

**PART 70 OPERATING PERMIT
and ENHANCED NEW SOURCE REVIEW
OFFICE OF AIR MANAGEMENT**

**Ford Electronics and Refrigeration Corporation
4747 Western Avenue
Connersville, Indiana 47331**

(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 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.

Operation Permit No.: T041-6896-00004	
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 plant.

Responsible Official: W.H. Shillingford, Plant Manager
Source Address: 4747 Western Avenue, Connersville, Indiana 47331
Mailing Address: 4747 Western Avenue, Connersville, Indiana 47331
SIC Code: 3714
County Location: Fayette
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Major 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) natural gas fired boiler (ID No. BLR1), rated at 37.0 million (MM) British thermal units (Btu) per hour, using No. 2 distillate fuel oil as back-up fuel, exhausting through one (1) stack, identified as PH-C-2-3;
- (2) one (1) natural gas fired boiler (ID No. BLR2), rated at 37.0 million (MM) British thermal units (Btu) per hour, using No. 2 distillate fuel oil as back-up fuel, exhausting through one (1) stack, identified as PH-D-2-2;
- (3) one (1) natural gas fired boiler (ID No. BLR4), rated at 72.0 million (MM) British thermal units (Btu) per hour, using No. 2 distillate fuel oil as back-up fuel, exhausting through one (1) stack, identified as PH-F-2-3;
- (4) one (1) natural gas fired boiler (ID No. BLR5), rated at 72.0 million (MM) British thermal units (Btu) per hour, using No. 2 distillate fuel oil as back-up fuel, exhausting through one (1) stack, identified as PH-G-2-4;
- (5) one (1) condenser paint spray booth (ID No. 2PNT), using an air atomization spray application system, using a maximum of 15.1 gallons of coating per hour, using dry filters for particulate matter overspray control, and exhausting through two (2) stacks, identified as G-22-1 and E-23-2;
- (6) one (1) accumulator paint spray booth (ID No. 3PNT), using an electrostatic disc spray application system, using a maximum of 1.23 gallons of coating per hour, using dry filters for particulate matter overspray control, and exhausting through one (1) stack, identified as C-2-1;
- (7) one (1) maintenance paint spray booth (ID No. MAINTPAINT), using either an air assisted spray application system, a roller application system, or a brush application system, as well as paint spraying from various aerosol cans, using a maximum of 0.048 gallons of coating per hour, using dry filters for particulate matter overspray control, and exhausting through one (1) stack, identified as MAINTPAINT;

- (8) one (1) North Condenser conveyORIZED vapor degreaser (ID No. 1DGR), using a maximum of 27.56 gallons of solvent per hour, with a carbon adsorption unit (ID No. ADSORB1) for control of volatile organic compound (VOC) emissions, and exhausting through one (1) stack;
- (9) one (1) Evaporator Plate Fin B & B conveyORIZED vapor degreaser (ID No. 2DGR), using a maximum of 38.1 gallons of solvent per hour, with a carbon adsorption unit (ID No. ADSORB2) for control of volatile organic compound (VOC) emissions, and exhausting through one (1) stack;
- (10) one (1) thermal de-oiler (De-oiler #1) processing a maximum of 6,000 pounds of metal parts per hour, using a maximum of 30 pounds of oil per hour, with a thermal incinerator using natural gas as supplementary fuel at a heat input rate of 7.5 million (MM) British thermal units (Btu) per hour for control of volatile organic compounds (VOC), exhausting through two (2) stacks (DO1 and DO2);
- (11) one (1) thermal de-oiler (De-oiler #2) processing a maximum of 2,400 pounds of metal parts per hour, using a maximum of 40 pounds of oil per hour, with a thermal incinerator using natural gas as supplementary fuel at a heat input rate of 2.5 MMBtu per hour for control of VOC, exhausting through one (1) stack (DO3);
- (12) one (1) metal part spray cleaning operation (ID No. SPCL), using a maximum of 0.19 gallons of solvent per hour;
- (13) one (1) compressor flushing and testing operation (ID No. FLUSH), using a maximum of 0.61 gallons of solvent per hour;
- (14) one (1) induction brazing operation (ID No. BRAZING), using a maximum of 2.3 pounds of brazing flux solvent per hour;
- (15) one (1) North Solder Line (ID No. SOLDER1), using a maximum of 14.5 pounds of solder flux solvent per hour; and
- (16) one (1) South Solder Line (ID No. SOLDER2), using a maximum of 14.5 pounds of solder flux solvent per hour.

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 does not currently have any insignificant activities, as defined in 326 IAC 2-7-1 (21) that have applicable requirements.

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); and
- (b) It is a source in 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 [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."

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) 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)(9) 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]

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- (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)(8)]

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. [326 IAC 2-5-3]
 - (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 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. 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) IDEM, OAM shall reserve the right to issue a new permit.

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.

B.27 Enhanced New Source Review [326 IAC 2]

The requirements of the construction permit rules in 326 IAC 2 are satisfied by this permit for any previously unpermitted facilities and facilities to be constructed within eighteen (18) months after the date of issuance of this permit, as listed in Sections A.2 and A.3.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Major Source

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21, this source is a major source.

C.2 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.3 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 (6) minute averaging period, as determined in 326 IAC 5-1-4.
- (b) 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.

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

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

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

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

C.7 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.8 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.9 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.10 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 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.11 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.12 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.

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 shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

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

within ninety (90) days after the date of issuance of this permit.

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

- (c) 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.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, 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 in a process in more than the 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. 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 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.

- (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.
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports.
- (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.

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).

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) natural gas fired boiler (ID No. BLR1), rated at 37.0 million (MM) British thermal units (Btu) per hour, using No. 2 distillate fuel oil as back-up fuel, exhausting through one (1) stack, identified as PH-C-2-3;
- (2) one (1) natural gas fired boiler (ID No. BLR2), rated at 37.0 million (MM) British thermal units (Btu) per hour, using No. 2 distillate fuel oil as back-up fuel, exhausting through one (1) stack, identified as PH-D-2-2;
- (3) one (1) natural gas fired boiler (ID No. BLR4), rated at 72.0 million (MM) British thermal units (Btu) per hour, using No. 2 distillate fuel oil as back-up fuel, exhausting through one (1) stack, identified as PH-F-2-3; and
- (4) one (1) natural gas fired boiler (ID No. BLR5), rated at 72.0 million (MM) British thermal units (Btu) per hour, using No. 2 distillate fuel oil as back-up fuel, exhausting through one (1) stack, identified as PH-G-2-4.

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

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

Pursuant to 326 IAC 6-2-3(a) (Particulate emission limitations for sources of indirect heating: Emission Limitations for Facilities Specified in 326 IAC 6-2-1(b)), the PM emissions from each of the four (4) boilers (ID Nos. BLR1, BLR2, BLR3, and BLR4) shall be limited to 0.3 pounds per MMBtu heat input.

This limitation is based on the following equation:

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

$$Pt = \frac{50 \times 0.67 \times 55}{76.5 \times 218^{0.75} \times 4^{0.25}} = 0.30 \text{ lb/MMBtu}$$

D.1.2 Sulfur Dioxide (SO₂) [326 IAC 7-1.1-1]

Pursuant to 326 IAC 7-1.1 (SO₂ Emissions Limitations) the SO₂ emissions from each of the four (4) boilers (ID Nos. BLR1, BLR2, BLR3, and BLR4) firing No. 2 distillate fuel oil shall not exceed five tenths (0.5) pounds per MMBtu heat input.

Compliance Determination Requirements

D.1.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM and SO₂ limits specified in Conditions D.1.1 and D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.4 Sulfur Dioxide Emissions and Sulfur Content

Compliance shall be determined utilizing one of the following options.

- (a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the fuel oil sulfur content does not exceed five-tenths percent (0.5%) by weight by:

- (1) Providing vendor analysis of fuel delivered, if accompanied by a certification; or
- (2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
 - (A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
 - (B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling; or
- (b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from each of the four (4) boilers (ID Nos. BLR1, BLR2, BLR3, and BLR4), using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.

A determination of noncompliance pursuant to either of the methods specified in (a) or (b) above shall not be refuted by evidence of compliance pursuant to the other method.

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

D.1.5 Visible Emissions Notations

- (a) Daily visible emission notations of each of the four (4) boilers (ID Nos. BLR1, BLR2, BLR3, and BLR4) stack exhausts shall be performed during normal daylight operations when the boilers are burning No. 2 distillate fuel oil and 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.

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

D.1.6 Record Keeping Requirements

- (a) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below.
 - (1) Calendar dates covered in the compliance determination period;
 - (2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;
 - (3) A certification, signed by the owner or operator, that the records of the fuel supplier certifications represent all of the fuel combusted during the period; and

If the fuel supplier certification is used to demonstrate compliance the following, as a minimum, shall be maintained:

- (4) Fuel supplier certifications;
- (5) The name of the fuel supplier; and
- (6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

- (b) To document compliance with Condition D.1.5, the Permittee shall maintain records of daily visible emission notations of each of the four (4) boilers (ID Nos. BLR1, BLR2, BLR3, and BLR4) stack exhausts.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.7 Reporting Requirements

The Natural Gas Fired Boiler Certification shall be submitted when submitting monitoring, testing reports/results or other documents as required by this permit to the address listed in Section C - General Reporting Requirements, of this permit, using the certification form located at the end of this permit, or its equivalent.

