

**FEDERALLY ENFORCEABLE STATE  
OPERATING PERMIT (FESOP)  
OFFICE OF AIR MANAGEMENT**

**ITT Aerospace Communications Division  
1919 W. Cook Road  
Fort Wayne, IN 46801**

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 and contains the conditions and provisions specified in 326 IAC 2-8 and 40 CFR Part 70.6 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments) and IC 13-15 and IC 13-17 (prior to July 1, 1996, IC 13-1-1-4 and IC 13-7-10).

Operation Permit No.: F003-5093-00201	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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## **SECTION A SOURCE SUMMARY**

### **A.1 General Information**

The Permittee owns and operates a communications equipment and meteorological instrument manufacturing facility.

Responsible Official: Les Sackett  
Source Address: 1919 W. Cook Road, Fort Wayne, IN 46801  
Mailing Address: Same  
SIC Code: 3661,3699  
County Location: Allen  
County Status: Attainment for all criteria pollutants  
Source Status: Synthetic Minor Source, FESOP Program

### **A.2 Emission Units and Pollution Control Summary**

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

- (1) One (1) paint spray booth with particulate emissions controlled by dry filters.
- (2) One (1) washer/cleaner operation.
- (3) One (1) wave Solder operation.
- (4) One (1) Bearing cleaning operation.
- (5) One (1) Cobehn spraying operation.

### **A.3 Insignificant Activities**

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(20):

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour.
- (2) Cleaners and solvents characterized as follows:  
A) having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38° C (100° F) or;  
B) having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20° C (68° F);  
The use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (3) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment
- (4) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

- (5) Paved and unpaved roads and parking lots with public access.
- (6) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (7) 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.

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

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

## **SECTION B            GENERAL CONDITIONS**

- B.1     General Requirements [IC 13-15] [IC 13-17] (Prior to July 1, 1996: IC 13-7 and IC 13-1-1)  
The permittee shall comply with the provisions of IC 13-15 (Permits Generally), IC 13-17 (Air Pollution Control) and the rules promulgated thereunder.
- B.2     Definitions            [326 IAC 2-8-1]  
Terms in this permit shall have the meaning assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11 (prior to July 1, 1996, IC 13-7-2, IC 13-1-1-2), 326 IAC 1-2, and 326 IAC 2-7 shall prevail.
- B.3     Permit Term            [326 IAC 2-8-4(2)]  
This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-5-5-3 (prior to July 1, 1996, IC 13-7-10-2.5), of the permit.
- B.4     Enforceability        [326 IAC 2-8-6]  
(a)     All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.  
  
(b)     Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.
- B.5     Termination of Right to Operate    [326 IAC 2-8-9]  
The expiration of this permit terminates the Permittee's right to operate unless a timely and complete renewal application has been submitted consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-7.
- B.6     Severability            [326 IAC 2-8-4(4)]  
(a)     The provisions of this permit are severable, and if any provisions of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.  
  
(b)     Indiana 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.
- B.7     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.8     Duty to Supplement and Provide Information    [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]  
(a)     The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall also provide additional information as requested by IDEM, OAM, to determine the compliance status of the source in accordance with 326 IAC 2-8-5(a).
- (c) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that the IDEM, OAM 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.
- (d) Upon written request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. For information claimed to be confidential, the Permittee shall furnish such records directly to both the U.S. EPA and IDEM, OAM, along with a claim of confidentiality.

Such confidentiality claims shall meet the requirements of 40 CFR Part 2, Subpart B (when submitting to U.S. EPA) and 326 IAC 17 (when submitting to IDEM, OAM).

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAM 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.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:

- (1) enforcement action;
- (2) permit termination, revocation and reissuance or modification; and
- (3) denial of a permit renewal application.

(b) 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.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)]

Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification and any other certification required under this permit shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

A responsible official is defined at 326 IAC 2-7-1(33).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually certify that the source has complied with the terms and conditions contained in this permit, including emission limitations, standards, and work practices. The certification shall be submitted April 15 to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) This annual compliance certification report required by this permit shall be timely if:
- (1) Delivered by U.S. mail and postmarked on or before the date it is due; or
  - (2) Delivered by any other method if it is received and stamped by IDEM, OAM, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
- (1) The identification of each term and 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; and
  - (5) Such other facts as IDEM, OAM, may require to determine the compliance status of the source.

B.13 Preventive Maintenance Plan [326 IAC 2-8-4(9)] [326 IAC 1-6-3]

- (a) The Permittee shall prepare, maintain and implement operation and Preventive Maintenance Plans as necessary including the following information on each:
- (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;
  - (3) Corrective actions that will be implemented in the event an inspection indicates an out of specification situation;
  - (4) A time schedule for taking such corrective actions including a schedule for devising additional corrective actions for situations that may not have been



predicted; and

(5) Identification and quantification of the replacement parts which will be maintained in inventory for quick replacement.

(b) Preventive Maintenance Plans shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

B.14 Emergency Provision [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 as follows:

(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 describes 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 of this permit;

(4) The Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency occurrence by telephone or facsimile;

Telephone No.: 1-800-451-6027 (ask for Office of Air Management) or,  
Telephone No.: 317-233-5674  
Facsimile No.: 317-233-5967

(5) The Permittee submitted written notice or by facsimile of the emergency to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency. The notice shall fulfill the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(C)(33).

- (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 any emergency or upset provision contained in 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM, may require that the preventive maintenance plan required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency 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 clause (B) above.

