

PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT

**Raybestos Products Company
1204 Darlington Avenue
Crawfordsville, Indiana 47933**

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

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

Operation Permit No.: T107-6836-00007	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date:

SECTION A

SOURCE SUMMARY

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

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary automotive parts manufacturing operation.

Responsible Official: Jan Morse
Source Address: 1204 Darlington Avenue, Crawfordsville, Indiana 47933
Mailing Address: 1204 Darlington Avenue, Crawfordsville, Indiana 47933
Phone Number: 765-362-3500
SIC Code: 2621, 3069, 3499, 3295, 3479, 3471, 2891
County Location: Montgomery
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Minor Source, under PSD Rules;
Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

- (1) One (1) steel blanking and surface finishing operation, installed in 1980, identified as P001, with a maximum capacity of 7,714 pounds steel rings per hour and 9,461 pounds steel scrap per hour, using one (1) cyclone as control, exhausting to one (1) stack (10263), consisting of the following equipment:
 - (A) Two (2) belt sanders.
- (2) One (1) trichloroethylene degreasing operation, identified as P002, consisting of the following equipment:
 - (A) One (1) open top degreaser, installed in 1989, identified as P002A, using one (1) carbon absorber as control, exhausting to one (1) stack (10276);
 - (B) One (1) trichloroethylene storage tank, installed in 1982, with a maximum capacity of 1,800 gallons; and
 - (C) One (1) open top degreaser, using one (1) carbon absorber as control.
- (3) Two (2) sodium nitrite salt baths, one installed in 1967 and the other to be installed in 1998, identified as P003a and P003b, with a maximum capacity of 527 (P003a) and 3500 (P003b) pounds heat treated steel rings per hour, exhausting to one (1) stack (10200).
- (4) One (1) metal grinding and grooving operation, installed in 1952, identified as P004, with a maximum capacity of 5,010 pounds ground and grooved wafers per hour, using baghouse(s) as control, consisting of the following equipment:

- (A) One (1) edge grinder;
 - (B) Sixteen (16) groovers;
 - (C) Three (3) grit blasters;
 - (D) Ten (10) grinders;
 - (E) Four (4) sanders;
 - (F) One (1) packermatic;
 - (G) Two (2) deburr machines;
 - (H) One (1) wire brush;
 - (I) One (1) brush unit;
 - (J) One (1) demag unit;
 - (K) One (1) milling machine;
 - (L) Other miscellaneous equipment;
 - (M) Three (3) grinders;
 - (N) One (1) timesaver;
 - (O) Three (3) sanders;
 - (P) Four (4) lathes;
 - (Q) Five (5) groovers;
 - (R) One (1) covel;
 - (S) Three (3) drill presses;
 - (T) Two (2) slotting machines;
 - (U) One (1) grit blaster;
 - (V) One (1) blanchard;
 - (W) One (1) boring mill;
 - (X) One (1) wafer grinder; and
 - (Y) Other miscellaneous equipment.
- (5) One (1) metal etch lines operation, identified as P007, with a maximum capacity of 3,723 pounds etched steel per hour, using two (2) acid gas scrubbers as control, consisting of the following equipment:

- (A) One (1) etcher, installed in 1986, with an acid gas scrubber as control, exhausting to one (1) stack (13304);
 - (B) One (1) etcher, installed in 1986, with an acid gas scrubber as control, exhausting to one (1) stack (13305); and
 - (C) One (1) lime slaking collection, installed in 1983, identified as P015, with one (1) baghouse as control, exhausting to one (1) stack (13203).
- (6) One (1) general cleaning with solvents operation, installed in 1952, identified as P008, exhausting through roof vents, exits, and entrances.
- (7) One (1) bonding/flattening process, installed in 1984, identified as P009, with a maximum capacity of 8,560 pounds bonded/flattened products per hour, consisting of the following equipment:
- (A) Two (2) bonders, exhausting to one (1) stack (13072);
 - (B) Two (2) bonders, exhausting to one (1) stack (13073);
 - (C) One (1) bonder, exhausting to one (1) stack (13075);
 - (D) One (1) bonder, exhausting to one (1) stack (13076); and
 - (E) One (1) induction bonder, identified as P015, using one (1) baghouse as control, exhausting to one (1) stack (13203).
- (8) One (1) powder mixing operation, installed in 1952, identified as P010, with a maximum capacity of 1,000 pounds mixed powder per hour, using baghouse(s) as control, consisting of the following equipment:
- (A) Thirteen (13) wafer presses;
 - (B) Other miscellaneous equipment;
 - (C) Two (2) pulverizers;
 - (D) One (1) oven;
 - (E) Four (4) wafer presses;
 - (F) Other miscellaneous equipment;
 - (G) Multiple drum opening vents;
 - (H) One (1) iron shaker;
 - (I) One (1) iron blender;
 - (J) One (1) copper blender;
 - (K) One (1) dry blender;
 - (L) One (1) copper shaker;

- (M) One (1) pulverizer; and
 - (N) Other miscellaneous equipment.
- (9) One (1) graphite spray operation, installed in 1952, identified as P011, with a maximum capacity of 164 sintered metal and graphitics pieces per hour, consisting of the following equipment:
- (A) Four (4) wafer press/graphite spray booths, exhausting to one (1) stack (14100);
 - (B) Three (3) wafer press/graphite spray booths, exhausting to one (1) stack (14101);
 - (C) Two (2) wafer press/graphite spray booths, exhausting to one (1) stack (14112);
 - (D) One (1) graphite spray booth, exhausting to one (1) stack (14113); and
 - (E) Two (2) wafer press/graphite spray booths, exhausting to one (1) stack (14116).
- (10) One (1) adhesive rollcoating operation, identified as P012, with a maximum capacity of 40,000 steel discs per hour, consisting of the following equipment:
- (A) One (1) HD rollercoater and oven, installed prior to 1974;
 - (B) One (1) HD dual rollercoater and oven, installed prior to 1974;
 - (C) One (1) AT rollercoater and oven, installed in 1976, using a catalytic oxidizer as control;
 - (D) One (1) AT dual rollercoater and oven, installed in 1976, using a catalytic oxidizer as control;
 - (E) One (1) Rayflex rollcoater, installed in 1974, identified as P004;
 - (F) One (1) adhesive spray booth, installed in 1964, using dry filters as control;
 - (G) One (1) sample department rollcoater, installed in 1995;
 - (H) One (1) rollcoating adhesive application system, identified as an addition to P012, with maximum coating rate of 14,400 steel parts per hour, equipped with a natural gas fired catalytic oxidizer for VOC and HAP control, with maximum heat input capacity no greater than 3.6 million British thermal units per hour;
 - (I) One (1) natural gas fired cure oven, rated at 1.6 million British thermal units per hour;
 - (J) One (1) Mini coater for black resin, installed prior to 1974; and
 - (K) One (1) Union Tool rollcoater, installed prior to 1974.
- (11) One (1) paper saturation operation, identified as P013, with a maximum capacity of 40,400 paper friction products per hour, consisting of the following equipment:
- (A) One (1) post cure oven, installed in 1988, using a thermal oxidizer as control, exhausting to one (1) stack (16101);

- (B) One (1) post cure oven, installed in 1988, using a thermal oxidizer as control, exhausting to one (1) stack (16102);
 - (C) One (1) post cure oven, installed in 1988, using a thermal oxidizer as control, exhausting to one (1) stack (16103);
 - (D) One (1) post cure oven, installed in 1988, using a thermal oxidizer as control, exhausting to one (1) stack (16104);
 - (E) One (1) post cure oven, installed in 1988, using a thermal oxidizer as control, exhausting to one (1) stack (16105);
 - (F) One (1) monorail cure oven, installed in 1988, using a thermal oxidizer as control, exhausting to one (1) stack (16125);
 - (G) One (1) saturator dry out oven, installed in 1988, using a thermal oxidizer as control, exhausting to one (1) stack (16114);
 - (H) One (1) saturator dry out oven, installed in 1988, using a thermal oxidizer as control, exhausting to one (1) stack (16124);
 - (I) One (1) saturator oven, installed in 1993, using a thermal oxidizer as control, exhausting to one (1) stack (13058);
 - (J) One (1) oven drier, installed in 1984, exhausting to one (1) stack (20101);
 - (K) One (1) saturator, installed in 1984, exhausting to one (1) stack (20105);
 - (L) One (1) chinawood oil exhaust fan, installed in 1988, exhausting to one (1) stack (14124);
 - (M) One (1) chinawood oil exhaust fan, installed in 1988, exhausting to one (1) stack (14125); and
 - (N) One (1) resin saturation line, equipped with two (2) 1.6 million British thermal units per hour natural gas fired burners, using a 9.5 million British thermal units per hour natural gas fired thermal oxidizer as control.
- (12) One (1) paper grinding and grooving operation, installed in 1989, identified as P015, with a maximum capacity of 4,278 ground and grooved wafers per hour, using baghouse(s) as control, consisting of the following equipment:
- (A) Four (4) wafer grinders;
 - (B) Three (3) grinders;
 - (C) One (1) groover;
 - (D) One (1) brush unit;
 - (E) One (1) auto control;
 - (F) One (1) conveyor;

- (G) Other miscellaneous equipment;
 - (H) One (1) boring machine;
 - (I) Seven (7) wafer grinders;
 - (J) Five (5) bore and turn;
 - (K) One (1) grinder;
 - (L) Other miscellaneous equipment;
 - (M) Multiple inspection tables;
 - (N) One (1) parts sorter;
 - (O) Two (2) grinders;
 - (P) Three (3) brush units;
 - (Q) Three (3) packermatics;
 - (R) Three (3) press in groovers (PIG);
 - (S) Two (2) chamfer machines;
 - (T) Six (6) grinders;
 - (U) Six (6) groovers;
 - (V) One (1) oil coater;
 - (W) One (1) transfer line;
 - (X) One (1) sander;
 - (Y) One (1) auto control;
 - (Z) Other miscellaneous equipment; and
 - (AA) One (1) groover, identified as P018;
- (13) One (1) adhesive/saturant formulation and mixing operation, installed in 1988, identified as P017, with a maximum capacity of 2,000 phenolic adhesives gallons per hour, consisting of the following equipment:
- (A) One (1) adhesive process kettle, exhausting to one (1) stack (16201);
 - (B) One (1) adhesive process kettle, exhausting to one (1) stack (16202);
 - (C) One (1) adhesive process kettle, exhausting to one (1) stack (16203);
 - (D) One (1) adhesive process kettle, exhausting to one (1) stack (16204);

- (E) One (1) adhesive process kettle, exhausting to one (1) stack (16205);
- (F) One (1) adhesive process kettle, exhausting to one (1) stack (16206);
- (G) One (1) adhesive process kettle, exhausting to one (1) stack (16207);
- (H) One (1) storage tank, identified as MEK (near rollcoaters), with a maximum capacity of 1,000 gallons of MEK;
- (I) One (1) storage tank, identified as Ethanol (near rollcoaters), with a maximum capacity of 8,000 gallons of ethanol;
- (J) One (1) bulk storage tank T-1, containing ethanol, with maximum storage capacity of 12,000 gallons, exhausting to one (1) stack (16159);
- (K) One (1) bulk storage tank T-2, containing resin, with maximum storage capacity of 13,000 gallons, exhausting to one (1) stack (16160);
- (L) One (1) bulk storage tank T-3, containing resin, with maximum storage capacity of 11,000 gallons, exhausting to one (1) stack (16161);
- (M) One (1) bulk storage tank T-4, containing resin, with maximum storage capacity of 4,200 gallons, exhausting to one (1) stack (16162);
- (N) One (1) bulk storage tank T-5, containing MEK, with maximum storage capacity of 4,500 gallons, exhausting to one (1) stack (16163);
- (O) One (1) bulk storage tank T-7, containing resin, with maximum storage capacity of 4,500 gallons, exhausting to one (1) stack (16164);
- (P) One (1) bulk storage tank T-6, containing resin, with maximum storage capacity of 4,500 gallons, exhausting to one (1) stack (16165);
- (Q) One (1) day tank T-14, containing blended resin, with maximum storage capacity of 1,000 gallons, exhausting to one (1) stack (16153);
- (R) One (1) day tank T-13, containing blended resin, with maximum storage capacity of 1,000 gallons, exhausting to one (1) stack (16154);
- (S) One (1) day tank T-12, containing blended resin, with maximum storage capacity of 1,500 gallons, exhausting to one (1) stack (16155);
- (T) One (1) day tank T-10, containing blended resin, with maximum storage capacity of 1,500 gallons, exhausting to one (1) stack (16156);
- (U) One (1) day tank T-9, containing blended resin, with maximum storage capacity of 1,000 gallons, exhausting to one (1) stack (16157);
- (V) One (1) day tank T-8, containing blended resin, with maximum storage capacity of 1,000 gallons, exhausting to one (1) stack (16158);
- (W) One (1) day tank T-16, identified as wash out bed 2, with maximum storage capacity of 1,000 gallons, exhausting to one (1) stack (16170); and

- (X) One (1) day tank T-17, identified as wash out bed 1, with maximum storage capacity of 1,000 gallons, exhausting to one (1) stack (16171).
- (14) One (1) paper blanking operation, installed in 1989, identified as P018, with a maximum capacity of 420 pounds of stamped paper per hour and 1,052 pounds of paper scrap per hour, using baghouse(s) as control, consisting of the following equipment:
 - (A) One (1) blank press;
 - (B) Other miscellaneous equipment;
 - (C) Eight (8) blank presses;
 - (D) Two (2) feeders;
 - (E) Scales;
 - (F) One (1) air press;
 - (G) One (1) baler; and
 - (H) Other miscellaneous equipment.
- (15) One (1) rubber making operation, installed in 1979, identified as P019, with a maximum capacity of 200 pounds of rubber friction material per hour, using baghouse(s) as control, consisting of the following equipment:
 - (A) One (1) banbury mixer.
- (16) One (1) 25.5 million British thermal units per hour (mmBtu/hr) natural gas fired boiler, installed in 1952, identified as P020A, exhausting to one (1) stack (17500).
- (17) One (1) 15 million British thermal units per hour (mmBtu/hr) natural gas fired boiler, installed in 1988, identified as P020B, exhausting to one (1) stack (14165).

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (1) One (1) 60 hp natural gas fired boiler, installed in 1984; and
- (2) Paper making operation including two pulp mixers, associated caustic, alum and wastewater tanks, and one steam heated paper rolling and drying process.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22).
- (b) It is a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

- (a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."

B.2 Definitions [326 IAC 2-7-1]

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

B.3 Permit Term [326 IAC 2-7-5(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 13-15-5-3.

B.4 Enforceability [326 IAC 2-7-7(a)]

- (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 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.6 Severability [326 IAC 2-7-5(5)]

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

B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(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 2-7-4(b)] [326 IAC 2-7-5(6)(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 furnish to IDEM, OAM, within a reasonable time, any information that 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.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAM copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (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.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, 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.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, 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 or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was based on continuous or intermittent data;
 - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);
 - (5) Any insignificant activity that has been added without a permit revision;
 - (6) Such other facts, as specified in Sections D of this permit, as IDEM, OAM may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM.

B.13 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Management,
Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or 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 fulfills the requirement of 326 IAC 2-7-5(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(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. 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 Plans required under 326 IAC 2-7-4(c)(10) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 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 materials of substantial economic value.

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

B.14 Permit Shield [326 IAC 2-7-15]

-
- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.

- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
 - (1) The applicable requirements are included and specifically identified in this permit; or
 - (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM has issued the modification. [326 IAC 2-7-12(b)(7)]

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

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

Indiana Department of Environmental Management
Compliance 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.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) An emergency as defined in 326 IAC 2-7-1(12); or
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
 - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (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 practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(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 2-7-9(c)]

B.18 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

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, Indiana 46206-6015
- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
 - (1) 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) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due.
 - (2) If IDEM, OAM upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
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 2-7 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 being needed to process the application.

- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAM fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

- (a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.
- (b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

B.22 Operational Flexibility [326 IAC 2-7-20]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air 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, Illinois 60604-3590

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

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAM in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

(b) For each such Section 502(b)(10) of the Clean Air Act 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.

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(34).

- (c) Emission Trades [326 IAC 2-7-20(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 of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(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 2-7-5(9). No prior notification of IDEM, OAM, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.23 Construction Permit Requirement [326 IAC 2]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

B.24 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper 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 Part 70 source is located, or emissions related activity is conducted, or where records must be 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 assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-7-6(6)]

- (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM nor an authorized representative, may disclose the information unless and until IDEM, OAM makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]
- (2) The Permittee, and IDEM, OAM acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

B.25 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:
Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

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

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.2 Opacity [326 IAC 5-1]

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

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

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.

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

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

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

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

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.8 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

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

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

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.9 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, 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 may extend the compliance schedule an additional ninety (90) days provided the Permittee notifies:

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

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

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.10 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- (a) 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. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.11 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.12 Temperature Gauge Specifications

Whenever a condition in this permit requires the measurement of temperature 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 twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures in June, 1997.
- (b) If the ERP is disapproved by IDEM, OAM the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (c) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (d) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (e) Upon direct notification by IDEM, OAM that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.
[326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) Submit:
 - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
 - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
 - (3) A verification to IDEM, OAM that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.15 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]
[326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
- (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :
 - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
- (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring 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;
 - (3) An automatic measurement was taken when the process was not operating; or

- (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
 - (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

C.18 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, 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.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) 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.
- (d) 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.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (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 for a minimum of three (3) years and available upon the request of an IDEM, OAM representative, for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or local agency within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (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, where applicable:
 - (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) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Semi-Annual Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due.
- (d) Unless otherwise specified in this permit, any semi-annual report shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) 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.

Stratospheric Ozone Protection

C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

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

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

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (1) One (1) steel blanking and surface finishing operation, installed in 1980, identified as P001, with a maximum capacity of 7,714 pounds steel rings per hour and 9,461 pounds steel scrap per hour, using one (1) cyclone as control, exhausting to one (1) stack (10263), consisting of the following equipment:
 - (A) Two (2) belt sanders.
- (3) Two (2) sodium nitrite salt baths, one installed in 1967 and the other to be installed in 1998, identified as P003a and P003b, with a maximum capacity of 527 (P003a) and 3500 (P003b) pounds heat treated steel rings per hour, exhausting to one (1) stack (10200).
- (4) One (1) metal grinding and grooving operation, installed in 1952, identified as P004, with a maximum capacity of 5,010 pounds ground and grooved wafers per hour, using baghouse(s) as control, consisting of the following equipment:
 - (A) One (1) edge grinder;
 - (B) Sixteen (16) groovers;
 - (C) Three (3) grit blasters;
 - (D) Ten (10) grinders;
 - (E) Four (4) sanders;
 - (F) One (1) packermatic;
 - (G) Two (2) deburr machines;
 - (H) One (1) wire brush;
 - (I) One (1) brush unit;
 - (J) One (1) demag unit;
 - (K) One (1) milling machine;
 - (L) Other miscellaneous equipment;
 - (M) Three (3) grinders;
 - (N) One (1) timesaver;
 - (O) Three (3) sanders;
 - (P) Four (4) lathes;
 - (Q) Five (5) groovers;
 - (R) One (1) covel;
 - (S) Three (3) drill presses;
 - (T) Two (2) slotting machines;
 - (U) One (1) grit blaster;
 - (V) One (1) blanchard;
 - (W) One (1) boring mill;
 - (X) One (1) wafer grinder; and
 - (Y) Other miscellaneous equipment.
- (5) One (1) metal etch lines operation, identified as P007, with a maximum capacity of 3,723 pounds etched steel per hour, using two (2) acid gas scrubbers as control, consisting of the following equipment:
 - (A) One (1) etcher, installed in 1986, with an acid gas scrubber as control, exhausting to one (1) stack (13304);
 - (B) One (1) etcher, installed in 1986, with an acid gas scrubber as control, exhausting to one (1) stack (13305); and
 - (C) One (1) lime slaking collection, installed in 1983, identified as P015, with one (1) baghouse as control, exhausting to one (1) stack (13203).
- (7) One (1) bonding/flattening process, installed in 1984, identified as P009, with a maximum capacity of 8,560 pounds bonded/flattened products per hour, consisting of the following equipment:
 - (A) Two (2) bonders, exhausting to one (1) stack (13072);
 - (B) Two (2) bonders, exhausting to one (1) stack (13073);
 - (C) One (1) bonder, exhausting to one (1) stack (13075);
 - (D) One (1) bonder, exhausting to one (1) stack (13076); and

Raybestos Products Company
Crawfordsville, Indiana
Permit Reviewer: Cathie Moore

Page 32 of 60
OP No. T107-6836-00007

- (E) One (1) induction bonder, identified as P015, using one (1) baghouse as control, exhausting to one (1) stack (13203).
- (8) One (1) powder mixing operation, installed in 1952, identified as P010, with a maximum capacity of 1,000 pounds mixed powder per hour, using baghouse(s) as control, consisting of the following equipment:
 - (A) Thirteen (13) wafer presses;
 - (B) Other miscellaneous equipment;
 - (C) Two (2) pulverizers;
 - (D) One (1) oven;
 - (E) Four (4) wafer presses;
 - (F) Other miscellaneous equipment;
 - (G) Multiple drum opening vents;
 - (H) One (1) iron shaker;
 - (I) One (1) iron blender;
 - (J) One (1) copper blender;
 - (K) One (1) dry blender;
 - (L) One (1) copper shaker;
 - (M) One (1) pulverizer; and
 - (N) Other miscellaneous equipment.
- (9) One (1) graphite spray operation, installed in 1952, identified as P011, with a maximum capacity of 164 sintered metal and graphitics pieces per hour, consisting of the following equipment:
 - (A) Four (4) wafer press/graphite spray booths, exhausting to one (1) stack (14100);
 - (B) Three (3) wafer press/graphite spray booths, exhausting to one (1) stack (14101);
 - (C) Two (2) wafer press/graphite spray booths, exhausting to one (1) stack (14112);
 - (D) One (1) graphite spray booth, exhausting to one (1) stack (14113); and
 - (E) Two (2) wafer press/graphite spray booths, exhausting to one (1) stack (14116).
- (12) One (1) paper grinding and grooving operation, installed in 1989, identified as P015, with a maximum capacity of 4,278 ground and grooved wafers per hour, using baghouse(s) as control, consisting of the following equipment:
 - (A) Four (4) wafer grinders;
 - (B) Three (3) grinders;
 - (C) One (1) groover;
 - (D) One (1) brush unit;
 - (E) One (1) auto control;
 - (F) One (1) conveyor;
 - (G) Other miscellaneous equipment;
 - (H) One (1) boring machine;
 - (I) Seven (7) wafer grinders;
 - (J) Five (5) bore and turn;
 - (K) One (1) grinder;
 - (L) Other miscellaneous equipment;
 - (M) Multiple inspection tables;
 - (N) One (1) parts sorter;
 - (O) Two (2) grinders;
 - (P) Three (3) brush units;
 - (Q) Three (3) packermatics;
 - (R) Three (3) press in groovers (PIG);
 - (S) Two (2) chamfer machines;
 - (T) Six (6) grinders;
 - (U) Six (6) groovers;
 - (V) One (1) oil coater;
 - (W) One (1) transfer line;

(AA)	One (1) groover, identified as P018, using a baghouse as control, exhausting to one (1) stack (14015);
(14)	One (1) paper blanking operation, installed in 1989, identified as P018, with a maximum capacity of 420 pounds of stamped paper per hour and 1,052 pounds of paper scrap per hour, using baghouse(s) as control, consisting of the following equipment: (A) One (1) blank press; (B) Other miscellaneous equipment; (C) Eight (8) blank presses; (D) Two (2) feeders; (E) Scales; (F) One (1) air press; (G) One (1) baler; and (H) Other miscellaneous equipment.
(15)	One (1) rubber making operation, installed in 1979, identified as P019, with a maximum capacity of 200 pounds of rubber friction material per hour, using baghouse(s) as control, consisting of the following equipment: (A) One (1) banbury mixer.
(Insignificant Activity)	Paper making operation including two pulp mixers, associated caustic, alum and wastewater tanks, and one steam heated paper rolling and drying process.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2:

- (a) The PM from the steel blanking and surface finishing operation shall not exceed the 17.32 pounds per hour;
- (b) The PM from the sodium nitrite salt bath shall not exceed 1.67 (P003a) and 5.96 (P003b) pounds per hour;
- (c) The PM from the metal grinding and grooving operation shall not exceed 7.58 pounds per hour;
- (d) The PM from the metal etch lines operation shall not exceed 6.21 pounds per hour;
- (e) The PM from the bonding/flattening process shall not exceed 10.86 pounds per hour;
- (f) The PM from the powder mixing operation shall not exceed 2.57 pounds per hour;
- (g) The PM from the graphite spray shall not exceed 0.07 pounds per hour;
- (h) The PM from the paper grinding and grooving operation shall not exceed 6.82 pounds per hour;
- (i) The PM from the paper blanking operation shall not exceed 3.33 pounds per hour; and
- (j) The PM from the rubber making operation shall not exceed 0.87 pounds per hour.

These limits are established as E in the following formula:

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

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

D.1.2 Volatile Organic Compound (VOC) [326 IAC 8]

Any change or modification to the one (1) graphite spray operation that would lead to an increase volatile organic compound (VOC) emissions above twenty-five (25) tons per year must be approved by the Office of Air Management (OAM) before such change or modification can occur.

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the steel operations which are connected to or require control equipment for particulate matter (PM) emissions in the one (1) steel blanking and surface finishing operation and any control devices.

Compliance Determination Requirements

D.1.4 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

The Permittee is not required to test these facilities by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter (PM) limits specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.5 Particulate Matter (PM)

Pursuant to 326 IAC 6-3-2:

- (a) The cyclone for PM control shall be in operation at all times when the one (1) steel blanking and surface finishing operation is in operation;
- (b) The baghouses for PM control shall be in operation at all times when the one (1) metal grinding and grooving operation is in operation;
- (c) The acid gas scrubbers for PM control shall be in operation at all times when the one (1) metal etch lines operation is in operation;
- (d) The baghouses for PM control shall be in operation at all times when the one (1) powder mixing operation is in operation;
- (e) The dry filters for PM control shall be in operation at all times when the one (1) graphite spray operation is in operation;
- (f) The baghouses for PM control shall be in operation at all times when the one (1) paper grinding and grooving operation is in operation;
- (g) The baghouses for PM control shall be in operation at all times when the one (1) paper blanking operation is in operation; and

- (h) The baghouse for PM control shall be in operation at all times when the one (1) rubber making operation is in operation.

D.1.6 Visible Emissions Notations

- (a) Daily visible emission notations of the steel blanking and surface finishing operation, the metal grinding and grooving operation, the metal etch lines operation, the bonding/flattening process, the powder mixing operation, the paper grinding and grooving operation, the rubber making operation, and the one (1) graphite spray operation stack exhausts shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.1.7 Monitoring

Monitoring of the one (1) sodium nitrite salt bath is not required by this permit. However, any change or modification to this facility as specified in 326 IAC 2-1 may require this facility to have monitoring requirements.

D.1.8 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the one (1) metal grinding and grooving operation, the one (1) powder mixing operation, the one (1) paper grinding and grooving operation, the one (1) paper blanking operation and the one (1) rubber making operation when venting to the atmosphere. Inspections are optional when venting indoors. All defective bags shall be replaced.