SECTION D.2 FACILITY OPERATION CONDITIONS

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

- (5) one (1) condenser paint spray booth (ID No. 2PNT), using an air atomization spray application system, using a maximum of 15.1 gallons of coating per hour, using dry filters for particulate matter overspray control, and exhausting through two (2) stacks, identified as G-22-1 and E-23-2;
- (6) one (1) accumulator paint spray booth (ID No. 3PNT), using an electrostatic disc spray application system, using a maximum of 1.23 gallons of coating per hour, using dry filters for particulate matter overspray control, and exhausting through one (1) stack, identified as C-2-1; and
- (7) one (1) maintenance paint spray booth (ID No. MAINTPAINT), using either an air assisted spray application system, a roller application system, or a brush application system, as well as paint spraying from various aerosol cans, using a maximum of 0.048 gallons of coating per hour, using dry filters for particulate matter overspray control, and exhausting through one (1) stack, identified as MAINTPAINT.

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

D.2.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM from the three (3) paint spray booths (ID Nos. 2PNT, 3PNT, and MAINTPAINT) shall not exceed the pound per hour emission rate 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.2.2 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 each of the three (3) paint spray booths (ID Nos. 2PNT, 3PNT, and MAINTPAINT) and their respective control devices.

Compliance Determination Requirements

D.2.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.2.1 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.2.4 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the three (3) paint spray booths (ID Nos. 2PNT, 3PNT, and MAINTPAINT) are in operation.

D.2.5 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (G-22-1, E-23-2, C-2-1, and MAINTPAINT) while one or more of the booths are in operation. 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.
- (b) Monthly inspections shall be performed of the coating emissions from the stack 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 a noticeable change in overspray emission, or evidence of overspray 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.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

D.2.6 Record Keeping Requirements

- (a) To document compliance with Conditions D.2.4 and D.2.5, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3 FACILITY OPERATION CONDITIONS

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

- (8) one (1) North Condenser conveyORIZED vapor degreaser (ID No. 1DGR), using a maximum of 27.56 gallons of solvent per hour, with a carbon adsorption unit (ID No. ADSORB1) for control of volatile organic compound (VOC) emissions, and exhausting through one (1) stack; and
- (9) one (1) Evaporator Plate Fin B & B conveyORIZED vapor degreaser (ID No. 2DGR), using a maximum of 38.1 gallons of solvent per hour, with a carbon adsorption unit (ID No. ADSORB2) for control of volatile organic compound (VOC) emissions, and exhausting through one (1) stack.

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

D.3.1 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.3.2 Hazardous Air Pollutants (HAPs) [326 IAC 20-6-1] [40 CFR 63, Subpart T]

Pursuant to 40 CFR 63, Subpart T, and 326 IAC 20-6-1, the two (2) degreasing operations (ID Nos. 1DGR and 2DGR) are subject to the following conditions:

- (1) Pursuant to 40 CFR 63.460(d), each solvent cleaning machine subject to this subpart that commenced construction or reconstruction on or before November 29, 1993, shall achieve compliance with the provisions of this subpart no later than December 2, 1997.
- (2) Pursuant to 40 CFR 63.463(a), except as provided in 40 CFR 63.464, the Permittee shall ensure that each in-line solvent cleaning machine conforms to the following design requirements:
 - (A) Each cleaning machine shall be designed or operated to meet one of the following requirements:
 - (i) an idling and downtime mode cover, as described in 40 CFR 63.463(d)(1)(i), that may be readily opened or closed, that completely covers the cleaning machine openings when in place, and is free of cracks, holes, and other defects; or
 - (ii) a reduced room draft as described in 40 CFR 63.463(e)(2)(ii).
 - (B) Each cleaning machine shall have a freeboard ratio of 0.75 or greater.
 - (C) Each cleaning machine shall have 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.
 - (D) Each vapor cleaning machine 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) Each vapor cleaning machine 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) Each vapor cleaning machine shall have a primary condenser.
 - (G) Each cleaning machine that uses a lip exhaust shall be designed and operated to route all collected solvent vapors through a properly operated and maintained carbon adsorber that meets the requirements of 40 CFR 63.463(e)(2)(vii).
- (3) Pursuant to 40 CFR 63.463(c), except as provided in 40 CFR 63.464, the Permittee shall comply with one of the following requirements for each of the existing in-line cleaning machines at the source:
- (A) Employ one of the following control combinations:
 - (i) Superheated vapor and freeboard ratio of 1.0.
 - (ii) Freeboard refrigeration device and freeboard ratio of 1.0.
 - (iii) Dwell and freeboard refrigeration device.
 - (iv) Dwell and carbon adsorber.
 - (B) Demonstrate that the solvent cleaning machine can achieve and maintain an idling emission limit of 0.10 kilograms per hour per square meter (0.021 pounds per hour per square foot) of solvent/air interface area as determined using the procedures in 40 CFR 63.465(a) and appendix A of 40 CFR 63.
- (4) Pursuant to 40 CFR 63.463(d), except as provided in 40 CFR 63.464, the Permittee shall meet all of the following required work and operational practices for each of the in-line solvent cleaning machines:
- (A) Control air disturbances across the cleaning machine opening(s) by incorporating one of the following control equipment or techniques:
 - (i) 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.
 - (ii) A reduced room draft as described in 40 CFR 63.463(e)(2)(ii).
 - (B) The parts baskets or the parts being cleaned in an open-top batch vapor cleaning machine shall not occupy more than 50 percent 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 (i.e., a baffled or enclosed area of the solvent cleaning machine).

- (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 unless an equally effective approach has been approved by the Commissioner.
 - (E) Parts baskets or parts shall not be removed from any solvent cleaning machine until dripping has stopped.
 - (F) During startup of each vapor cleaning machine, the primary condenser shall be turned on before the sump heater.
 - (G) During shutdown of each vapor cleaning machine, 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 from any solvent cleaning machine, 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) Each operator of a solvent cleaning machine shall complete and pass the applicable sections of the test of solvent cleaning operating procedures in appendix B of 40 CFR 60 if requested during an inspection by the Commissioner.
 - (J) Waste solvent, still bottoms, and sump bottoms shall be collected and stored in closed containers. The closed containers may contain a device that would allow pressure relief, but would not allow liquid solvent to drain from the container.
 - (K) Sponges, fabric, wood, and paper products shall not be cleaned.
- (5) Pursuant to 40 CFR 63.463(e), the Permittee shall comply with the following requirements for each solvent cleaning machine complying with paragraph (3) above:
- (A) Conduct monitoring of each control device used to comply with paragraph (3)(A) above as provided in 40 CFR 63.466.
 - (B) Determine during each monitoring period whether each control device used to comply with these standards meets the requirements specified in paragraphs (i) through (vii) below:
 - (i) If a freeboard refrigeration device is used to comply with these standards, the Permittee shall ensure that the chilled air blanket temperature (in °F), measured at the center of the air blanket, is no greater than 30 percent of the solvent's boiling point.
 - (ii) If a reduced room draft is used to comply with these standards, the Permittee shall comply with the following requirements:

- (a) Ensure that the 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 40 CFR 63.466(d).
 - (b) 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 40 CFR 63.466(d).
- (iii) If a working-mode cover is used to comply with these standards, the Permittee shall comply with the following requirements:
- (a) Ensure that the cover opens only for part entrance and removal and completely covers the cleaning machine openings when closed.
 - (b) Ensure that the working-mode cover is maintained free of cracks, holes, and other defects.
- (iv) If an idling-mode cover is used to comply with these standards, the Permittee shall comply with the following requirements:
- (a) Ensure that the cover is in place whenever parts are not in the solvent cleaning machine and completely covers the cleaning machine openings when in place.
 - (b) Ensure that the idling-mode cover is maintained free of cracks, holes, and other defects.
- (v) If a dwell is used to comply with these standards, the Permittee shall comply with the following requirements:
- (a) Determine the appropriate dwell time for each type of part or parts basket, or determine the maximum dwell time using the most complex part type or parts basket, as described in 40 CFR 63.465(d).
 - (b) Ensure that, after cleaning, each part is held in the solvent cleaning machine freeboard area above the vapor zone for the dwell time determined for that particular part or parts basket, or for the maximum dwell time determined using the most complex part type or parts basket.
- (vi) If a superheated vapor system is used to comply with these standards, the Permittee shall comply with the following requirements:
- (a) Ensure that the temperature of the solvent vapor at the center of the superheated vapor zone is at least 10°F above the solvent's boiling point.