- B.15 Deviations from Permit Requirements and/or Conditions [326 IAC 2-8-4(3)(C)(ii)]  
Deviations from requirements, (for emergencies see Condition B.14 - Emergency Provision) the probable cause of such deviations, and any corrective actions or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

Written notification shall be submitted on the attached Deviation Occurrence Reporting Forms.

**B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination**

[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8(a)]  
[326 IAC 2-8-8(b)] [326 IAC 2-8-8(c)]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a 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)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 (prior to July 1, 1996, in IC 13-7-10-5) or if the commissioner determines any of the following:
  - (1) That it 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, OAM, 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 practical. [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, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

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

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include, at minimum, 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(20).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, IN 46206-6015

- (b) **Timely Submittal of Permit Renewal** [326 IAC 2-5-3]  
(1) The Permittee has a duty to submit a timely and complete permit renewal application. A timely renewal application is one that is:
- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
  - (B) Delivered by U. S. mail and postmarked on or before the date it is due; or
  - (C) Delivered by any other method if it is received and stamped by IDEM, OAM, on or before the date it is due.
- (2) If IDEM, OAM 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.
- (c) **Right to Operate After Application of Renewal** [326 IAC 2-8-9]  
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, OAM takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, any additional information identified as needed to process the application.
- B.18 **Administrative Permit Amendment** [326 IAC 2-8-10]  
(a) An administrative permit amendment is a FESOP revision that makes changes of the type specified under 326 IAC 2-8-10(a).
- (b) An administrative permit amendment may be made by IDEM, OAM, consistent with the procedures specified under 326 IAC 2-8-10(b).
- (c) The Permittee may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]
- B.19 **Minor Permit Modification** [326 IAC 2-8-11(a)] [326 IAC 2-8-11(b)(1) and (2)]  
(a) A permit modification is any revision to this permit that cannot be accomplished as an administrative permit amendment under 326 IAC 2-8-10.
- (b) Minor permit modification procedures shall follow the procedures specified under 326 IAC 2-8-11(b)(1)(A) through (F).

- (c) An application requesting the use of minor modification procedures shall meet the requirements of 326 IAC 2-8-3(c) and shall include the information required in 326 IAC 2-8-11(b)(3)(A) through (D).
- (d) The Permittee may make the change proposed in its minor permit modification application immediately after it files such application unless the change is subject to the construction permit requirements of 326 IAC 2-1, 326 IAC 2-2, or 326 IAC 2-3. After the Permittee makes the change allowed under minor permit modification procedures, and until IDEM, OAM takes any of the actions specified in 326 IAC 2-8-11(b)(5), the Permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this period, the Permittee need not comply with the existing permit terms and conditions it seeks to modify. If the Permittee fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against it. [326 IAC 2-8-11(b)(6)]

B.20 Significant Permit Modification [326 IAC 2-8-11(d)]

- (a) Significant modification procedures shall be used for applications requesting permit modifications that do not qualify as minor permit modifications or as administrative amendments.
- (b) Any significant change in existing monitoring permit terms or conditions and every relaxation of reporting or record keeping permit terms or conditions of this permit shall be considered significant.
- (c) Nothing in 326 IAC 2-8-11(d) shall be construed to preclude the Permittee from making changes consistent with 326 IAC 2-8 that would render existing permit compliance terms and conditions irrelevant.
- (d) Significant modifications of this permit shall meet all requirements of 326 IAC 2-8, including those for application, public participation, and review by the U.S. EPA, as they apply to permit issuance and renewal.

B.21 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-8-11(b)(2)]

Notwithstanding 326 IAC 2-8-11(b)(1)(D)(I) and 326 IAC 2-8-11(c)(1), minor permit modification procedures may be used for modifications of this permit involving the use of economic incentives, marketable FESOP's, emissions trading, and other similar approaches to the extent that such minor permit modification procedures are explicitly provided for in the applicable implementation plan (SIP) or in applicable requirements promulgated by the U.S. EPA.

B.22 Operational Flexibility [326 IAC 2-8-15]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) through (d), without 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) The changes do not result in emissions which exceed the emissions allowable

under this permit (whether expressed therein as a rate of emissions or in terms of total emissions);

- (3) The Permittee notifies the:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

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

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326I AC 2-7-1(C)(33). The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (4) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review. Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-8-15(b)(1), (c)(1), and (d).
- (b) For each such change, the required written notification shall include the following:
- (1) A brief description of the change within the source;
  - (2) The date on which the change will occur;
  - (3) Any change in emissions; and
  - (4) Any permit term or condition that is no longer applicable as a result of the change.
- (c) Emission Trades [326 IAC 2-8-15(c)]  
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints in section (a) of this condition and those in 326 IAC 2-8-15(c).
- (d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7) and subject to the constraints in section (a) of this condition and those in 326 IAC 2-8-15(d).

B.23 Construction Permit Requirement [326 IAC 2-1]

Prior to any change in the operation which may result in an increase in allowable emissions exceeding those specified in 326 IAC 2-1-1 (Construction and Operating Permit Requirements), the change must be approved by the Office of Air Management (OAM).