D.1.9 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.10 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records of daily visible emission notations of the steel blanking and surface finishing operation, the metal grinding and grooving operation, the metal etch lines operation, the bonding/flattening process, the powder mixing operation, the paper grinding and grooving operation, the paper blanking operation, and the rubber making operation stack exhausts.
- (b) To document compliance with Condition D.1.8, the Permittee shall maintain records of the results of the inspections required under Condition D.1.8.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (2) One (1) trichloroethylene degreasing operation, identified as P002, consisting of the following equipment:
- (A) One (1) open top degreaser, installed in 1989, identified as P002A, using one (1) carbon absorber as control, exhausting to one (1) stack (10276);and
 - (B) One (1) trichloroethylene storage tank, with a maximum capacity of 1,800 gallons.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR Part 63, Subpart A]

The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR Part 63, Subpart T.

D.2.2 Halogenated Solvent Cleaning Machine NESHAP [40 CFR Part 63, Subpart T]

This facility is subject to 40 CFR Part 63, Subpart T, (Halogenated Solvent Cleaning Machine NESHAP) that was promulgated on December 2, 1994. The source shall come into compliance with this rule no later than December 2, 1997.

- (i) The following design requirements for the degreasing operation are applicable:
 - (a) Reduce the room draft as described in §63.463(e)(2)(ii).
 - (b) A freeboard ratio of 0.75 or greater shall be maintained.
 - (c) An automated parts handling system capable of moving parts or parts baskets at a speed of 3.4 meters per minute (11 feet per minute) or less from the initial loading of parts through removal of cleaned parts shall be installed.
 - (d) The degreaser shall be equipped with a device that shuts off the sump heat if the sump liquid solvent level drops to the sump heater coils.
 - (e) The degreaser shall be equipped with a vapor level control device that shuts off sump heat if the vapor level in the vapor cleaning machine rises above the height of the primary condenser.
 - (f) The degreaser shall have primary cooling or condensing coils.
 - (g) A combination of controls, including a freeboard refrigeration device, reduced room draft, and a freeboard ratio of 1.0 shall be used.
 - (h) Monitoring shall be conducted of each control device used.
- (ii) The following operational practices for the degreasing operation are applicable:
 - (a) Cover(s) to each solvent cleaning machine shall be in place during the idling mode, and during the downtime mode unless either the solvent has been removed from the machine or maintenance or monitoring is being performed that requires the cover(s) to not be in place.

- (b) Parts baskets or the parts being cleaned in the degreaser shall not occupy more than fifty percent (50%) of the solvent/air interface area unless the parts baskets or parts are introduced at a speed of 0.9 meters per minute (3 feet per minute) or less.
- (c) Any spraying operations shall be done within the vapor zone or within a section of the solvent cleaning machine that is not directly exposed to the ambient air.
- (d) Parts shall be oriented so that the solvent drains from them freely. Parts having cavities or blind holes shall be tipped or rotated before being removed from any solvent cleaning machine.
- (e) The Permittee shall ensure that, after cleaning, each part is held in the solvent vapor cleaning machine freeboard area for the dwell time determined for that particular part or basket, or for the maximum dwell time determined by using the most complex part type or parts basket.
- (f) During startup the primary condenser shall be turned on before the sump heater.
- (g) During shutdown the sump heater shall be turned off and the solvent vapor layer allowed to collapse before the primary condenser is turned off.
- (h) When solvent is added or drained, the solvent shall be transferred using threaded or other leakproof couplings and the end of the pipe in the solvent sump shall be located beneath the liquid solvent surface.
- (i) The machine and associated controls shall be maintained as recommended by the manufacturers of the equipment or by EPA approved alternative methods.
- (j) Each operator shall complete and pass the applicable sections of the test of solvent cleaning operating procedures in appendix B of Subpart T, if requested during an inspection.
- (k) Waste solvent ,still bottoms, and sump bottoms shall be collected and stored in closed containers that may contain a pressure relief device.
- (l) Sponges, fabric, wood, and paper products shall not be cleaned.

D.2.3 Volatile Organic Compound (VOC) [326 IAC 8-3-3]

Pursuant to 326 IAC 8-3-3 (Open Top Vapor Degreasing Operations), the Permittee shall:

- (1) Equip the vapor degreaser with a cover that can be opened and closed easily without disturbing the vapor zone;
- (2) Keep the cover closed at all times except when processing work loads through the degreaser or except when necessary for maintenance access;
- (3) Minimize solvent carryout by:
 - (A) Racking parts to allow complete drainage;
 - (B) Moving parts in and out of the degreaser at less than 3.3 meters per minute (eleven (11) feet per minute);

- (C) Degreasing the workload in the vapor zone at least thirty (30) seconds or until condensation ceases;
 - (D) Tipping out any pools of solvent on the cleaned parts before removal; and
 - (E) Allowing parts to dry within the degreaser for at least fifteen (15) seconds or until visually dry;
- (4) Not degrease porous or absorbent materials, such as cloth, leather, wood, or rope;
 - (5) Not occupy more than half of the degreaser's open top area with the workload;
 - (6) Not load the degreaser such that the vapor level drops more than fifty percent (50%) of the vapor depth when the workload is removed;
 - (7) Never spray above the vapor level;
 - (8) Repair solvent leaks immediately, or shut down the degreaser;
 - (9) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, such that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere;
 - (10) Prohibit workplace fans from blowing across the degreaser opening.
 - (11) Not allow visually detectable water in the solvent exiting the water separator; and
 - (12) Provide a permanent, conspicuous label summarizing the operating requirements.

D.2.4 Volatile Organic Compound (VOC) [326 IAC 8-3-6]

Pursuant to 326 IAC 8-3-6:

- (a) The Permittee shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover that can be opened and closed easily without disturbing the vapor zone.
 - (2) Equip the degreaser with the following switches:
 - (A) A condenser flow switch and thermostat which shuts off sump heat if condenser coolant stops circulating or becomes too warm.
 - (B) A spray safety switch which shuts off spray pump if the vapor level drops more than ten (10) centimeters (four (4) inches).
 - (3) Equip the degreaser with a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

- (4) Equip the degreaser with the following control device:
 - (A) A carbon adsorption system with ventilation which, with the cover open, achieves a ventilation rate of greater than or equal to fifteen (15) cubic meters per minute per square meter (fifty (50) cubic feet per minute per square foot) of air to vapor interface area and an average of less than twenty-five (25) parts per million of solvent is exhausted over one (1) complete adsorption cycle.
- (b) The Permittee shall ensure that the following operating requirements are met:
 - (1) Keep the cover closed at all times except when the processing workloads through the degreaser.
 - (2) Minimize the solvent carryout emissions by:
 - (A) racking articles to allow complete drainage;
 - (B) moving articles in and out of the degreaser at less than three and three-tenths (3.3) meters per minute (eleven (11) feet per minute);
 - (C) degreasing the workload in the vapor zone at least thirty (30) seconds or until condensation ceases;
 - (D) tipping out any pools of solvent on the cleaned articles before removal; and
 - (E) allowing articles to dry within the degreaser for at least fifteen (15) seconds or until visually dry.
 - (3) Prohibit the entrance into the degreaser of porous or absorbent materials such as, but not limited to, cloth, leather, wood, or rope.
 - (4) Prohibit occupation of more than one-half ($\frac{1}{2}$) of the degreaser's open top area with the workload.
 - (5) Prohibit the loading of the degreaser to the point where the vapor level would drop more than half of the vapor depth when the workload is removed.
 - (6) Prohibit solvent spraying above the vapor level.
 - (7) Repair solvent leaks immediately or shut down the degreaser if leaks cannot be repaired immediately.
 - (8) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty-percent (20%) of the waste solvent by weight could evaporate.
 - (9) Prohibit the exhaust ventilation rate from exceeding twenty (20) cubic meters per minute per square meter (sixty-five (65) cubic feet per minute per square foot) of degreaser open area unless a greater ventilation rate is necessary to meet Occupational Safety and Health Administration requirements.
 - (10) Prohibit workplace fans from blowing across the degreaser opening.
 - (11) Prohibit visually detectable water in the solvent exiting the water separator.

D.2.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility.

Compliance Determination Requirements

D.2.6 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the volatile organic compound limits specified in Conditions D.2.1, D.2.2, and D.2.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.7 Monitoring Requirements

The Permittee shall determine whether each control device used to comply with 40 CFR 63, Subpart T meets the following requirements:

- (a) Ensure weekly that the chilled air blanket temperature measured at the center of the air blanket of the freeboard refrigeration device is no greater than thirty percent (30%) of the solvent's boiling point. A thermometer or thermocouple shall be used to measure the temperature at the center of the air blanket during the idling mode.
- (b) Ensure that flow or movement of air across the top of the freeboard area of the solvent cleaning machine, or within the solvent cleaning machine enclosure does not exceed 15.2 meters per minute (50 feet per minute) at any time, as measured using the procedures in § 63.466(d).
 - (i) The Permittee shall conduct initial and quarterly monitoring of wind speed within six (6) inches above the top of the freeboard area of the solvent cleaning machine as follows:
 - (A) Determine the direction of the wind current by slowly rotating a velometer or similar device until the maximum speed is located;
 - (B) Orient a velometer in the direction of the wind current at each of the four corners of the machine;
 - (C) Record the reading for each corner;
 - (D) Average the values obtained at each corner and record the average wind speed.
- (c) Establish and maintain the operating conditions under which the wind speed was demonstrated to be 15.2 meters per minute (50 feet per minute) or less as described in § 63.466(d).
 - (i) Monitor initially and weekly, the room parameters that are used to achieve the reduced room draft.

- (d) Monitor the hoist speed as follows:
 - (i) Determine the hoist speed by measuring the time it takes for the hoist to travel a measured distance. The speed is equal to the distance in meters divided by the time in minutes (meters per minute).
 - (ii) Monitoring shall be conducted monthly. If after the first year, no exceedances of the hoist speed are measured, the owner or operator may begin monitoring the hoist speed quarterly.
 - (iii) If an exceedance of the hoist speed occurs during quarterly monitoring, the monitoring frequency returns to monthly until another year of compliance without an exceedance is demonstrated.
 - (iv) If an owner or operator can demonstrate to EPA's satisfaction in the initial compliance report that the hoist cannot exceed a speed of 3.4 meters per minute (11 feet per minute), the required monitoring frequency is quarterly, including during the first year of compliance.
- (d) If any of the requirements of the above (a, b, or c) are not met, the Permittee shall determine whether an exceedance has occurred.
 - (i) An exceedance has occurred if (c) has not been met; or
 - (ii) An exceedance has occurred if (a) or (b) has not been met and is not corrected within fifteen (15) days of detection. Adjustments or repairs shall be made to the solvent cleaning system or control device to reestablish required levels. The parameter must be remeasured immediately upon adjustment or repair and demonstrated to be within required limits.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.8 Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- (1) The Permittee shall maintain records to document compliance with Conditions D.2.1, D.2.2 and D.2.3. These records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit. These records shall include a minimum of the following:

The following records shall be kept for the life of the degreaser:

- (a) Owner's manuals or written maintenance and operating procedures, for the solvent cleaning machine and control equipment.
- (b) The date of installation of the solvent cleaning machine and all of its control devices.
- (c) Records of the halogenated HAP solvent content for each solvent used in the solvent cleaning machine.

The following records shall be kept for a period of five (5) years:

- (d) Results of monitoring required in Condition D.2.6.

- (e) Information or actions taken to comply with Condition D.2.1, including written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to accepted levels.
- (f) Estimates of annual solvent consumption of the solvent cleaning machine.

Records maintained for (c) and (f) of this condition shall be taken monthly and shall be complete and sufficient to establish compliance with the NESHAP Subpart T as established in Condition D.2.6.

D.2.9 Reporting Requirements

A summary of the information to document compliance with Conditions D.2.1, D.2.2, and D.2.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, and to the following address:

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (a) The initial notification report for P002 required under 40 CFR 63.468(a) was submitted on August 18, 1995.
- (b) Submit an initial statement of compliance for the solvent cleaning machine no later than 150 days after December 2, 1997. This statement shall include:
 - (i) The name and address of the owner or operator;
 - (ii) The address of the solvent cleaning machine;
 - (iii) A list of the control equipment used to achieve compliance for the solvent cleaning machine.
 - (iv) A list of the parameters that are monitored and the values of these parameters measured on or during the first month after the compliance date.
 - (v) Conditions to maintain the wind speed as designated in Condition D.2.6.
- (c) Submit an annual report by February 1 of the year following the one for which the reporting is being made. This report shall include:
 - (i) A signed statement from the facility owner or his designee stating that, "All operators of solvent cleaning machines have received training on the proper operation of solvent cleaning machines and their control devices sufficient to pass the test required in § 63.463(d)(10).
 - (ii) An estimate of the solvent consumption for each solvent cleaning machine during the reporting period.

- (d) Submit a semiannual exceedance report. Once an exceedance has occurred, the owner or operator shall follow a quarterly reporting format until a request to reduce reporting frequency has been approved as under § 63.468(i). Exceedance reports shall be delivered or postmarked by the 30th day following the end of each calendar half or quarter, as appropriate. The report shall include:
 - (i) Information on the actions taken to comply with monitoring conditions in Condition D.2.6, including records of written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to accepted levels.
 - (ii) The reason for any exceedance that has occurred and description of the actions taken.
 - (iii) If not exceedances of a parameter have occurred, or a piece of equipment has not been inoperative, out of control, repaired, or adjusted, such information shall be stated in the report.

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (6) One (1) general cleaning with solvents operation, installed in 1952, identified as P008, exhausting through roof vents, exits, and entrances.
- (10) One (1) adhesive rollcoating operation, identified as P012, with a maximum capacity of 40,000 steel discs per hour, consisting of the following equipment:
 - (A) One (1) HD rollercoater and oven, installed prior to 1974;
 - (B) One (1) HD dual rollercoater and oven, installed prior to 1974;
 - (C) One (1) AT rollercoater and oven, installed in 1976, using a catalytic oxidizer as control;
 - (D) One (1) AT dual rollercoater and oven, installed in 1976, using a catalytic oxidizer as control;
 - (E) One (1) Rayflex rollcoater, installed in 1974, identified as P004;
 - (F) One (1) adhesive spray booth, installed in 1964, using dry filters as control;
 - (G) One (1) sample department rollcoater, installed in 1995;
 - (H) One (1) rollcoating adhesive application system, identified as an addition to P012, with maximum coating rate of 14,400 steel parts per hour, equipped with a natural gas fired catalytic oxidizer for VOC and HAP control, with maximum heat input capacity no greater than 3.6 million British thermal units per hour;
 - (I) One (1) natural gas fired cure oven, rated at 1.6 million British thermal units per hour;
 - (J) One (1) Mini coater for black resin, constructed prior to 1974; and
 - (K) One (1) Union Tool rollcoater, constructed prior to 1974.
- (13) One (1) adhesive/saturant formulation and mixing operation, installed in 1988, identified as P017, with a maximum capacity of 2,000 phenolic adhesives gallons per hour, consisting of the following equipment:
 - (A) One (1) adhesive process kettle, exhausting to one (1) stack (16201);
 - (B) One (1) adhesive process kettle, exhausting to one (1) stack (16202);
 - (C) One (1) adhesive process kettle, exhausting to one (1) stack (16203);
 - (D) One (1) adhesive process kettle, exhausting to one (1) stack (16204);
 - (E) One (1) adhesive process kettle, exhausting to one (1) stack (16205);
 - (F) One (1) adhesive process kettle, exhausting to one (1) stack (16206);
 - (G) One (1) adhesive process kettle, exhausting to one (1) stack (16207);
 - (H) One (1) storage tank, identified as MEK (near rollcoaters), with a maximum capacity of 1,000 gallons of MEK;
 - (I) One (1) storage tank, identified as Ethanol (near rollcoaters), with a maximum capacity of 8,000 gallons of ethanol;
 - (J) One (1) bulk storage tank T-1, containing ethanol, with maximum storage capacity of 12,000 gallons, exhausting to one (1) stack (16159);
 - (K) One (1) bulk storage tank T-2, containing resin, with maximum storage capacity of 13,000 gallons, exhausting to one (1) stack (16160);
 - (L) One (1) bulk storage tank T-3, containing resin, with maximum storage capacity of 11,000 gallons, exhausting to one (1) stack (16161);
 - (M) One (1) bulk storage tank T-4, containing resin, with maximum storage capacity of 4,200 gallons, exhausting to one (1) stack (16162);
 - (N) One (1) bulk storage tank T-5, containing MEK, with maximum storage capacity of 4,500 gallons, exhausting to one (1) stack (16163);
 - (O) One (1) bulk storage tank T-7, containing resin, with maximum storage capacity of 4,500 gallons, exhausting to one (1) stack (16164);

- (P) One (1) bulk storage tank T-6, containing resin, with maximum storage capacity of 4,500 gallons, exhausting to one (1) stack (16165);
- (Q) One (1) day tank T-14, containing blended resin, with maximum storage capacity of 1,000 gallons, exhausting to one (1) stack (16153);
- (R) One (1) day tank T-13, containing blended resin, with maximum storage capacity of 1,000 gallons, exhausting to one (1) stack (16154);
- (S) One (1) day tank T-12, containing blended resin, with maximum storage capacity of 1,500 gallons, exhausting to one (1) stack (16155);
- (T) One (1) day tank T-10, containing blended resin, with maximum storage capacity of 1,500 gallons, exhausting to one (1) stack (16156);
- (U) One (1) day tank T-9, containing blended resin, with maximum storage capacity of 1,000 gallons, exhausting to one (1) stack (16157);
- (V) One (1) day tank T-8, containing blended resin, with maximum storage capacity of 1,000 gallons, exhausting to one (1) stack (16158);
- (W) One (1) day tank T-16, identified as wash out bed 2, with maximum storage capacity of 1,000 gallons, exhausting to one (1) stack (16170); and
- (X) One (1) day tank T-17, identified as wash out bed 1, with maximum storage capacity of 1,000 gallons, exhausting to one (1) stack (16171).

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), no owner or operator of a facility (the rollcoating adhesive application system (the addition to P012)) engaged in the surface coating of steel parts may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of 3.5 pounds of VOC per gallon of coating, excluding water, as applied by the coating applicator for a forced warm air dried system.
- (b) When operating the thermal oxidizer to achieve the limit for 326 IAC 8-2-9, 3.5 pounds of VOC emitted to the atmosphere per gallon of coating less water delivered to the applicator, the thermal oxidizer shall maintain a minimum 95% capture efficiency and 95% destruction efficiency. These efficiencies and the use of the thermal oxidizer are required by 326 IAC 8-1-2(a)(2). Based upon 326 IAC 8-1-2(c) and the overall control efficiency of 90%, the VOC content of the coating shall not exceed 67 pounds per gallon of coating solids delivered to the applicator.

D.3.2 Volatile Organic Compounds (VOC) [326 IAC 8]

Any change or modification to any of these facilities except the rollcoating adhesive application system (the addition to P012) that would lead to an increase in volatile organic compound (VOC) emissions above twenty-five (25) tons per year must be approved by the Office of Air Management (OAM) before such change or modification can occur.

D.3.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the one (1) adhesive rollcoating operation and any control devices.

Compliance Determination Requirements

D.3.4 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

The Permittee is not required to test the general cleaning with solvents operation and the adhesive/saturant formulation operation by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the volatile organic compound (VOC) limit specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.3.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

Within 60 days of achieving maximum production, the Permittee shall perform VOC testing to show compliance with Condition D.3.1 and 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) for the one (1) rollcoating adhesive application system (the addition to P012) utilizing Method 25, 40 CFR 60, Appendix A, or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

D.3.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.3.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.3.7 Monitoring

Monitoring of the general cleaning with solvents operation and the adhesive/saturant formulation operation is not required by this permit. However, any change or modification to this facility as specified in 326 IAC 2-1 would require this facility to have monitoring requirements.

D.3.8 Volatile Organic Compound (VOC)

Pursuant to Construction Permit (CP 107-8186-00007) issued on June 5, 1997, the catalytic oxidizer for VOC control shall be in operation at all times when the one (1) rollcoating adhesive application system (the addition to P012) is in operation. When the catalytic incinerator is operating, a minimum operating temperature of 750°F shall be maintained or a temperature, fan amperage and duct velocity determined in the compliance tests to maintain at least 90 percent overall control (including capture and destruction) efficiency of VOC emissions. In addition, the catalyst shall be tested quarterly for efficiency.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.9 Record Keeping Requirements

- (a) To document compliance with Conditions D.3.1 and D.3.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.3.1 and D.3.2.
 - (1) The amount and VOC and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used:

- (2) The volume weighted VOC and HAP content of the coatings and solvents used for each day that any coating with VOC content greater than 2.9 pounds per gallon is used. If at any time a coating with VOC content greater than 2.9 pounds per gallon less water is used, compliance with this rule shall be shown by the use of the following equation to calculate daily volume weighted average:

$$\frac{\text{lb VOC}}{\text{gallon less water}} = \frac{3 \text{ coatings } [D_c * O * Q / [1 - W * D_c / D_w]]}{3C}$$

D_c = density of coating, lb/gal

O = weight percent organics, %

W = percent volume water, %

D_w = density of water, lb/gal

Q = quantity of coating, gal/unit

C = total of coatings used, gal/unit;

- (3) The solvent usage for each month;
- (4) The total VOC and HAP usage for each month; and
- (5) The weight of VOC and HAP emitted for each compliance period.
- (b) To document compliance with Condition D.3.8, the Permittee shall maintain a daily log of oxidizer operating temperatures and quarterly catalyst efficiency tests.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.4

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (11) One (1) paper saturation operation, identified as P013, with a maximum capacity of 40,400 paper friction products per hour, consisting of the following equipment:
- (A) One (1) post cure oven, installed in 1988, using a thermal oxidizer as control, exhausting to one (1) stack (16101);
 - (B) One (1) post cure oven, installed in 1988, using a thermal oxidizer as control, exhausting to one (1) stack (16102);
 - (C) One (1) post cure oven, installed in 1988, using a thermal oxidizer as control, exhausting to one (1) stack (16103);
 - (D) One (1) post cure oven, installed in 1988, using a thermal oxidizer as control, exhausting to one (1) stack (16104);
 - (E) One (1) post cure oven, installed in 1988, using a thermal oxidizer as control, exhausting to one (1) stack (16105);
 - (F) One (1) monorail cure oven, installed in 1988, using a thermal oxidizer as control, exhausting to one (1) stack (16125);
 - (G) One (1) saturator dry out oven, installed in 1988, using a thermal oxidizer as control, exhausting to one (1) stack (16114);
 - (H) One (1) saturator dry out oven, installed in 1988, using a thermal oxidizer as control, exhausting to one (1) stack (16124);
 - (I) One (1) saturator oven, installed in 1993, using a thermal oxidizer as control, exhausting to one (1) stack (13058);
 - (J) One (1) oven drier, installed in 1984, exhausting to one (1) stack (20101);
 - (K) One (1) saturator, installed in 1984, exhausting to one (1) stack (20105);
 - (L) One (1) chinawood oil exhaust fan, installed in 1988, exhausting to one (1) stack (14124);
 - (M) One (1) chinawood oil exhaust fan, installed in 1988, exhausting to one (1) stack (14125); and
 - (N) One (1) resin saturation line, equipped with two (2) 1.6 million British thermal units per hour natural gas fired burners, using a 9.5 million British thermal units per hour natural gas fired thermal oxidizer as control.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 (General Reduction Requirements) and Construction Permit (CP107-3006-00007), issued on November 23, 1993, the one (1) saturator oven (identified as (I) above) shall remain totally enclosed at all times it is in operation. The operating temperature of the thermal oxidizer shall be maintained at minimum operating temperature of 1,400°F, or a temperature determined in the latest stack test that assures ninety-five percent (95%) destruction of the captured volatile organic compound (VOC). This will satisfy the requirements of Best Available Control Technology (BACT)

D.4.2 Volatile Organic Compound (VOC) [326 IAC 8-2-5]

- (a) Pursuant to 326 IAC 8-2-5 (Paper Coating Operations), the owner or operator of a facility engaged in the surface coating of paper may not cause, allow, or permit the discharge into the atmosphere of any volatile organic compound in excess of two and nine-tenths (2.9) pounds of VOC per gallon of coating excluding water delivered to the coating applicator.

- (b) When operating the thermal oxidizer to achieve the limit for 326 IAC 8-2-5, 2.9 pounds of VOC emitted to the atmosphere per gallon of coating less water delivered to the applicator, the thermal oxidizer shall maintain a minimum 97.5% capture efficiency and 97.5% destruction efficiency. These efficiencies and the use of the thermal oxidizer are required by 326 IAC 8-1-2(a)(2). Based upon 326 IAC 8-1-2(c) and the overall control efficiency of 95%, the VOC content of the coating shall not exceed 95 pounds per gallon of coating solids delivered to the applicator.

D.4.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.4.4 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

During the period between 30 and 36 months after issuance of this permit, the Permittee shall perform VOC testing utilizing Method 25, 40 CFR 60, Appendix A, or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. The Office of Air Management has determined that one oxidizer of a multiple unit may be used as a representative of the other oxidizers. Subsequently, one oxidizer of the multiple unit will be tested according to the test schedule, until all oxidizers are tested. However, if the representative oxidizer does not show compliance with the limits or, after calculations to convert the results from the representative oxidizer to the other oxidizers, the other oxidizers are not in compliance, then a re-test of all oxidizers shall be performed to show compliance with the permit requirements. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

D.4.5 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.4.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.4.6 Volatile Organic Compound (VOC)

To demonstrate compliance with Condition D.4.2, the thermal oxidizers for VOC control shall be in operation at all times when the one (1) paper saturation operation is in operation. The operating temperature of the thermal oxidizer shall be maintained at a minimum operating temperature of 1,400°F, or a temperature determined in the latest stack test that assures ninety-five percent (95%) overall control (including capture and destruction) efficiency of volatile organic compound (VOC) emissions.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.7 Record Keeping Requirements

- (a) To document compliance with Conditions D.4.1 and D.4.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.4.1 and D.4.2.

- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;
- (2) A log of the usage each month
- (3) The volume weighted VOC content of the coatings used for each month for each day that any coating with VOC content greater than 2.9 pounds per gallon is used. If at any time a coating with VOC content greater than 2.9 pounds per gallon less water is used, compliance with this rule shall be shown by the use of the following equation to calculate daily volume weighted average:

$$\frac{\text{lb VOC}}{\text{gallon less water}} = \frac{3 \text{ coatings } [Dc * O * Q / [1 - W * Dc / Dw]]}{3C}$$

Dc = density of coating, lb/gal

Dw = density of water, lb/gal

O = weight percent organics, % Q = quantity of coating, gal/unit

W = percent volume water, %

C = total of coatings used, gal/unit;

- (4) The solvent usage for each month;
 - (5) The total VOC usage for each month; and
 - (6) The weight of VOCs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.5

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(16) One (1) 25.5 million British thermal units per hour (mmBtu/hr) natural gas fired boiler, installed in 1952, identified as P020A, exhausting to one (1) stack (17500).

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.5.1 Particulate Matter (PM) [326 IAC 6-2-3]

Pursuant to this 326 IAC 6-2-3(a), the particulate matter (PM) emissions from the 25.5 million British thermal unit per hour (mmBtu/hr) boiler (P020A) constructed in 1952, shall not exceed 0.8 pounds per million Btu. This limitation is used because the calculated limitation was greater than 0.80 pounds per million Btu.

The calculated limitation is based on the following equation:

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}}$$

Where:

C = Maximum ground level concentration with respect to distance from the point source at the "critical" wind speed for level terrain. This shall equal 50 micrograms per cubic meter for a period not to exceed a sixty (60) minute time period.

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

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 operation 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.