- (b) Ensure that the manufacturer's specifications for determining the minimum proper dwell time within the superheated vapor system is followed.
 - (c) Ensure that parts remain within the superheated vapor for at least the minimum proper dwell time.
 - (vii) If a carbon adsorber in conjunction with a lip exhaust is used to comply with these standards, the Permittee shall comply with the following requirements:
 - (a) Ensure that the concentration of organic solvent in the exhaust from this device does not exceed 100 parts per million of any halogenated HAP compound as measured using the procedure in 40 CFR 63.466(e). If the halogenated HAP solvent concentration in the carbon adsorber exhaust exceeds 100 parts per million, the owner or operator shall adjust the desorption schedule or replace the disposable canister, if not a regenerative system, so that the exhaust concentration of halogenated HAP solvent is brought below 100 parts per million.
 - (b) Ensure that the carbon adsorber bed is not bypassed during desorption.
 - (c) Ensure that the lip exhaust is located above the solvent cleaning machine cover so that the cover closes below the lip exhaust level.
 - (C) If any of the requirements of paragraph (5)(B) above are not met, the Permittee shall determine whether an exceedance has occurred using the following criteria:
 - (i) An exceedance has occurred if the requirements of paragraphs (5)(B)(ii)(b), (5)(B)(iii)(a), (5)(B)(iv)(a), (5)(B)(v), (5)(B)(vi)(b), (5)(B)(vi)(c), (5)(B)(vii)(b), or (5)(B)(vii)(c) above have not been met.
 - (ii) An exceedance has occurred if the requirements of paragraphs (5)(B)(i), (5)(B)(ii)(a), (5)(B)(iii)(b), (5)(B)(iv)(b), (5)(B)(vi)(a), or (5)(B)(vii)(a) above have not been met and are not corrected within 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 re-measured immediately upon adjustment or repair and demonstrated to be within required limits.
 - (D) The Permittee shall report all exceedances and all corrections and adjustments made to avoid an exceedance as specified in 40 CFR 63.468(h).
- (6) Pursuant to 40 CFR 63.465(d), for each of the in-line solvent cleaning machines at the source using a dwell to comply with paragraph (3)(A) above, the appropriate dwell time for each part or parts basket shall be determined using the following procedures:
- (A) Determine the amount of time for the part or parts basket to cease dripping once placed in the vapor zone. The part or parts basket used for this determination must be at room temperature before being placed in the vapor zone.

- (B) The proper dwell time for parts to remain in the freeboard area above the vapor zone is no less than 35 percent of the time determined in paragraph (6)(A) above.

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 each degreaser (ID Nos. 1DGR and 2DGR) and each of the carbon adsorption units (ADSORB1 and ADSORB2) controlling VOC emissions.

Compliance Determination Requirements

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

The Permittee is not required to test the two (2) degreasing operations (ID Nos. 1DGR and 2DGR) by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the two (2) degreasing operations (ID Nos. 1DGR and 2DGR) are in compliance. If testing is required by IDEM, compliance with the limit specified in Condition D.3.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.3.5 Hazardous Air Pollutants (HAPs) [326 IAC 20-6-1] [40 CFR 63, Subpart T]

(1) Pursuant to 40 CFR 63.465(e), the potential to emit from all solvent cleaning operations at the source that are subject to this subpart shall be determined using the procedures described in paragraphs (1)(A) through (1)(C) below. A source's total potential to emit is the sum of the HAP emissions from all solvent cleaning operations, plus all HAP emissions from other facilities within the source.

- (A) Determine the potential to emit for each individual solvent cleaning using equation 6.

$$PTE_i = H_i * W_i * SAI_i \quad (6)$$

Where:

PTE_i = the potential to emit for solvent cleaning machine i (kilograms of solvent per year).

H_i = hours of operation for solvent cleaning machine i (hours per year).
= 8760 hours per year, unless otherwise restricted by a Federally enforceable requirement.

W_i = the working mode uncontrolled emission rate (kilograms per square meter per hour).
= 1.12 kilograms per square meter per hour for in-line cleaning machines.

SAI_i = solvent/air interface area of solvent cleaning machine i (square meters).
40 CFR 63.461 defines the solvent/air interface area for those machines that have a solvent/air interface. Cleaning machines that do not have a solvent/air interface shall calculate a solvent/air interface area using the procedure in the following paragraph.

- (B) Cleaning machines that do not have a solvent/air interface shall calculate a solvent/air interface area using equation 7.

$$SAI = 2.20 * (Vol)^{0.6} \quad (7)$$

Where:

SAI = the solvent/air interface area (square meters).

Vol = the cleaning capacity of the solvent cleaning machine (cubic meters).

- (C) Sum the PTE_i for all solvent cleaning operations to obtain the total potential to emit for solvent cleaning operations at the source.
- (2) Pursuant to 40 CFR 63.466(a), except as provided in paragraph (5) of this section, for each in-line solvent cleaning machine at the source complying with the equipment standards in paragraphs (3)(A) or (3)(B) in Condition D.3.1, the Permittee shall conduct monitoring and record the results on a weekly basis for the control devices, as appropriate, specified below:
- (A) If a freeboard refrigeration device is used to comply with these standards, the Permittee shall use a thermometer or thermocouple to measure the temperature at the center of the air blanket during the idling mode.
- (B) If a superheated vapor system is used to comply with these standards, the Permittee shall use a thermometer or thermocouple to measure the temperature at the center of the superheated solvent vapor zone while the solvent cleaning machine is in the idling mode.
- (3) Pursuant to 40 CFR 63.466(b), except as provided in paragraph (6) of this section, for each in-line solvent cleaning machine at the source complying with the equipment standards in paragraphs (3)(A) or (3)(B) in Condition D.3.1, the Permittee shall conduct monitoring and record the results on a monthly basis for the control devices, as appropriate, specified below:
- (A) If a cover (working-mode, downtime-mode, and/or idling-mode cover) is used to comply with these standards, the Permittee shall conduct a visual inspection to determine if the cover is opening and closing properly, completely covers the cleaning machine openings when closed, and is free of cracks, holes, and other defects.
- (B) If a dwell is used, the Permittee shall determine the actual dwell time by measuring the period of time that parts are held within the freeboard area of the solvent cleaning machine after cleaning.
- (4) Pursuant to 40 CFR 63.466(c), except as provided in paragraph (6) of this section, for each in-line solvent cleaning machine at the source complying with the equipment standards in paragraph (3) of Condition D.3.1, the Permittee shall monitor the hoist speed as follows:
- (A) The Permittee shall 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) The 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 the Permittee can demonstrate to the Commissioner'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.
- (5) Pursuant to 40 CFR 63.466(e), except as provided in paragraph (6) of this section, the Permittee using a carbon adsorber to comply with this subpart shall measure and record the concentration of halogenated HAP solvent in the exhaust of the carbon adsorber weekly with a colorimetric detector tube. This test shall be conducted while the solvent cleaning machine is in the working mode and is venting to the carbon adsorber. The exhaust concentration shall be determined using the procedure specified below:
- (A) Use a colorimetric detector tube designed to measure a concentration of 100 parts per million by volume of solvent in air to an accuracy of +25 parts per million by volume.
 - (B) Use the colorimetric detector tube according to the manufacturer's instructions.
 - (C) Provide a sampling port for monitoring within the exhaust outlet of the carbon adsorber that is easily accessible and located at least 8 stack or duct diameters downstream from any flow disturbance such as a bend, expansion, contraction, or outlet; downstream from no other inlet; and 2 stack or duct diameters upstream from any flow disturbance such as a bend, expansion, contraction, inlet or outlet.
- (6) Pursuant to 40 CFR 63.466(g), the Permittee using a control device listed in paragraphs (2) through (5) above can use alternative monitoring procedures approved by the Commissioner.

D.3.6 Compliance Schedule

The following shall apply to the Evaporator Plate Fin B & B conveyORIZED vapor degreaser (ID No. 2DGR) only:

- (1) Ford Electronics and Refrigeration Corporation has stated that the Evaporator Plate Fin B & B conveyORIZED vapor degreaser (ID No. 2DGR) was not able to meet the December 2, 1997 compliance deadline for Subpart T. Ford has submitted a detailed description of the new system which will replace the Evaporator Plate Fin B & B conveyORIZED vapor degreaser (ID No. 2DGR), a compliance schedule for the degreaser (ID No. 2DGR), which is scheduled to be removed from the source in November, 1998, a description of interim control steps that Ford will take to reduce halogenated solvent emissions until the degreaser is removed from the source, and a description of any steps that Ford is willing to take to reduce emissions of pollutants below levels required under Subpart T or other regulations. This information is listed below:

Replacement System

Description of the Thermal De-oiling System - Consists of a zoned insulated steel-lined chamber with circulation fans (forced convection heating), conveyor, exhaust ducts, a gas-fired incinerator and controls. Parts will be carried through the oven (180°C) on a conveyor. The oven will exhaust through an incinerator with approximately a two (2) second dwell time at 850°C.

Compliance Schedule

Plate Fin B & B Degreaser (2DGR)

!	October 31, 1997	-	Complete process trials
!	November 29, 1997	-	Project sign-off
!	December 23, 1997	-	Award contract and issue purchase order for thermal de-oiler equipment
!	January 16, 1998	-	Issue purchase order for monorail
!	February 27, 1998	-	Issue purchase order for platform
!	June 30, 1998	-	Begin installation of thermal de-oiler equipment
!	Oct. - Nov., 1998	-	On-site trial/de-bugging of new system and removal of non-compliant degreaser
!	December 1, 1998	-	Full operation of new equipment

(2) **Interim emission control steps that Ford will take to reduce halogenated solvent emissions until the non-compliant degreaser (2DGR) is removed from the source**

The Plate Fin B & B degreaser is currently equipped with a carbon adsorption unit for controlling VOCs. Ford will continue to operate this control for as long as the solvent degreaser is in operation. Additionally, the Connersville plant will implement all applicable work and operational practice standards detailed in 40 CFR 63.463(d)(1) through (d)(12).