B.24 Inspection and Entry [326 IAC 2-8-5(a)(2)]

Upon presentation of IDEM identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, 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 are kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of demonstrating compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of demonstrating compliance with this permit or applicable requirements.  
[326 IAC 2-8-5(a)(4)]

B.25 Annual Fee Payment [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

- (a) The Permittee shall pay annual fees to IDEM, OAM, consistent with the fee schedule established in 326 IAC 2-8-16.
- (b) Failure to pay may result in administrative enforcement action, revocation of this permit, referral to the Office of Attorney General for collection, or other appropriate measures.
- (c) The Permittee shall pay the annual fee within thirty (30) calendar days of receipt of a billing by IDEM, OAM or in a time period that is consistent with the payment schedule issued by IDEM, OAM.
- (d) If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before due date, the Permittee shall call the following telephone numbers: 1-800-451-6027 or 317-233-0179 (ask for OAM, Data Support Section), to determine the appropriate permit fee. The applicable fee is due April 1 of each year.



## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

### Emissions Limitations [326 IAC 2-8-4(1)]

C.1 Overall Source Limit (326 IAC 2-8)

Pursuant to 326 IAC 2-8, emissions of any regulated pollutant from the entire source shall not exceed 99 tons per 365 day period. Emissions of hazardous air pollutants (HAP) from the entire source shall not exceed 9 tons per 365 day period for any individual HAP or 24 tons per 365 day period of any combination of HAPs. Emissions shall include those from all emission points at the source including those that are insignificant as defined in 326 IAC 2-7-1(20). The source shall be allowed to add insignificant activities not already listed in this permit, as long as the total emissions from the source do not exceed the above specified limits. In the event that any condition or combination of conditions in Section D of this permit differs from the above, the most restrictive limit will prevail.

C.2 Opacity

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following:

- (a) Visible emissions shall not exceed an average of 40 percent opacity in 24 consecutive readings,
- (b) Visible emissions shall not exceed 60 percent opacity for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period.

C.3 Open Burning

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.

C.4 Fugitive Dust Emissions

The Permittee shall be in violation of 326 IAC 6-4 if any of the criteria specified in 326 IAC 6-4-2 (1) through (4) are violated.

C.5 Operation of Equipment [326 IAC 2-8-5(a)(4)]

- (a) All equipment that potentially might emit pollutants into the ambient air shall be properly operated and maintained.
- (b) Unless otherwise stated in this permit, all air pollution control equipment listed in this permit shall be operated at all times that the emission unit(s) vented to the control equipment is in operation.
- (c) The permittee shall perform all necessary maintenance and make all necessary attempts to keep all air pollution control equipment in proper operating condition at all times.

### **Testing [326 IAC 2-8-4(3)]**

- C.6 Performance Testing  
None required.

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

- C.7 Compliance Monitoring [326 IAC 2-8-4(3)]  
Compliance with applicable requirements shall be documented in accordance with the provisions of 326 IAC 2-8-4(3). The Permittee shall be responsible for installing any necessary equipment and initiating any additional monitoring no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee shall notify:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

in writing, with full justification of the reasons for inability to meet this date and a schedule which it expects to meet. If a denial of the request is not received before the monitoring is fully implemented, the schedule shall be deemed approved. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(C)(33).

- C.8 Maintenance of Monitoring Equipment [326 IAC 1-6]  
The Permittee shall perform all necessary maintenance and make all necessary attempts to keep all required monitoring equipment in proper operating condition at all times. In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem.

The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. Preventive maintenance plans of the monitors shall be implemented. In addition prompt correction, as indicated, shall be initiated within the time frames specified, whenever the parameters monitored fall outside of the indicated values.

- C.9 Monitoring Methods [326 IAC 3]  
Any monitoring or testing performed to meet the requirements of this permit shall be performed, whenever applicable according to the provisions of 326 IAC 3, or 40 CFR Part 60, Appendix A, as appropriate, unless some other method is specified in this permit.

- C.10 Pressure Gauge Specifications  
Whenever a condition in this permit requires the taking of pressure drop across any part of the unit or its control device the gauge employed shall have a scale such that the expected normal reading shall be no less than 20 percent of full scale and be accurate within  $\pm 2$  percent of full scale reading. The instrument shall be quality assured and maintained as specified by the vendor.

**Corrective Actions** [326 IAC 2-8-4(1)] [326 IAC 2-8-5(1)]

C.11 Failure to Take Corrective Action

For each unit for which parametric monitoring is required, appropriate corrective actions as described in the Preventive Maintenance Plan shall be taken when indicated by monitoring information. Failure to take corrective action following an excursion of a surrogate monitoring parameter within the prescribed time will constitute a violation of the permit unless taking the corrective action set forth in the Plan would be unreasonable.

After investigating the reason for the excursion, the Permittee may be excused from taking further corrective action for any of the following reasons:

- (a) Providing that prompt action was taken to correct the monitoring equipment, that the monitoring equipment malfunctioned, giving a false reading; or
- (b) The Permittee has determined that the parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied; or
- (c) An automatic measurement was taken when the process was not operating; or
- (d) The Permittee determines that the process has already returned to operating within "normal" parameters and no corrective action is required.

Records shall be kept of all instances in which the action values were not met and of all corrective actions taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.12 Actions Related to Noncompliance Demonstrated by a Stack Test

Whenever the results of the stack test performed in conformance with Condition C.6 - Performance Testing, of this permit exceed the level specified in any condition of this permit, appropriate corrective actions shall be submitted to IDEM-OAM within 30 (thirty) days of receipt of the test results. These actions shall be implemented immediately unless notified by OAM that they are not acceptable. The Permittee shall minimize emissions while the corrective actions are being implemented.

A second test to demonstrate compliance shall be performed within 120 days.

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

C.13 Monitoring Data Availability

All observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions. Records shall be kept of the times that the equipment is not operating. If the

equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality. If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded. At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed 5 percent of the operating time in any quarter. Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason.