N = Number of stacks in fuel burning operation.

a = Plume rise factor which is used to make allowance for less than theoretical plume rise. The value 0.67 shall be used for Q less than or equal to 1,000 mmBtu/hr heat input. The value 0.8 shall be used for Q greater than 1,000 mmBtu/hr heat input.

h = Stack height in feet. If a number of stacks of different heights exist, the average stack height to represent "N" stacks shall be calculated by weighing each stack height with its particulate matter emission rate as follows:

$$h = \frac{\sum_{i=1}^N H_i \times pa_i \times Q}{\sum_{i=1}^N pa_i \times Q}$$

Where:

pa = the actual controlled emission rate in lb/mmBtu using the emission factor from AP-42 or stack test data. Stacks constructed after January 1, 1971, shall be credited with GEP stack height only. GEP stack height shall be calculated as specified in 326 IAC 1-7.

Compliance Determination Requirements

D.5.2 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter (PM) limit specified in Condition D.5.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.5.3 Monitoring

Monitoring of this facility is not required by this permit. However, any change or modification to this facility as specified in 326 IAC 2-1 would require this facility to have monitoring requirements.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.5.4 Natural Gas Fired Boiler Certification

An annual certification shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the Natural Gas Fired Boiler Certification form located at the end of this permit, or its equivalent, no later than July 1 of each year.

SECTION D.6

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(17) One (1) 15 million British thermal units per hour (mmBtu/hr) natural gas fired boiler, installed in 1988, identified as P020B, exhausting to one (1) stack (14165).

Insignificant Activity: One (1) 60 hp natural gas fired boiler, installed in 1984.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.6.1 Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emissions for Sources of Indirect Heating), the one (1) 15 million British thermal unit per hour (mmBtu/hr) boiler (P020B) constructed in 1988, and the one (1) 60 hp boiler shall be limited to 0.40 pounds per million British thermal unit (lb/mmBtu)

This limitation is based on the following equation:

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

Where:

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

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 operation 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.

Compliance Determination Requirements

D.6.2 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

The Permittee is not required to test these facilities by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter (PM) limit specified in Condition D.6.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.6.3 Monitoring

Monitoring of these facilities is not required by this permit. However, any change or modification to this facility as specified in 326 IAC 2-1 would require this facility to have monitoring requirements.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.6.4 Natural Gas Fired Boiler Certification

An annual certification for the one (1) 15 million British thermal unit per hour (mmBtu/hr) boiler shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the Natural Gas Fired Boiler Certification form located at the end of this permit, or its equivalent, no later than July 1 of each year.

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

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Raybestos Products Company
Source Address: 1204 Darlington Avenue, Crawfordsville, Indiana 47933
Mailing Address: 1204 Darlington Avenue, Crawfordsville, Indiana 47933
Part 70 Permit No.: T107-6836-00007

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

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

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: Raybestos Products Company
Source Address: 1204 Darlington Avenue, Crawfordsville, Indiana 47933
Mailing Address: 1204 Darlington Avenue, Crawfordsville, Indiana 47933
Part 70 Permit No.: T107-6836-00007

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2	
9 1.	This is an emergency as defined in 326 IAC 2-7-1(12)
C	The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
C	The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9 2.	This is a deviation, reportable per 326 IAC 2-7-5(3)(c)
C	The Permittee must submit notice in writing within ten (10) calendar days

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

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

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

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

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

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

**PART 70 OPERATING PERMIT
NATURAL GAS FIRED BOILER CERTIFICATION**

Source Name: Raybestos Products Company
Source Address: 1204 Darlington Avenue, Crawfordsville, Indiana 47933
Mailing Address: 1204 Darlington Avenue, Crawfordsville, Indiana 47933
Part 70 Permit No.: T107-6836-00007

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

Report period

Beginning: _____

Ending: _____

Boiler Affected

Alternate Fuel

Days burning alternate fuel

From

To

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

Signature:

Printed Name:

Title/Position:

Date:

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

**PART 70 OPERATING PERMIT
 SEMI-ANNUAL COMPLIANCE MONITORING REPORT**

Source Name: Raybestos Products Company
 Source Address: 1204 Darlington Avenue, Crawfordsville, Indiana 47933
 Mailing Address: 1204 Darlington Avenue, Crawfordsville, Indiana 47933
 Part 70 Permit No.: T107-6836-00007

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

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted semi-annually. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of each Deviation

Form Completed By: _____
 Title/Position: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name: Raybestos Products Company
Source Location: 1204 Darlington Avenue, Crawfordsville, Indiana 47933
County: Montgomery
SIC Code: 2621, 3069, 3499, 3295, 3479, 3471, and 2891
Operation Permit No.: T107-6836-00007
Permit Reviewer: Cathie Moore

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Raybestos Products Company relating to the operation of an automotive parts manufacturing operation.

Permitted Emission Units and Pollution Control Equipment

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

- (1) One (1) steel blanking and surface finishing operation, installed in 1980, identified as P001, with a maximum capacity of 7,714 pounds steel rings per hour and 9,461 pounds steel scrap per hour, using one (1) cyclone as control, exhausting to one (1) stack (10263), consisting of the following equipment:
 - (A) Two (2) belt sanders.
- (2) One (1) trichloroethylene degreasing operation, identified as P002, consisting of the following equipment:
 - (A) One (1) open top degreaser, installed in 1989, identified as P002A, using one (1) carbon absorber as control, exhausting to one (1) stack (10276);
 - (B) One (1) trichloroethylene storage tank, installed in 1982, with a maximum capacity of 1,800 gallons.
- (3) One (1) sodium nitrite salt bath, installed in 1967, identified as P003, with a maximum capacity of 527 pounds heat treated steel rings per hour, exhausting to one (1) stack (10200).
- (4) One (1) metal grinding and grooving operation, installed in 1952, identified as P004, with a maximum capacity of 5,010 pounds ground and grooved wagers per hour, using two (2) baghouses as control, exhausting to two (2) stacks (14003 and 14006), consisting of the following equipment:
 - (A) One (1) edge grinder, exhausting to 14003;
 - (B) Sixteen (16) groovers, exhausting to stack 14003;

- (C) Three (3) grit blasters, exhausting to stack 14003;
 - (D) Ten (10) grinders, exhausting to stack 14003;
 - (E) Four (4) sanders, exhausting to stack 14003;
 - (F) One (1) packermatic, exhausting to stack 14003;
 - (G) Two (2) deburr machines, exhausting to stack 14003;
 - (H) One (1) wire brush, exhausting to stack 14003;
 - (I) One (1) brush unit, exhausting to stack 14003;
 - (J) One (1) demag unit, exhausting to stack 14003;
 - (K) One (1) milling machine, exhausting to stack 14003;
 - (L) Other miscellaneous equipment, exhausting to stack 14003;
 - (M) Three (3) grinders, exhausting to stack 14006;
 - (N) One (1) timesaver, exhausting to stack 14006;
 - (O) Three (3) sanders, exhausting to stack 14006;
 - (P) Four (4) lathes, exhausting to stack 14006;
 - (Q) Five (5) groovers, exhausting to stack 14006;
 - (R) One (1) covel, exhausting to stack 14006;
 - (S) Three (3) drill presses, exhausting to stack 14006;
 - (T) Two (2) slotting machines, exhausting to stack 14006;
 - (U) One (1) grit blaster, exhausting to stack 14006;
 - (V) One (1) blanchard, exhausting to stack 14006;
 - (W) One (1) boring mill, exhausting to stack 14006;
 - (X) One (1) wafer grinder, exhausting to stack 14006; and
 - (Y) Other miscellaneous equipment.
- (5) One (1) metal etch lines operation, identified as P007, with a maximum capacity of 3,723 pounds etched steel per hour, using two (2) acid gas scrubbers as control, consisting of the following equipment:

- (A) One (1) etcher, installed in 1986, with an acid gas scrubber as control, exhausting to one (1) stack (13304);
 - (B) One (1) etcher, installed in 1986, with an acid gas scrubber as control, exhausting to one (1) stack (13305); and
 - (C) One (1) lime slaking collection, installed in 1983, identified as P015, with one (1) baghouse as control, exhausting to one (1) stack (13203).
- (6) One (1) general cleaning with solvents operation, installed in 1952, identified as P008, exhausting through roof vents, exits, and entrances.
- (7) One (1) bonding/flattening process, installed in 1984, identified as P009, with a maximum capacity of 8,560 pounds bonded/flattened products per hour, consisting of the following equipment:
- (A) Two (2) bonders, exhausting to one (1) stack (13072);
 - (B) Two (2) bonders, exhausting to one (1) stack (13073);
 - (C) One (1) bonder, exhausting to one (1) stack (13075);
 - (D) One (1) bonder, exhausting to one (1) stack (13076); and
 - (E) One (1) induction bonder, identified as P015, using one (1) baghouse as control, exhausting to one (1) stack (13203).
- (8) One (1) powder mixing operation, installed in 1952, identified as P010, with a maximum capacity of 1,000 pounds mixed powder per hour, using three (3) baghouses as control, consisting of the following equipment:
- (A) Thirteen (13) wafer presses, exhausting to one (1) stack (14000);
 - (B) Other miscellaneous equipment, exhausting to one (1) stack (14000);
 - (C) Two (2) pulverizers, exhausting to one (1) stack (14002);
 - (D) One (1) oven, exhausting to one (1) stack (14002);
 - (E) Four (4) wafer presses, exhausting to one (1) stack (14002);
 - (F) Other miscellaneous equipment, exhausting to one (1) stack (14002);
 - (G) Multiple drum opening vents, exhausting to one (1) stack (14013);
 - (H) One (1) iron shaker, exhausting to one (1) stack (14013);
 - (I) One (1) iron blender, exhausting to one (1) stack (14013);
 - (J) One (1) copper blender, exhausting to one (1) stack (14013);

- (K) One (1) dry blender, exhausting to one (1) stack (14013);
 - (L) One (1) copper shaker, exhausting to one (1) stack (14013);
 - (M) One (1) pulverizer, exhausting to one (1) stack (14013); and
 - (N) Other miscellaneous equipment, exhausting to one (1) stack (14013).
- (9) One (1) graphite spray operation, installed in 1952, identified as P011, with a maximum capacity of 164 sintered metal and graphitics per hour, using dry filters as control, consisting of the following equipment:
- (A) Four (4) wafer press/graphite spray booths, exhausting to one (1) stack (14100);
 - (B) Three (3) wafer press/graphite spray booths, exhausting to one (1) stack (14101);
 - (C) Two (2) wafer press/graphite spray booths, exhausting to one (1) stack (14112);
 - (D) One (1) graphite spray booth, exhausting to one (1) stack (14113); and
 - (E) Two (2) wafer press/graphite spray booths, exhausting to one (1) stack (14116).
- (10) One (1) adhesive rollcoating operation, identified as P012, with a maximum capacity of 40,000 steel discs per hour, consisting of the following equipment:
- (A) One (1) HD rollcoater oven, installed prior to 1974, exhausting to one (1) stack (13080);
 - (B) One (1) AT rollcoater oven, installed in 1976, using a catalytic oxidizer as control, exhausting to one (1) stack (13081);
 - (C) One (1) HD rollcoater drier, installed prior to 1974, exhausting to one (1) stack (13144);
 - (D) One (1) AT rollcoater drier, installed in 1976, using a catalytic oxidizer as control, exhausting to one (1) stack (13145);
 - (E) One (1) Rayflex rollcoater, installed in 1974, identified as P004, exhausting to one (1) stack (14003);
 - (F) One (1) adhesive spray booth, installed in 1964, using dry filters as control, exhausting to one (1) stack (15183);
 - (G) One (1) sample department rollcoater, installed in 1995;

- (H) One (1) rollcoating adhesive application system, identified as an addition to P012, with maximum coating rate of 14,400 steel parts per hour, equipped with a natural gas fired catalytic oxidizer for VOC and HAP control, with maximum heat input capacity no greater than 3.6 million British thermal units per hour, exhausting to one (1) stack; and
 - (I) One (1) natural gas fired cure oven, rated at 1.6 million British thermal units per hour.
- (11) One (1) paper saturation operation, identified as P013, with a maximum capacity of 40,400 paper friction products per hour, consisting of the following equipment:
- (A) One (1) post cure oven, installed in 1988, using a thermal oxidizer as control, exhausting to one (1) stack (16101);
 - (B) One (1) post cure oven, installed in 1988, using a thermal oxidizer as control, exhausting to one (1) stack (16102);
 - (C) One (1) post cure oven, installed in 1988, using a thermal oxidizer as control, exhausting to one (1) stack (16103);
 - (D) One (1) post cure oven, installed in 1988, using a thermal oxidizer as control, exhausting to one (1) stack (16104);
 - (E) One (1) post cure oven, installed in 1988, using a thermal oxidizer as control, exhausting to one (1) stack (16105);
 - (F) One (1) monorail cure oven, installed in 1988, using a thermal oxidizer as control, exhausting to one (1) stack (16125);
 - (G) One (1) saturator dry out oven, installed in 1988, using a thermal oxidizer as control, exhausting to one (1) stack (16114);
 - (H) One (1) saturator dry out oven, installed in 1988, using a thermal oxidizer as control, exhausting to one (1) stack (16124);
 - (I) One (1) saturator oven, installed in 1993, using a thermal oxidizer as control, exhausting to one (1) stack (13058);
 - (J) One (1) oven drier, installed in 1984, exhausting to one (1) stack (20101);
 - (K) One (1) saturator, installed in 1984, exhausting to one (1) stack (20105);
 - (L) One (1) chinawood oil exhaust fan, installed in 1988, exhausting to one (1) stack (14124); and
 - (M) One (1) chinawood oil exhaust fan, installed in 1988, exhausting to one (1) stack (14125).
- (12) One (1) paper grinding and grooving operation, installed in 1989, identified as P015, with a maximum capacity of 4,278 ground and grooved wafers per hour, consisting of the following equipment:

- (A) Four (4) wafer grinders, using a baghouse as control, exhausting to one (1) stack (13200);
- (B) Three (3) grinders, using a baghouse as control, exhausting to one (1) stack (13200);
- (C) One (1) groover, using a baghouse as control, exhausting to one (1) stack (13200);
- (D) One (1) brush unit, using a baghouse as control, exhausting to one (1) stack (13200);
- (E) One (1) auto control, using a baghouse as control, exhausting to one (1) stack (13200);
- (F) One (1) conveyor, using a baghouse as control, exhausting to one (1) stack (13200);
- (G) Other miscellaneous equipment, exhausting to one (1) stack (13200);
- (H) One (1) boring machine, using a baghouse as control, exhausting to one (1) stack (13201);
- (I) Seven (7) wafer grinders, using a baghouse as control, exhausting to one (1) stack (13201);
- (J) Five (5) bore and turn, using a baghouse as control, exhausting to one (1) stack (13201);
- (K) One (1) grinder, using a baghouse as control, exhausting to one (1) stack (13201);
- (L) Other miscellaneous equipment, exhausting to one (1) stack (13201);
- (M) Multiple inspection tables, using a baghouse as control, exhausting to one (1) stack (13203);
- (N) One (1) parts sorter, using a baghouse as control, exhausting to one (1) stack (13203);
- (O) Two (2) grinders, using a baghouse as control, exhausting to one (1) stack (13203);
- (P) Three (3) brush units, using a baghouse as control, exhausting to one (1) stack (13203);
- (Q) Three (3) packermatics, using a baghouse as control, exhausting to one (1) stack (13203);
- (R) Three (3) press in groovers (PIG), using a baghouse as control, exhausting to one (1) stack (13203);

- (S) Two (2) chamferings, using a baghouse as control, exhausting to one (1) stack (13203);
 - (T) Six (6) grinders, using a baghouse as control, exhausting to one (1) stack (13203);
 - (U) Six (6) groover, using a baghouse as control, exhausting to one (1) stack (13203);
 - (V) One (1) oil coater, using a baghouse as control, exhausting to one (1) stack (13203);
 - (W) One (1) transfer line, using a baghouse as control, exhausting to one (1) stack (13203);
 - (X) One (1) sander, using a baghouse as control, exhausting to one (1) stack (13203);
 - (Y) One (1) auto control, using a baghouse as control, exhausting to one (1) stack (13203);
 - (Z) Other miscellaneous equipment, exhausting to one (1) stack (13203); and
 - (AA) One (1) groover, identified as P018, using a baghouse as control, exhausting to one (1) stack (14015);
- (13) One (1) adhesive/saturant formulation and mixing operation, installed in 1988, identified as P017, with a maximum capacity of 2,000 phenolic adhesives per hour, consisting of the following equipment:
- (A) One (1) adhesive kettle, identified as T-1, with a maximum capacity of 12,000 gallons of ethanol, exhausting to one (1) stack (16201);
 - (B) One (1) adhesive kettle, identified as T-2, with a maximum capacity of 13,000 gallons of resin 536, exhausting to one (1) stack (16202);
 - (C) One (1) adhesive kettle, identified as T-3, with a maximum capacity of 11,000 gallons of resin 536, exhausting to one (1) stack (16203);
 - (D) One (1) adhesive kettle, identified as T-4, with a maximum capacity of 4,200 gallons of resin 479, exhausting to one (1) stack (16204);
 - (E) One (1) adhesive kettle, identified as T-5, with a maximum capacity of 4,500 gallons of MEK, exhausting to one (1) stack (16205);
 - (F) One (1) adhesive kettle, identified as T-6, with a maximum capacity of 4,500 gallons of resin 295E, exhausting to one (1) stack (16206);
 - (G) One (1) adhesive kettle, identified as T-7, with a maximum capacity of 4,400 gallons of resin 295E, exhausting to one (1) stack (16207);

- (H) One (1) storage tank, identified as MEK (near rollcoaters), with a maximum capacity of 1,000 gallons of MEK; and
 - (I) One (1) storage tank, identified as Ethanol (near rollcoaters), with a maximum capacity of 2,000 gallons of ethanol.
- (14) One (1) paper blanking operation, installed in 1989, identified as P018, with a maximum capacity of 420 pounds of stamped paper per hour and 1,052 pounds of paper scrap per hour, consisting of the following equipment:
- (A) One (1) blank press, using a baghouse as control, exhausting to one (1) stack (14006);
 - (B) Other miscellaneous equipment, exhausting to one (1) stack (14006);
 - (C) Eight (8) blank presses, using a baghouse as control, exhausting to one (1) stack (14015);
 - (D) Two (2) feeders, using a baghouse as control, exhausting to one (1) stack (14015);
 - (E) Scales, using a baghouse as control, exhausting to one (1) stack (14015);
 - (F) One (1) air press, using a baghouse as control, exhausting to one (1) stack (14015);
 - (G) One (1) baler, using a baghouse as control, exhausting to one (1) stack (14015); and
 - (H) Other miscellaneous equipment, exhausting to one (1) stack (14015).
- (15) One (1) rubber making operation, installed in 1979, identified as P019, with a maximum capacity of 200 pounds of rubber friction products per hour, using a baghouse as control, exhausting to one (1) stack (14009), consisting of the following equipment:
- (A) One (1) banbury mixer.
- (16) One (1) 25.5 million British thermal units per hour (mmBtu/hr) natural gas fired boiler, installed in 1952, identified as P020A, exhausting to one (1) stack (17500).
- (17) One (1) 15 million British thermal units per hour (mmBtu/hr) natural gas fired boiler, installed in 1988, identified as P020B, exhausting to one (1) stack (14165).

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Emission Units and Pollution Control Equipment Under Enhanced New Source Review (ENSR)

There are no new facilities to be reviewed under the ENSR process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour;
- (2) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu/hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu/hour;
- (3) Combustion source flame safety purging on startup;
- (4) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons;
- (5) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month;
- (6) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons;
- (7) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;
- (8) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings;
- (9) Machining where an aqueous cutting coolant continuously floods the machining interface;
- (10) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6;
- (11) Cleaners and solvents characterized as follows:
 - a) having a vapor pressure equal to or less than 2 kPa; 15mmHg; or 0.3psi measured at 38 degrees C (100°F) or;
 - b) having a vapor pressure equal to or less than 0.7kPa; 5mmHg; 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;
- (12) Solvent recycling systems with batch capacity less than or equal to 100 gallons;
- (13) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume;
- (14) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs;

- (15) Quenching operations used with heat treating processes;
- (16) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment;
- (17) Heat exchanger cleaning and repair;
- (18) Process vessel degassing and cleaning to prepare for internal repairs;
- (19) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone;
- (20) Stockpiled soils from soil remediation activities that are covered and waiting for transport for disposal;
- (21) Paved and unpaved roads and parking lots with public access;
- (22) Asbestos abatement projects regulated by 326 IAC 14-10;
- (23) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower;
- (24) On-site fire and emergency response training approved by the department;
- (25) Gasoline generators not exceeding 110 horsepower;
- (26) 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;
- (27) Filter or coalescer media changeout;
- (28) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees C);
- (29) A laboratory as defined by 326 IAC 2-7-1(20)(C);
- (30) A copper cyanide electroplating operation;
- (31) One (1) 60 hp natural gas fired boiler, installed in 1984; and
- (32) One (1) electric inert atmosphere (H_2 gas contained by nitrogen screens) continuous belt furnace capable of belt speed of twenty feet per minute and operating temperature of 1800°F. A maximum of 156 pounds per hour of matrix will be sintered. The excess hydrogen gas is flared off from small stacks from the oven inside the building.

Existing Approvals

The source has been operating under the following approvals:

- (1) Operation Permit (OP 54-04-92-0314), issued on April 18, 1988, amended on January 19, 1989 and July 16, 1992.
- (2) Operation Permit (OP 54-04-92-0147), issued on December 12, 1989.
- (3) Construction Permit (CP 107-3006), issued on November 23, 1993.
- (4) Registration (CP 107-3665), issued on June 30, 1994.
- (5) Construction Permit (CP 107-4169), issued on April 28, 1995.
- (6) Construction Permit (CP 107-4658), issued on October 18, 1995
- (7) Construction Permit (CP 107-8186), issued on June 5, 1997
- (8) Exemption (CP 107-8816), issued on September 18, 1997.

Enforcement Issue

There are no Enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

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

An administratively complete Part 70 permit application for the purposes of this review was received on October 7, 1996. Additional information was received on November 17, 1997.

A Notice of Administrative Completeness was mailed to the source on October 29, 1996.

Potential Emissions

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as "emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility."

Pollutant	Potential Emissions (tons/year)
PM	less than 100
PM-10	less than 100
SO ₂	less than 100
VOC	greater than 100, less than 250
CO	less than 100
NO _x	less than 100

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

HAP's	Potential Emissions (tons/year)
Trichloroethylene	greater than 10
Methyl Chloride	less than 10
Hydrochloric Acid	less than 10
Methyl Ethyl Ketone	less than 10
Chlorobenzene	less than 10
Phenol	greater than 10
Formaldehyde	less than 10
Ethyl Benzene	less than 10
Toluene	less than 10
Xylene	less than 10
Fine Mineral Fibers	less than 10
Methanol	greater than 10
TOTAL	greater than 25

- (a) The potential emissions (as defined in the Indiana Rule) of volatile organic compounds (VOC) are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential emissions (as defined in Indiana Rule) of any single HAP are equal to or greater than ten (10) tons per year and the potential emissions (as defined in Indiana Rule) of a combination HAPs are greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions
 Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the OAM and the source's 1995 emission data.

Pollutant	Actual Emissions (tons/year)
PM	8.153
PM-10	8.153
SO ₂	0.090
VOC	200.455
CO	3.150
HAP (Trichloroethylene)	0.000
HAP (Methyl Chloride)	0.000
HAP (Methyl Ethyl Ketone)	2.680
HAP (Chlorobenzene)	0.000
HAP (Phenol)	1.392
HAP (Formaldehyde)	0.464
HAP (Hydrochloric Acid)	0.975
HAP (Ethyl Benzene)	0.000
HAP (Toluene)	0.000
HAP (Xylene)	0.000
HAP (Fine Mineral Fibers)	0.000
HAP (Methanol)	0.000
NO _x	15.000

County Attainment Status

The source is located in Montgomery County.

Pollutant	Status
TSP	attainment
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Montgomery County has been designated as attainment or unclassifiable for ozone.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (1) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (2) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

- (a) The one (1) trichloroethylene storage tank (included in the equipment numbered P002), installed in 1982 with 1,800 gallon capacity is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.110a, Subpart Ka), because its capacity is less than forty thousand (40,000) gallons.
- (b) The six (6) volatile organic compound (VOC) storage tanks (included in the equipment numbered as P017. The tanks are individually numbered as T-4, T-5, T-6, T-7, MEK, and Ethanol), installed in 1988, are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.110b, Subpart Kb), because their capacities are less than forty (40) cubic meters.
- (c) The three (3) volatile organic compound (VOC) storage tanks (included in the equipment numbered as P017. The tanks are individually numbered as T-1, T-2, T-3), installed in 1988, are subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.116b, Subpart Kb), because their capacities are greater than seventy-five (75) cubic meters, but less than forty (40) cubic meters.
 - (1) The Permittee shall keep records readily accessible of the dimension of each storage vessel and an analysis showing the capacity of each storage vessel for the life of the source.
- (d) The volatile organic compound (VOC) storage tanks (Insignificant Activities) are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.110a, Subpart Ka), because their capacities are less than forty thousand (40,000) gallons, regardless of installation date.
- (e) The volatile organic compound (VOC) storage tanks (Insignificant Activities) are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.110b, Subpart Kb), because their capacities are less than forty (40) cubic meters, regardless of installation date.
- (f) The one (1) 25.5 million British thermal units per hour (mmBtu/hr) natural gas fired boiler is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40a, Subpart Da), because it was constructed in 1952 which is prior to the rule's applicability date of September 18, 1978.
- (g) The one (1) 15 million British thermal units per hour (mmBtu/hr) natural gas fired boiler is not subject to the requirements of the New Source Performance Standard, 326 IAC 12-1, (40 CFR 60.40b, Subpart Db), even though it was constructed in 1988, which is within the rules applicability date of between June 19, 1984 and June 8, 1989 because the heat input is less than one hundred (100) million British thermal units per hour (mmBtu/hr).
- (h) The one (1) open top trichloroethylene degreaser is subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 14, (40 CFR 63.460, Subpart T). The source shall come into compliance with this rule not later than December 2, 1997.
 - (i) The following design requirements for the degreasing operation are applicable:

- (a) Reduce the room draft as described in §63.463(e)(2)(ii).
 - (b) A freeboard ratio of 0.75 or greater shall be maintained.
 - (c) An automated parts handling system capable of moving parts or parts baskets at a speed of 3.4 meters per minute (11 feet per minute) or less from the initial loading of parts through removal of cleaned parts shall be installed.
 - (d) The degreaser shall be equipped with a device that shuts off the sump heat if the sump liquid solvent level drops to the sump heater coils.
 - (e) The degreaser shall be equipped with a vapor level control device that shuts off sump heat if the vapor level in the vapor cleaning machine rises above the height of the primary condenser.
 - (f) The degreaser shall have a primary condenser.
 - (g) A combination of controls, including a freeboard refrigeration device, reduced room draft, and a freeboard ratio of 1.0 shall be used.
 - (h) Monitoring shall be conducted of each control device used.
- (ii) The following operational practices for the degreasing operation are applicable:
- (a) Cover(s) to each solvent cleaning machine shall be in place during the idling mode, and during the downtime mode unless either the solvent has been removed from the machine or maintenance or monitoring is being performed that requires the cover(s) to not be in place.
 - (b) Parts baskets or the parts being cleaned in the degreaser shall not occupy more than fifty percent (50%) of the solvent/air interface area unless the parts baskets or parts are introduced at a speed of 0.9 meters per minute (3 feet per minute) or less.
 - (c) Any spraying operations shall be done within the vapor zone or within a section of the solvent cleaning machine that is not directly exposed to the ambient air.
 - (d) Parts shall be oriented so that the solvent drains from them freely. Parts with holes may need to be tipped or rotated before being removed.
 - (e) Parts or baskets shall not be removed from any solvent cleaning machine before dripping has stopped.
 - (f) During startup the primary condenser shall be turned on before the sump heater.
 - (g) During shutdown the sump heater shall be turned off and the solvent vapor layer allowed to collapse before the primary condenser is turned off.