(3) **Steps that Ford is willing to take to reduce emissions of pollutants below levels required under Subpart T or other regulations**

First, it should be noted that an additional consideration for Ford's inability to meet the December 2, 1997 compliance deadline is the fact that over the past five (5) years, the Connersville plant has implemented major projects to replace four (4) solvent degreasing systems with non-solvent systems. Also, the previously existing non-compliant Plate Fin Tube degreaser has been recently removed from the source. These replacement projects, coupled with their present plans to eliminate one (1) more solvent system, represents not only a substantial commitment to go beyond regulatory requirements (achieving zero (0) HAP emissions), but also is the approach which certainly is of most benefit to the environment in the long term.

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

D.3.7 Monitoring

-
- (1) The source shall conduct monitoring and record the results on a monthly basis for the control devices, as appropriate, specified below:

- (A) If a cover (working-mode, downtime-mode, and/or idling-mode cover) is used to comply with the standards of 40 CFR 63.463(c)(1)(i), the source shall conduct a visual inspection to determine if the cover is opening and closing properly, completely covers the cleaning machine openings when closed, and is free of cracks, holes, and other defects.
- (B) The source shall determine the actual dwell time by measuring the period of time that parts are held within the freeboard area of the solvent cleaning machine after cleaning.
- (C) Pursuant to 40 CFR 63.466(e), the source using a carbon adsorber to comply with 40 CFR 63, Subpart T shall measure and record the concentration of halogenated HAP solvent in the exhaust of the carbon adsorber weekly with a colorimetric detector tube. This test shall be conducted while the solvent cleaning machine is in the working mode and is venting to the carbon adsorber. The exhaust concentration shall be determined using the procedure specified below:
 - (i) Use a colorimetric detector tube designed to measure a concentration of 100 parts per million by volume of solvent in air to an accuracy of +25 parts per million by volume.
 - (ii) Use the colorimetric detector tube according to the manufacturer's instructions.
 - (iii) Provide a sampling port for monitoring within the exhaust outlet of the carbon adsorber that is easily accessible and located at least 8 stack or duct diameters downstream from any flow disturbance such as a bend, expansion, contraction, or outlet; downstream from no other inlet; and 2 stack or duct diameters upstream from any flow disturbance such as a bend, expansion, contraction, inlet or outlet.
- (2) The Evaporator Plate Fin B & B conveyORIZED vapor degreaser (ID No. 2DGR), which did not achieve compliance with Subpart T by the December 2, 1997 compliance deadline, shall be replaced by the non-solvent system listed under Condition D.3.5 on page 41 of this permit according to the compliance schedule also listed under Condition D.3.5 on page 41 of this permit.

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

D.3.8 Record Keeping Requirements

- (1) Pursuant to 40 CFR 63.467(a), for each in-line solvent cleaning machine at the source complying with the provisions of 40 CFR 63.463, the Permittee shall maintain records in written or electronic form specified below for the lifetime of the machine.
 - (A) Owner's manuals, or if not available, written maintenance and operating procedures, for the solvent cleaning machine and control equipment;
 - (B) The date of installation for the solvent cleaning machine and all of its control devices. If the exact date for installation is not known, a letter certifying that the cleaning machine and its control devices were installed prior to, or on, November 29, 1993, or after November 29, 1993, may be substituted;

- (C) If a dwell is used to comply with these standards, records of the tests required in 40 CFR 63.465(d) to determine an appropriate dwell time for each part or parts basket;
 - (D) Records of the halogenated HAP solvent content for each solvent used in a solvent cleaning machine subject to the provisions of Subpart T.
- (2) Pursuant to 40 CFR 63.467(b), for each in-line solvent cleaning machine at the source complying with 40 CFR 63.463, the Permittee shall maintain records specified below either in electronic or written form for a period of 5 years.
- (A) The results of control device monitoring required under 40 CFR 63.466.
 - (B) Information on the actions taken to comply with 40 CFR 63.463(e) and (f). This information shall include 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.
 - (C) Estimates of annual solvent consumption for each solvent cleaning machine.
 - (D) Records of the date and results of the weekly measurement of the halogenated HAP solvent concentration in the carbon adsorber exhaust required in 40 CFR 63.466(e).
- (3) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.9 Reporting Requirements

- (1) Pursuant to 40 CFR 63.468(a), the Permittee shall submit an initial notification report to the Commissioner no later than thirty (30) days after issuance of this permit, for each existing solvent cleaning machine subject to the provisions of Subpart T. The report shall include the information specified below:
- (A) The name and address of the owner or operator.
 - (B) The address (i.e., physical location) of the solvent cleaning machine(s).
 - (C) A brief description of each solvent cleaning machine including machine type (batch vapor, batch cold, vapor in-line or cold in-line), solvent/air interface area, and existing controls.
 - (D) The date of installation for each solvent cleaning machine or a letter certifying that the solvent cleaning machine was installed prior to, or after, November 29, 1993.
 - (E) The anticipated compliance approach for each solvent cleaning machine.
 - (F) An estimate of annual halogenated HAP solvent consumption for each solvent cleaning machine.

- (2) Pursuant to 40 CFR 63.468(d), the Permittee shall submit to the Commissioner an initial statement of compliance for each solvent cleaning machine complying with the provisions of 40 CFR 63.463. For existing sources, this report shall be submitted to the Commissioner no later than 150 days after the compliance date specified in 40 CFR 63.460(d) (December 2, 1997). This statement shall include the requirements specified below:
 - (A) The name and address of the owner or operator.
 - (B) The address (i.e., physical location) of the solvent cleaning machine(s).
 - (C) A list of the control equipment used to achieve compliance for each solvent cleaning machine.
 - (D) For each piece of control equipment required to be monitored, 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.
 - (E) Conditions to maintain the wind speed requirements of 40 CFR 63.463(e)(2)(ii), if applicable.
 - (F) The date and results of the weekly measurement of the halogenated HAP solvent concentration in the carbon adsorber exhaust required in 40 CFR 63.466(e).
- (3) Pursuant to 40 CFR 63.468(f), the Permittee shall submit an annual report by February 1 of the year following the one for which the reporting is being made for each in-line solvent cleaning machine complying with the provisions of 40 CFR 63.463. This report shall include the requirements specified below:
 - (A) A signed statement from Ford Electronics and Refrigeration Corporation 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 40 CFR 63.463(d)(10)."
 - (B) An estimate of solvent consumption for each solvent cleaning machine during the reporting period.
- (4) Pursuant to 40 CFR 63.468(h), for each in-line solvent cleaning machine the source shall submit an exceedance report to the Commissioner semiannually except when, the Commissioner determines on a case-by-case basis that more frequent reporting is necessary to accurately assess the compliance status of the source or, an exceedance occurs. Once an exceedance has occurred the owner or operator shall follow a quarterly reporting format until a request to reduce reporting frequency under 40 CFR 63.468(i) is approved. Exceedance reports shall be delivered or postmarked by the 30th day following the end of each calendar half or quarter, as appropriate. The exceedance report shall include the applicable information specified below:
 - (A) Information on the actions taken to comply with 40 CFR 63.463(e). This information shall include 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.

- (B) If an exceedance has occurred, the reason for the exceedance and a description of the actions taken.
 - (C) If no 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.
- (5) Pursuant to 40 CFR 63.468(i), the Permittee that is required to submit an exceedance report on a quarterly (or more frequent) basis may reduce the frequency of reporting to semiannual if the conditions specified below are met:
- (A) The Permittee has demonstrated a full year of compliance without an exceedance.
 - (B) The Permittee continues to comply with all relevant record keeping and monitoring requirements specified in 40 CFR 63, Subpart A (General Provisions) and in 40 CFR 63, Subpart T.
 - (C) The Commissioner does not object to a reduced frequency of reporting for the affected source as provided in paragraph (e)(3)(iii) of 40 CFR 63, Subpart A (General Provisions).

SECTION D.4 FACILITY OPERATION CONDITIONS

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

- (10) one (1) thermal de-oiler (De-oiler #1) processing a maximum of 6,000 pounds of metal parts per hour, using a maximum of 30 pounds of oil per hour, with a thermal incinerator using natural gas as supplementary fuel at a heat input rate of 7.5 million (MM) British thermal units (Btu) per hour for control of volatile organic compounds (VOC), exhausting through two (2) stacks (DO1 and DO2); and
- (11) one (1) thermal de-oiler (De-oiler #2) processing a maximum of 2,400 pounds of metal parts per hour, using a maximum of 40 pounds of oil per hour, with a thermal incinerator using natural gas as supplementary fuel at a heat input rate of 2.5 MMBtu per hour for control of VOC, exhausting through one (1) stack (DO3).

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

D.4.1 BACT Condition [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 and CP-041-9441-00004, issued April 27, 1998, the thermal incinerators (rated at 7.5 MMBtu per hour and 2.5 MMBtu per hour, respectively) on each of the two (2) thermal de-oilers (De-oiler #1 and #2) shall be in operation at all times that each of the de-oilers is in operation. When operating, the thermal incinerators on De-oiler #1 and De-oiler #2 shall maintain minimum operating temperatures of 1,500° F and 1,560° F, respectively, and a gas residence time in the oxidizing zone for each incinerator of 1.0 second, or a temperature and gas residence time determined in the compliance tests (described in Condition D.4.3) to maintain at least 95% destruction of VOC captured and a capture efficiency of 100%.

D.4.2 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 each thermal de-oiler (De-oiler #1 and #2) and each of the thermal incinerators controlling VOC emissions.

