

\*There are no PM10 and PM2.5 emission factors (PM10 and PM2.5 emission assumed equal to PM emissions)

Potential Throughput (tons/yr) = [Potential Throughput (lbs/hr)] \* [8,760 hrs/yr] \* [ton/2000 lbs]

Potential to Emit (tons/yr) = [Potential Throughput (tons/yr)] \* [Emission Factor (lb/ton)] \* [ton/2,000 lbs]

**Appendix A: Emission Calculations  
Fugitive Dust Emissions - Paved Roads**

**Company Name: Bendix Commercial Vehicle Systems, LLC  
Source Address: 1230 Sabine St., Huntington, IN 46750  
Exemption Number: E069-36704-00080  
Reviewer: Dominic Williams**

**Paved Roads at Industrial Site**

The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (1/2011).

**Vehicle Information (provided by source)**

Type	Maximum number of vehicles per day	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Semi-truck (entering plant) (one-way trip)	14.8	1.0	14.8	27.7	410.1	75	0.014	0.2	76.7
Semi-truck (leaving plant) (one-way trip)	14.8	1.0	14.8	27.7	410.1	75	0.014	0.2	76.7
<b>Totals</b>			<b>29.6</b>		<b>820.1</b>			<b>0.4</b>	<b>153.4</b>

Average Vehicle Weight Per Trip = 

27.7
------

 tons/trip  
Average Miles Per Trip = 

0.01
------

 miles/trip

Unmitigated Emission Factor,  $E_f = [k * (sL)^{0.91} * (W)^{1.02}]$  (Equation 1 from AP-42 13.2.1)

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	27.7	27.7	27.7	tons = average vehicle weight (provided by source)
sL =	9.7	9.7	9.7	g/m <sup>2</sup> = silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor,  $E_{ext} = E * [1 - (p/4N)]$  (Equation 2 from AP-42 13.2.1)

Mitigated Emission Factor,  $E_{ext} = E_f * [1 - (p/4N)]$   
where p = 

125
-----

 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)  
N = 

365
-----

 days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, $E_f =$	2.577	0.515	0.1265	lb/mile
Mitigated Emission Factor, $E_{ext} =$	2.356	0.471	0.1157	lb/mile

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)
Semi-truck (entering plant) (one-way trip)	0.10	0.02	0.00	0.09	0.02	0.00
Semi-truck (leaving plant) (one-way trip)	0.10	0.02	0.00	0.09	0.02	0.00
<b>Totals</b>	<b>0.20</b>	<b>0.04</b>	<b>0.01</b>	<b>0.18</b>	<b>0.04</b>	<b>0.01</b>

**Methodology**

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

**Abbreviations**

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



# Indiana Department of Environmental Management

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**Michael R. Pence**  
*Governor*

**Carol S. Comer**  
*Commissioner*

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

**TO:** Blake Tippmann  
Bendix Commercial Vehicle Systems  
1850 Riverfork Dr  
Huntington, IN 46750

**DATE:** May 20, 2016

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

**SUBJECT:** Final Decision  
Exemption  
069 - 36704 - 00080

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:  
Mike Pogorelc, Plant Manager  
Stanley King Bendix Commercial Vehicle Systems  
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 2/17/2016

# Mail Code 61-53

IDEM Staff	LPOGOST 5/20/2016 Bendix Commercial Vehicle Systems LLC 069 - 36704 - 00080 final)		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING	
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	

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1		<del>Blake Tippmann Bendix Commercial Vehicle Systems LLC 1850 Riverfork Dr Huntington IN 46750 (Source CAATS)</del> Via USPS certified mail										
2		Mike Pogorelc Plant Manager Bendix Commercial Vehicle Systems LLC 1850 Riverfork Dr Huntington IN 46750 (RO CAATS)										
3		Huntington Town Council and Mayors Office 300 Cherry St. Huntington IN 46750 (Local Official)										
4		Huntington County Board of Commissioners 201 N. Jefferson Street Huntington IN 46750 (Local Official)										
5		Frederick & Iva Moore 6019 W 650 N Ligonier IN 46767 (Affected Party)										
6		Ms. Mary Shipley 10968 E 100 S Marion IN 46953 (Affected Party)										
7		Huntington County Health Department 354 N. Jefferson Street, Suite 201 Huntington IN 46750 (Health Department)										
8		Melvin & Deborah Gillespie 5616 N 200 E Huntington IN 46750 (Affected Party)										
9		Stanley King Bendix Commercial Vehicle Systems LLC 901 Cleveland Street Elyria OH 44035 (Source – addl contact)										
10												
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