- (h) When solvent is added or drained, the solvent shall be transferred using threaded or other leakproof couplings and the end of the pipe in the solvent sump shall be located beneath the liquid solvent surface.
 - (i) The machine and associated controls shall be maintained as recommended by the manufacturers of the equipment or by EPA approved alternative methods.
 - (j) Each operator shall complete and pass the applicable sections of the test of solvent cleaning operating procedures in appendix B of Subpart T, if requested during an inspection.
 - (k) Waste solvent, still bottoms, and sump bottoms shall be collected and stored in closed containers that may contain a pressure relief device.
 - (l) Sponges, fabric, wood, and paper products shall not be cleaned.
- (i) The degreasing operations (insignificant activities) are not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart T, because the degreasing operations use mineral spirits as their solvent

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

This source is not subject to the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) because the potential emissions of any criteria pollutant are less than two hundred fifty (250) tons per year and it is not one the 28 listed source categories.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of volatile organic compounds (VOC). Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

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, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 8-1-6 (General Reduction Requirements)

- (a) The one (1) open top vapor degreaser is not subject to the requirements of 326 IAC 8-1-6 (General Reduction Requirements), because it is regulated by another provision of this article, specifically, 326 IAC 8-3-3 (Open Top Vapor Degreasing Operation) and 326 IAC 8-3-6 (Open Top Vapor Degreasing Operation and Control Operation).
- (b) The one (1) sodium nitrite salt bath (P003) is not subject to the requirements of 326 IAC 8-1-6 (General Reduction Requirements), because it was constructed in 1967, which is prior to the January 1, 1980 applicability date. No other 326 IAC 8 rules apply.
- (c) The one (1) metal etch lines operation (P007) constructed partially in 1983 and partially in 1986, is not subject to the requirements of 326 IAC 8-1-6 (General Reduction Requirements), because the potential volatile organic compound (VOC) emissions are less than twenty-five (25) tons per year.
- (d) The one (1) general cleaning with solvents operation (P008) is not subject to the requirements of 326 IAC 8-1-6 (General Reduction Requirements), because it was constructed in 1952, which is prior to the January 1, 1980 applicability date. No other 326 IAC 8 rules apply.
- (e) The one (1) graphite spray operation (P011) is not subject to the requirements of 326 IAC 8-1-6 (General Reduction Requirements), because it was constructed in 1952, which is prior to the January 1, 1980 applicability date. No other 326 IAC 8 rules apply.
- (f) The one (1) HD rollcoater oven, one (1) AT rollcoater oven, one (1) HD rollcoater drier, one (1) AT rollcoater drier, one (1) Rayflex rollcoater, and one (1) adhesive spray booth (part of the one (1) adhesive rollcoating operation (P012)) are not subject to the requirements of 326 IAC 8-1-6 (General Reduction Requirements) because they were all constructed prior to the January 1, 1980 applicability date. No other 326 IAC 8 rules apply.
- (g) The one (1) sample department rollcoater (part of the one (1) adhesive rollcoating operation (P012)) constructed in 1995, is not subject to the requirements of 326 IAC 8-1-6 (General Reduction Requirements) because the potential emissions are less than twenty-five (25) tons per year. No other 326 IAC 8 rules apply.
- (h) The one (1) paper saturation operation (P013) constructed partially in 1984 and partially in 1988, is subject to the requirements of 326 IAC 8-1-6 (General Reduction Requirements). Pursuant to 326 IAC 8-1-6 (General Reduction Requirements) and Construction Permit (CP107-3006-00007) issued on November 23, 1993, the line meets the criteria for total enclosure and is equipped with a thermal incinerator. This system is accepted as fulfilling the requirements of this rule since this is the most effective VOC emission control available.
- (i) The one (1) adhesive/saturant formulation and mixing operation (P017) is not subject to the requirements of 326 IAC 8-1-6 (General Reduction Requirements) because it is regulated by another provision of this article, specifically 326 IAC 8-9 (Volatile Organic Storage Tanks).

326 IAC 8-6 (Organic Solvent Emission Limitations)

None of the facilities listed in this permit are subject to the requirements of 326 IAC 8-6 (Organic Solvent Emission Limitations), even though the source's potential volatile organic compound (VOC) emissions are greater than one hundred (100) tons per year, because the source did not commence operation in the period from October 7, 1974 to January 1, 1980, which is the rule's applicability dates for sources located in Montgomery County.

326 IAC 8-2-9 (Miscellaneous Metal Coating Operations)

The sample department rollcoater (part of the one (1) adhesive rollcoating operation (P012)) is not subject to the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) because the potential and actual emissions are less than fifteen (15) pounds per day.

The rollcoating adhesive application system (the addition to P012) is subject to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) because its Standard Industrial Classification Code (SIC) is in the range of 33 to 39. Pursuant to this rule, the VOC content of the coatings applied to steel parts shall be limited to 3.5 pounds of VOC per gallon of coating, less water, as applied by the coating applicator for a forced warm air dried system. The facility will comply with the state VOC limits by using either a thermal or catalytic oxidizer to limit VOC emissions from rollcoating operations to less than 3.5 pounds per gallon of coating, less water.

326 IAC 8-1-2 (Compliance Methods)

Pursuant to 326 IAC 8-1-2(b) (Compliance Methods), the VOC emissions from the rollcoating adhesive application system (the addition to P012) shall be limited to no greater than the equivalent emissions (E), expressed as pounds of VOC per gallon of coating solids. Equivalency shall be determined using the following equation:

$$E = L / [1 - (L / D)]$$

where:

L = 326 IAC 8-2-9 limit of 3.5 pounds VOC per gallon of coating

D = 7.36 pounds of VOC per gallon of coating

Therefore, E = 6.67 pounds of VOC per gallon of solids applied.

Pursuant to 326 IAC 8-1-2(c) (Compliance Methods), the overall control efficiency shall be no less than the equivalent overall efficiency calculated using the following equation:

$$O = \{[V - E] / V\} * 100$$

where:

V = Actual VOC content of 22.48 pounds of VOC per gallon of coating solids applied.

E = Equivalent emission limit of 6.67 pounds of VOC per gallons of solids applied

Therefore, O = Equivalent overall efficiency of the capture system and control device of 70.3%.

Since the facility proposes to install a catalytic or thermal oxidizer with a minimum overall control efficiency of 90 percent, the facility will comply with the requirements of this rule.

326 IAC 8-3-3 (Open Top Vapor Degreasing Operations)

Pursuant to 326 IAC 8-3-3 (Open Top Vapor Degreasing Operations), the Permittee shall:

- (1) Equip the vapor degreaser with a cover that can be opened and closed easily with out disturbing the vapor zone;
- (2) Keep the cover closed at all times except when processing work loads through the degreaser;
- (3) Minimize solvent carryout by:
 - (A) Racking parts to allow complete drainage;
 - (B) Moving parts in and out of the degreaser at less than 3.3 meters per minute (eleven (11) feet per minute);
 - (C) Degreasing the workload in the vapor zone at least thirty (30) seconds or until condensation ceases;
 - (D) Tipping out any pools of solvent on the cleaned parts before removal; and
 - (E) Allowing parts to dry within the degreaser for at least fifteen (15) seconds or until visually dry;
- (4) Not degrease porous or absorbent materials, such as cloth, leather, wood, or rope;
- (5) Not occupy more than half of the degreaser's open top area with the workload;
- (6) Not load the degreaser such that the vapor level drops more than fifty percent (50%) of the vapor depth when the workload is removed;
- (7) Never spray above the vapor level;
- (8) Repair solvent leaks immediately, or shut down the degreaser;
- (9) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, such that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere;
- (10) Not use workplace fans near the degreaser opening;
- (11) Not allow visually detectable water in the solvent exiting the water separator; and
- (12) Provide a permanent, conspicuous label summarizing the operating requirements.

326 IAC 8-3-6 (Open Top Vapor Degreaser Operation and Control Operation)
Pursuant to 326 IAC 8-3-6:

- (a) The Permittee shall ensure that the following control equipment requirements are met:
- (1) Equip the degreaser with a cover that can be opened and closed easily without disturbing the vapor zone.
 - (2) Equip the degreaser with the following switches:
 - (A) A condenser flow switch and thermostat which shuts off sump heat if condenser coolant stops circulating or becomes too warm.
 - (B) A spray safety switch which shuts off spray pump if the vapor level drops more than ten (10) centimeters (four (4) inches).
 - (3) Equip the degreaser with a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) Equip the degreaser with one (1) of the following control devices:
 - (A) A freeboard ratio of seventy-five hundredths (0.75) or greater and a powered cover if the degreaser opening is greater than one (1) square meter (ten and eight-tenths (10.8) square feet).
 - (B) A refrigerated chiller.
 - (C) An enclosed design in which the cover opens only when the article is actually entering or exiting the degreaser.
 - (D) A carbon adsorption system with ventilation which, with the cover open, achieves a ventilation rate of greater than or equal to fifteen (15) cubic meters per minute per square meter (fifty (50) cubic feet per minute per square foot) of air to vapor interface area and an average of less than twenty-five (25) parts per million of solvent is exhausted over one (1) complete adsorption cycle.
 - (E) Other systems of demonstrated equivalent or better control as those outlined in clauses (A) through (D). Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) The Permittee shall ensure that the following operating requirements are met:
- (1) Keep the cover closed at all times except when the processing workloads through the degreaser.
 - (2) Minimize the solvent carryout emissions by:
 - (A) racking articles to allow complete drainage;

- (B) moving articles in and out of the degreaser at less than three and three-tenths (3.3) meters per minute (eleven (11) feet per minute);
 - (C) degreasing the workload in the vapor zone at least thirty (30) seconds or until condensation ceases;
 - (D) tipping out any pools of solvent on the cleaned articles before removal; and
 - (E) allowing articles to dry within the degreaser for at least fifteen (15) seconds or until visually dry.
- (3) Prohibit the entrance into the degreaser of porous or absorbent materials such as, but not limited to, cloth, leather, wood, or rope.
 - (4) Prohibit occupation of more than one-half (½) of the degreaser's open top area with the workload.
 - (5) Prohibit the loading of the degreaser to the point where the vapor level would drop more than ten (10) centimeters (four (4) inches) when the workload is removed.
 - (6) Prohibit solvent spraying above the vapor level.
 - (7) Repair solvent leaks immediately or shut down the degreaser if leaks cannot be repaired immediately.
 - (8) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty-percent (20%) of the waste solvent by weight could evaporate.
 - (9) Prohibit the exhaust ventilation rate from exceeding twenty (20) cubic meters per minute per square meter (sixty-five (65) cubic feet per minute per square foot) of degreaser open area unless a greater ventilation rate is necessary to meet Occupational Safety and Health Administration requirements.
 - (10) Prohibit the use of workplace fans near the degreaser opening.
 - (11) Prohibit visually detectable water in the solvent exiting the water separator.

326 IAC 6-3-2 (Process Operations)

- (a) Pursuant to 326 IAC 6-3-2, the particulate matter (PM) overspray from the one (1) steel blanking and surface finishing operation (P001) shall be limited to 17.32 pounds per hour. The limit was established by the following equation:

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

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

For the one (1) steel blanking and surface finishing operation:

$$P = 17,175 \text{ pounds per hour} = 8.5875 \text{ tons per hour}$$

$$E = 17.32 \text{ pounds per hour}$$

The one (1) cyclone shall be in operation at all times the steel blanking and surface finishing operation is in operation to ensure compliance with this requirement.

- (b) Pursuant to 326 IAC 6-3-2, the particulate matter (PM) overspray from the one (1) sodium nitrite salt bath (P003) shall be limited to 1.67 pounds per hour. This limitation was established by the equation listed in (a).

For the one (1) sodium nitrite salt bath:

$$P = 527 \text{ pounds per hour} = 0.2635 \text{ tons per hour}$$

$$E = 1.677 \text{ pounds per hour}$$

The entire bath is enclosed and ventilated through a ceiling ventilator.

- (c) Pursuant to 326 IAC 6-3-2, the particulate matter (PM) overspray from the one (1) metal grinding and grooving operation (P004) shall be limited to 7.58 pounds per hour. This limitation was established by the equation listed in (a).

For the one (1) metal grinding and grooving operation:

$$P = 5,010 \text{ pounds per hour} = 2.505 \text{ tons per hour}$$

$$E = 7.58 \text{ pounds per hour}$$

The two (2) baghouses shall be in operation at all times the metal grinding operation is in operation to ensure compliance with this requirement.

- (d) Pursuant to 326 IAC 6-3-2, the particulate matter (PM) overspray from the one (1) metal etch lines operation (P007) shall be limited to 6.21 pounds per hour. This limitation was established by the equation listed in (a).

For the one (1) metal etch lines operation:

$$P = 3,723 \text{ pounds per hour} = 1.8615 \text{ tons per hour}$$

$$E = 6.21 \text{ pounds per hour}$$

The two (2) acid gas scrubbers shall be in operation at all times the metal etch lines operation is in operation to ensure compliance with this requirement.

- (e) Pursuant to 326 IAC 6-3-2, the particulate matter (PM) overspray from the one (1) bonding/flattening process (P009) shall be limited to 10.86 pounds per hour. This limitation was established by the equation listed in (a).

For the one (1) bonding/flattening process:

$$P = 8,560 \text{ pounds per hour} = 4.28 \text{ tons per hour}$$

$$E = 10.86 \text{ pounds per hour}$$

The one (1) baghouse shall be in operation at all times the bonding/flattening operation is in operation to ensure compliance with this requirement.

- (f) Pursuant to 326 IAC 6-3-2, the particulate matter (PM) overspray from the one (1) powder mixing operation (P010) shall be limited to 2.57 pounds per hour. This limitation was established by the equation listed in (a).

For the one (1) powder mixing operation:

$$P = 1,000 \text{ pounds per hour} = 0.5 \text{ tons per hour}$$

$$E = 2.57 \text{ pounds per hour}$$

The three (3) baghouses shall be in operation at all times the powder mixing operation is in operation to ensure compliance with this requirement.

- (g) Pursuant to 326 IAC 6-3-2, the particulate matter (PM) overspray from the one (1) graphite spray operation (P011) shall be limited to 0.07 pounds per hour. This limitation was established by the equation listed in (a).

For the one (1) graphite spray operation:

$$P = 4.85 \text{ pounds per hour} = 0.0024 \text{ tons per hour}$$

$$E = 0.07 \text{ pounds per hour}$$

The dry filters shall be in operation at all times the graphite spray operation is in operation to ensure compliance with this requirement.

- (h) Pursuant to 326 IAC 6-3-2, the particulate matter (PM) overspray from the one (1) paper grinding and grooving operation (P015) shall be limited to 6.82 pounds per hour. This limitation was established by the equation listed in (a).

For the one (1) paper grinding and grooving operation:

$$P = 4,278 \text{ pounds per hour} = 2.139 \text{ tons per hour}$$

$$E = 6.82 \text{ pounds per hour}$$

The three (3) baghouses shall be in operation at all times the paper grinding and grooving operation is in operation to ensure compliance with this requirement.

- (i) Pursuant to 326 IAC 6-3-2, the particulate matter (PM) overspray from the one (1) paper blanking operation (P018) shall be limited to 3.33 pounds per hour. This limitations was established by the equation listed in (a).

For the one (1) paper blanking operation:

$$P = 1,472 \text{ pounds per hour} = 0.736 \text{ tons per hour}$$

$$E = 3.33 \text{ pounds per hour}$$

The two (2) baghouses shall be in operation at all times the paper blanking operation is in operation ensure compliance with this requirement.

- (j) Pursuant to 326 IAC 6-3-2, the particulate matter (PM) overspray from the one (1) rubber making operation (P019) shall be limited to 0.87 pounds per hour. This limitation was established by the equation listed in (a).

For the one (1) rubber making operation:

$$P = 200 \text{ pounds per hour} = 0.1 \text{ tons per hour}$$

$$E = 0.87 \text{ pounds per hour}$$

The one (1) baghouse shall be in operation at all times the rubber making operation is in operation to ensure compliance with this requirement.

326 IAC 6-2-3 (Particulate Emission Limitation for Sources of Indirect Heating)

Pursuant to this 326 IAC 6-2-3(a), the particulate matter (PM) emissions from the 25.5 million British thermal unit per hour (mmBtu/hr) boiler (P020A) constructed in 1952, shall not exceed 0.8 pounds per million Btu. This limitation is used because the calculated limitation was greater than 0.80 pounds per million Btu.

The calculated limitation is based on the following equation:

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}}$$

Where:

C = Maximum ground level concentration with respect to distance from the point source at the "critical" wind speed for level terrain. This shall equal 50 micrograms per cubic meter for a period not to exceed a sixty (60) minute time period.

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

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 operation 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.

N = Number of stacks in fuel burning operation.

a = Plume rise factor which is used to make allowance for less than theoretical plume rise. The value 0.67 shall be used for Q less than or equal to 1,000 mmBtu/hr heat input. The value 0.8 shall be used for Q greater than 1,000 mmBtu/hr heat input.

h = Stack height in feet. If a number of stacks of different heights exist, the average stack height to represent "N" stacks shall be calculated by weighing each stack height with its particulate matter emission rate as follows:

$$h = \frac{\sum_{i=1}^N H_i \times pa_i \times Q_i}{\sum_{i=1}^N pa_i \times Q_i}$$

Where:

pa = the actual controlled emission rate in lb/mmBtu using the emission factor from AP-42 or stack test data. Stacks constructed after January 1, 1971, shall be credited with GEP stack height only. GEP stack height shall be calculated as specified in 326 IAC 1-7.

For the boiler:

$$\begin{aligned} C &= 50 \\ Q &= 25.5 \\ N &= 1 \\ a &= 0.67 \\ h &= 31 \end{aligned}$$

Pt = 1.19 > 0.8, therefore the boiler is limited to 0.8 lb/mmBtu.

Based on the calculations made, the boiler is in compliance with this requirement.

326 IAC 6-2-4 (Particulate Emissions for Sources of Indirect Heating)

Pursuant to 326 IAC 6-2-4 (Particulate Emissions for Sources of Indirect Heating), the one (1) 15 million British thermal units per hour (mmBtu/hr) boiler (P020B) constructed in 1988 and the one (1) 2.55 million British thermal units per hour (mmBtu/hr) constructed in 1984, shall be limited to 0.52 pounds per million British thermal unit (lb/mmBtu).

This limitation is based on the following equation:

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

Where:

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

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 operation 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.

For the two (2) boilers:

$$Q = 17.55$$

Pt = 0.52, therefore the boiler is limited to 0.52 lb/mmBtu.

Based on the calculations made, the two (2) boilers are in compliance with this requirement.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

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

The compliance monitoring requirements applicable to this source are as follows:

The one (1) steel blanking and surface finishing operation (P001), the one (1) sodium nitrite salt bath, the one (1) metal grinding and grooving operation, the one (1) metal etch lines operation, the one (1) bonding/flattening process, the one (1) powder mixing operation, the one (1) graphite spray operation, the one (1) paper grinding and grooving operation, the one (1) paper blanking operation, and one (1) rubber making operation have applicable compliance monitoring conditions as specified below:

- (a) Daily visible emissions notations of the steel blanking and surface finishing operation the one (1) sodium nitrite salt bath, the one (1) metal grinding and grooving operation, the one (1) metal etch lines operation, the one (1) bonding/flattening process, the one (1) powder mixing operation, the one (1) graphite spray operation, the one (1) paper grinding and grooving operation, the one (1) paper blanking operation, and one (1) rubber making operation exhausts shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

- (b) The Permittee shall record the total static pressure drop across the baghouse controlling the metal grinding and grooving operation, the powder mixing operation, the paper grinding and grooving operation, the paper blanking operation, and the rubber making operation, at least once per shift when the metal grinding and grooving operation is in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 0.0 to 10.0 inches of water or a range established during the latest stack test. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of the above mentioned range for any one reading.
- (c) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters on the one (1) graphite spray operation. To monitor the performance of the dry filters, daily observations shall be made of the overspray while one or more of the booths are in operation.
- (d) Weekly inspections shall be performed of the coating emissions from the stack of the one (1) graphite spray operation and the presence of overspray on the rooftops and the nearby ground. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed.

These monitoring conditions are necessary because the cyclone, baghouses, dry filters, and acid gas scrubbers for one (1) steel blanking and surface finishing operation (P001), the one (1) sodium nitrite salt bath, the one (1) metal grinding and grooving operation, the one (1) metal etch lines operation, the one (1) bonding/flattening process, the one (1) powder mixing operation, the one (1) graphite spray operation, the one (1) paper grinding and grooving operation, the one (1) paper blanking operation, and one (1) rubber making operation must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

The one (1) open top degreaser (P002) has applicable compliance monitoring conditions as specified below:

- (a) The Permittee shall determine whether each control device used to comply with 40 CFR 63, Subpart T meets the following requirements:
 - (1) Ensure weekly that the chilled air blanket temperature measured at the center of the air blanket of the freeboard refrigeration device is no greater than thirty percent (30%) of the solvent's boiling point. A thermometer or thermocouple shall be used to measure the temperature at the center of the air blanket during the idling mode.
 - (2) Ensure that flow or movement of air across the top of the freeboard area of the solvent cleaning machine , or within the solvent cleaning machine enclosure does not exceed 15.2 meters per minute (50 feet per minute) at any time, as measured using the procedures in § 63.466(d).
 - (A) The Permittee shall conduct initial and quarterly monitoring of wind speed within six (6) inches above the top of the freeboard area of the solvent cleaning machine as follows:

- (i) Determine the direction of the wind current by slowly rotating a velometer or similar device until the maximum speed is located;
 - (ii) Orient a velometer in the direction of the wind current at each of the four corners of the machine;
 - (iii) Record the reading for each corner;
 - (iv) Average the values obtained at each corner and record the average wind speed.
- (3) Establish and maintain the operating conditions under which the wind speed was demonstrated to be 15.2 meters per minute (50 feet per minute) or less as described in § 63.466(d).
- (A) Monitor initially and weekly, the room parameters established during the initial compliance test that are used to achieve the reduced room draft.
- (4) Monitor the hoist speed as follows:
- (A) Determine the hoist speed by measuring the time it takes for the hoist to travel a measured distance. The speed is equal to the distance in meters divided by the time in minutes (meters per minute).
 - (B) Monitoring shall be conducted monthly. If after the first year, no exceedances of the hoist speed are measured, the owner or operator may begin monitoring the hoist speed quarterly.
 - (C) If an exceedance of the hoist speed occurs during quarterly monitoring, the monitoring frequency returns to monthly until another year of compliance without an exceedance is demonstrated.
 - (D) If an owner or operator can demonstrate to EPA's satisfaction in the initial compliance report that the hoist cannot exceed a speed of 3.4 meters per minute (11 feet per minute), the required monitoring frequency is quarterly, including during the first year of compliance.
- (4) If any of the requirements of the above (a, b, or c) are not met, the Permittee shall determine whether an exceedance has occurred.
- (A) An exceedance has occurred if (c) has not been met; or
 - (B) An exceedance has occurred if (a) or (b) has not been met and is not corrected within fifteen (15) days of detection. Adjustments or repairs shall be made to the solvent cleaning system or control device to reestablish required levels. The parameter must be remeasured immediately upon adjustment or repair and demonstrated to be within required limits.

These monitoring conditions are necessary because the open top vapor degreaser must operate properly to ensure compliance with 40 CFR 63.460, Subpart T and 326 IAC 8-3 (Open Top Vapor Degreaser Operations).

The one (1) rollcoating adhesive application system (the addition to P012) has applicable compliance monitoring conditions as specified below:

- (a) When the catalytic incinerator is operating, a minimum operating temperature of 750°F shall be maintained or a temperature, fan amperage and duct velocity determined in the compliance tests to maintain at least 90 percent overall control (including capture and destruction) efficiency of VOC emissions.

These monitoring conditions are necessary because the catalytic incinerator for the rollcoating adhesive application system (the addition to P012) must operate properly to ensure compliance with 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), 326 IAC 8-1-2 (Compliance Methods, and 326 IAC 2-7 (Part 70).

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) Part 70 Application Form GSD-08.

- (a) This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the Clean Air Act.
- (b) Since there are no new emission units, 326 IAC 2-1-3.4 (New Source Toxics Control) does not apply.

Conclusion

The operation of this automotive parts manufacturing operation shall be subject to the conditions of the attached proposed **Part 70 Permit No. T107-6836-00007**.

Indiana Department of Environmental Management Office of Air Management

Addendum to the Technical Support Document for Part 70 Operating Permit

Source Name: Raybestos Products Company
Source Location: 1204 Darlington Avenue, Crawfordsville, Indiana
47933
County: Montgomery
SIC Code: 2621, 3069, 3499, 3295, 3479, 3471, 2891
Operation Permit No.: T107-6836-00007
Permit Reviewer: Cathie Moore

On December 22, 1997, the Office of Air Management (OAM) had a notice published in the Journal Review, Crawfordsville, Indiana, stating that Raybestos Products Company had applied for a Part 70 Operating Permit to operate an automotive parts manufacturing operation. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On January 27, 1998, Tim Dibble of Raybestos Products Company submitted comments on the proposed Part 70 Permit. The summary of the comments is as follows (~~strikeout~~ added to show what was deleted and **bold** added to show what was added):

Comment 1:

Section A.2(1)

How important is the maximum capacity production rate number? The number presented here is the maximum production for the entire manufacturing operation and not the operations covered by the cyclone and permit.

Response to Comment 1:

The maximum capacity production number is needed because it is the factor that determines the allowable particulate matter emissions (326 IAC 6-3-2) from each operation. Some of these operations shall use control equipment to ensure compliance with these limitations. There will be no changes to this condition in the final permit due to this comment.

Comment 2:

Section A.2(3)

Although only one Nitrite bath currently exists, there is a capital planning such that a second line will be installed within the next year to double the capacity of the line. Does this need to be included in this permit? The existing unit will be removed following successful performance of the new operation. The nitrite salt bath (P003) will be replaced within the next 18 months. The unit will be approximately twice the capacity of the existing unit. The process consists of a molten salt bath, a quench tank, and a rinse tank. The salt bath is maintained at 1500-1600F. Quench is a barely liquid form of salt heated to 400F. The rinse is city water in a static bath which is replenished on a routine basis. The water is hauled off site for disposal. The system is enclosed except for the operator's station. The new process will be ventilated with two 5400 cfm fans. The usage numbers are expected to be proportional to the existing unit: Nitrate salt, avg 25 lb/hr, max 50 lb/hr, Methyl Chloride avg 2 lb/hr, max 4 pounds per hour. The steel process should increase to avg 2000 lb/hr, max 3500 lb/hr. The high heat section of the unit is electrically heated. The quench tank is steam heated. The rinse tank is not heated other than by hot parts being immersed.

Response to Comment 2:

The potential Volatile Organic Compound (VOC) and Particulate Matter (PM) emissions from this operation are negligible. This operation is exempt from Construction Permit Requirements, as specified in 326 IAC 2-1. Therefore, no separate Enhanced New Source Review (ENSR) approval is required.

Condition A.2(3) "Emission Units and Pollution Control Equipment Summary" has been changed to be as follows:

- (3) ~~One (1)~~ **Two (2)** sodium nitrite salt baths, **one** installed in 1967 **and the other to be installed in 1998**, identified as P003a **and P003b**, with a maximum capacity of 527 **(P003a) and 3500 (P003b)** pounds heat treated steel rings per hour, exhausting to one (1) stack (10200).

The equipment listed in Section D.1 (3) has been changed to be as follows:

- (3) ~~One (1)~~ **Two (2)** sodium nitrite salt baths, **one** installed in 1967 **and the other to be installed in 1998**, identified as P003a **and P003b**, with a maximum capacity of 527 **(P003a) and 3500 (P003b)** pounds heat treated steel rings per hour, exhausting to one (1) stack (10200).