Compliance Determination Requirements

D.4.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

Within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, the Permittee shall perform VOC testing on each of the two (2) thermal incinerators, controlling VOC emissions from the two (2) thermal de-oilers, to demonstrate compliance with Condition D.4.1 utilizing 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.

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

D.4.4 Record Keeping Requirements

- (a) The Permittee shall maintain records of the operating temperature and the gas residence time in the oxidizing zone for each of the two (2) thermal incinerators, controlling VOC emissions from the two (2) thermal de-oilers.
- (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)]

- (12) one (1) metal part spray cleaning operation (ID No. SPCL), using a maximum of 0.19 gallons of solvent per hour;
- (13) one (1) compressor flushing and testing operation (ID No. FLUSH), using a maximum of 0.61 gallons of solvent per hour;
- (14) one (1) induction brazing operation (ID No. BRAZING), using a maximum of 2.3 pounds of brazing flux solvent per hour;
- (15) one (1) North Solder Line (ID No. SOLDER1), using a maximum of 14.5 pounds of solder flux solvent per hour; and
- (16) one (1) South Solder Line (ID No. SOLDER2), using a maximum of 14.5 pounds of solder flux solvent per hour.

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

D.5.1 Volatile Organic Compounds (VOC) [326 IAC 2-1]

Any change or modification that would lead to an increase in allowable emissions greater than exempt levels, as specified in 326 IAC 2-1, shall be subject to New Source Review and must be approved by the Office of Air Management (OAM) before such change can occur.

Compliance Determination Requirements

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

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, verification that any VOC emissions increase is less than exempt levels shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

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

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Ford Electronics and Refrigeration Corporation
Source Address: 4747 Western Avenue, Connersville, Indiana 47331
Mailing Address: 4747 Western Avenue, Connersville, Indiana 47331
Part 70 Permit No.: T041-6896-00004

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: Ford Electronics and Refrigeration Corporation
Source Address: 4747 Western Avenue, Connersville, Indiana 47331
Mailing Address: 4747 Western Avenue, Connersville, Indiana 47331
Part 70 Permit No.: T041-6896-00004

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

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: _____

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

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

Source Name: Ford Electronics and Refrigeration Corporation
Source Address: 4747 Western Avenue, Connersville, Indiana 47331
Mailing Address: 4747 Western Avenue, Connersville, Indiana 47331
Part 70 Permit No.: T041-6896-00004

**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: Ford Electronics and Refrigeration Corporation
 Source Address: 4747 Western Avenue, Connersville, Indiana 47331
 Mailing Address: 4747 Western Avenue, Connersville, Indiana 47331
 Part 70 Permit No.: T041-6896-00004

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 and Enhanced New Source Review (ENSR)

Source Background and Description

Source Name: Ford Electronics and Refrigeration Corporation
Source Location: 4747 Western Avenue
Connersville, Indiana 47331
County: Fayette
SIC Code: 3714
Operation Permit No.: T041-6896-00004
Permit Reviewer: Trish Earls/EVP

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Ford Electronics and Refrigeration Corporation relating to the operation of a stationary automotive parts manufacturing plant.

Permitted Emission Units and Pollution Control Equipment

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

- (1) one (1) natural gas fired boiler (ID No. BLR1), rated at 37.0 million (MM) British thermal units (Btu) per hour, using No. 2 distillate fuel oil as back-up fuel, exhausting through one (1) stack, identified as PH-C-2-3;
- (2) one (1) natural gas fired boiler (ID No. BLR2), rated at 37.0 million (MM) British thermal units (Btu) per hour, using No. 2 distillate fuel oil as back-up fuel, exhausting through one (1) stack, identified as PH-D-2-2;
- (3) one (1) natural gas fired boiler (ID No. BLR4), rated at 72.0 million (MM) British thermal units (Btu) per hour, using No. 2 distillate fuel oil as back-up fuel, exhausting through one (1) stack, identified as PH-F-2-3;
- (4) one (1) natural gas fired boiler (ID No. BLR5), rated at 72.0 million (MM) British thermal units (Btu) per hour, using No. 2 distillate fuel oil as back-up fuel, exhausting through one (1) stack, identified as PH-G-2-4;
- (5) one (1) condenser paint spray booth (ID No. 2PNT), using an air atomization spray application system, using a maximum of 15.1 gallons of coating per hour, using dry filters for particulate matter overspray control, and exhausting through two (2) stacks, identified as G-22-1 and E-23-2;
- (6) one (1) accumulator paint spray booth (ID No. 3PNT), using an electrostatic disc spray application system, using a maximum of 1.23 gallons of coating per hour, using dry filters for particulate matter overspray control, and exhausting through one (1) stack, identified as C-2-1;
- (7) one (1) maintenance paint spray booth (ID No. MAINTPAINT), using either an air assisted spray application system, a roller application system, or a brush application system, as well as paint spraying from various aerosol cans, using a maximum of 0.048 gallons of coating per hour, using dry filters for particulate matter overspray control, and exhausting through one (1) stack, identified as MAINTPAINT;

- Note: The maintenance paint spray booth is replacing the radiator paint spray booth (ID No. 1PNT)
- (8) one (1) North Condenser conveyORIZED vapor degreaser (ID No. 1DGR), using a maximum of 18.4 gallons of solvent per hour, with a carbon adsorption unit (ID No. ADSORB1) for control of volatile organic compound (VOC) emissions, and exhausting through one (1) stack;
 - (9) one (1) Evaporator Plate Fin B & B conveyORIZED vapor degreaser (ID No. 2DGR), using a maximum of 38.1 gallons of solvent per hour, with a carbon adsorption unit (ID No. ADSORB2) for control of volatile organic compound (VOC) emissions, and exhausting through one (1) stack;
 - (10) one (1) thermal de-oiler (De-oiler #1) processing a maximum of 6,000 pounds of metal parts per hour, using a maximum of 30 pounds of oil per hour, with a thermal incinerator using natural gas as supplementary fuel at a heat input rate of 7.5 million (MM) British thermal units (Btu) per hour for control of volatile organic compounds (VOC), exhausting through two (2) stacks (DO1 and DO2); and
 - (11) one (1) thermal de-oiler (De-oiler #2) processing a maximum of 2,400 pounds of metal parts per hour, using a maximum of 40 pounds of oil per hour, with a thermal incinerator using natural gas as supplementary fuel at a heat input rate of 2.5 MMBtu per hour for control of VOC, exhausting through one (1) stack (DO3).

Note: De-oiler #1 is replacing the Evaporator Plate Fin B & B conveyORIZED vapor degreaser (ID No. 2DGR). An aqueous cleaning emission-free system has replaced the previously existing Evaporator Plate Fin Tube conveyORIZED vapor degreaser (ID No. 3DGR), which has already been removed from the source. The Evaporator Plate Fin B & B conveyORIZED vapor degreaser is scheduled to be removed from service by November 30, 1998.

Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR

The source also consists of the following unpermitted facilities/units:

- (12) one (1) metal part spray cleaning operation (ID No. SPCL), using a maximum of 0.19 gallons of solvent per hour;
- (13) one (1) compressor flushing and testing operation (ID No. FLUSH), using a maximum of 0.61 gallons of solvent per hour;
- (14) one (1) induction brazing operation (ID No. BRAZING), using a maximum of 2.3 pounds of brazing flux solvent per hour;
- (15) one (1) North Solder Line (ID No. SOLDER1), using a maximum of 14.5 pounds of solder flux solvent per hour; and
- (16) one (1) South Solder Line (ID No. SOLDER2), using a maximum of 14.5 pounds of solder flux solvent per hour.

New Emission Units and Pollution Control Equipment Requiring 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 (one (1) Ace model 230-RKG multiple chambered cleaning oven);
- (2) 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;
- (3) a petroleum fuel, other than gasoline, dispensing facility having a storage capacity less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month;
- (4) vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;
- (5) application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings;
- (6) machining where an aqueous cutting coolant continuously floods the machining interface;
- (7) degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6;
- (8) cleaners and solvents characterized as follows:
 - A) having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100°F) or;
 - B) having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20°C (68°F);the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months;
- (9) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment;
- (10) closed loop heating and cooling systems;
- (11) activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume;
- (12) any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs;
- (13) noncontact cooling tower systems with a forced and induced draft cooling tower system not regulated under a NESHAP;
- (14) heat exchanger cleaning and repair;
- (15) paved and unpaved roads and parking lots with public access;
- (16) underground conveyors;
- (17) asbestos abatement projects regulated by 326 IAC 14-10;
- (18) purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process;
- (19) equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment;
- (20) Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling tower;
- (21) on-site fire and emergency response training approved by the department;
- (22) diesel generators not exceeding 1600 horsepower;
- (23) a laboratory as defined in 326 IAC 2-7-1(20)(C);
- (24) individual machining operations that use cutting oil; and
- (25) two (2) air stripping towers, each capable of processing 700 gallons of water per minute, used to remove trichloroethylene from the source's wastewater.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (1) PC (21) 1314, issued November 3, 1978;
- (2) PC (21) 1515, issued April 13, 1982;
- (3) PC (21) 1547, issued April 4, 1984;
- (4) PC (21) 1576, issued January 10, 1985;
- (5) Exemption, issued December 6, 1985;
- (6) Exemption, issued August 25, 1987;
- (7) OP 21-06-90-0080, issued September 18, 1987;
- (8) OP 21-06-90-0081, issued September 18, 1987;
- (9) OP 21-06-90-0082, issued September 18, 1987;
- (10) OP 21-06-90-0083, issued September 18, 1987;
- (11) OP 21-06-90-0084, issued September 18, 1987;
- (12) OP 21-06-90-0085, issued September 18, 1987;
- (13) OP 21-06-90-0086, issued September 18, 1987;
- (14) OP 21-06-90-0087, issued September 18, 1987;
- (15) OP 21-06-90-0088, issued September 18, 1987;
- (16) Registration, issued January 19, 1988;
- (17) Exemption, issued June 30, 1988;
- (18) Registration, issued January, 1998; and
- (19) CP-041-9441-00004, issued April 27, 1998.