C.14 General Record Keeping Requirements

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location and available within one hour upon verbal request of an IDEM, OAM representative, for a minimum of three (3) years. They may be stored elsewhere for the remaining two years providing they are made available within thirty (30) days after written request.
- (b) Records of required monitoring information shall include:
  - (1) The date, place, and time of sampling or measurements;
  - (2) The dates analyses were performed;
  - (3) The company or entity performing the analyses;
  - (4) The analytic techniques or methods used;
  - (5) The results of such analyses; and
  - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include:
  - (1) Copies of all reports required by this permit;
  - (2) All original strip chart recordings for continuous monitoring instrumentation;
  - (3) All calibration and maintenance records;
  - (4) All preventive maintenance and corrective actions that were implemented. Such records shall briefly describe what was done and indicate who did it;
  - (5) Relevant work purchases orders;
  - (6) Quality assurance and quality control procedures;
  - (7) Operator's standard operating procedures;

- (8) Manufacturer's specifications or their equivalent; and
- (9) Equipment "troubleshooting" guidance.

C.15 General Reporting Requirements

- (a) Reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be timely if:
- (1) Delivered by U.S. mail and postmarked on or before the date it is due; or
  - (2) Delivered by any other method if it is received and stamped by IDEM, OAM, on or before the date it is due.
- (c) All instances of deviations from any requirements of this permit must be clearly identified in such reports.
- (d) Any corrective actions taken as a result of an exceedance of a limit, an excursion from the parametric values, or a malfunction that may have caused excess emissions must be clearly identified in such reports.
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

## **SECTION D.1 FACILITY OPERATION CONDITIONS**

One (1) paint spray booth with particulate emissions controlled by dry filters, one (1) washer/cleaner operation, one (1) wave Solder operation, one (1) bearing cleaning operation, and one (1) Cobehn spraying operation.

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

#### **D.1.1 Volatile Organic Compound**

That the volatile organic compound (VOC) air pollutant emissions shall be limited as follows:

- (a) The total quantity of VOCs used at the plant shall be limited to 8.25 tons per month.

Therefore, the requirements of 326 IAC 2-7 do not apply.

- (b) The total quantity of VOCs used in the paint spray booth shall not exceed 15 pounds per day or 3.0 pounds per hour.

Therefore, the requirements of 326 IAC 8-2-9 do not apply.

#### **D.1.2 Hazardous Air Pollutants**

That the hazardous air pollutants emissions shall be limited as follows:

- (a) The total quantity of HAPs used at the plant shall be limited to 2.0 tons per month.

- (b) The total quantity of any single HAP used at the plant shall be limited to 0.75 tons per month.

Therefore, the requirements of 326 IAC 2-7 do not apply.

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

A Preventive Maintenance Plan, in accordance with Condition B.13 of this permit, is required for the dry filters used for particulate control on the paint spray booth.

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

#### **D.1.4 Volatile Organic Compound (VOC) Usage**

That the Permittee shall maintain records at the source of the materials used that contain any VOCs. The records shall be complete and sufficient to establish compliance with the VOC usage limits and/or VOC emission limits established in this permit. The records shall contain a minimum of the following:

- (a) The weight of VOC containing material used, including purchase orders and invoices necessary to verify the type and amount used;

- (b) The VOC content (weight percent) of each material used;

- (c) The weight of VOCs emitted for each compliance period.

D.1.5 Hazardous Air Pollutant (HAP)

That the Permittee shall maintain records at the facility of the materials used that contain any HAPs. The records shall be complete and sufficient to establish compliance with the HAP usage limits and/or HAP emission limits that may be established in this permit. The records shall contain a minimum of the following:

- (a) The weight of HAP containing material used, including purchase orders and invoices necessary to verify the type and amount used;
- (b) The HAP content (**weight percent**) of each material used;
- (c) The weight of HAPs emitted for each compliance period.
- (d) Identification of the facility or facilities associated with the usage of each HAP.

D.1.6 Quarterly Reporting

That a quarterly summary to document compliance with operation conditions number D.1.1 and D.1.2 shall be submitted to the address(es) listed in Section C - General Reporting Requirements, using the enclosed forms or their equivalent, within thirty (30) days after the end of the quarter being reported.

State Form 47738 (5-96)

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

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

Source Name: ITT Aerospace Communications Division  
Source Location :1919 W. Cook Road, Fort Wayne, IN 46801  
FESOP No.: F003-5093-00201

**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:

- 9 Deviation Occurrence Reporting Form (For Control Equipment Monitoring)
- 9 Deviation Occurrence Reporting Form (For Material Usage, Quality, Etc.)
- 9 Relocation Notification
- 9 Test Result (specify) \_\_\_\_\_
- 9 Report (specify) \_\_\_\_\_
- 9 Notification (specify) \_\_\_\_\_
- 9 Other (specify) \_\_\_\_\_

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:



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

### FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) DEVIATION OCCURRENCE REPORT

Source Name: ITT Aerospace Communications Division  
Source Location :1919 W. Cook Road, Fort Wayne, IN 46801  
FESOP No.: F003-5093-00201

If a deviation has occurred, a separate copy of this report must be submitted for **each** material type, quantity usage and operation limitation (except control equipment monitoring) listed in this permit .  
Attach a signed certification to complete this report.