The potential particulate matter emissions from this new sodium nitrite salt bath are at insignificant levels, therefore no New Source Review permit approval is required.

Condition D.1.1(b) "Particulate Matter" has been changed to be as follows because of the increase in capacity $[(3500 \text{ lb/hr} / 2000 \text{ lb/ton})^{0.67}] * 4.1 = 5.96 \text{ lb/hr}$:

- (b) The PM from the sodium nitrite salt bath shall not exceed 1.67 **(P003a) and 5.96 (P003b)** pounds per hour;

Comment 3:

Section A.2(4)
The word "wagers" should be "wafers".

Section D.1(4)
Wagers should be wafers (if listing equipment is still required)

Response to Comment 3:

Pursuant to this comment, Condition A.2 (4) "Emission Units and Pollution Control Equipment Summary" has been changed to be as follows:

- (4) One (1) metal grinding and grooving operation, installed in 1952, identified as P004, with a maximum capacity of 5,010 pounds ground and grooved ~~wagers~~ **wafers** per hour, using two (2) baghouses as control, exhausting to two (2) stacks (14003 and 14006), consisting of the following equipment:

Also, the equipment listing in Section D.1 (4) "FACILITY OPERATION CONDITIONS" has been changed to be as follows:

- (4) One (1) metal grinding and grooving operation, installed in 1952, identified as P004, with a maximum capacity of 5,010 pounds ground and grooved ~~wagers~~ **wafers** per hour, using two (2) baghouses as control, exhausting to two (2) stacks (14003 and 14006), consisting of the following equipment:

The Technical Support Document (TSD) should also reflect this change. However, the TSD is not physically changed after Public Notice. The change is noted here in the Addendum.

Comment 4:

A.2(4), (8), (12), (14) and (15)

Regarding operations exhausting to baghouses; is it possible to agree that all dust creating operations will be connected to appropriate baghouses such that visible dust emission from the plant will be controlled without requiring specific assignment of equipment to a baghouse? We are undergoing a major operational change toward cellular manufacturing, and as such, much equipment will be moved in the near future. Rather than require each move of equipment to result in a permit modification, eliminating the listing of equipment with each control device and replacing the requirement with phrasing requiring connection between existing dust control equipment and dust producing operations in an area would be more practical. The following language is proposed.

Emission Units and Pollution Control Equipment Summary

(Replacing A.2(4), (8), (12), (14), and (15) and other appropriate references)

Raybestos operates the following baghouses of either shaker or pulsejet design. The baghouses are separated by the facility and therefore they type of dust which is generated.

West Plant: Sintered Metal, Graphitics, Rayflex, Cork, Paper, Wood, and Steel

Operations in the West Plant currently include paper making, paper blanking, sintered metal and graphitics mixing, sample part manufacturing, grinding, grooving, cutting, sanding, gritblasting and other operations. The following dust collectors service the West Plant operations. Those appropriately marked have outside exhaust, the remainder are enclosed within the facility or are tied into a second collector for final treatment prior to exhaust.

- 1) 14003-external exhaust
- 2) 14006-external exhaust
- 3) 14000 and 14000 A through D-external exhaust, one point
- 4) 14002-external exhaust
- 5) 14013-external exhaust
- 6) 14100-no external exhaust
- 7) 10203-no external exhaust
- 8) 14007-portable unit, no external exhaust
- 9) 14008-external exhaust
- 10) 14009-external exhaust
- 11) 14010-no external exhaust
- 12) 14011-no external exhaust
- 13) 14012-external exhaust
- 14) 14013-external exhaust
- 15) 10263-cyclone-no external exhaust
- 16) 14014-no external exhaust
- 17) 14015-external exhaust
- 18) 10275-external exhaust
- 19) 16216-no external exhaust
- 20) 14595-no external exhaust

East Plant - Paper, Sintered metal, Graphitics, Rayflex, and Cork

The East Plant, which consists of final assembly process uses grinding, grooving, turning, gritblasting, sanding brushing and milling, generally of paper based friction products. The East Plant is serviced by the following dust collectors to which all dust producing equipment in the area is connected.

- 1) 13068-no external exhaust
- 2) 13203-external exhaust
- 3) 13200-external exhaust
- 4) 13201-external exhaust

North Plant - Steel, Sintered metal

The North Plant is the steel preparation facility. The primary operations are associated with the core steel of the friction products. The dust producing operations are generally limited to grinding or sanding of steel. Dust producing operations of this type are connected to the following control devices:

- 1) 10239-Cyclone with external exhaust
- 2) 10224-Arrestal wet collector with no external exhaust
- 3) 10321-Wet dust collector with no external exhaust

Response to Comment 4:

Pursuant to this comment, Condition A.2 (4), (8), (12), (14), and (15) "Emission Units and Pollution Control Equipment Summary" has been changed to be as follows:

- (4) One (1) metal grinding and grooving operation, installed in 1952, identified as P004, with a maximum capacity of 5,010 pounds ground and grooved wafers per hour, using ~~two (2)~~ baghouse(s) as control, ~~exhausting to two (2) stacks (14003 and 14006)~~, consisting of the following equipment:
 - (A) One (1) edge grinder, ~~exhausting to 14003~~;
 - (B) Sixteen (16) groovers, ~~exhausting to stack 14003~~;
 - (C) Three (3) grit blasters, ~~exhausting to stack 14003~~;
 - (D) Ten (10) grinders, ~~exhausting to stack 14003~~;
 - (E) Four (4) sanders, ~~exhausting to stack 14003~~;
 - (F) One (1) packermatic, ~~exhausting to stack 14003~~;
 - (G) Two (2) deburr machines, ~~exhausting to stack 14003~~;
 - (H) One (1) wire brush, ~~exhausting to stack 14003~~;
 - (I) One (1) brush unit, ~~exhausting to stack 14003~~;
 - (J) One (1) demag unit, ~~exhausting to stack 14003~~;
 - (K) One (1) milling machine, ~~exhausting to stack 14003~~;
 - (L) Other miscellaneous equipment, ~~exhausting to stack 14003~~;
 - (M) Three (3) grinders, ~~exhausting to stack 14006~~;
 - (N) One (1) timesaver, ~~exhausting to stack 14006~~;
 - (O) Three (3) sanders, ~~exhausting to stack 14006~~;
 - (P) Four (4) lathes, ~~exhausting to stack 14006~~;

- (Q) Five (5) groovers, ~~exhausting to stack 14006;~~
 - (R) One (1) covel, ~~exhausting to stack 14006;~~
 - (S) Three (3) drill presses, ~~exhausting to stack 14006;~~
 - (T) Two (2) slotting machines, ~~exhausting to stack 14006;~~
 - (U) One (1) grit blaster, ~~exhausting to stack 14006;~~
 - (V) One (1) blanchard, ~~exhausting to stack 14006;~~
 - (W) One (1) boring mill, ~~exhausting to stack 14006;~~
 - (X) One (1) wafer grinder, ~~exhausting to stack 14006;~~ and
 - (Y) Other miscellaneous equipment.
- (8) One (1) powder mixing operation, installed in 1952, identified as P010, with a maximum capacity of 1,000 pounds mixed powder per hour, using ~~three (3)~~ **baghouse(s)** as control, consisting of the following equipment:
- (A) Thirteen (13) wafer presses, ~~exhausting to one (1) stack (14000);~~
 - (B) Other miscellaneous equipment, ~~exhausting to one (1) stack (14000);~~
 - (C) Two (2) pulverizers, ~~exhausting to one (1) stack (14002);~~
 - (D) One (1) oven, ~~exhausting to one (1) stack (14002);~~
 - (E) Four (4) wafer presses, ~~exhausting to one (1) stack (14002);~~
 - (F) Other miscellaneous equipment, ~~exhausting to one (1) stack (14002);~~
 - (G) Multiple drum opening vents, ~~exhausting to one (1) stack (14013);~~
 - (H) One (1) iron shaker, ~~exhausting to one (1) stack (14013);~~
 - (I) One (1) iron blender, ~~exhausting to one (1) stack (14013);~~
 - (J) One (1) copper blender, ~~exhausting to one (1) stack (14013);~~
 - (K) One (1) dry blender, ~~exhausting to one (1) stack (14013);~~
 - (L) One (1) copper shaker, ~~exhausting to one (1) stack (14013);~~
 - (M) One (1) pulverizer, ~~exhausting to one (1) stack (14013);~~ and
 - (N) Other miscellaneous equipment, ~~exhausting to one (1) stack (14013).~~
- (12) One (1) paper grinding and grooving operation, installed in 1989, identified as P015, with a maximum capacity of 4,278 ground and grooved wafers per hour, **using baghouse(s) as control**, consisting of the following equipment:
- (A) Four (4) wafer grinders, ~~using a baghouse as control, exhausting to one (1) stack (13200);~~

- (B) Three (3) grinders, ~~using a baghouse as control, exhausting to one (1) stack (13200);~~
- (C) One (1) groover, ~~using a baghouse as control, exhausting to one (1) stack (13200);~~
- (D) One (1) brush unit, ~~using a baghouse as control, exhausting to one (1) stack (13200);~~
- (E) One (1) auto control, ~~using a baghouse as control, exhausting to one (1) stack (13200);~~
- (F) One (1) conveyor, ~~using a baghouse as control, exhausting to one (1) stack (13200);~~
- (G) Other miscellaneous equipment, ~~exhausting to one (1) stack (13200);~~
- (H) One (1) boring machine, ~~using a baghouse as control, exhausting to one (1) stack (13204);~~
- (I) Seven (7) wafer grinders, ~~using a baghouse as control, exhausting to one (1) stack (13204);~~
- (J) Five (5) bore and turn, ~~using a baghouse as control, exhausting to one (1) stack (13204);~~
- (K) One (1) grinder, ~~using a baghouse as control, exhausting to one (1) stack (13204);~~
- (L) Other miscellaneous equipment, ~~exhausting to one (1) stack (13204);~~
- (M) Multiple inspection tables, ~~using a baghouse as control, exhausting to one (1) stack (13203);~~
- (N) One (1) parts sorter, ~~using a baghouse as control, exhausting to one (1) stack (13203);~~
- (O) Two (2) grinders, ~~using a baghouse as control, exhausting to one (1) stack (13203);~~
- (P) Three (3) brush units, ~~using a baghouse as control, exhausting to one (1) stack (13203);~~
- (Q) Three (3) packermatics, ~~using a baghouse as control, exhausting to one (1) stack (13203);~~
- (R) Three (3) press in groovers (PIG), ~~using a baghouse as control, exhausting to one (1) stack (13203);~~
- (S) Two (2) chamferings, ~~using a baghouse as control, exhausting to one (1) stack (13203);~~
- (T) Six (6) grinders, ~~using a baghouse as control, exhausting to one (1) stack (13203);~~

- (U) Six (6) groover, ~~using a baghouse as control, exhausting to one (1) stack (13203);~~
 - (V) One (1) oil coater, ~~using a baghouse as control, exhausting to one (1) stack (13203);~~
 - (W) One (1) transfer line, ~~using a baghouse as control, exhausting to one (1) stack (13203);~~
 - (X) One (1) sander, ~~using a baghouse as control, exhausting to one (1) stack (13203);~~
 - (Y) One (1) auto control, ~~using a baghouse as control, exhausting to one (1) stack (13203);~~
 - (Z) Other miscellaneous equipment, ~~exhausting to one (1) stack (13203);~~ and
 - (AA) One (1) groover, identified as P018, ~~using a baghouse as control, exhausting to one (1) stack (14015);~~
- (14) One (1) paper blanking operation, installed in 1989, identified as P018, with a maximum capacity of 420 pounds of stamped paper per hour and 1,052 pounds of paper scrap per hour, **using baghouse(s) as control**, consisting of the following equipment:
- (A) One (1) blank press, ~~using a baghouse as control, exhausting to one (1) stack (14006);~~
 - (B) Other miscellaneous equipment, ~~exhausting to one (1) stack (14006);~~
 - (C) Eight (8) blank presses, ~~using a baghouse as control, exhausting to one (1) stack (14015);~~
 - (D) Two (2) feeders, ~~using a baghouse as control, exhausting to one (1) stack (14015);~~
 - (E) Scales, ~~using a baghouse as control, exhausting to one (1) stack (14015);~~
 - (F) One (1) air press, ~~using a baghouse as control, exhausting to one (1) stack (14015);~~
 - (G) One (1) baler, ~~using a baghouse as control, exhausting to one (1) stack (14015);~~ and
 - (H) Other miscellaneous equipment, ~~exhausting to one (1) stack (14015).~~
- (15) One (1) rubber making operation, installed in 1979, identified as P019, with a maximum capacity of 200 pounds of rubber friction material per hour, using **a baghouse(s) as control**, ~~exhausting to one (1) stack (14009)~~, consisting of the following equipment:
- (A) One (1) banbury mixer.

Also, the equipment listed in Section D.1(4), "FACILITY OPERATION CONDITIONS" has been changed to be as follows:

- (4) One (1) metal grinding and grooving operation, installed in 1952, identified as P004, with a maximum capacity of 5,010 pounds ground and grooved wafers per hour, using ~~two (2)~~ baghouse(s) as control, ~~exhausting to two (2) stacks (14003 and 14006)~~, consisting of the following equipment:
- (A) One (1) edge grinder, ~~exhausting to 14003;~~
 - (B) Sixteen (16) groovers, ~~exhausting to stack 14003;~~
 - (C) Three (3) grit blasters, ~~exhausting to stack 14003;~~
 - (D) Ten (10) grinders, ~~exhausting to stack 14003;~~
 - (E) Four (4) sanders, ~~exhausting to stack 14003;~~
 - (F) One (1) packermatic, ~~exhausting to stack 14003;~~
 - (G) Two (2) deburr machines, ~~exhausting to stack 14003;~~
 - (H) One (1) wire brush, ~~exhausting to stack 14003;~~
 - (I) One (1) brush unit, ~~exhausting to stack 14003;~~
 - (J) One (1) demag unit, ~~exhausting to stack 14003;~~
 - (K) One (1) milling machine, ~~exhausting to stack 14003;~~
 - (L) Other miscellaneous equipment, ~~exhausting to stack 14003;~~
 - (M) Three (3) grinders, ~~exhausting to stack 14006;~~
 - (N) One (1) timesaver, ~~exhausting to stack 14006;~~
 - (O) Three (3) sanders, ~~exhausting to stack 14006;~~
 - (P) Four (4) lathes, ~~exhausting to stack 14006;~~
 - (Q) Five (5) groovers, ~~exhausting to stack 14006;~~
 - (R) One (1) covel, ~~exhausting to stack 14006;~~
 - (S) Three (3) drill presses, ~~exhausting to stack 14006;~~
 - (T) Two (2) slotting machines, ~~exhausting to stack 14006;~~
 - (U) One (1) grit blaster, ~~exhausting to stack 14006;~~
 - (V) One (1) blanchard, ~~exhausting to stack 14006;~~
 - (W) One (1) boring mill, ~~exhausting to stack 14006;~~
 - (X) One (1) wafer grinder, ~~exhausting to stack 14006;~~ and
 - (Y) Other miscellaneous equipment.
- (8) One (1) powder mixing operation, installed in 1952, identified as P010, with a maximum capacity of 1,000 pounds mixed powder per hour, using ~~three (3)~~ baghouse(s) as control, consisting of the following equipment:
- (A) Thirteen (13) wafer presses, ~~exhausting to one (1) stack (14000);~~
 - (B) Other miscellaneous equipment, ~~exhausting to one (1) stack (14000);~~
 - (C) Two (2) pulverizers, ~~exhausting to one (1) stack (14002);~~
 - (D) One (1) oven, ~~exhausting to one (1) stack (14002);~~
 - (E) Four (4) wafer presses, ~~exhausting to one (1) stack (14002);~~
 - (F) Other miscellaneous equipment, ~~exhausting to one (1) stack (14002);~~
 - (G) Multiple drum opening vents, ~~exhausting to one (1) stack (14013);~~
 - (H) One (1) iron shaker, ~~exhausting to one (1) stack (14013);~~
 - (I) One (1) iron blender, ~~exhausting to one (1) stack (14013);~~
 - (J) One (1) copper blender, ~~exhausting to one (1) stack (14013);~~
 - (K) One (1) dry blender, ~~exhausting to one (1) stack (14013);~~
 - (L) One (1) copper shaker, ~~exhausting to one (1) stack (14013);~~
 - (M) One (1) pulverizer, ~~exhausting to one (1) stack (14013);~~ and
 - (N) Other miscellaneous equipment, ~~exhausting to one (1) stack (14013).~~
- (12) One (1) paper grinding and grooving operation, installed in 1989, identified as P015, with a maximum capacity of 4,278 ground and grooved wafers per hour, **using baghouse(s) as control**, consisting of the following equipment:

- (A) Four (4) wafer grinders, ~~using a baghouse as control, exhausting to one (1) stack (13200);~~
 - (B) Three (3) grinders, ~~using a baghouse as control, exhausting to one (1) stack (13200);~~
 - (C) One (1) groover, ~~using a baghouse as control, exhausting to one (1) stack (13200);~~
 - (D) One (1) brush unit, ~~using a baghouse as control, exhausting to one (1) stack (13200);~~
 - (E) One (1) auto control, ~~using a baghouse as control, exhausting to one (1) stack (13200);~~
 - (F) One (1) conveyor, ~~using a baghouse as control, exhausting to one (1) stack (13200);~~
 - (G) Other miscellaneous equipment, ~~exhausting to one (1) stack (13200);~~
 - (H) One (1) boring machine, ~~using a baghouse as control, exhausting to one (1) stack (13201);~~
 - (I) Seven (7) wafer grinders, ~~using a baghouse as control, exhausting to one (1) stack (13201);~~
 - (J) Five (5) bore and turn, ~~using a baghouse as control, exhausting to one (1) stack (13201);~~
 - (K) One (1) grinder, ~~using a baghouse as control, exhausting to one (1) stack (13201);~~
 - (L) Other miscellaneous equipment, ~~exhausting to one (1) stack (13201);~~
 - (M) Multiple inspection tables, ~~using a baghouse as control, exhausting to one (1) stack (13203);~~
 - (N) One (1) parts sorter, ~~using a baghouse as control, exhausting to one (1) stack (13203);~~
 - (O) Two (2) grinders, ~~using a baghouse as control, exhausting to one (1) stack (13203);~~
 - (P) Three (3) brush units, ~~using a baghouse as control, exhausting to one (1) stack (13203);~~
 - (Q) Three (3) packermatics, ~~using a baghouse as control, exhausting to one (1) stack (13203);~~
 - (R) Three (3) press in groovers (PIG), ~~using a baghouse as control, exhausting to one (1) stack (13203);~~
 - (S) Two (2) chamferings, ~~using a baghouse as control, exhausting to one (1) stack (13203);~~
 - (T) Six (6) grinders, ~~using a baghouse as control, exhausting to one (1) stack (13203);~~
 - (U) Six (6) groover, ~~using a baghouse as control, exhausting to one (1) stack (13203);~~
 - (V) One (1) oil coater, ~~using a baghouse as control, exhausting to one (1) stack (13203);~~
 - (W) One (1) transfer line, ~~using a baghouse as control, exhausting to one (1) stack (13203);~~
 - (X) One (1) sander, ~~using a baghouse as control, exhausting to one (1) stack (13203);~~
 - (Y) One (1) auto control, ~~using a baghouse as control, exhausting to one (1) stack (13203);~~
 - (Z) Other miscellaneous equipment, ~~exhausting to one (1) stack (13203);~~ and
 - (AA) One (1) groover, identified as P018, ~~using a baghouse as control, exhausting to one (1) stack (14015);~~
- (14) One (1) paper blanking operation, installed in 1989, identified as P018, with a maximum capacity of 420 pounds of stamped paper per hour and 1,052 pounds of paper scrap per hour, **using baghouse(s) as control**, consisting of the following equipment:
- (A) One (1) blank press, ~~using a baghouse as control, exhausting to one (1) stack (14006);~~
 - (B) Other miscellaneous equipment, ~~exhausting to one (1) stack (14006);~~
 - (C) Eight (8) blank presses, ~~using a baghouse as control, exhausting to one (1) stack (14015);~~
 - (D) Two (2) feeders, ~~using a baghouse as control, exhausting to one (1) stack (14015);~~
 - (E) Scales, ~~using a baghouse as control, exhausting to one (1) stack (14015);~~
 - (F) One (1) air press, ~~using a baghouse as control, exhausting to one (1) stack (14015);~~
 - (G) One (1) baler, ~~using a baghouse as control, exhausting to one (1) stack (14015);~~ and
 - (H) Other miscellaneous equipment, ~~exhausting to one (1) stack (14015).~~
- (15) One (1) rubber making operation, installed in 1979, identified as P019, with a maximum capacity of 200 pounds of rubber friction material per hour, using **a baghouse(s) as control**, ~~exhausting to one (1) stack (14009);~~ consisting of the following equipment:
- (A) One (1) banbury mixer.

The Technical Support Document (TSD) should also reflect this change. However, the TSD is not physically changed after Public Notice. The change is noted here in the Addendum.

Comment 5:

Section A.2(9)

There is no unit of measure for the graphite spray operation. It should be "pieces". The use of dry filters should be removed.

Response to Comment 5:

Pursuant to this comment, Condition A.2(9) "Emission Units and Pollution Control Equipment Summary" has been changed to be as follows:

- (9) One (1) graphite spray operation, installed in 1952, identified as P011, with a maximum capacity of 164 sintered metal and graphitics **pieces** per hour, ~~using dry filters as control,~~ consisting of the following equipment:

Also, the equipment listed in Section D.1(9) "FACILITY OPERATION CONDITIONS" has been changed to be as follows:

- (9) One (1) graphite spray operation, installed in 1952, identified as P011, with a maximum capacity of 164 sintered metal and graphitics **pieces** per hour, ~~using dry filters as control,~~ consisting of the following equipment:

The Technical Support Document (TSD) should also reflect this change. However, the TSD is not physically changed after Public Notice. The change is noted here in the Addendum.

Comment 6:

Section A.2(10) Rollcoating: (P012)

In Item 10, it appears that there was a small error made in the identity of the roller coaters. Machine number 13080 and 13081 are the ovens for the heavy duty (HD) rollcoaters. They each have an exhaust stack. The coating heads themselves, machine numbers 13252, 13255 and 13248 do not have independent exhaust. The AT coating operations, the coating heads, machine numbers 13139, 13138 and 13140 and the corresponding ovens, machine numbers 13144 and 13155 are exhausted through the catalytic oxidizer, machine number and stack number 13147.

The sample department rollcoater, item (G), does not have an independent stack. The rollcoating operation in item (H) is not yet installed and is not scheduled for installation until at least the 1999 calendar year.

In addition to the rollcoaters listed, the following coaters are present in the facility: Machine 13247 Mini coater for black resin, installed before 1974, does not have an independent stack.

Machine 15249 Union Tool rollcoater, installed before 1974, does not have an independent stack.

Items A and C should be the same, items B and C should be the same i.e.:

- (A) One (1) HD rollercoater and oven, installed prior to 1974
- (B) One (1) HD dual rollercoater and oven, installed prior to 1974
- (C) One (1) AT rollercoater and oven, installed in 1976, using a catalytic oxidizer as control
- (D) One (1) AT dual rollercoater and oven, installed in 1976, using a catalytic oxidizer as control

Response to Comment 6:

Pursuant to this comment, Condition A.2(10) "Emission Units and Pollution Control Equipment Summary" has been changed to be as follows:

- (10) One (1) adhesive rollcoating operation, identified as P012, with a maximum capacity of 40,000 steel discs per hour, consisting of the following equipment:
 - (A) One (1) HD rollercoater **and** oven, installed prior to 1974, ~~exhausting to one (1) stack (13080);~~
 - (B) One (1) ~~AT HD dual~~ rollercoater **and** oven, installed ~~in prior to 1976~~ **1974**, ~~using a catalytic oxidizer as control, exhausting to one (1) stack (13081);~~
 - (C) One (1) ~~HD AT~~ rollercoater ~~drier and oven~~, installed ~~prior to in 1974~~ **1976**, ~~using a catalytic oxidizer as control exhausting to one (1) stack (13144);~~
 - (D) One (1) AT **dual** rollercoater ~~drier and oven~~, installed in 1976, using a catalytic oxidizer as control, ~~exhausting to one (1) stack (13145);~~
 - (E) One (1) Rayflex rollcoater, installed in 1974, identified as P004, ~~exhausting to one (1) stack (14003);~~
 - (F) One (1) adhesive spray booth, installed in 1964, using dry filters as control, ~~exhausting to one (1) stack (15103);~~
 - (G) One (1) sample department rollcoater, installed in 1995;
 - (H) One (1) rollcoating adhesive application system, identified as an addition to P012, with maximum coating rate of 14,400 steel parts per hour, equipped with a natural gas fired catalytic oxidizer for VOC and HAP control, with maximum heat input capacity no greater than 3.6 million British thermal units per hour, ~~exhausting to one (1) stack; and~~
 - (I) One (1) natural gas fired cure oven, rated at 1.6 million British thermal units per hour;
 - (J) One (1) Mini coater for black resin, installed prior to 1974; and**
 - (K) One (1) Union Tool rollcoater, installed prior to 1974.**

Also, the equipment listed in Section D.3 "FACILITY OPERATION CONDITIONS" has been changed to be as follows:

- (10) One (1) adhesive rollcoating operation, identified as P012, with a maximum capacity of 40,000 steel discs per hour, consisting of the following equipment:
 - (A) One (1) HD rollercoater **and** oven, installed prior to 1974, ~~exhausting to one (1) stack (13080);~~
 - (B) One (1) ~~AT HD dual~~ rollercoater **and** oven, installed ~~in prior to 1976~~ **1974**, ~~using a catalytic oxidizer as control, exhausting to one (1) stack (13081);~~
 - (C) One (1) ~~HD AT~~ rollercoater ~~drier and oven~~, installed ~~prior to in 1974~~ **1976**, ~~using a catalytic oxidizer as control exhausting to one (1) stack (13144);~~
 - (D) One (1) AT **dual** rollercoater ~~drier and oven~~, installed in 1976, using a catalytic oxidizer as control, ~~exhausting to one (1) stack (13145);~~

- (E) One (1) Rayflex rollcoater, installed in 1974, identified as P004, ~~exhausting to one (1) stack (14003);~~
- (F) One (1) adhesive spray booth, installed in 1964, using dry filters as control, ~~exhausting to one (1) stack (15183);~~
- (G) One (1) sample department rollcoater, installed in 1995;
- (H) One (1) rollcoating adhesive application system, identified as an addition to P012, with maximum coating rate of 14,400 steel parts per hour, equipped with a natural gas fired catalytic oxidizer for VOC and HAP control, with maximum heat input capacity no greater than 3.6 million British thermal units per hour, ~~exhausting to one (1) stack; and~~
- (I) One (1) natural gas fired cure oven, rated at 1.6 million British thermal units per hour;
- (J) One (1) Mini coater for black resin, constructed prior to 1974; and**
- (K) One (1) Union Tool rollcoater, constructed prior to 1974.**

These two (2) additional rollcoaters are not subject to the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating Requirements) because they were constructed prior to the January 1, 1980 applicability date for this rule.

The Technical Support Document (TSD) should also reflect this change. However, the TSD is not physically changed after Public Notice. The change is noted here in the Addendum.

Comment 7:

A.2(11) Saturation (P013)

In Item 11, it appears that the newest saturation line being constructed under 107-4658 is not listed. This operation is not yet fully installed and does not yet have machine numbers assigned. The operation will have a thermal oxidizer as the exhaust point.