All conditions from previous approvals were incorporated into this Part 70 permit.

Enforcement Issue

- (a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled *Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR*.

- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.
- (c) IDEM is aware that the Evaporator Plate Fin B & B conveyORIZED vapor degreaser (ID No. 2DGR) is not in compliance with 40 CFR 63.460 - 63.468, Subpart T.
- (d) IDEM is reviewing this matter and has taken appropriate action. The compliance schedule in this proposed permit will satisfy the requirements of the above listed NESHAP.

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 11, 1996. Additional information was received on October 27, 1997 and December 3, 1997.

A notice of completeness letter was mailed to the source on October 29, 1996.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (7 pages).

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	greater than 100, less than 250
PM-10	greater than 100, less than 250
SO ₂	greater than 100, less than 250
VOC	greater 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)
Glycol Ethers	greater than 10
Methyl Ethyl Ketone	less than 10
Xylene	less than 10
Toluene	less than 10
Trichloroethylene	greater than 10
Methanol	greater than 10
Ethylbenzene	less than 10
TOTAL	greater than 25

- (a) The potential emissions (as defined in 326 IAC 1-2-55) of PM₁₀, VOC and SO₂ 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 326 IAC 1-2-55) of any single HAP is equal to or greater than ten (10) tons per year and the potential emissions (as defined in 326 IAC 1-2-55) of a combination HAPs is 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 1996 OAM emission data.

Pollutant	Actual Emissions (tons/year)
PM	3.32
PM-10	1.87
SO ₂	0.85
VOC	132.97
CO	4.31
HAP (Trichloroethylene)	7.10
NO _x	17.25

Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

Process/ facility	Limited Potential to Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Surface Coating	12.3	12.3	0.0	264.2	0.0	0.0	198.7
Combustion	7.3	7.3	115.0	1.5	18.3	73.5	0.0
Degreasing	0.0	0.0	0.0	424.7	0.0	0.0	424.7
Thermal De-oilers	0.0	0.0	0.0	15.3	0.0	0.0	0.0
Metal Parts Spray Cleaning ⁽¹⁾	0.0	0.0	0.0	10.1	0.0	0.0	9.6
Flushing and Testing ⁽¹⁾	0.0	0.0	0.0	12.8	0.0	0.0	0.0

Soldering ⁽¹⁾	0.0	0.0	0.0	127.0	0.0	0.0	127.0
Brazing ⁽¹⁾	0.0	0.0	0.0	10.1	0.0	0.0	0.0
Total Emissions*	19.6	19.6	115.0	865.7	18.3	73.5	760.0

(1) These facilities are being reviewed under the ENSR process. Potential VOC emissions from the unpermitted facilities are greater than 25 tons per year, therefore, these facilities would have required a permit. The ENSR process and issuance of this Part 70 permit will satisfy the requirements of the construction permit rules.

* Total emissions include controlled potential emissions from all emission units at the source.

County Attainment Status

The source is located in Fayette 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 (NO_x) 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. Fayette County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

(a) The four (4) natural gas fired boilers (ID Nos. BLR1, BLR2, BLR4, and BLR5), using No. 2 distillate fuel oil as back-up fuel, each rated at 37, 37, 72, and 72 MMBtu per hour, respectively, are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c through 60.48c, Subpart Dc), "Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units", because each boiler was constructed prior to the June 9, 1989 applicability date of this rule.

(b) The North Condenser conveyORIZED vapor degreaser (ID No. 1DGR) and the Evaporator Plate Fin B & B conveyORIZED vapor degreaser (ID No. 2DGR) are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20, (40 CFR 63.460 through 63.468, Subpart T) and 326 IAC 20-6-1 because each degreaser is an in-line vapor cleaning machine using trichloroethylene as a cleaning agent. The two (2) thermal de-oilers are not subject to the requirements of Subpart T because they do not use halogenated solvents and are not vapor or cold solvent cleaning machines. The metal parts spray cleaning operation is not subject to this rule because it is a spray cleaning operation and it not covered under the provisions of this rule.

Pursuant to 40 CFR 63, Subpart T, and 326 IAC 20-6-1, the two (2) degreasing operations are subject to the following conditions:

- (1) Pursuant to 40 CFR 63.460(d), each solvent cleaning machine subject to this subpart that commenced construction or reconstruction on or before November 29, 1993, shall achieve compliance with the provisions of this subpart no later than December 2, 1997.
- (2) Pursuant to 40 CFR 63.463(a), except as provided in 40 CFR 63.464, the Permittee shall ensure that each in-line solvent cleaning machine conforms to the following design requirements:
 - (A) Each cleaning machine shall be designed or operated to meet one of the following requirements:
 - (i) An idling and downtime mode cover, as described in 40 CFR 63.463(d)(1)(i), that may be readily opened or closed, that completely covers the cleaning machine openings when in place, and is free of cracks, holes, and other defects; or
 - (ii) A reduced room draft as described in 40 CFR 63.463(e)(2)(ii).
 - (B) Each cleaning machine shall have a freeboard ratio of 0.75 or greater.
 - (C) Each cleaning machine shall have 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.
 - (D) Each vapor cleaning machine 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) Each vapor cleaning machine 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) Each vapor cleaning machine shall have a primary condenser.
 - (G) Each cleaning machine that uses a lip exhaust shall be designed and operated to route all collected solvent vapors through a properly operated and maintained carbon adsorber that meets the requirements of 40 CFR 63.463(e)(2)(vii).
- (3) Pursuant to 40 CFR 63.463(c), except as provided in 40 CFR 63.464, the Permittee shall comply with one of the following requirements for each of the existing in-line cleaning machines at the source:
 - (A) Employ one of the following control combinations:
 - (i) Superheated vapor and freeboard ratio of 1.0.
 - (ii) Freeboard refrigeration device and freeboard ratio of 1.0.
 - (iii) Dwell and freeboard refrigeration device.
 - (iv) Dwell and carbon adsorber.

- (B) Demonstrate that the solvent cleaning machine can achieve and maintain an idling emission limit of 0.10 kilograms per hour per square meter (0.021 pounds per hour per square foot) of solvent/air interface area as determined using the procedures in 40 CFR 63.465(a) and appendix A of 40 CFR 63.
- (4) Pursuant to 40 CFR 63.463(d), except as provided in 40 CFR 63.464, the Permittee shall meet all of the following required work and operational practices for each of the in-line solvent cleaning machines:
- (A) Control air disturbances across the cleaning machine opening(s) by incorporating one of the following control equipment or techniques:
 - (i) 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.
 - (ii) A reduced room draft as described in 40 CFR 63.463(e)(2)(ii).
 - (B) The parts baskets or the parts being cleaned in an open-top batch vapor cleaning machine shall not occupy more than 50 percent 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 (i.e., a baffled or enclosed area of the solvent cleaning machine).
 - (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 unless an equally effective approach has been approved by the Commissioner.
 - (E) Parts baskets or parts shall not be removed from any solvent cleaning machine until dripping has stopped.
 - (F) During startup of each vapor cleaning machine, the primary condenser shall be turned on before the sump heater.
 - (G) During shutdown of each vapor cleaning machine, 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 from any solvent cleaning machine, 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) Each operator of a solvent cleaning machine shall complete and pass the applicable sections of the test of solvent cleaning operating procedures in appendix B of 40 CFR 60 if requested during an inspection by the Commissioner.

- (J) Waste solvent, still bottoms, and sump bottoms shall be collected and stored in closed containers. The closed containers may contain a device that would allow pressure relief, but would not allow liquid solvent to drain from the container.
- (K) Sponges, fabric, wood, and paper products shall not be cleaned.
- (5) Pursuant to 40 CFR 63.463(e), the Permittee shall comply with the following requirements for each solvent cleaning machine complying with paragraph (3) above:
 - (A) Conduct monitoring of each control device used to comply with paragraph (3)(A) above as provided in 40 CFR 63.466.
 - (B) Determine during each monitoring period whether each control device used to comply with these standards meets the requirements specified in paragraphs (i) through (vii) below:
 - (i) If a freeboard refrigeration device is used to comply with these standards, the Permittee shall ensure that the chilled air blanket temperature (in of), measured at the center of the air blanket, is no greater than 30 percent of the solvent's boiling point.
 - (ii) If a reduced room draft is used to comply with these standards, the Permittee shall comply with the following requirements:
 - (a) Ensure that the 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 40 CFR 63.466(d).
 - (b) 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 40 CFR 63.466(d).
 - (iii) If a working-mode cover is used to comply with these standards, the Permittee shall comply with the following requirements:
 - (a) Ensure that the cover opens only for part entrance and removal and completely covers the cleaning machine openings when closed.
 - (b) Ensure that the working-mode cover is maintained free of cracks, holes, and other defects.
 - (iv) If an idling-mode cover is used to comply with these standards, the Permittee shall comply with the following requirements:
 - (a) Ensure that the cover is in place whenever parts are not in the solvent cleaning machine and completely covers the cleaning machine openings when in place.
 - (b) Ensure that the idling-mode cover is maintained free of cracks, holes, and other defects.