Stack/Vent ID:
Equipment/Operation:
Parameter Subject to Material Type, Quantity Usage or Operation Limitations Specified in the Permit: (ex: 2500 lb per day, 300 hours per yr, 5000 gallons per month)
Determination Period for this Parameter: (ex: 365-day rolling sum, fixed monthly rate)
<b>9</b> Permit Has No Rate Limitations for this Parameter.
Content Restriction for this Parameter: (ex: maximum of 40 percent VOC in inks, 0.5 percent sulfur content)
Demonstration Method for this Parameter: (ex: MSDS, Supplier, material sampling & analysis)
<b>9</b> Permit Has No Content Limitations for this Parameter.
Comments:

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

**FESOP Quarterly Report**

Source Name: ITT Aerospace Communications Division  
Source Location :1919 W. Cook Road, Fort Wayne, IN 46801  
Operation Permit No.: F003-5093-00201  
Facility: Total for entire plant.  
Parameter: VOCs                      Limit: 8.25 tons per month  
Parameter: Single HAP                Limit: 0.75 per month  
Parameter: Total HAPs                Limit: 2.0 tons per month

Year: \_\_\_\_\_

Month	VOC Usage (tons per month)	Single HAP Usage (tons per month)	Total HAP Usage (tons per month)

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: \_\_\_\_\_

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

## Indiana Department of Environmental Management Office of Air Management

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

#### Source Background And Description

Source Name: ITT Aerospace Communications Division  
Source Location :1919 W. Cook Road, Fort Wayne, IN 46801  
County: Allen  
Operation Permit No.: F003-5093-00201  
Permit Reviewer: Warren E. McPhail

The Office of Air Management (OAM) has reviewed a Federally Enforceable State Operating Permit (FESOP) application from ITT Aerospace Communications Division relating to the operation of a communications equipment and meteorological instrument manufacturing facility.

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

- (1) One (1) paint spray booth with particulate emissions controlled by dry filters.
- (2) One (1) washer/cleaner operation.
- (3) One (1) wave Solder operation.
- (4) One (1) Bearing cleaning operation.
- (5) One (1) Cobehn spraying operation.

The source also includes the following insignificant activities:

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour.
- (2) Cleaners and solvents characterized as follows:
  - A) having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38° C (100° F) or;
  - B) having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20° C (68° F);The use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (3) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment

- (4) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (5) Paved and unpaved roads and parking lots with public access.
- (6) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (7) 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.

There are no Enforcement actions pending.

### Recommendation

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

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

A complete FESOP application for the purposes of this review was received on December 13, 1996.

### Potential to Emit (PTE) Calculations

See Appendix A pages 1 and 2, Potential to Emit (PTE) Calculations, for detailed calculations.

### Total PTE

PTE is defined as "the maximum capacity of a stationary source to emit a pollutant under its physical and operational design", [326IAC 2-7-1(28)].

Pollutant	PTE (tons/year)
PM	34.49
PM-10	34.49
SO <sub>2</sub>	0
VOC	117.01
CO	0
NO <sub>x</sub>	0

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP	PTE (tons/year)
Toluene	40.21
others	54.82
TOTAL HAPs	95.03

The potential to emit (as defined in the Indiana Rule) of VOCs is greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7-1.

and

The potential to emit (as defined in Indiana Rule) of any single HAP are greater than or equal to 10 tons/year and the potential to emit (as defined in Indiana Rule) of combination of a HAPs are greater than or equal to 25 tons/year. Therefore, the source is subject to the provisions of 326 IAC 2-7-1.

A source with "potential to emit" high enough to make it a "major source" but whose actual emissions are below the Part 70 emission levels may elect to avoid the Part 70 Operating Permit Program by agreeing to accept a permit with federally enforceable limits that restrict its PTE to below the major source emission levels. The permit containing these restrictions is called a Federally Enforceable State Operating Permit (FESOP).

#### County Attainment Status

The source is located in Allen County.

Pollutant	Status ( <b>attainment or unclassifiable/ severe, moderate, marginal, or maintenance nonattainment</b> )
TSP	Attainment
PM-10	Attainment
SO <sub>2</sub>	Attainment
Ozone	Attainment
CO	Attainment
NO <sub>2</sub>	Attainment

#### Limited PTE

The source has accepted a federally enforceable VOC limit of 99 tons per year, consisting of approximately 2.0 tons per year for the insignificant activities. This VOC limit will insure compliance with all HAP limits.

and

The source has accepted a limit of 9 tons per year for any single HAP and/or 24 tons per year for any combination of HAPs.

Limited PTE (tons/year)							
The table below summarizes the total potential to emit of the significant and insignificant emission units.							
	PM	PM-10	SO2	VOC	CO	NOx	HAPs
Processes	1.18	1.18	-	97.0	-	-	24.0
Insignificant	-	-	-	2.00	-	-	0.0
Total Emissions	1.18	1.18	-	99.0	-	-	24.0

Attached Table 1 summarizes the permit conditions and requirements.

**Federal Rule Applicability**

There are no New Source Performance Standards (326 IAC 12) applicable to this facility.

**State Rule Applicability**

326 IAC 8-4-3 (FESOP)

Pursuant to this rule, the permittee shall perform the record keeping and reporting required.

326 IAC 2-8-4 (FESOP)

Pursuant to this rule, the following conditions shall apply to the surface coating operation :

- (a) The amount of VOCs delivered to the applicators plus the amount of VOCs used for clean-up and all other applications shall be limited to 8.25 tons per month. The amount of any single HAP delivered to the applicators plus the amount of any single HAP used for clean-up and all other applications shall be limited to 0.75 tons per month. The amount of any combination of HAPs delivered to the applicators plus the amount of any combination of HAPs used for clean-up and all other applications shall be limited to 2.0 tons per month.