In addition to the operations listed here, we have developed long term plans which include the installation of two new saturation lines, 1 monorail post cure oven and 2 additional box ovens. Do these operations need to be included in this permit even though they have not been designed or will the existing construction permit process continue? Although the construction of the additional units listed in the comment is anticipated, none of the construction will be completed within 18 months. Modifications to the permit will be submitted when appropriate.

The reference to the new saturator does not include the changes submitted subsequent to the development of the actual operation. The operation is heated with two 1.6 mmBtu natural gas burners and is controlled with a thermal oxidizer with a 9.5 mmBtu natural gas burner.

Response to Comment 7:

The new saturator was previously permitted under Registration CP107-4658-00007, issued October 18, 1995. At the time of the Title 5 application submittal, this operation was not yet constructed and was left off the application. The saturator has now been constructed.

Pursuant to the first paragraph of this comment, Condition A.2(11) "Emission Units and Pollution Control Equipment Summary" has been changed to be as follows:

- (11) One (1) paper saturation operation, identified as P013, with a maximum capacity of 40,400 paper friction products per hour, consisting of the following equipment:
 - (A) One (1) post cure oven, installed in 1988, using a thermal oxidizer as control, exhausting to one (1) stack (16101);
 - (B) One (1) post cure oven, installed in 1988, using a thermal oxidizer as control, exhausting to one (1) stack (16102);
 - (C) One (1) post cure oven, installed in 1988, using a thermal oxidizer as control, exhausting to one (1) stack (16103);

- (D) One (1) post cure oven, installed in 1988, using a thermal oxidizer as control, exhausting to one (1) stack (16104);
- (E) One (1) post cure oven, installed in 1988, using a thermal oxidizer as control, exhausting to one (1) stack (16105);
- (F) One (1) monorail cure oven, installed in 1988, using a thermal oxidizer as control, exhausting to one (1) stack (16125);
- (G) One (1) saturator dry out oven, installed in 1988, using a thermal oxidizer as control, exhausting to one (1) stack (16114);
- (H) One (1) saturator dry out oven, installed in 1988, using a thermal oxidizer as control, exhausting to one (1) stack (16124);
- (I) One (1) saturator oven, installed in 1993, using a thermal oxidizer as control, exhausting to one (1) stack (13058);
- (J) One (1) oven drier, installed in 1984, exhausting to one (1) stack (20101);
- (K) One (1) saturator, installed in 1984, exhausting to one (1) stack (20105);
- (L) One (1) chinawood oil exhaust fan, installed in 1988, exhausting to one (1) stack (14124); ~~and~~
- (M) One (1) chinawood oil exhaust fan, installed in 1988, exhausting to one (1) stack (14125); **and**
- (N) One (1) resin saturation line, equipped with two (2) 1.6 million British thermal units per hour natural gas fired burners, using a 9.5 million British thermal units per hour natural gas fired thermal oxidizer as control.**

Also, the equipment listed in Section D.4 "FACILITY OPERATION CONDITIONS" has been changed to be as follows:

- (11) One (1) paper saturation operation, identified as P013, with a maximum capacity of 40,400 paper friction products per hour, consisting of the following equipment:
 - (A) One (1) post cure oven, installed in 1988, using a thermal oxidizer as control, exhausting to one (1) stack (16101);
 - (B) One (1) post cure oven, installed in 1988, using a thermal oxidizer as control, exhausting to one (1) stack (16102);
 - (C) One (1) post cure oven, installed in 1988, using a thermal oxidizer as control, exhausting to one (1) stack (16103);
 - (D) One (1) post cure oven, installed in 1988, using a thermal oxidizer as control, exhausting to one (1) stack (16104);
 - (E) One (1) post cure oven, installed in 1988, using a thermal oxidizer as control, exhausting to one (1) stack (16105);
 - (F) One (1) monorail cure oven, installed in 1988, using a thermal oxidizer as control, exhausting to one (1) stack (16125);
 - (G) One (1) saturator dry out oven, installed in 1988, using a thermal oxidizer as control, exhausting to one (1) stack (16114);
 - (H) One (1) saturator dry out oven, installed in 1988, using a thermal oxidizer as control, exhausting to one (1) stack (16124);
 - (I) One (1) saturator oven, installed in 1993, using a thermal oxidizer as control, exhausting to one (1) stack (13058);

- (J) One (1) oven drier, installed in 1984, exhausting to one (1) stack (20101);
- (K) One (1) saturator, installed in 1984, exhausting to one (1) stack (20105);
- (L) One (1) chinawood oil exhaust fan, installed in 1988, exhausting to one (1) stack (14124); ~~and~~
- (M) One (1) chinawood oil exhaust fan, installed in 1988, exhausting to one (1) stack (14125); **and**
- (N) One (1) resin saturation line, equipped with two (2) 1.6 million British thermal units per hour natural gas fired burners, using a 9.5 million British thermal units per hour natural gas fired thermal oxidizer as control.**

The Technical Support Document (TSD) should also reflect this change. However, the TSD is not physically changed after Public Notice. The change is noted here in the Addendum.

Also, the following condition has been added to the permit. The remaining conditions have been re-numbered:

D.4.2 Volatile Organic Compound (VOC) [326 IAC 8-2-5]

- (a) Pursuant to 326 IAC 8-2-5 (Paper Coating Operations), the owner or operator of a facility engaged in the surface coating of paper may not cause, allow, or permit the discharge into the atmosphere of any volatile organic compound in excess of two and nine-tenths (2.9) pounds of VOC per gallon of coating excluding water delivered to the coating applicator.**
- (b) When operating the thermal oxidizer to achieve the limit for 326 IAC 8-2-5, 2.9 pounds of VOC emitted to the atmosphere per gallon of coating less water delivered to the applicator, the thermal oxidizer shall maintain a minimum 97.5% capture efficiency and 97.5% destruction efficiency. These efficiencies and the use of the thermal oxidizer are required by 326 IAC 8-1-2(a)(2). Based upon 326 IAC 8-1-2(c) and the overall control efficiency of 95%, the VOC content of the coating shall not exceed 95 pounds per gallon of coating solids delivered to the applicator.**

Regarding the second paragraph of this comment, if the two new saturation lines are going to be constructed within eighteen (18) months of the date of issuance of this Part 70 Permit, then the modification should be included in this permit. If the proposed date of construction will be after eighteen (18) months of the date of issuance of this permit, then a modification to the Part 70 Permit should be filed at a later date (within eighteen (18) months of proposed date of construction). There will be no changes to this condition in the final permit due to this comment.

Comment 8:

A.2(13)

A number of items appear to be mis-identified in the draft permit.

Adhesive and Resin Formulation and Storage Vessels			
The first part of the list does not appear to be separately listed in the permit			
Machine Number	Description	Capacity (gallons)	Content
16159	Bulk storage tank T-1	12000	solvent (ethanol)
16160	Bulk storage tank T-2	13000	resin
16161	Bulk storage tank T-3	11000	resin
16162	Bulk storage tank T-4	4200	resin
16163	Bulk storage tank T-5	4500	solvent (MEK)
16164	Bulk storage tank T-7	4500	resin
16165	Bulk storage tank T-6	4500	resin
16153	day tank T-14	1000	blended resin
16154	day tank T-13	1000	blended resin
16155	day tank T-12	1500	blended resin
16156	day tank T-10	1500	blended resin
16157	day tank T-9	1000	blended resin
16158	day tank T-8	1000	blended resin
16170	day tank T-16	1000	wash out bed 2
16171	day tank T-17	1000	wash out bed 1
The following are in the permit			
16201	Adhesive kettle		formulation
16202	Adhesive kettle		formulation
16203	Adhesive kettle		formulation
16204	Adhesive kettle		formulation
16205	Adhesive kettle		formulation
16206	Adhesive kettle		formulation
16207	Adhesive kettle		formulation
Alcohol tank	storage tank	2000	ethanol
MEK tank	storage tank	1000	methyl ethyl ketone
Alcohol tank	storage tank	300	ethanol

Please note that the 2000 gallon ethanol tank for the East Plant will be increased to an 8000 gallon storage tank by the end of 1998.

Please delete the notation "identified as T-#", from each of the adhesive kettles items (A) through (G).

Response to Comment 8:

Pursuant to this comment, Condition A.2(13) "Emission Units and Pollution Control Equipment Summary" has been changed to be as follows:

- (13) One (1) adhesive/saturant formulation and mixing operation, installed in 1988, identified as P017, with a maximum capacity of 2,000 phenolic adhesives gallons per hour, consisting of the following equipment:
 - (A) One (1) adhesive **process** kettle, ~~identified as T-1, with a maximum capacity of 12,000 gallons of ethanol,~~ exhausting to one (1) stack (16201);
 - (B) One (1) adhesive **process** kettle, ~~identified as T-2, with a maximum capacity of 13,000 gallons of resin 536,~~ exhausting to one (1) stack (16202);
 - (C) One (1) adhesive **process** kettle, ~~identified as T-3, with a maximum capacity of 11,000 gallons of resin 536,~~ exhausting to one (1) stack (16203);
 - (D) One (1) adhesive **process** kettle, ~~identified as T-4, with a maximum capacity of 4,200 gallons of resin 479,~~ exhausting to one (1) stack (16204);
 - (E) One (1) adhesive **process** kettle, ~~identified as T-5, with a maximum capacity of 4,500 gallons of MEK,~~ exhausting to one (1) stack (16205);
 - (F) One (1) adhesive **process** kettle, ~~identified as T-6, with a maximum capacity of 4,500 gallons of resin 295E,~~ exhausting to one (1) stack (16206);
 - (G) One (1) adhesive **process** kettle, ~~identified as T-7, with a maximum capacity of 4,400 gallons of resin 295E,~~ exhausting to one (1) stack (16207);
 - (H) One (1) storage tank, identified as MEK (near rollcoaters), with a maximum capacity of 1,000 gallons of MEK; ~~and~~
 - (I) One (1) storage tank, identified as Ethanol (near rollcoaters), with a maximum capacity of ~~2,000~~ **8,000** gallons of ethanol;
 - (J) **One (1) bulk storage tank T-1, containing ethanol, with maximum storage capacity of 12,000 gallons, exhausting to one (1) stack (16159);**
 - (K) **One (1) bulk storage tank T-2, containing resin, with maximum storage capacity of 13,000 gallons, exhausting to one (1) stack (16160);**
 - (L) **One (1) bulk storage tank T-3, containing resin, with maximum storage capacity of 11,000 gallons, exhausting to one (1) stack (16161);**
 - (M) **One (1) bulk storage tank T-4, containing resin, with maximum storage capacity of 4,200 gallons, exhausting to one (1) stack (16162);**
 - (N) **One (1) bulk storage tank T-5, containing MEK, with maximum storage capacity of 4,500 gallons, exhausting to one (1) stack (16163);**

- (O) One (1) bulk storage tank T-7, containing resin, with maximum storage capacity of 4,500 gallons, exhausting to one (1) stack (16164);
- (P) One (1) bulk storage tank T-6, containing resin, with maximum storage capacity of 4,500 gallons, exhausting to one (1) stack (16165);
- (Q) One (1) day tank T-14, containing blended resin, with maximum storage capacity of 1,000 gallons, exhausting to one (1) stack (16153);
- (R) One (1) day tank T-13, containing blended resin, with maximum storage capacity of 1,000 gallons, exhausting to one (1) stack (16154);
- (S) One (1) day tank T-12, containing blended resin, with maximum storage capacity of 1,500 gallons, exhausting to one (1) stack (16155);
- (T) One (1) day tank T-10, containing blended resin, with maximum storage capacity of 1,500 gallons, exhausting to one (1) stack (16156);
- (U) One (1) day tank T-9, containing blended resin, with maximum storage capacity of 1,000 gallons, exhausting to one (1) stack (16157);
- (V) One (1) day tank T-8, containing blended resin, with maximum storage capacity of 1,000 gallons, exhausting to one (1) stack (16158);
- (W) One (1) day tank T-16, identified as wash out bed 2, with maximum storage capacity of 1,000 gallons, exhausting to one (1) stack (16170); and
- (X) One (1) day tank T-17, identified as wash out bed 1, with maximum storage capacity of 1,000 gallons, exhausting to one (1) stack (16171).

Also the equipment listed in Section D.3 "FACILITY OPERATION CONDITIONS" has been changed to be as follows:

- (13) One (1) adhesive/saturant formulation and mixing operation, installed in 1988, identified as P017, with a maximum capacity of 2,000 phenolic adhesives gallons per hour, consisting of the following equipment:
 - (A) One (1) adhesive **process** kettle, ~~identified as T-1, with a maximum capacity of 12,000 gallons of ethanol,~~ exhausting to one (1) stack (16201);
 - (B) One (1) adhesive **process** kettle, ~~identified as T-2, with a maximum capacity of 13,000 gallons of resin 536,~~ exhausting to one (1) stack (16202);
 - (C) One (1) adhesive **process** kettle, ~~identified as T-3, with a maximum capacity of 11,000 gallons of resin 536,~~ exhausting to one (1) stack (16203);
 - (D) One (1) adhesive **process** kettle, ~~identified as T-4, with a maximum capacity of 4,200 gallons of resin 479,~~ exhausting to one (1) stack (16204);
 - (E) One (1) adhesive **process** kettle, ~~identified as T-5, with a maximum capacity of 4,500 gallons of MEK,~~ exhausting to one (1) stack (16205);
 - (F) One (1) adhesive **process** kettle, ~~identified as T-6, with a maximum capacity of 4,500 gallons of resin 295E,~~ exhausting to one (1) stack (16206);
 - (G) One (1) adhesive **process** kettle, ~~identified as T-7, with a maximum capacity of 4,400 gallons of resin 295E,~~ exhausting to one (1) stack (16207);
 - (H) One (1) storage tank, identified as MEK (near rollcoaters), with a maximum capacity of 1,000 gallons of MEK; ~~and~~
 - (I) One (1) storage tank, identified as Ethanol (near rollcoaters), with a maximum capacity of ~~2,000~~ 8,000 gallons of ethanol;

- (J) One (1) bulk storage tank T-1, containing ethanol, with maximum storage capacity of 12,000 gallons, exhausting to one (1) stack (16159);
- (K) One (1) bulk storage tank T-2, containing resin, with maximum storage capacity of 13,000 gallons, exhausting to one (1) stack (16160);
- (L) One (1) bulk storage tank T-3, containing resin, with maximum storage capacity of 11,000 gallons, exhausting to one (1) stack (16161);
- (M) One (1) bulk storage tank T-4, containing resin, with maximum storage capacity of 4,200 gallons, exhausting to one (1) stack (16162);
- (N) One (1) bulk storage tank T-5, containing MEK, with maximum storage capacity of 4,500 gallons, exhausting to one (1) stack (16163);
- (O) One (1) bulk storage tank T-7, containing resin, with maximum storage capacity of 4,500 gallons, exhausting to one (1) stack (16164);
- (P) One (1) bulk storage tank T-6, containing resin, with maximum storage capacity of 4,500 gallons, exhausting to one (1) stack (16165);
- (Q) One (1) day tank T-14, containing blended resin, with maximum storage capacity of 1,000 gallons, exhausting to one (1) stack (16153);
- (R) One (1) day tank T-13, containing blended resin, with maximum storage capacity of 1,000 gallons, exhausting to one (1) stack (16154);
- (S) One (1) day tank T-12, containing blended resin, with maximum storage capacity of 1,500 gallons, exhausting to one (1) stack (16155);
- (T) One (1) day tank T-10, containing blended resin, with maximum storage capacity of 1,500 gallons, exhausting to one (1) stack (16156);
- (U) One (1) day tank T-9, containing blended resin, with maximum storage capacity of 1,000 gallons, exhausting to one (1) stack (16157);
- (V) One (1) day tank T-8, containing blended resin, with maximum storage capacity of 1,000 gallons, exhausting to one (1) stack (16158);
- (W) One (1) day tank T-16, identified as wash out bed 2, with maximum storage capacity of 1,000 gallons, exhausting to one (1) stack (16170); and
- (X) One (1) day tank T-17, identified as wash out bed 1, with maximum storage capacity of 1,000 gallons, exhausting to one (1) stack (16171).

The Technical Support Document (TSD) should also reflect this change. However, the TSD is not physically changed after Public Notice. The change is noted here in the Addendum.

Comment 9:

Section A.2(12)

If the previously discussed requirement to eliminate listing can be agreed to, then these changes are not required.

- (S) "Chamferings" should be "Chamfer Machines"
- (U) "Groover" should be "Groovers"

Response to Comment 9:

Pursuant to this comment, Condition A.2(12)(S) and (U) "Emission Units and Pollution Control Equipment Summary" have been changed to be as follows:

- (S) Two (2) ~~chamferings~~ **chamfer machines**;
- (U) Six (6) groovers;

Also, the equipment listed in Section D.1 "FACILITY OPERATION CONDITIONS" has been changed to be as follows:

- (S) Two (2) ~~chamferings~~ **chamfer machines**;
- (U) Six (6) groovers;

The Technical Support Document (TSD) should also reflect this change. However, the TSD is not physically changed after Public Notice. The change is noted here in the Addendum.

Comment 10:

Section A.2(13)

There are no units associated with the capacity. The units should be "gallons".

Response to Comment 10:

Pursuant to this comment, Condition A.2(13) "Emission Units and Pollution Control Equipment Summary" has been changed to be as follows:

- (13) One (1) adhesive/saturant formulation and mixing operation, installed in 1988, identified as P017, with a maximum capacity of 2,000 phenolic adhesives **gallons** per hour, consisting of the following equipment:

Also the equipment in Section D.3(13) "FACILITY OPERATION CONDITIONS" has been changed to be as follows:

- (13) One (1) adhesive/saturant formulation and mixing operation, installed in 1988, identified as P017, with a maximum capacity of 2,000 phenolic adhesives **gallons** per hour, consisting of the following equipment:

The Technical Support Document (TSD) should also reflect this change. However, the TSD is not physically changed after Public Notice. The change is noted here in the Addendum.

Comment 11:

Section A.2(15)

The product should be described as rubber friction material.

Response to Comment 11:

Pursuant to this comment, Condition A.2(15) "Emission Units and Pollution Control Equipment Summary" has been changed to be as follows:

- (15) One (1) rubber making operation, installed in 1979, identified as P019, with a maximum capacity of 200 pounds of rubber friction ~~products~~ **material** per hour, using a baghouse as control, exhausting to one (1) stack (14009), consisting of the following equipment:

Also, the equipment listed in Section D.1(15) "FACILITY OPERATION CONDITIONS" has been changed to be as follows:

- (15) One (1) rubber making operation, installed in 1979, identified as P019, with a maximum capacity of 200 pounds of rubber friction ~~products~~ **material** per hour, using a baghouse as control, exhausting to one (1) stack (14009), consisting of the following equipment:

The Technical Support Document (TSD) should also reflect this change. However, the TSD is not physically changed after Public Notice. The change is noted here in the Addendum.

Comment 12:

Section A.2 or A.3
Missing operation (Paper making)

The papermaking operation had been given an exemption (April 8, 1988) and was listed on the insignificant activities list. However, several reviewers of the document have been concerned that the visible emissions from the papermaking operation would be construed as a non-permitted process. Specifically the pulper stacks may have a small amount of visible emission of particulate for very short periods during the initial dumping phase of the pulping process. Additionally, the papermill has fairly continuous steam and water vapor emissions.

Response to Comment 12:

Pursuant to this comment, Condition A.3 "Specifically Regulated Insignificant Activities" has been changed to be as follows:

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (1) One (1) 60 hp natural gas fired boiler, installed in 1984; **and**
- (2) **Paper making operation including two pulp mixers, associated caustic, alum and wastewater tanks, and one steam heated paper rolling and drying process.**

Also, this operation has been added to the list of equipment in Section D.1 "FACILITY OPERATION CONDITIONS".

Comment 13:

Section B.24

If you approve of the change to listing the pollution control devices for the particulate sources in the facility rather than listing each piece of equipment currently attached to a specific particulate source, then numerous anticipated changes will not require this extensive paperwork trail.

Response to Comment 13:

The listing of the equipment now states that particulate emission equipment shall have pollution control equipment, but does not specify which pollution control equipment belongs to which operation. Therefore, flexibility to change pollution control equipment to other operations is allowed providing that the allowable particulate emission limitations are not exceeded. There will be no changes to this condition in the final permit due to this comment.

Comment 14:

Section B.26(e)

We would prefer the following language be used:

“Photographs and records of equipment provided to or acquired by IDEM must meet the guidelines provided by Raybestos to protect operational and trade secrets. Should a required record not be possible without compromising trade secrets, then Raybestos would submit such documentation to IDEM under the confidentiality records procedure established in Section B.8 of the permit”

Response to Comment 14:

Pursuant to 326 IAC 17 (Public Records), the source may file a claim of confidentiality for any information provided to or acquired by IDEM. There will be no changes to this condition in the final permit due to this comment.

Comment 15:

Section C.2

Where can training as a certified observer for opacity be obtained?

Response to Comment 15:

A certified observer for opacity is not required by this permit, only a trained observer is required. However, if training as a certified observer for opacity is desired, please contact Carl Koontz Associates, P.O. Box 8216, Hermitage, Tennessee 37076-8216 or at (615) 889-2194. There will be no changes to this condition in the final permit due to this comment.

Comment 16:

Section C.14

Please note that the ERP has been submitted.

Response to Comment 16:

Pursuant to this comment, Condition C.14 (now renumbered Condition C.13) “Emergency Reduction Plan” has been changed to be as follows:

C.1413 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures in June, 1997.**
- (b) If the ERP is disapproved by IDEM, OAM the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.**
- (c) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.**
- (d) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.**

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

Comment 17:

Section C.20(d)

Recordkeeping requirements are not already legally required shall be implemented within ninety (90) days of permit issuance or as otherwise stated in the permit.

(You've requested a stack test of the saturation system incinerators within 30 to 36 months of the permit issuance and it would be inconsistent with this requirement.)

Response to Comment 17:

The Permittee shall keep records of the thermal incinerator temperature beginning within ninety (90) days of permit issuance if this requirement was not already required by a previous permit. If these records were required by a previous permit, then they should be maintained from the date of operation of the equipment. If the performance tests have not yet been conducted, the Permittee is required to maintain incinerator temperatures at the level specified in the conditions in Section D. After the performance tests, if the required incinerator temperature is different from the temperature specified in the conditions in Section D, then the performance test temperature will be the required incinerator temperature. Records of incinerator temperature shall be maintained regardless of whether or not performance testing has been conducted or not. There will be no changes to this condition in the final permit due to this comment.

Comment 18:

Section D.1

There is no D.1(2)

Response to Comment 18:

The equipment in the various Section D's are numbered the same as they are numbered in Condition A.2. That is why there is not a (2) in Section D.1. Item (2) is in Section D.2. There will be no changes to this section in the final permit due to this comment.

Comment 19:

Section D.1(5)

There are two (2) iron phosphating processes, one for AT and one for HD. It is not clear whether this specification is required.

Response to Comment 19:

These processes have their own requirements and have been separated as such. If the processes are operated in conjunction with another operation, it is not necessary to state this providing that all processes are operating in compliance with the requirements of this permit. There will be no changes to this condition in the final permit due to this comment.

Comment 20:

Section D.1

There is no D.1(6)

Response to Comment 20:

The equipment in the various Section D's are numbered the same as they are numbered in Condition A.2. That is why there is not a (2) in Section D.1. Item (2) is in Section D.2. There will be no changes to this section in the final permit due to this comment.

Comment 21:

Section D.1.1 Particulate Matter

These particulate matter emission limitations do not state whether they are pre- or post- control. If they are post control, the application and verification will be impossible. There are multiple source for each of the collectors. Similarly, if the limits are to exist pre-control, then it needs to be determine if this is each individual operation or if it is a cumulative total for all operations. For example, there are 9 paper blanking presses (D.1.1(I)). Would they need to be measured while control is running or not running?

Response to Comment 21:

These particulate matter emission limitations are the allowable emission limitations. The operation can not exceed this limit with or without control. However, the equipment shall be considered in compliance with this requirement when using particulate matter control equipment. The allowable limits for each operation are based on their maximum operating capacity. Each piece of equipment's allowable particulate matter limitation is based on it's maximum throughput capacity. The measurement to show compliance would be while control is running if the equipment is connected to a control device. If stack testing were ever required of these emission units, the test protocol (as required by Condition C.8 of this permit) would need to address this issue. OAM staff would assist in developing a reasonable approach to satisfy the compliance issue to be addressed at that time. There will be no change to this condition in the final permit due to this comment.

Comment 22:

Section D.1.3

The PMP should apply only to the steel operations which are connected or require collectors. Operations such as blanking, turning or gearshaping have no anticipated emissions.

Response to Comment 22:

Pursuant to this comment, Condition D.1.3 "Preventive Maintenance Plan" has been changed to be as follows:

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the **steel operations which are connected to or require control equipment for particulate matter (PM) emissions in the** one (1) steel blanking and surface finishing operation and any control devices.

Comment 23:

Section D.1.6 Visible emission notations.

Except for the metal etch line units, the exhaust stacks referred to are inaccessible for visual inspection except for someone actually getting on the roof. Access to the roof is normally limited to team if personnel in radio contact with a back-up inside since the roof is not designed for normal daily traffic. Although the exact stacks can not be seen from the ground, requiring daily access to the roof appears to be unnecessarily dangerous for the benefit provided.

Daily verification of the emission will also be more burdensome than beneficial. We would like to suggest that visible emission from the facility would be initially verified weekly. Following the establishment of "normal" emissions, the checks would be reduced to monthly inspections from the ground. Following three months of continued "normal" emission, the inspections from the ground could be reduced to quarterly inspections. In the event of upset or abnormal conditions being noted, the inspection frequency would be increased back to the weekly inspections following the same frequency would be increased back to the weekly inspections following the same "normal" routine for returning to less strenuous inspection schedule.

Response to Comment 23:

Regarding the first paragraph of this comment, access to the roof is not necessary to record visible emissions. An observer does not have to be able to see the stack. They are required to look at the exhaust coming from the stack. If the observer stood far enough away from the building, then they should be able to see the emissions from standing on the ground.

Regarding the second paragraph of this comment, daily emissions notations are required to document compliance with many permit requirements including Condition C.2 "Opacity", Condition D.1.1 "Particulate Matter", and Condition D.1.5 "Particulate Matter". The Office of Air Management feels that if visible emissions were only verified once a week, once per month, or once per quarter, the possibility for a malfunction of the control equipment would not be detected soon enough and would lead to a deviation from the permit requirements. There will be no changes to this condition in the final permit due to this comment.

Comment 24:

Section D.1.7 Monitoring

(A) As indicated earlier, the replacement of this operation is anticipated. What kinds of monitoring would be required? Advanced knowledge of these requirements will allow the specification of the proper controls and monitoring equipment during installation.

(B) The graphite spray operations do not have individual filters. There are no controls on these operations.

(C) Since access to the roof is dangerous and cumbersome, it is proposed that the weekly inspection be performed for a period of three (3) months. If the emissions continue as "normal", then the inspection frequency may be decreased to monthly, and then decreased to quarterly, and emission evaluations may be made from the ground rather than requiring roof access. It has been determined that access to the roof would not be necessary to record visible emission notations. However, in D.1.7(c), weekly inspections of the coating emissions and the "presence of overspray on the roofs and nearby ground" are required. These are in conflict. As stated previously, access to the roof is to be avoided as a requirement due to the inherent dangers therein.

Response to Comment 24:

For section (a), unless control equipment is added with the new line, there probably won't be any monitoring requirements. This statement is just to make the Permittee aware that a change to the operation may require monitoring requirements. Pursuant to this comment Condition D.1.7 "Monitoring" has been clarified and has been changed to be as follows:

D.1.7 Monitoring

(a) Monitoring of the one (1) sodium nitrite salt bath is not required by this permit. However, any change or modification to this facility as specified in 326 IAC 2-1 may require this facility to have monitoring requirements.