- (v) If a dwell is used to comply with these standards, the Permittee shall comply with the following requirements:
 - (a) Determine the appropriate dwell time for each type of part or parts basket, or determine the maximum dwell time using the most complex part type or parts basket, as described in 40 CFR 63.465(d).
 - (b) Ensure that, after cleaning, each part is held in the solvent cleaning machine freeboard area above the vapor zone for the dwell time determined for that particular part or parts basket, or for the maximum dwell time determined using the most complex part type or parts basket.
- (vi) If a superheated vapor system is used to comply with these standards, the Permittee shall comply with the following requirements:
 - (a) Ensure that the temperature of the solvent vapor at the center of the superheated vapor zone is at least 10°F above the solvent's boiling point.
 - (b) Ensure that the manufacturer's specifications for determining the minimum proper dwell time within the superheated vapor system is followed.
 - (c) Ensure that parts remain within the superheated vapor for at least the minimum proper dwell time.
- (vii) If a carbon adsorber in conjunction with a lip exhaust is used to comply with these standards, the Permittee shall comply with the following requirements:
 - (a) Ensure that the concentration of organic solvent in the exhaust from this device does not exceed 100 parts per million of any halogenated HAP compound as measured using the procedure in 40 CFR 63.466(e). If the halogenated HAP solvent concentration in the carbon adsorber exhaust exceeds 100 parts per million, the owner or operator shall adjust the desorption schedule or replace the disposable canister, if not a regenerative system, so that the exhaust concentration of halogenated HAP solvent is brought below 100 parts per million.
 - (b) Ensure that the carbon adsorber bed is not bypassed during desorption.
 - (c) Ensure that the lip exhaust is located above the solvent cleaning machine cover so that the cover closes below the lip exhaust level.
- (C) If any of the requirements of paragraph (5)(B) above are not met, the Permittee shall determine whether an exceedance has occurred using the following criteria:

- (i) An exceedance has occurred if the requirements of paragraphs (5)(B)(ii)(b), (5)(B)(iii)(a), (5)(B)(iv)(a), (5)(B)(v), (5)(B)(vi)(b), (5)(B)(vi)(c), (5)(B)(vii)(b), or (5)(B)(vii)(c) above have not been met.
 - (ii) An exceedance has occurred if the requirements of paragraphs (5)(B)(i), (5)(B)(ii)(a), (5)(B)(iii)(b), (5)(B)(iv)(b), (5)(B)(vi)(a), or (5)(B)(vii)(a) above have not been met and are not corrected within 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 re-measured immediately upon adjustment or repair and demonstrated to be within required limits.
- (D) The Permittee shall report all exceedances and all corrections and adjustments made to avoid an exceedance as specified in 40 CFR 63.468(h).
- (6) Pursuant to 40 CFR 63.465(d), for each of the in-line solvent cleaning machines at the source using a dwell to comply with paragraph (3)(A) above, the appropriate dwell time for each part or parts basket shall be determined using the following procedures:
- (A) Determine the amount of time for the part or parts basket to cease dripping once placed in the vapor zone. The part or parts basket used for this determination must be at room temperature before being placed in the vapor zone.
 - (B) The proper dwell time for parts to remain in the freeboard area above the vapor zone is no less than 35 percent of the time determined in paragraph (6)(A) above.
- (7) Pursuant to 40 CFR 63.465(e), the potential to emit from all solvent cleaning operations at the source shall be determined using the procedures described in paragraphs (7)(A) through (7)(C) below. A source's total potential to emit is the sum of the HAP emissions from all solvent cleaning operations, plus all HAP emissions from other facilities within the source.
- (A) Determine the potential to emit for each individual solvent cleaning using equation 6.

$$PTE_i = H_i * W_i * SAI_i \quad (6)$$

Where:

PTE_i = the potential to emit for solvent cleaning machine i (kilograms of solvent per year).

H_i = hours of operation for solvent cleaning machine i (hours per year).
= 8760 hours per year, unless otherwise restricted by a Federally enforceable requirement.

W_i = the working mode uncontrolled emission rate (kilograms per square meter per hour).
= 1.12 kilograms per square meter per hour for in-line cleaning machines.

SAI_i = solvent/air interface area of solvent cleaning machine i (square meters).
40 CFR 63.461 defines the solvent/air interface area for those machines that have a solvent/air interface. Cleaning machines that do not have a solvent/air interface shall calculate a solvent/air interface area using the procedure in the following paragraph.

- (B) Cleaning machines that do not have a solvent/air interface shall calculate a solvent/air interface area using equation 7.

$$SAI = 2.20 * (Vol)^{0.6} \quad (7)$$

Where:

SAI = the solvent/air interface area (square meters).
 Vol = the cleaning capacity of the solvent cleaning machine (cubic meters).

- (C) Sum the PTE_i for all solvent cleaning operations to obtain the total potential to emit for solvent cleaning operations at the source.

- (8) Pursuant to 40 CFR 63.466(a), except as provided in paragraph (11) of this section, for each in-line solvent cleaning machine at the source complying with the equipment standards in paragraphs (3)(A) or (3)(B) above, the Permittee shall conduct monitoring and record the results on a weekly basis for the control devices, as appropriate, specified below:

- (A) If a freeboard refrigeration device is used to comply with these standards, the Permittee shall use a thermometer or thermocouple to measure the temperature at the center of the air blanket during the idling mode.
- (B) If a superheated vapor system is used to comply with these standards, the Permittee shall use a thermometer or thermocouple to measure the temperature at the center of the superheated solvent vapor zone while the solvent cleaning machine is in the idling mode.

- (9) Pursuant to 40 CFR 63.466(b), except as provided in paragraph (12) of this section, for each in-line solvent cleaning machine at the source complying with the equipment standards in paragraphs (3)(A) or (3)(B) above, the Permittee shall conduct monitoring and record the results on a monthly basis for the control devices, as appropriate, specified below:

- (A) If a cover (working-mode, downtime-mode, and/or idling-mode cover) is used to comply with these standards, the Permittee shall conduct a visual inspection to determine if the cover is opening and closing properly, completely covers the cleaning machine openings when closed, and is free of cracks, holes, and other defects.
- (B) If a dwell is used, the Permittee shall determine the actual dwell time by measuring the period of time that parts are held within the freeboard area of the solvent cleaning machine after cleaning.

- (10) Pursuant to 40 CFR 63.466(c), except as provided in paragraph (12) of this section, for each in-line solvent cleaning machine at the source complying with the equipment standards in paragraph (3) above, the Permittee shall monitor the hoist speed as follows:

- (A) The Permittee shall 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) The 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 the Permittee can demonstrate to the Commissioner'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.
- (11) Pursuant to 40 CFR 63.466(e), except as provided in paragraph (12) of this section, the Permittee using a carbon adsorber to comply with this subpart shall measure and record the concentration of halogenated HAP solvent in the exhaust of the carbon adsorber weekly with a colorimetric detector tube. This test shall be conducted while the solvent cleaning machine is in the working mode and is venting to the carbon adsorber. The exhaust concentration shall be determined using the procedure specified below:
- (A) Use a colorimetric detector tube designed to measure a concentration of 100 parts per million by volume of solvent in air to an accuracy of +25 parts per million by volume.
 - (B) Use the colorimetric detector tube according to the manufacturer's instructions.
 - (C) Provide a sampling port for monitoring within the exhaust outlet of the carbon adsorber that is easily accessible and located at least 8 stack or duct diameters downstream from any flow disturbance such as a bend, expansion, contraction, or outlet; downstream from no other inlet; and 2 stack or duct diameters upstream from any flow disturbance such as a bend, expansion, contraction, inlet or outlet.
- (12) Pursuant to 40 CFR 63.466(g), the Permittee using a control device listed in paragraphs (8) through (11) above can use alternative monitoring procedures approved by the Commissioner.
- (13) Pursuant to 40 CFR 63.467(a), for each in-line solvent cleaning machine at the source complying with the provisions of 40 CFR 63.463, the Permittee shall maintain records in written or electronic form specified below for the lifetime of the machine.
- (A) Owner's manuals, or if not available, written maintenance and operating procedures, for the solvent cleaning machine and control equipment;
 - (B) The date of installation for the solvent cleaning machine and all of its control devices. If the exact date for installation is not known, a letter certifying that the cleaning machine and its control devices were installed prior to, or on, November 29, 1993, or after November 29, 1993, may be substituted;