Therefore, the requirements of 326 IAC 2-7 do not apply.

326 IAC 5-1-2 (Visible Emission Limitations)

Pursuant to this rule, the visible emissions shall meet the following:

- (a) visible emissions shall not exceed an average of 40% opacity in 24 consecutive readings.
- (b) visible emissions shall not exceed 60% opacity for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period.

326 IAC 6-4 (Fugitive Dust Emissions)

Pursuant to this rule, if fugitive dust is visible crossing the boundary or property line of the source, the source is in violation of this fugitive dust rule. Observations of visible emissions crossing the

property line of the source at or near ground level must be made by a qualified representative of IDEM.

**326 IAC 6**

Pursuant to 326 IAC 6, the particulate matter (PM) overspray from the surface coating facilities shall be prevented from being visibly detectable at the exhaust or accumulating on the rooftops or on the ground.

**326 IAC 8-2-9**

Pursuant to 326 IAC 8-2-9, VOC emissions from surface coating operations shall not exceed the following:

- (a) 4.3 pounds per gallon of coating, excluding water, delivered to a coating applicator that applies clear coatings.
- (b) 3.5 pounds per gallon of coating, excluding water, delivered to a coating applicator in a coating application system that is air dried.
- (c) 3.5 pounds per gallon of coating, excluding water, delivered to a coating applicator that applies extreme performance coatings.
- (d) 3.0 pounds per gallon of coating, excluding water, delivered to a coating applicator for all other coatings and coating application systems.

**Compliance Monitoring**

The entire plant has applicable compliance monitoring conditions as specified below:

The volatile organic compound (VOC) air pollutant emissions shall be limited as follows:

- (a) The total quantity of VOCs used at the plant shall be limited to 8.25 tons per month.

The hazardous air pollutant emissions shall be limited as follows:

- (a) The total quantity of HAPs used at the plant shall be limited to 2.0 tons per month.
- (b) The total quantity of any single HAP used at the plant shall be limited to 0.75 tons per month.

These operating limitations are necessary to ensure compliance with 326 IAC 2-8 (FESOP).

**Air Toxic Emissions**

Indiana presently requests applicants to provide information on emissions of the 187 hazardous

air pollutants set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) FESOP Application GSD-08.

This source will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Amendments to Clean Air Act.

## **Conclusion**

The operation of this communications equipment and meteorological instrument manufacturing facility will be subject to the conditions of the attached proposed FESOP No. F003-5093-00201.



Table (1)

<b>Stack/Vent ID:</b>				
<b>Stack/Vent Dimensions:</b> Ht: Dia: Temp: Flow:				
<b>Emission Unit: Entire Plant</b>				
<b>Date of Construction:</b>				
<b>Alternative Scenario: None</b>				
<b>Pollution Control Equipment:</b>				
<b>General Description of Requirement:</b>	VOCs Usage	HAPs Usage	Single HAP Usage	
<b>Numerical Emission Limit:</b>	8.25 tons VOC/mo	2.0 tons HAPs/mo	0.75 tons Single HAP/mo	
<b>Regulation/Citation:</b>	326IAC 2-8-3	326IAC 2-8-3	326IAC 2-8-3	
<b>Compliance Demonstration:</b>				
<b>PERFORMANCE TESTING</b>				
<b>Parameter/Pollutant to be Tested:</b>				
<b>Testing Method/Analysis:</b>				
<b>Testing Frequency/Schedule:</b>				
<b>Submittal of Test Results:</b>				
<b>COMPLIANCE MONITORING</b>				
<b>Monitoring Description:</b>	Total Usage	Total Usage	Total Usage	
<b>Monitoring Method:</b>	Monthly Log	Monthly Log	Monthly Log	
<b>Monitoring Regulation/Citation:</b>				
<b>Monitoring Frequency:</b>	Monthly	Monthly	Monthly	
<b>RECORD KEEPING</b>				
<b>Parameter/Pollutant to be Recorded:</b>	VOCs Used	HAPs Used	Single HAP Used	
<b>Recording Frequency:</b>	Monthly	Monthly	Monthly	
<b>Submittal Schedule of Reports:</b>	When requested by OAM	When requested by OAM	When requested by OAM	
<b>REPORTING REQUIREMENTS</b>				
<b>Information in Report:</b>	Certification, Excess Usage	Certification, Excess Usage	Certification, Excess Usage	
<b>Reporting Frequency/Submittal:</b>	Semiannual	Semiannual	Semiannual	
<b>Additional Comments:</b>				

ITT Aerospace Communications Division  
Fort Wayne, IN  
Permit Reviewer: Warren E. McPhail

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F003-5093-00201

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

Addendum to the  
Technical Support Document for Federally Enforceable State Operating Permit (FESOP)

**ITT Aerospace Communications Division  
1919 West Cook Road  
Fort Wayne, IN 46801**

F003-5093-00201

On September 5, 1997, the Office of Air Management (OAM) had a notice published in the Fort Wayne Journal Gazette in Fort Wayne, Indiana stating that ITT Aerospace Communications Division had applied for a Federally Enforceable State Operating Permit (FESOP) to operate a communications equipment and meteorological instrument manufacturing facility with control. The notice also stated that OAM proposed to issue a FESOP for this operation and provided information on how the public could review the proposed FESOP and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this FESOP should be issued as proposed.