~~(b) Weekly inspections shall be performed of the coating emissions from the stack of the one (1) graphite spray operation and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C Compliance Monitoring Plan Failure to Take Response Steps, shall be considered a violation of this permit.~~

For (b), Condition A.2(9) has been changed to be as follows:

- (9) One (1) graphite spray operation, installed in 1952, identified as P011, with a maximum capacity of 164 sintered metal and graphitics pieces per hour, ~~using dry filters as control~~, consisting of the following equipment:

Also, the equipment listed in D.1(9) "FACILITY OPERATION CONDITIONS" has been changed to be as follows:

- (9) One (1) graphite spray operation, installed in 1952, identified as P011, with a maximum capacity of 164 sintered metal and graphitics pieces per hour, ~~using dry filters as control~~, consisting of the following equipment:

The Technical Support Document (TSD) should also reflect this change. However, the TSD is not physically changed after Public Notice. The change is noted here in the Addendum.

Condition D.1.7(b) has been deleted from the permit and the remaining subparts have been re-numbered.

For (c), the Office of Air Management has decided that since the one (1) graphite spray operation does not have dry filters, there is no need to check the roof for particulate matter overspray. Only visible emissions notations shall be required.

Condition D.1.6(a) "Visible Emission Notations" has been changed to be as follows:

- (a) Daily visible emission notations of the steel blanking and surface finishing operation, the metal grinding and grooving operation, the metal etch lines operation, the bonding/flattening process, the powder mixing operation, the paper grinding and grooving operation, the rubber making operation, **and the one (1) graphite spray operation** stack exhausts shall be performed during normal daylight operations **when exhausting to the atmosphere**. A trained employee shall record whether emissions are normal or abnormal.

Comment 25:

Section D.1.8 Parametric Monitoring

As we discussed over the phone, Raybestos does not currently have the equipment in place to monitor the pressure drop across the baghouses. You indicated in the conversation that this requirements could be replaced with quarterly inspections of the baghouses.

Please delete the reference to "woodworking" and the "redirecting of vents" from this and subsequent lines.

Response to Comment 25:

Pursuant to this comment, Condition D.1.8 "Parametric Monitoring" has been deleted from the permit and replaced with a condition requiring quarterly inspections. The condition has been changed to be as follows:

D.1.8 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the one (1) metal grinding and grooving operation, the one (1) powder mixing operation, the one (1) paper grinding and grooving operation, the one (1) paper blanking operation and the one (1) rubber making operation when venting to the atmosphere. Inspections are optional when venting indoors. All defective bags shall be replaced.

Also, Condition D.1.10(c) (now re-lettered Condition D.1.10(b)) "Record Keeping Requirements" has been changed to be as follows:

(e)(b) To document compliance with Condition D.1.8, the Permittee shall maintain records of the results of the inspections required under Condition D.1.8.

The Compliance Monitoring Requirements in the Technical Support Document (TSD) should also reflect this change. However, the TSD is not physically changed after Public Notice. The change is noted here in the Addendum.

Comment 26:

Section D.1.10 Record Keeping

(a) The permittee shall maintain records of visible emission notations as described above in D.1.7 and D.1.8.

(b) strike

(c) To document compliance, the following documents will be maintained:

- (1) Records of the following operational parameters during normal operation
 - (A) required inspections
- (2) Operation and preventative maintenance logs, including work purchase orders
- (3) Operator standard operating procedures (where applicable)
- (4) Documentation of all response steps implemented, per event.
- (5) Manufacturer's specifications or equivalent.

Response to Comment 26:

For (a), the Office of Air Management feels that if visible emissions were only verified once a week, once per month, or once per quarter, the possibility for a malfunction of the control equipment would not be detected soon enough and would lead to a deviation from the permit requirements. There will be no changes to this condition in the final permit due to this comment.

Condition D.1.10(b) "Record Keeping Requirements" has been deleted from the final permit as follows. The remaining subsections of this condition have been re-lettered:

~~(b) To document compliance with Condition D.1.7(b), the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.~~

For (c), Condition D.1.10(c) (now re-lettered Condition D.1.10(b)) "Record Keeping Requirements" has been changed to be as follows (bold added for emphasis):

~~(e)~~(b) **To document compliance with Condition D.1.8, the Permittee shall maintain records of the results of the inspections required under Condition D.1.8.**

Comment 27:

Section D.2.1

As with several operations, production requirements indicate that a second vapor degreaser will need to be installed by the end of the calendar year. Does this need to be represented in this permit?

We briefly discussed the problem with the wording of these elements. As you became aware, the degreaser we operate is considerably larger than any you were familiar with. Therefore, some of the requirements and restrictions are very specific and to make sure that the compliance can be achieved, the wording must reflect the reality of the operation.

The degreaser, and the new one to be installed this year, are large units, with openings approximately 16 feet long by 6 feet wide. The current unit stands approximately 12 feet high. The tank has an internal sump with capacity of 150-300 gallons of solvent. The solvent is heated to boiling with steam. The vapor generated is primarily controlled by a cooling water jacket around the perimeter of the unit. Above the cooling water jacket is freeboard. The freeboard has refrigerated chiller coils around the perimeter to maintain a temperature, at idle, of 1/3 the boiling point of the solvent or 57-58F. A roll-top lid is located at the top of the freeboard. The roll top lid is an idling mode cover only and needs only be closed when the degreaser is not processing loads. A lip vent is provided to assure compliance with OSHA exposure requirements. The lip vent is connected to a carbon absorber (Solvent Vapor Recovery Module or SVRM).

Response to Comment 27:

If the degreaser is going to be constructed within eighteen (18) months of the date of issuance of this Part 70 Permit, then the modification should be included in this permit. If the proposed date of construction will be after eighteen (18) months of the date of issuance of this permit, then a modification to the Part 70 Permit should be filed at a later date (within eighteen (18) months of proposed date of construction). After conversations with the source, it has been determined that the degreaser will not be constructed until after the issuance of this Part 70 Permit. Therefore, the source will submit a Part 70 Operation Permit modification request prior to the construction of this degreaser. There will be no changes to this condition in the final permit due to this comment.

Comment 28:

Section D.2.1

Section (l) if (g) is included, then (a), (b) and (f) are redundant. Item (f) should be rewritten to indicate a primary cooling coil, not condenser.

Item (f) should be a cooling or condensing coils rather than condenser. From an engineering standpoint, the use of the word condenser indicates a powered refrigeration device. The primary cooling coil is currently water cooled. This operation is explained in Section 3 of the preamble to the rule on page 62573 of the Federal Register Notice; Monday November 29, 1993.

Response to Comment 28:

This condition is quoted directly from the National Emission Standards For Hazardous Air Pollutants (NESHAP), 40 CFR 63.463, Subpart T, for batch vapor and in-line cleaning machine standards. This facility is subject to the requirements of this subpart. Condition D.2.1(i)(f) (now renumbered Condition D.2.2(i)(f)) "Halogenated Solvent Cleaning Machine NESHAP" has been changed to be as follows:

- (f) The degreaser shall have ~~a primary condenser~~ **cooling or condensing coils.**

The Technical Support Document (TSD) should also reflect this change. However, the TSD is not physically changed after Public Notice. The change is noted here in the Addendum.

Comment 29:

Section D.2.1 (ii)(d)

Rotating or tipping parts within a vapor degreaser is impractical and presents a significant risk to human health and safety. The vapor degreaser is a large open tank into which parts are lowered by a 3 ton hoist. A person would have to enter the degreaser to be able to tip or rotate parts. This standard language does not make sense for a vapor degreasing system.

As explained, the parts are hung or oriented to minimize collection of solvent. Tipping or rotating the parts would require a person exposing themselves to the vapor. This operation can not be done on our degreaser without significant danger. Therefore, leaving the wording in the permit is not acceptable. If the wording from the CFR 63.462(d)(5) "Parts shall be oriented so that the solvent drains from them freely. Parts having **cavities** or **blind** holes shall be tipped or rotated before being removed from any solvent cleaning machine" would exempt the parts which we manufacture. Again, changing the command from "shall" to "may" is recommended.

Response to Comment 29:

Pursuant to this comment, Condition D.2.1(ii)(d) (now renumbered Condition D.2.2(ii)(d)) "Halogenated Solvent Cleaning Machine NESHAP" has been changed to be as follows:

- (d) Parts shall be oriented so that the solvent drains from them freely. ~~Parts with holes may need to be tipped or rotated before being removed.~~ **Parts having cavities or blind holes shall be tipped or rotated before being removed from any solvent cleaning machine.**

The Technical Support Document (TSD) should also reflect this change. However, the TSD is not physically changed after Public Notice. The change is noted here in the Addendum.

Comment 30:

Section D.2.1(ii)(e)

Reword to "Parts or baskets shall not be removed from the vapor zone until the vapor level has recovered to the level of the primarily cooling coil."

Although 40 CFR 463 (d)(5) does say that "parts may not be removed from any solvent cleaning machine until dripping has stopped", that is not a readily measurable standard for large scale vapor degreasers. In a vapor degreaser, the solvent level collapses when cold steel is placed in the vapor zone. As additional Btu heat the steel, the solvent cleans the surface by condensation. Once the solvent level has recovered to the cooling water jacket, the steel has reached temperature and no additional cleaning is occurring. Once the vapor has recovered, the racks are suspended in the freeboard area for a period of at least 15 seconds or until visually dry (326 IAC 8-3-3(E)). It is this requirement which keeps solvent from "dripping." Therefore, this requirement is misleading in that it is easily interpreted to mean that the parts may not be removed from the vapor zone until dripping has stopped, while visible confirmation of the lack of dripping is impossible while the parts are in the vapor zone. The wording in the CFR 63.463 (e)(2)(v)(B) "ensure that, after cleaning, each part is held in the solvent vapor cleaning machine freeboard area for the dwell time determine for that particular part or basket, or for the maximum dwell time determined by using the most complex part type or parts basket" appears to be more applicable. Specifically, this time is a minimum 30 seconds for the type of racks which we use.

Response to Comment 30:

Pursuant to this comment, Condition D.2.1(ii)(e) (now renumbered Condition D.2.2(ii)(e)) has been changed to be as follows:

- (e) ~~Parts or baskets shall not be removed from any solvent cleaning machine before dripping has stopped.~~ **The Permittee shall ensure that, after cleaning, each part is held in the solvent vapor cleaning machine freeboard area for the dwell time determined for that particular part or basket, or for the maximum dwell time determined by using the most complex part type or parts basket.**

The Technical Support Document (TSD) should also reflect this change. However, the TSD is not physically changed after Public Notice. The change is noted here in the Addendum.

Comment 31:

Section D.2.2(2)

The cover must be closed when the degreaser is in idling mode except when necessary for maintenance access.

Although this requirement is in the IAC, it contradicts the operating requirements of the cover and can easily be misconstrued. The clarification requested to specify idling mode is to differentiate between short breaks while the parts are being hung on racks or employee breaks and shutdown periods when the degreaser is in idle and the cover should be used. Additionally, the clarification for maintenance access is to prevent potential violations during such activities.

Response to Comment 31:

Pursuant to this comment, Condition D.2.2(2) (now renumbered Condition D.2.3(2)) "Volatile Organic Compound" has been changed to be as follows:

- (2) Keep the cover closed at all times except when processing work loads through the degreaser **or except when necessary for maintenance access;**

The Technical Support Document (TSD) should also reflect this change. However, the TSD is not physically changed after Public Notice. The change is noted here in the Addendum.

Comment 32:

Section D.2.2(3)(D)

This item should be struck.

Response to Comment 32:

This condition is quoted directly from 326 IAC 8-3-3 for open top vapor degreaser operations. This facility is subject to the requirements of this rule. There will be no changes to this condition in the final permit due to this comment.

Comment 33:

Section D.2.2(11)

The purpose of the water separator is to be able to remove water from the degreaser solvent. If this requirement is to be interpreted that water in the separator will not be allowed to go back to the degreaser, I agree. If the requirement means that the water may not be drained from the separator, I disagree; as it would outlaw its primary function within the operation of the degreaser.

Response to Comment 33:

The requirement is to be interpreted that water in the separator will not be allowed to go back to the degreaser. There will be no changes to this condition in the final permit due to this comment.

Comment 34:

Section D.2.3(a)(4)

Since the carbon adsorption system is in place, it would be simpler to eliminate all subparts except (D).

Response to Comment 34:

Condition D.2.3(a)(4) (now renumbered Condition D.2.4(a)(4)) "Volatile Organic Compound" has been changed to be as follows:

(4) Equip the degreaser with ~~one (1) of~~ the following control devices:

~~(A) A freeboard ratio of seventy five hundredths (0.75) or greater and a powered cover if the degreaser opening is greater than one (1) square meter (ten and eight tenths (10.8) square feet).~~

~~(B) A refrigerated chiller.~~

~~(C) An enclosed design in which the cover opens only when the article is actually entering or exiting the degreaser.~~

~~(D)~~(A) A carbon adsorption system with ventilation which, with the cover open, achieves a ventilation rate of greater than or equal to fifteen (15) cubic meters per minute per square meter (fifty (50) cubic feet per minute per square foot) of air to vapor interface area and an average of less than twenty-five (25) parts per million of solvent is exhausted over one (1) complete adsorption cycle.

~~(E) Other systems of demonstrated equivalent or better control as those outlined in clauses (A) through (D). Such systems shall be submitted to the U.S. EPA as a SIP revision.~~

Comment 35:

Section D.2.3(b)(1)

The cover will be closed when the degreaser is in idling mode.

Response to Comment 35:

This condition is quoted directly from 326 IAC 8-3-6 for open top vapor degreaser operations and control requirements. This facility is subject to the requirements of this rule. There will be no changes to this condition in the final permit due to this comment.

Comment 36:

Section D.2.3(b)(2)(D)

See above explanation, this should be struck.

Response to Comment 36:

This condition is quoted directly from 326 IAC 8-3-6 for open top vapor degreaser operations and control requirements. This facility is subject to the requirements of this rule. There will be no changes to this condition in the final permit due to this comment.

Comment 37:

Section D.2.3(b)(5)

Should be struck. The previous requirement of ½ of the vapor depth which is approximately 3 feet.

As explained in our phone conversation, these measurements are not feasible for a 5 foot high vapor zone. In D.2.2 (6), the requirement is that “the vapor level should not drop more than 50% of the vapor depth when the workload is removed.” The requirement in 326 IAC 8-3-6 is not acceptable for a large production machine.

Response to Comment 37:

Pursuant to this comment, Condition D.2.3(b)(5) (now renumbered Condition D.2.4(b)(5)) “Volatile Organic Compounds” has been changed to be as follows:

- (5) Prohibit the loading of the degreaser to the point where the vapor level would drop more than ~~ten (10) centimeters (four (4) inches)~~ **half of the vapor depth** when the workload is removed.

The Technical Support Document (TSD) should also reflect this change. However, the TSD is not physically changed after Public Notice. The change is noted here in the Addendum.

Comment 38:

Section D.2.3(b)(10)

The following wording would be preferable: Prohibit workplace fans from blowing across the opening of the degreaser.

The problem we foresee with this language is the operator’s need for personal cooling fans during the summer months. The use of fans near the degreaser must occur for the health and safety of the operators. The prohibition on the fans is to prevent their use from creating a draft and inducing solvent release to the atmosphere. Therefore the suggested wording “Prohibit workplace fans from blowing across the opening of the degreaser” meets both requirements.

Response to Comment 38:

1. Condition D.2.2(10) (now renumbered Condition D.2.3(10)) “Volatile Organic Compound” has been changed to be as follows:

- (10) Prohibit ~~the use of~~ workplace fans ~~near~~ **from blowing across** the degreaser opening.

2. Condition D.2.3(b)(10) (now renumbered Condition D.2.4(b)(10)) “Volatile Organic Compound” has been changed to be as follows:

- (10) Prohibit ~~the use of~~ workplace fans ~~near~~ **from blowing across** the degreaser opening.

The Technical Support Document (TSD) should also reflect this change. However, the TSD is not physically changed after Public Notice. The change is noted here in the Addendum.

Comment 39:

Section D.2.3(b)(11)
Should be struck, see earlier discussion D.2.2(11).

Response to Comment 39:

The requirement is to be interpreted that water in the separator will not be allowed to go back to the degreaser. There will be no changes to this condition in the final permit due to this comment.

Comment 40:

Section D.2.8(a)
The initial notification was made on August 18, 1995. A copy of the notifications can be provided at your request.

Response to Comment 40:

Condition D.2.8(a) (now renumbered Condition D.2.9(a)) "Reporting Requirements" has been changed to be as follows:

(a) ~~Submit an initial notification report immediately. The report shall include the following information:~~ **The initial notification report for P002 required under 40 CFR 63.468(a) was submitted on August 18, 1995.**

- ~~(i) The name and address of the owner or operator;~~
- ~~(ii) The address of the solvent cleaning machine;~~
- ~~(iii) A brief description of each solvent cleaning machine including machine type, solvent/air interface area, and existing controls.~~
- ~~(iv) The date of installation for the solvent cleaning machine.~~
- ~~(v) The anticipated compliance approach for the solvent cleaning machine;~~
- ~~(vi) An estimated annual halogenated HAP solvent consumption for the solvent cleaning machine.~~

Comment 41:

Section D.3(13)
Should be modified as described earlier in A.2(13)

Response to Comment 41:

The equipment in Section D.3(13) "FACILITY OPERATION CONDITIONS" has been changed to be as follows (bold added to show what was added):

(13) One (1) adhesive/saturant formulation and mixing operation, installed in 1988, identified as P017, with a maximum capacity of 2,000 phenolic adhesives **gallons** per hour, consisting of the following equipment:

Comment 42:

Section D.3.1
Spraying operations are not done, the word is meaningless for our operations.

Response to Comment 42:

Condition D.3.1(c) "Volatile Organic Compounds" has been deleted from the final permit as follows:

~~(c) Solvent sprayed from the application equipment during clean up or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.~~

Comment 43:

Section D.3.5

Testing requirements: As indicated earlier, the addition to P012 rollercoating has not been installed and is not approved for the 1998 budget year. The testing period should mirror that within the permit language -120 days after full operation.

Response to Comment 43:

Pursuant to this comment, Condition D.3.5 has been changed to be as follows:

D.3.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

During the period between 30 and 36 months after issuance of this permit Within 60 days of achieving maximum production, the Permittee shall perform VOC testing to show compliance with Condition D.3.1 and 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) for the one (1) rollcoating adhesive application system (the addition to P012) utilizing Method 25, 40 CFR 60, Appendix A, or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

Comment 44:

Section D.3.8(a)(2)

A log of use is irrelevant for the facility. We are permitted for 8760 hours except for the Sample Department Rollcoater which is covered by special reporting needs. A log of use is excessive paperwork which we are not able to provide.

As listed in the draft permit, we are not able to comply with the recordkeeping requirements. The stated purpose of these requirements is to demonstrate compliance with the proposed emissions. I am unable to find in either referenced section the specific requirements which are listed in the permit.

The requested information has the following purposes to generate the required emission rate data:

- 1) The VOC and HAP content of the material is obtained from Manufacturer's specification or by testing. The number is typically in pounds per gallon. The amount of VOC and HAP is obtained by multiplying the above number by the total gallons purchased over the period of interest. Since we purchase and receive all materials in pounds, a correction factor of the density must be used. The result is the VOC or HAP in pounds which can either be treated in an oxidizer or vented to the atmosphere.
- 2) The logs of dates of use is irrelevant unless it is attempting to show hour by hour compliance. The log is cumbersome to achieve, there are simply too many operators who can possibly make errors which would result in a non-compliance. It is our contention that by obtaining the first requested data on a monthly basis, dividing by the number of operating hours in the month, the VOC or HAP content available for emission is determined.

- 3) The volume weighted average content would be required under two conditions. First the material in use has significant amounts of water. Our material does not. Secondly, if coatings had widely varying VOC content and it was not possible to ascertain the exact values requested in step 1, then the average would result in a single line multiplication. Because our system will allow for specific VOC or HAP content evaluation, this requirement is not needed.
- 4) As explained in the first comment, keeping solvent usage for clean-up separate from other solvent use, a double counting would occur. You state that total solvent use would be acceptable, however the wording "cleanup solvent" has a particular connotation and may result in an unnecessary violation. Eliminate the word "cleanup" from this requirement.
- 5) The total VOC and HAP usage for each month is achieved by multiplying the numbers obtained in Step 1.
- 6) The weight of VOC and HAP emitted for each compliance period. This is achieved by multiplying the use of these materials (Step 5) by the collection and oxidizing efficiency at each operation determined by stack testing once every five years. In many cases, the collection efficiency has been established at 100%.

Therefore, it is possible to simplify the requirements of D.3.8 to:

- a) To document compliance with Conditions D.3.1 and D.3.2, the Permittee shall maintain records. The records shall be accumulated monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.3.1 or D.3.2. The records shall include:
 - (1) the amount of each resin and solvent used in each process for the recording period (one month)
 - (2) the amount of VOC or HAP emissions from each process (in pounds) for each recording period and the demonstration that this does not exceed the emission limitation.
 - (3) the total amount of VOC or HAP emitted from the facility for each compliance period.

Response to Comment 44:

The log of use is required to show compliance with 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) not to show hours of operation. The source may change the coatings used in this operation without prior permit approval from the Office of Air Management (OAM). The source must keep records of all coatings used to show that each coating used is a compliant coating. When the source uses a noncompliant coating, the catalytic oxidizer must be used to reduce VOC emissions to be as if a compliant coating was used. Therefore, the log of coating use is in fact relevant for this facility. Condition D.3.8 (now Condition D.3.10) "Record Keeping Requirements" has been changed to be as follows:

D.3.810 Record Keeping Requirements

- (a) To document compliance with Conditions D.3.1 and D.3.2, the Permittee shall maintain records in accordance with (1) through ~~(6)~~ (5) below. Records maintained for (1) through ~~(6)~~ (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.3.1 and D.3.2.

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

~~(2) A log of the dates of use;~~

~~(3)~~(2) The volume weighted VOC and HAP content of the coatings and solvents used for each month **for each day that any coating with VOC content greater than 2.9 pounds per gallon is used. If at any time a coating with VOC content greater than 2.9 pounds per gallon less water is used, compliance with this rule shall be shown by the use of the following equation to calculate daily volume weighted average:**

$$\frac{\text{lb VOC}}{\text{gallon less water}} = \frac{3 \text{ coatings } [Dc * O * Q / [1 - W * Dc / Dw]]}{3C}$$

Dc = density of coating, lb/gal
O = weight percent organics, %
W = percent volume water, %

Dw = density of water, lb/gal
Q = quantity of coating, gal/unit
C = total of coatings used, gal/unit;

~~(4)~~(3) The ~~cleanup~~ solvent usage for each month;

~~(5)~~(4) The total VOC and HAP usage for each month; and

~~(6)~~(5) The weight of VOC and HAP emitted for each compliance period.

(b) **To document compliance with Condition D.3.7, the Permittee shall maintain a daily log of oxidizer operating temperatures and quarterly catalyst efficiency tests.**

~~(b)~~(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Comment 45:

Section D.3.8(a)(4)

Most of our operations are able to use the clean-up solvents as dilution solvents for the rollcoating operations. As such, there is no point in measuring specific use of clean-up solvents since it would result in double counting and excessive estimated emissions. Waste material generation can be recorded.

Response to Comment 45:

The source shall keep records of the usage of each solvent whether it is used for clean up or for dilution. Records of the total solvent usage will be sufficient to show compliance with this condition. There will be no changes to this condition in the final permit due to this comment.

Comment 46:

Section D.3.8(a)(1), (3), (5) and (6)

All of these subparts to the requirements of demonstrating the amount of HAP emitted for each compliance period. For simplicity, I would suggest combining all of these requirements into language similar to the following:

The weight of VOC and HAP emitted for each compliance period shall be calculated. The amount of emissions shall be based on material purchases and use records. Where applicable, the emissions of VOC and HAP at a process controlled by a thermal or catalytic oxidizer will be reduced by the demonstrated destruction efficiency of the oxidizer.

Response to Comment 46:

All of these subparts are required to show compliance with 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations). There are different ways to show compliance with this rule, including using only compliant coatings, using a daily volume weighted average or emissions after oxidation or incineration. A source must choose which way to show compliance. However, the source may decide later to show compliance another way. These records must be maintained so that if the source has to choose another way to show compliance, they can. There will be no changes to this condition in the final permit due to this comment.

Comment 47:

Section D.4.1

Does this 100% enclosure encompass all saturation operations or only that permitted under CP 3006? The other operations will not meet this requirement.

Response to Comment 47:

This condition only covers the equipment permitted under Construction Permit 3006. The other operations are covered by Condition D.4.2 and 326 IAC 8-2-5 (Paper Coating Operations).

1. Condition D.4.1 "Volatile Organic Compounds" has been changed to be as follows:

D.4.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 (General Reduction Requirements) and Construction Permit (CP107-3006-00007), issued on November 23, 1993, the ~~paper saturation operation~~ **one (1) saturator oven (identified as (I) above)** shall remain totally enclosed at all times it is in operation. **The operating temperature of the thermal oxidizer shall be maintained at minimum operating temperature of 1,400°F, or a temperature determined in the latest stack test that assures ninety-five percent (95%) destruction of the captured volatile organic compound (VOC).** This, ~~in conjunction with Condition D.4.5,~~ will satisfy the requirements of Best Available Control Technology (BACT)

2. Condition D.4.4 (now renumbered Condition D.4.7) "Volatile Organic Compounds" has been changed to be as follows:

D.4.47 Volatile Organic Compound (VOC)

~~Pursuant to 326 IAC 8-1-6 and~~ To demonstrate compliance with Conditions ~~D.4.4 and~~ D.4.2, the thermal oxidizers for VOC control shall be in operation at all times when the one (1) paper saturation operation is in operation. The operating temperature of the thermal oxidizer shall be maintained at a minimum operating temperature of 1,400°F, or a temperature determined in the latest stack test that assures ninety-five percent (95%) **overall control (including capture and destruction) efficiency of the captured** volatile organic compound (VOC) **emissions.**

Comment 48:

Section D.4.4

Is this stack testing requirement for all oxidizers? If so, why must it be accomplished in such a short window? The stack test for CP 3006 has been completed and sent to the Agency. If stack testing were to be required of all the oxidizers, is it possible to do one of any multiple unit, i.e. batch oven or saturator and used that data to apply to all units of that class?

As indicated in your response, where multiple units exist, testing one as a representative is permissible. Please add this testing exemption to the requirement.

Response to Comment 48:

Stack testing is required for the oxidizers that are used to comply with the 326 IAC 8-1-6 (Best Available Control Technology) and 326 IAC 8-2-5 (Paper Coating Operations) limits specified in Conditions D.4.1 and D.4.2. The Office of Air Management has determined that one oxidizer of a multiple unit may be used as a representative of the other oxidizers. It will be tested this time and then, another oxidizer shall be tested and so on until all oxidizers are tested. However, if the representative oxidizer does not show compliance with the limits or, after calculations to convert the results from the representative oxidizer to the other oxidizers, the other oxidizers are not in compliance, then a re-test of all oxidizers shall be performed to show compliance with the permit requirements. Condition D.4.3 (now renumbered Condition D.4.4) "Testing Requirements" has been changed to be as follows:

D.4.34 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

During the period between 30 and 36 months after issuance of this permit, the Permittee shall perform VOC testing utilizing Method 25, 40 CFR 60, Appendix A, or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. **The Office of Air Management has determined that one oxidizer of a multiple unit may be used as a representative of the other oxidizers. Subsequently, one oxidizer of the multiple unit will be tested according to the test schedule, until all oxidizers are tested. However, if the representative oxidizer does not show compliance with the limits or, after calculations to convert the results from the representative oxidizer to the other oxidizers, the other oxidizers are not in compliance, then a re-test of all oxidizers shall be performed to show compliance with the permit requirements. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.**

Comment 49:

Section D.4.6 Recordkeeping Requirements

Similar to the arguments presented for rollcoating, the majority of the recordkeeping requirements are not needed to demonstrate compliance.

The amount of material used for each compliance period shall be demonstrated. The VOC and HAP emissions shall be based on the amount of material used in each process reduced by the demonstrated destruction efficiency of the thermal or catalytic oxidizers.

The log of dates of operation should not be required since the operation is permitted for 8760 hours. The other components to the VOC and HAP content will be required for the above calculation. The clean-up solvent is recovered and used during the process as dilution solvent, and is therefore not a separable item. Requiring its separate accounting would result in higher solvent use than actual. The amount of waste generated by the saturation processes is controlled and recorded.

Compliant coatings are not used, hence oxidizers are used on all paper saturation operations. Therefore, logging the materials used is burdensome and not beneficial. We are currently required to operate the oxidizer at all times when the operation is running and for most of the saturation processes, the oxidizer is the heat source for the curing oven.

Similarly, if logs of total solvent usage are sufficient to show compliance, then the language in the permit should state that.

Although a switch to compliant coatings may one day be possible, it is preferable to submit an administrative request for modification to the log system rather than be burdened with an operational log at each of the operations.

Comment 50:

Section D.5.1

The calculation for particulate matter does not appear to be logical. If the stack height is increased by 100 feet, the Pt increases approximately 5 times. The typical response to an unacceptable level of particulate is to raise the stack to increase the dispersion. The emissions arrived by AP-42 are easily an order of magnitude below the 0.8 pounds per million BTU number listed in D.5.1. Please clarify the reasons for these limitations.

Response to Comment 50:

This is the allowable particulate matter limitation for this facility. This calculation is taken directly from 326 IAC 6-2-3 (Emission Limitations for Facilities Specified in 326 IAC 6-2-1(c)). From the Part 70 permit application, the following values were used to complete the calculation:

C = 50
Q = 25.5
N = 1
a = 0.67
h = 31

Pt = 1.19

The rule also states that all facilities which were existing and in operation on or before June 8, 1972, shall in no case exceed 0.8 pounds per million British thermal unit (lb/mmBtu). Since 1.19 is greater than 0.8, the boiler is limited to 0.8 lb/mmBtu. To show that the boiler is in compliance with this requirement when using natural gas, the following conversion is used:

13.7 lb PM/MMCF, to convert this to lb/mmBtu: 1 MMCF = 1,000 mmBtu

13.7 lb PM/MMCF * 1 MMCF/1,000 mmBtu = 0.0137 lb/mmBtu which is less than 0.8 lb/mmBtu. Therefore, the boiler is in compliance with this requirement.

Comment 51:

Section D.5.4

Alternative fuel capability is not present with the boilers. As such, why would this certification be required?

Response to Comment 51:

Even though alternative fuel capability is not currently present with this boiler, the certification is required to show compliance with Condition D.5.1 "Particulate Matter" and 326 IAC 6-2-3. The Office of Air Management would also have to give prior approval to use of any other types of fuels for this boiler. Therefore, the certification is also required to show compliance with 326 IAC 2-1-3.2 (Enhanced New Source Review). There will be no changes to this condition in the final permit due to this comment.

Comment 52:

Section D.6.1

The calculation for particulate matter does not allow compliance by dispersion. Please clarify the reasons for these limitations.

Response to Comment 52:

This is the allowable particulate matter limitation for this facility. This calculation is taken directly from 326 IAC 6-2-4 (Emission Limitations for Facilities Specified in 326 IAC 6-2-1(d)). From the Part 70 permit application, the following values were used to complete the calculation:

$$Q = 17.55$$

$$Pt = 0.52$$

To show that the boiler is in compliance with this requirement when using natural gas, the following conversion is used:

13.7 lb PM/MMCF, to convert this to lb/mmBtu: 1 MMCF = 1,000 mmBtu

$13.7 \text{ lb PM/MMCF} * 1 \text{ MMCF}/1,000 \text{ mmBtu} = 0.0137 \text{ lb/mmBtu}$ which is less than 0.52 lb/mmBtu. Therefore, the boiler is in compliance with this requirement.

Comment 53:

Section D.6.4 Part 70 Operating Permit Natural Gas Fired Boiler Certification

The boilers are not currently capable of running alternative fuels. Is this certification necessary?

Response to Comment 53:

Even though alternative fuel capability is not currently present with this boiler, the certification is required to show compliance with Condition D.5.1 "Particulate Matter" and 326 IAC 6-2-3. The Office of Air Management would also have to give prior approval to use of any other types of fuels for this boiler. Therefore, the certification is also required to show compliance with 326 IAC 2-1-3.2 (Enhanced New Source Review). There will be no changes to this condition in the final permit due to this comment.

Upon further review, OAM has made the following changes to the final Part 70 permit (~~strikeout~~ added to show what was deleted and **bold** added to show what was added):

1. The second paragraph on the title page of the permit has been changed to be as follows:

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and ~~326 IAC 2-1-3.2~~ as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

2. The signature block on the cover page has been changed from Felicia R. George to **Janet G. McCabe**.

3. A "Source Summary" has been changed to be as follows:

SECTION A

SOURCE SUMMARY

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

4. Condition A.1 "General Information" has been changed to be as follows:

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary automotive parts manufacturing operation.

Responsible Official: Jan Morse
Source Address: 1204 Darlington Avenue, Crawfordsville, Indiana 47933
Mailing Address: 1204 Darlington Avenue, Crawfordsville, Indiana 47933
Phone Number: 765-362-3500
SIC Code: 2621, 3069, 3499, 3295, 3479, 3471, 2891
County Location: Montgomery
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Minor Source, under PSD Rules;
Major Source, Section 112 of the Clean Air Act

5. Condition A.4 "Part 70 Permit Applicability" has been changed to be as follows:

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22).
- (b) It is a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).**

6. Condition A.5 "Prior Permit Conditions Superseded" has been deleted as follows:

~~A.5 Prior Permit Conditions Superseded [326 IAC 2]~~

~~The terms and conditions of this permit incorporate all the current applicable requirements for all emission units located at this source, and supersede all terms and conditions in all registrations and permits, including construction permits, issued prior to the date of issuance of this permit. All terms and conditions in such registrations and permits are no longer in effect.~~

7. Condition B.1 "Permit No Defense" has been changed to be as follows:

B.1 Permit No Defense ~~[326 IAC 2-1-10]~~ [IC 13]

- (a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, **as set out in this permit in the Section B condition entitled "Permit Shield."**

8. Condition B.8(c) "Duty to Supplement and Provide Information" has been changed to be as follows:
- (c) Upon request, the Permittee shall also furnish to IDEM, OAM copies of records required to be kept by this permit. **If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, For information claimed to be confidential, the Permittee must ~~shall~~ furnish such records to IDEM, OAM along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must ~~shall~~ furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.**
9. Condition B.10(a) "Certification" has been changed to be as follows:
- (a) **Where specifically designated by this permit or required by an applicable requirement, any** ~~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.
10. Condition B.11(a) "Annual Compliance Certification" has been changed to be as follows :
- (a) The Permittee shall annually ~~certify that the source has complied~~ **submit a compliance certification report which addresses the status of the source's compliance** with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:
11. Condition B.11(c) "Annual Compliance Certification" has been changed to be as follows:
- (c) The annual compliance certification report shall include the following:
- (1) The identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was **based on** continuous or intermittent **data**;
 - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); ~~and~~
 - (5) **Any insignificant activity that has been added without a permit revision; and**
- ~~(5)~~ (6) Such other facts, as specified in Sections D of this permit, as IDEM, OAM may require to determine the compliance status of the source. The ~~notification which shall be submitted~~ **submittal** by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

12. Condition B.12 "Preventive Maintenance Plan" has been changed to be as follows:

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each **facility**:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing ~~emission units and associated~~ 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) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

13. Condition B.13(e) "Emergency Provisions" has been changed to be as follows:

- (e) IDEM, OAM may require that the Preventive Maintenance Plans required under 326 IAC ~~2-7-4(e)(9)~~ **2-7-1(c)(10)** be revised in response to an emergency.

14. Condition B.14 "Permit Shield" has been changed to be as follows:

B.14 Permit Shield [326 IAC 2-7-15]

- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.**
~~(b)~~ **(b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.**
Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided ~~that either of the following:~~
- (1) The applicable requirements are included and specifically identified in this permit; **or**

- (2) ~~IDEM, OAM in acting on the Part 70 permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the Part 70 permit includes the determination or a concise summary thereof. The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.~~
- ~~(b)~~ (c) ~~No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.~~
- ~~(e)~~ (d) ~~If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order. No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.~~
- ~~(d)~~ (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- ~~(e)~~ (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- ~~(f)~~ (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- ~~(g)~~ (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. ~~[326 IAC 2-7-12(b)(9)]~~ **[326 IAC 2-7-12(b)(7)]**

15. Condition B.16 "Deviations from Permit Requirements and Conditions" has been changed to be as follows:

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

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

Indiana Department of Environmental Management
Compliance 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.

- (b) **A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:**

- (1) **An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or**
- (2) **An emergency as defined in 326 IAC 2-7-1(12); or**
- (3) **Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.**
- (4) **Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.**

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- ~~(b)~~ (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. **The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).**
- ~~(c)~~ (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

16. Condition B.18(a) "Permit Renewal" has been changed to be as follows:

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) **and 326 IAC 2-7-1(40).**

17. Condition B.18(b)(1)(B) "Permit Renewal" has been changed to be as follows:

- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due. ~~[326 IAC 2-5-3]~~

18. Condition B.19 "Administrative Permit Amendment", Condition B.20 "Minor Permit Modification", and Condition B.21 "Significant Permit Modification" have all been combined into one condition numbered Condition B.19 "Permit Amendment or Modification" as follows. The remaining conditions of this section have been renumbered:

~~B.19 Administrative Permit Amendment [326 IAC 2-7-11]~~

- ~~(a) An administrative permit amendment is a Part 70 permit revision that makes changes of the type specified under 326 IAC 2-7-11(a).~~
- ~~(b) An administrative permit amendment may be made by IDEM, OAM consistent with the procedures specified under 326 IAC 2-7-11(e).~~
- ~~(c) The Permittee may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(e)(3)]~~

~~B.20 Minor Permit Modification [326 IAC 2-7-12]~~

- ~~(a) A permit modification is any revision to this permit that cannot be accomplished as an administrative permit amendment under 326 IAC 2-7-11.~~
- ~~(b) Minor modification to this permit shall follow the procedures specified under 326 IAC 2-7-12(b), except as provided by 326 IAC 2-7-12(c).~~
- ~~(c) An application requesting the use of minor modification procedures shall meet the requirements of 326 IAC 2-7-12(b) and shall include the information required in 326 IAC 2-7-12(b)(3)(A) through (E).~~
- ~~(d) The Permittee may make the change proposed in its minor permit modification application immediately after it files such application provided that the change has received any approval required by 326 IAC 2-1. 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 2-7-12(b)(3)(A) through (C), 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 2-7-12(b)(7)]~~

~~B.21 Significant Permit Modification [326 IAC 2-7-12(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) Every 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 2-7-12(d) shall be construed to preclude the Permittee from making changes consistent with 326 IAC 2-7 that would render existing permit compliance terms and conditions irrelevant.~~
- ~~(d) Significant modifications of this permit shall meet all requirements of 326 IAC 2-7, including those for application, public participation, review by affected states, review by the U.S. EPA, and availability of the permit shield, as they apply to permit issuance and renewal.~~

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) **The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.**

(b) **Any application requesting an amendment or modification of this permit shall be submitted to:**

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

Any such application should be certified by the “responsible official” as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.

(c) **The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]**

19. Condition B.26 (now renumbered Condition B.24) “Inspection and Entry” has been changed to be as follows:

B.2624 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of ~~IDEM~~ **proper** 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 Part 70 source is located, or emissions related activity is conducted, or where records must be 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 assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-7-6(6)]

(1) **The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]**

- (2) **The Permittee, and IDEM, OAM acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]**

20. Condition B.27 (now renumbered Condition B.25) "Transfer of Ownership or Operation" has been changed to be as follows:

~~B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]
Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:~~

- ~~(a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.~~
- ~~(b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11.~~
- ~~(c) IDEM, OAM shall reserve the right to issue a new permit.~~

B.25 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) **The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.**
- (b) **Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:**

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

The application which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) **The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]**

21. Condition B.28 (now renumbered Condition B.26) "Annual Fee Payment" has been changed to be as follows:

~~B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]~~

- (a) **The Permittee shall pay annual fees to IDEM, OAM within thirty (30) calendar days of receipt of a billing. or in a time period consistent with the fee schedule established in 326 IAC 2-7-19. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.**
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.

- (c) ~~If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before the due date, The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee. The applicable fee is due April 1 of each year.~~

22. Condition C.1 "PSD Minor Source Status" has been deleted as follows:

~~C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]~~

~~The total source potential emissions of volatile organic compounds (VOC) are less than 250 tons per 365 consecutive day period and it is not one of the 28 listed source categories. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.~~

23. Condition C.1 "Particulate Matter Emission Limitations for Processes with Process Weight Rates Less Than One Hundred pounds per hour" has been added to the permit as follows. The remaining conditions of this section have been renumbered:

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

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

24. Condition C.2 "Opacity" has been changed to be as follows:

~~C.2 Opacity [326 IAC 5-1]~~

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

- (a) ~~Visible emissions Opacity shall not exceed an average of forty percent (40%) opacity in twenty four (24) consecutive readings any one (1) six minute averaging period, as determined in 326 IAC 5-1-4.~~
- (b) ~~Visible emissions Opacity shall not exceed sixty percent (60%) opacity 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.~~

~~This condition is not federally enforceable.~~

25. Condition C.3 "Open Burning" has been changed to be as follows:

~~C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]~~

~~The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. This condition is not federally enforceable. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.~~

26. Condition C.4 "Incineration" has been changed to be as follows:

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

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

27. Condition C.5 "Fugitive Dust Emissions" has been changed to be as follows:

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). ~~Rule 326 IAC 6-4-2(4) regarding visible dust is not federally enforceable.~~

28. Condition C.6 "Operation of Equipment" has been changed to be as follows:

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this permit **and used to comply with an applicable requirement** shall be operated at all times that the emission unit(s) vented to the control equipment are in operation. ~~as described in Section D of this permit.~~

29. Condition C.7 "Asbestos Abatement Projects- Accreditation" and Condition C.13 "Asbestos Abatement Projects" have been combined into one condition as follows:

~~G.7 Asbestos Abatement Projects Accreditation [326 IAC 14-10] [326 IAC 18]
[40 CFR 61, Subpart M]~~

~~Prior to the commencement of any demolition or renovation activities, the Permittee shall use an Indiana accredited asbestos inspector to inspect thoroughly the affected facility or part of the facility where the demolition or renovation operation will occur for the presence of asbestos, including Category I and Category II nonfriable asbestos containing material. The requirement that the inspector be accredited is federally enforceable.~~

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

- (a) **Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.**
- (b) **The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:**
- (1) **When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or**
- (2) **If there is a change in the following:**
- (A) **Asbestos removal or demolition start date;**
- (B) **Removal or demolition contractor; or**
- (C) **Waste disposal site.**
- (c) **The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).**
- (d) **The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).**

All required notifications shall be submitted to:

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

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

30. Condition C.8 "Performance Testing" has been changed to be as follows:

C.8 Performance Testing ~~[326 IAC 3-2-1]~~ [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC ~~3-2-1~~ **3-6** (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

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

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

no later than thirty-five (35) days ~~before~~ **prior to** the intended test date. **The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.**

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

31. Condition C.9 "Compliance Monitoring" has been changed to be as follows:

C.9 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, 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 **may extend the compliance schedule an additional ninety (90) days provided the Permittee shall** notifies:

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

in writing, **prior to the end of the initial ninety (90) day compliance schedule** ~~no more than ninety (90) days after receipt of this permit~~, with full justification of the reasons for the 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 require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

32. Condition C.11 "Monitoring Methods" has been changed to be as follows:

C.11 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the **applicable** requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

33. Condition C.12 "Pressure Gauge Specifications" has been changed to be as follows:

C.12 ~~Pressure-Temperature~~ Gauge Specifications

Whenever a condition in this permit requires the measurement of ~~pressure drop~~ **temperature** 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 twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.

34. Condition C.15 (now renumbered Condition C.14) "Risk Management Plan" has been changed to be as follows:

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present **at a source** in more than ~~the a~~ threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

(a) Submit:

- (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
- (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

- (3) A verification to IDEM, OAM that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

35. The rule cites of Condition C.16 (now renumbered Condition C.15) “Compliance Monitoring Plan - Failure to Take Response Steps” have been changed to be as follows:

~~C.4615~~ Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5(3)]**[326 IAC 2-7-6]**
[326 IAC 1-6]

36. Condition C.17 (now renumbered Condition C.16) “Actions Related to Noncompliance Demonstrated by a Stack Test” has been changed to be as follows:

~~C.4716~~ Actions Related to Noncompliance Demonstrated by a Stack Test **[326 IAC 2-7-5]**
[326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

37. Condition C.18(a) (now renumbered Condition C.17(a)) “Emission Statement” has been changed to be as follows:

- (a) The Permittee shall submit ~~an certified,~~ annual emission statement **certified pursuant to the requirements of 326 IAC 2-6**, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

38. The rule cites in Condition C.20 (now renumbered Condition C.19) and subsection (a) "General Record Keeping Requirements" has been changed to be as follows:

~~C.20~~**19** General Record Keeping Requirements [326 IAC 2-7-5(3)~~(B)~~ **[326 IAC 2-7-6]**

- (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 **for a minimum of three (3) years** and available **upon the request** ~~within one (1) hour upon verbal request of an IDEM, OAM representative, for a minimum of three (3) years. They~~ **The records** may be stored elsewhere for the remaining two (2) years **as long as they are available upon request** ~~providing they are made available within thirty (30) days after written request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.~~

39. Condition C.21 (now renumbered Condition C.20) "General Reporting Requirements" has been changed to be as follows:

~~C.21~~**20** General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) **To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Semi-Annual Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**
- ~~(b)~~**(b)** **The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:**
- Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- ~~(c)~~**(c)** Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- ~~(d)~~**(d)** Unless otherwise specified in this permit, any ~~quarterly~~ **semi-annual** report shall be submitted within thirty (30) days of the end of the reporting period. **The report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**
- ~~(e)~~**(e)** All instances of deviations **as described in Section B - Deviations from Permit Requirements Conditions** must be clearly identified in such reports. **The Emergency/Deviation Occurrence Report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).** ~~A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:~~

~~(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or~~

~~(2) An emergency as defined in 326 IAC 2-7-1(12); or~~

~~(3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.~~

~~(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.~~

~~A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.~~

~~(e)~~(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

~~(f)~~(g) 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.

40. The following sentence was added to the equipment listing in Sections D.1, D.2, D.3, D.4, D.5, and D.6 "FACILITY OPERATION CONDITIONS"

Facility Description [326 IAC 2-7-5(15)]

41. Condition D.1.4 "Testing Requirements" has been changed to be as follows:

D.1.4 Testing Requirements [326 IAC 2-7-6(1),(6)] **[326 IAC 2-1.1-11]**

~~Testing of The Permittee is not required to test these facilities is not specifically required by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter (PM) limits specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.~~

42. Condition D.1.6(a) "Visible Emissions Notations" has been changed to be as follows:

(a) Daily visible emission notations of the steel blanking and surface finishing operation, the metal grinding and grooving operation, the metal etch lines operation, the bonding/flattening process, the powder mixing operation, the paper grinding and grooving operation, the rubber making operation, **and the one (1) graphite spray operation** stack exhausts shall be performed during normal daylight operations **when exhausting to the atmosphere**. A trained employee shall record whether emissions are normal or abnormal.

43. Condition D.1.9 "Broken Bag or Failure Detection" has been changed to be as follows:

D.1.9 **Broken or Failed Bag or Failure** Detection

In the event that bag failure has been observed:

(a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. **Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).**

- (b) ~~Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion.~~ **For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).**

44. Condition D.2.1 "General Provisions" has been added to the final permit as follows. The remaining conditions of this section have been renumbered:

D.2.1 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR Part 63, Subpart A]

The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR Part 63, Subpart T.

45. Condition D.2.5 (now renumbered Condition D.2.6) "Testing Requirements" has been changed to be as follows:

D.2.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

~~Testing of The Permittee is not required to test this facility is not specifically required by this permit. However~~ **IDEM may require compliance testing when necessary to determine if the facility is in compliance.** If testing is required by IDEM, compliance with the volatile organic compound limits specified in Conditions D.2.1, D.2.2, and D.2.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. ~~This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.~~

46. Condition D.2.6(c) (now renumbered Condition D.2.7(c)) "Monitoring Requirements" has been changed to be as follows:

- (c) Establish and maintain the operating conditions under which the wind speed was demonstrated to be 15.2 meters per minute (50 feet per minute) or less as described in § 63.466(d).
- (i) Monitor initially and weekly, the room parameters ~~established during the initial compliance test~~ that are used to achieve the reduced room draft.

47. Condition D.3.1 "Volatile Organic Compounds" has been changed to be as follows:

D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), ~~the VOC content of the coatings from the rollcoating adhesive application system (the addition to P012) applied to no owner or operator of a facility (the rollcoating adhesive application system (the addition to P012)) engaged in the surface coating of steel parts shall be limited to~~ **may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of 3.5 pounds of VOC per gallon of coating, less excluding water, as applied by the coating applicator for a forced warm air dried system.**

- (b) **When operating the thermal oxidizer to achieve the limit for 326 IAC 8-2-9, 3.5 pounds of VOC emitted to the atmosphere per gallon of coating less water delivered to the applicator, the thermal oxidizer shall maintain a minimum 95% capture efficiency and 95% destruction efficiency. These efficiencies and the use of the thermal oxidizer are required by 326 IAC 8-1-2(a)(2). Based upon 326 IAC 8-1-2(c) and the overall control efficiency of 90%, the VOC content of the coating shall not exceed 67 pounds per gallon of coating solids delivered to the applicator.**

48. Condition D.3.4 "Testing Requirements" has been changed to be as follows:

D.3.4 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

~~Testing of The Permittee is not required to test the general cleaning with solvents operation and the adhesive/saturant formulation operation is not specifically required by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the volatile organic compound (VOC) limit specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.~~

48. Condition D.3.5 "Testing Requirements" has been changed to be as follows:

D.3.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

~~During the period between 30 and 36 months after issuance of this permit~~ **Within 60 days of achieving maximum production, the Permittee shall perform VOC testing to show compliance with Condition D.3.1 and 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) for the one (1) rollcoating adhesive application system (the addition to P012) utilizing Method 25, 40 CFR 60, Appendix A, or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.**

49. Condition D.3.6 "Volatile Organic Compounds" has been added to the permit as follows. The remaining conditions of this section have been renumbered:

D.3.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.3.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

50. Condition D.3.7 (now renumbered Condition D.3.8) "Volatile Organic Compound" has been changed to be as follows:

D.3.78 Volatile Organic Compound (VOC)

~~Pursuant to Construction Permit (CP 107-8186-00007) issued on June 5, 1997, the catalytic oxidizer for VOC control shall be in operation at all times when the one (1) rollcoating adhesive application system (the addition to P012) is in operation. When the catalytic incinerator is operating, a minimum operating temperature of 750°F shall be maintained or a temperature, fan amperage and duct velocity determined in the compliance tests to maintain at least 90 percent overall control (including capture and destruction) efficiency of VOC emissions. In addition, the catalyst shall be tested quarterly for efficiency using a test method approved by the Commissioner.~~

51. Condition D.4.3 (now renumbered Condition D.4.4) "Testing Requirements" has been changed to be as follows:

D.4.4 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

During the period between 30 and 36 months after issuance of this permit, the Permittee shall perform VOC testing utilizing Method 25, 40 CFR 60, Appendix A, or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. **The Office of Air Management has determined that one oxidizer of a multiple unit may be used as a representative of the other oxidizers. Subsequently, one oxidizer of the multiple unit will be tested according to the test schedule, until all oxidizers are tested. However, if the representative oxidizer does not show compliance with the limits or, after calculations to convert the results from the representative oxidizer to the other oxidizers, the other oxidizers are not in compliance, then a re-test of all oxidizers shall be performed to show compliance with the permit requirements. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.**

52. Condition D.4.5 "Volatile Organic Compounds" has been added to the permit as follows. The remaining conditions of this section have been renumbered:

D.4.5 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.4.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

53. Condition D.5.2 "Testing Requirements" has been changed to be as follows:

D.5.2 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

~~Testing of~~ **The Permittee is not required to test** this facility ~~is not specifically required~~ by this permit. However, **IDEM may require compliance testing when necessary to determine if the facility is in compliance.** If testing is required by IDEM, compliance with the particulate matter (PM) limit specified in Condition D.5.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. ~~This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.~~

54. Condition D.6.1 "Particulate Matter" has been changed to be as follows:

D.6.1 Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emissions for Sources of Indirect Heating), the one (1) 15 million British thermal unit per hour (mmBtu/hr) boiler (P020B) constructed in 1988, and the one (1) 60 hp boiler shall be limited to ~~0.52~~ **0.40** pounds per million British thermal unit (lb/mmBtu)

This limitation is based on the following equation:

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

Where:

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

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 operation 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.

55. Condition D.6.2 "Testing Requirements" has been changed to be as follows:

D.6.2 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

~~Testing of The Permittee is not required to test these facilities is not specifically required by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter (PM) limit specified in Condition D.6.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.~~

56. On the Certification Form, the line "Emergency/Deviation Occurrence Reporting Form" has been deleted.
57. On the Emergency/ Deviation Occurrence Reporting Form, the last sentence "Attach a signed certification to complete this report" has been deleted from the bottom of the second page.
58. The Quarterly Compliance Report is now called the Semi-Annual Compliance Monitoring Report, delete the column marked "No Deviations", and the language has been changed.

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

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Raybestos Products Company
Source Address: 1204 Darlington Avenue, Crawfordsville, Indiana 47933
Mailing Address: 1204 Darlington Avenue, Crawfordsville, Indiana 47933
Part 70 Permit No.: T107-6836-00007

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 Annual Compliance Certification Letter

~~9 Emergency/Deviation Occurrence Reporting Form~~

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Other (specify) _____

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

Signature:

Printed Name:

Title/Position:

Date:

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

Page 2 of 2

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

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

~~Attach a signed certification to complete this report.~~

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

**PART 70 OPERATING PERMIT
 SEMI-ANNUAL COMPLIANCE MONITORING REPORT**

Source Name: Raybestos Products Company
 Source Address: 1204 Darlington Avenue, Crawfordsville, Indiana 47933
 Mailing Address: 1204 Darlington Avenue, Crawfordsville, Indiana 47933
 Part 70 Permit No.: T107-6836-00007

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

This report is an affirmation that the source has met all the **compliance monitoring** requirements stated in this permit. This report shall be submitted ~~quarterly~~ **semi-annually**. Any deviation from the **compliance monitoring** requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify ~~zero in the column marked "No Deviations"~~ **in the box marked "No deviations occurred this reporting period"**.

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD. LIST EACH COMPLIANCE MONITORING REQUIREMENT EXISTING FOR THIS SOURCE:

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of each Deviations	No Deviations

Form Completed By: _____
 Title/Position: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.