Upon further review, the OAM has decided to make the following changes to the FESOP:

1. Section D.1.3 (Preventive Maintenance [326 IAC 2-8-4(9)]) has been changed to clarify the facilities requiring a Preventative Maintenance Plan (PMP). Section D.1.3 now reads:  
A Preventive Maintenance Plan, in accordance with Condition B.13 of this permit, is required for the dry filters used for particulate control on the paint spray booth.
2. Because no control device monitoring is required, the monitoring device Deviation Occurrence Form has been removed.
3. To reduce the amount of paperwork, the three Quarterly Report Forms have been replaced with one form.

On October 3, 1997, ITT Aerospace Communications Division submitted comments on the proposed FESOP. The summary of the comments is as follows:

**Comment:**

The company requests that a PMP not be required because the only control devices required are dry filters used for particulate control on the paint spray booth, and particulate matter is not limited specifically in the FESOP conditions. If the PMP is retained, the company requests that the control devices covered by the PMP be specified.

**Response:**

The dry filters on the paint spray booth are required to insure compliance with 326 IAC 6-3, and therefore must be covered by a PMP. As mentioned above, Section D.1.3 has been modified to specify the facilities requiring a PMP.

**Comment:**

The company requests that the reference in the TSD to the applicability of 326 IAC 8-2-9 in limiting the VOC content of coatings used in surface coating operations be omitted due to the company's acceptance of VOC limitations in the construction permit for the paint spray booth.

Response:

IDEM agrees that 326 IAC 8-2-9 is not applicable to this facility. Section D.1.1 of the permit has been changed to read:

D.1.1 Volatile Organic Compound

That the volatile organic compound (VOC) air pollutant emissions shall be limited as follows:

- (a) The total quantity of VOCs used at the plant shall be limited to 8.25 tons per month.

Therefore, the requirements of 326 IAC 2-7 do not apply.

- (b) The total quantity of VOCs used in the paint spray booth shall not exceed 15 pounds per day or 3.0 pounds per hour.

Therefore, the requirements of 326 IAC 8-2-9 do not apply.

**Attachment 1: Emissions Calculations  
VOC and Particulate  
From Surface Coating Operations**

TSD Appendix A  
Attachment 1

**Company Name: ITT Aerospace Communications Division  
Address City IN Zip: 1919 W. Cook Road, Fort Wayne, IN 46801  
FESOP Number: F003-5093-00201  
Reviewer: Warren E. McPhail**

Material	Density (Lb/Gal)	Weight % Volatile (H2O& Organic)	Weight % Water	Weight % Organic	Volume % Water	Volume % Non-Vol (solids)	Gal of Material (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
Aeroglaze 2306	7.67	*****	0.0%	*****	0.0%	*****	*****	2.500	6.05	6.05	15.13	363.10	66.27	4.43	36.46	75%
Aeroglaze 2307	7.74	*****	0.0%	*****	0.0%	*****	*****	2.500	6.04	6.04	15.11	362.70	66.19	4.64	35.98	75%
Aeroglaze A276	8.81	*****	0.0%	*****	0.0%	*****	*****	2.500	5.51	5.51	13.77	330.38	60.29	9.04	20.32	75%
Dow Corning	7.74	*****	0.0%	*****	0.0%	*****	*****	2.500	5.67	5.67	14.18	340.41	62.12	5.66	ERR	75%
Goddard MSA9	9.00	*****	*****	0.0%	*****	*****	*****	2.500	0.00	0.00	0.00	0.00	0.00	22.17	0.00	75%
Goddard NS43	14.00	*****	*****	0.0%	*****	*****	*****	2.500	0.00	0.00	0.00	0.00	0.00	34.49	0.00	75%
Solithane	7.74	*****	0.0%	*****	0.0%	*****	*****	2.500	3.12	3.12	7.80	187.15	34.16	12.65	8.99	75%
Aeroglaze 9924	7.95	*****	0.0%	*****	0.0%	*****	*****	2.500	6.92	6.92	17.31	415.47	75.82	2.81	76.94	75%
IITRI	9.18	*****	0.0%	*****	0.0%	*****	*****	2.500	2.78	2.78	6.95	166.89	30.46	17.52	4.43	75%
Silquest A1100	7.26	*****	0.0%	*****	0.0%	*****	*****	2.500	5.68	5.68	14.21	341.07	62.25	4.31	*****	75%
Silquest A1100	7.13	*****	0.0%	*****	0.0%	*****	*****	2.500	6.74	6.74	16.84	404.27	73.78	1.07	*****	75%

**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

**Attachment 2: Emissions Calculations  
HAPs from Surface Coating Operations**

TSD Appendix A  
Attachment 2

**Company Name: ITT Aerospace Communications Division  
Address City IN Zip: 1919 W. Cook Road, Fort Wayne, IN 46801  
FESOP Number: F003-5093-00201  
Reviewer: Warren E. McPhail**

Material	Density (Lb/Gal)	Gal of Material (gal/unit)	Maximum (unit/hour)	Weight % Toluene	Weight % Xylene	Weight % Methanol	Weight % Hexane	Weight % Ethyl Benzene	Weight % MDI	Toluene (ton/yr)	Xylene (ton/yr)	Methanol (ton/yr)	Hexane (ton/yr)	Ethyl Benzene (ton/yr)	MDI (ton/yr)
Aeroglaze 20	7.67	1.00	2.50	*****	*****	*****	*****	*****	*****	16.80	<b>25.20</b>	0.00	12.60	8.40	0.84
Aeroglaze 20	7.74	1.00	2.50	*****	*****	*****	*****	*****	*****	16.95	21.19	0.00	<b>12.71</b>	8.48	<b>0.85</b>
Aeroglaze A2	8.81	1.00	2.50	*****	*****	*****	*****	*****	*****	9.65	24.12	0.00	4.82	<b>9.65</b>	0.00
Dow Corning	7.74	1.00	2.50	*****	*****	*****	*****	*****	*****	16.95	0.00	0.00	0.00	0.00	0.00
Aeroglaze 95	7.95	1.00	2.50	*****	*****	*****	*****	*****	*****	0.00	0.00	<b>1.74</b>	0.00	0.00	0.00
II TRI	9.18	1.00	2.50	*****	*****	*****	*****	*****	*****	<b>40.21</b>	20.10	0.00	0.00	0.00	0.00

**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

**Attachment 1: Emissions Calculations  
VOC and Particulate  
From Surface Coating Operations**

**Company Name: ITT Aerospace Communications Division  
Address City IN Zip: 1919 W. Cook Road, Fort Wayne, IN 46801  
FESOP Number: F003-5093-00201  
Reviewer: Warren E. McPhail**

Material	Density (Lb/Gal)	Weight % Volatile (H2O& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (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
Aeroglaze 2306	7.67	78.90%	0.0%	78.9%	0.0%	16.60%	1.00000	2.500	6.05	6.05	15.13	363.10	66.27	4.43	36.46	75%
Aeroglaze 2307	7.74	78.10%	0.0%	78.1%	0.0%	16.80%	1.00000	2.500	6.04	6.04	15.11	362.70	66.19	4.64	35.98	75%
Aeroglaze A276	8.81	62.50%	0.0%	62.5%	0.0%	27.10%	1.00000	2.500	5.51	5.51	13.77	330.38	60.29	9.04	20.32	75%
Dow Corning	7.74	73.30%	0.0%	73.3%	0.0%	0.00%	1.00000	2.500	5.67	5.67	14.18	340.41	62.12	5.66	ERR	75%
Goddard MSA94B	9.00	10.00%	10.0%	0.0%	15.0%	100.00%	1.00000	2.500	0.00	0.00	0.00	0.00	0.00	22.17	0.00	75%
Goddard NS43-C	14.00	10.00%	10.0%	0.0%	15.0%	100.00%	1.00000	2.500	0.00	0.00	0.00	0.00	0.00	<b>34.49</b>	0.00	75%
Solithane	7.74	40.30%	0.0%	40.3%	0.0%	34.70%	1.00000	2.500	3.12	3.12	7.80	187.15	34.16	12.65	8.99	75%
Aeroglaze 9924	7.95	87.10%	0.0%	87.1%	0.0%	9.00%	1.00000	2.500	6.92	6.92	<b>17.31</b>	<b>415.47</b>	<b>75.82</b>	2.81	76.94	75%
IITRI	9.18	30.30%	0.0%	30.3%	0.0%	62.80%	1.00000	2.500	2.78	2.78	6.95	166.89	30.46	17.52	4.43	75%
Silquest A1100(20%)1	7.26	78.30%	0.0%	78.3%	0.0%	4.30%	1.00000	2.500	5.68	5.68	14.21	341.07	62.25	4.31	132.20	75%
Silquest A1100(5%)	7.13	94.50%	0.0%	94.5%	0.0%	0.30%	1.00000	2.500	6.74	6.74	16.84	404.27	73.78	1.07	2245.95	75%

**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

**Attachment 2: Emissions Calculations  
HAPs from Surface Coating Operations**

TSD Appendix A  
Attachment 2

**Company Name: ITT Aerospace Communications Division  
Address City IN Zip: 1919 W. Cook Road, Fort Wayne, IN 46801  
FESOP Number: F003-5093-00201  
Reviewer: Warren E. McPhail**

Material	Density (Lb/Gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % Toluene	Weight % Xylene	Weight % Methanol	Weight % Hexone	Weight % Ethyl Benzene	Weight % MDI	Toluene (ton/yr)	Xylene (ton/yr)	Methanol (ton/yr)	Hexone (ton/yr)	Ethyl Benzene (ton/yr)	MDI (ton/yr)
Aeroglaze 2306	7.67	1.00	2.50	20.00%	30.00%	0.00%	15.00%	10.00%	1.00%	16.80	<b>25.20</b>	0.00	12.60	8.40	0.84
Aeroglaze 2307	7.74	1.00	2.50	20.00%	25.00%	0.00%	15.00%	10.00%	1.00%	16.95	21.19	0.00	<b>12.71</b>	8.48	<b>0.85</b>
Aeroglaze A276	8.81	1.00	2.50	10.00%	25.00%	0.00%	5.00%	10.00%	0.00%	9.65	24.12	0.00	4.82	<b>9.65</b>	0.00
Dow Corning	7.74	1.00	2.50	20.00%	0.00%	0.00%	0.00%	0.00%	0.00%	16.95	0.00	0.00	0.00	0.00	0.00
Aeroglaze 9924	7.95	1.00	2.50	0.00%	0.00%	2.00%	0.00%	0.00%	0.00%	0.00	0.00	<b>1.74</b>	0.00	0.00	0.00
IITRI	9.18	1.00	2.50	40.00%	20.00%	0.00%	0.00%	0.00%	0.00%	<b>40.21</b>	20.10	0.00	0.00	0.00	0.00

**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