- (C) If a dwell is used to comply with these standards, records of the tests required in 40 CFR 63.465(d) to determine an appropriate dwell time for each part or parts basket;
 - (D) Records of the halogenated HAP solvent content for each solvent used in a solvent cleaning machine subject to the provisions of Subpart T.
- (14) Pursuant to 40 CFR 63.467(b), for each in-line solvent cleaning machine at the source complying with 40 CFR 63.463, the Permittee shall maintain records specified below either in electronic or written form for a period of 5 years.
- (A) The results of control device monitoring required under 40 CFR 63.466.
 - (B) Information on the actions taken to comply with 40 CFR 63.463(e) and (f). This information shall include 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.
 - (C) Estimates of annual solvent consumption for each solvent cleaning machine.
 - (D) If a carbon adsorber is used to comply with these standards, records of the date and results of the weekly measurement of the halogenated HAP solvent concentration in the carbon adsorber exhaust required in 40 CFR 63.466(e).
- (15) Pursuant to 40 CFR 63.468(a), the Permittee shall submit an initial notification report to the Commissioner no later than thirty (30) days after issuance of this permit, for each existing solvent cleaning machine subject to the provisions of Subpart T. The report shall include the information specified below:
- (A) The name and address of the owner or operator.
 - (B) The address (i.e., physical location) of the solvent cleaning machine(s).
 - (C) A brief description of each solvent cleaning machine including machine type (batch vapor, batch cold, vapor in-line or cold in-line), solvent/air interface area, and existing controls.
 - (D) The date of installation for each solvent cleaning machine or a letter certifying that the solvent cleaning machine was installed prior to, or after, November 29, 1993.
 - (E) The anticipated compliance approach for each solvent cleaning machine.
 - (F) An estimate of annual halogenated HAP solvent consumption for each solvent cleaning machine.
- (16) Pursuant to 40 CFR 63.468(d), the Permittee shall submit to the Commissioner an initial statement of compliance for each solvent cleaning machine complying with the provisions of 40 CFR 63.463. For existing sources, this report shall be submitted to the Commissioner no later than 150 days after the compliance date specified in 40 CFR 63.460(d). This statement shall include the requirements specified in paragraphs (16)(A) through (16)(E) below:

- (A) The name and address of the owner or operator.
 - (B) The address (i.e., physical location) of the solvent cleaning machine(s).
 - (C) A list of the control equipment used to achieve compliance for each solvent cleaning machine.
 - (D) For each piece of control equipment required to be monitored, 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.
 - (E) Conditions to maintain the wind speed requirements of 40 CFR 63.463(e)(2)(ii), if applicable.
 - (F) If a carbon adsorber is used to comply with these standards, the date and results of the weekly measurement of the halogenated HAP solvent concentration in the carbon adsorber exhaust required in 40 CFR 63.466(e).
- (17) Pursuant to 40 CFR 63.468(f), the Permittee shall submit an annual report by February 1 of the year following the one for which the reporting is being made for each in-line solvent cleaning machine complying with the provisions of 40 CFR 63.463. This report shall include the requirements specified below:
- (A) A signed statement from Ford Electronics and Refrigeration Corporation 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 40 CFR 63.463(d)(10)."
 - (B) An estimate of solvent consumption for each solvent cleaning machine during the reporting period.
- (18) Pursuant to 40 CFR 63.468(h), for each in-line solvent cleaning machine the source shall submit an exceedance report to the Commissioner semiannually except when, the Commissioner determines on a case-by-case basis that more frequent reporting is necessary to accurately assess the compliance status of the source or, an exceedance occurs. Once an exceedance has occurred the owner or operator shall follow a quarterly reporting format until a request to reduce reporting frequency under paragraph (19) below is approved. Exceedance reports shall be delivered or postmarked by the 30th day following the end of each calendar half or quarter, as appropriate. The exceedance report shall include the applicable information specified below:
- (A) Information on the actions taken to comply with 40 CFR 63.463 (e). This information shall include 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.
 - (B) If an exceedance has occurred, the reason for the exceedance and a description of the actions taken.
 - (C) If no 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.

- (19) Pursuant to 40 CFR 63.468(i), the Permittee that is required to submit an exceedance report on a quarterly (or more frequent) basis may reduce the frequency of reporting to semiannual if the conditions specified below are met:
- (A) The Permittee has demonstrated a full year of compliance without an exceedance.
 - (B) The Permittee continues to comply with all relevant recordkeeping and monitoring requirements specified in 40 CFR 63, Subpart A (General Provisions) and in 40 CFR 63, Subpart T.
 - (C) The Commissioner does not object to a reduced frequency of reporting for the affected source as provided in paragraph (e)(3)(iii) of 40 CFR 63, Subpart A (General Provisions).

Ford Electronics and Refrigeration Corporation has stated that the North Condenser conveyORIZED vapor degreaser (ID No. 1DGR) was in compliance with the requirements of 40 CFR 63, Subpart T by December 2, 1997, by using the combination of a carbon adsorber and a dwell to control VOC emissions. Ford has also stated that the Evaporator Plate Fin B & B conveyORIZED vapor degreaser (ID No. 2DGR) and the previously existing Evaporator Plate Fin Tube conveyORIZED vapor degreaser (ID No. 3DGR) were not able to meet the December 2, 1997 compliance deadline for Subpart T. However, the Evaporator Plate Fin Tube degreaser (ID No. 3 DGR) has since been removed from the source and has been replaced with an emission-free aqueous cleaning system. The Evaporator Plate Fin B & B degreaser (ID No. 2DGR) is scheduled to be removed from the source by November 30, 1998. Two (2) thermal de-oilers (De-oiler #1 and De-oiler #2), which are non-solvent degreasing systems, are scheduled to be installed by October, 1998. One of these de-oilers (De-oiler #1) is replacing the non-compliant Plate Fin B & B degreaser (ID No. 2DGR). Ford Electronics and Refrigeration Corporation has submitted a detailed description of the controls and equipment that Ford will install to comply with Subpart T including a detailed description of the new system which will replace the degreaser that is still currently out of compliance with Subpart T. Ford has also submitted a compliance schedule, which was also submitted to the U.S. EPA to request a federally enforceable Compliance Order under Section 113(a) of the Clean Air Act, for the remaining non-compliant degreaser, a description of interim control steps that Ford will take to reduce halogenated solvent emissions, and a description of any steps that Ford is willing to take to reduce emissions of pollutants below levels required under Subpart T or other regulations. This information is listed below:

Replacement System

Description of the Thermal De-oiling System - Consists of a zoned insulated steel-lined chamber with circulation fans (forced convection heating), conveyor, exhaust ducts, a gas-fired incinerator and controls. Parts will be carried through the oven (180°C) on a conveyor. The oven will exhaust through an incinerator with approximately a two (2) second dwell time at 850°C.

Compliance Schedule

Plate Fin B & B Degreaser

- October 31, 1997 - Complete process trials
- November 29, 1997 - Project sign-off
- December 23, 1997 - Award contract and issue purchase order for thermal de-oiler equipment

- January 16, 1998 - Issue purchase order for monorail
- February 27, 1998 - Issue purchase order for platform
- June 30, 1998 - Begin installation of thermal de-oiler equipment
- Oct. - Nov., 1998 - On-site trial/de-bugging of new system and removal of non-compliant degreaser
- December 1, 1998 - Full operation of new equipment

Interim emission control steps that Ford will take to reduce halogenated solvent emissions until the degreaser is removed from the source

The Plate Fin B & B degreaser is currently equipped with a carbon adsorption unit for controlling VOCs. Ford will continue to operate this control for as long as the solvent degreaser is in operation. Additionally, the Connersville plant will implement all applicable work and operational practice standards detailed in 40 CFR (d)(1) through (d)(12).

Steps that Ford is willing to take to reduce emissions of pollutants below levels required under Subpart T or other regulations

First, it should be noted that an additional consideration for Ford's inability to meet the December 2, 1997 compliance deadline is the fact that over the past five (5) years, the Connersville plant has implemented major projects to replace four (4) solvent degreasing systems with non-solvent systems. Also, the previously existing non-compliant Plate Fin Tube degreaser has been recently removed from the source. These replacement projects, coupled with their present plans to eliminate one (1) more solvent system, represents not only a substantial commitment to go beyond regulatory requirements (achieving zero (0) VOC emissions), but also is the approach which certainly is of most benefit to the environment in the long term.

State Rule Applicability - Entire Source

26 IAC 2-2 (Prevention of Significant Deterioration)

This source is not subject to the requirements of 326 IAC 2-2. This source was constructed prior to the August 7, 1977 applicability date. The metal parts spray cleaning operation (ID No. SPCL) and the compressor flushing and testing operation (ID No. FLUSH)), both installed in 1979, have total potential emissions less than the PSD major modification emissions thresholds, therefore, the installation of these units was a minor modification to a major PSD source. The maintenance paint spray booth (ID No. MAINTPAINT) and the two (2) thermal de-oilers (De-oiler #1 and #2), installed in 1998, have potential emissions less than the PSD major modification emissions thresholds, therefore, the installation of these units is a minor modification to a major PSD source. Any future modification which results in an emissions increase greater than the significant emissions thresholds shall subject the source to the requirements of 326 IAC 2-2.

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 VOC and SO₂. 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.

326 IAC 6-4 (Fugitive Dust Emissions)

This source is subject to 326 IAC 6-4 for fugitive dust emissions. Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions), fugitive dust shall not be visible crossing the boundary or property line of a source. Observances of visible emissions crossing property lines may be refuted by factual data expressed in 326 IAC 6-4-2(1), (2) or (3).

326 IAC 8-6 (Organic Solvent Emission Limitations)

This source is not subject to the requirements of 326 IAC 8-6 because although the source has potential VOC emissions greater than 100 tons per year, the source commenced operation before October 7, 1974, and is located in Fayette County.

State Rule Applicability - Individual Facilities

326 IAC 2-1-3.4 (New Source Toxics Control)

Pursuant to 326 IAC 2-1-3.4 (New Source Toxics Control), any new process or production unit, which in and of itself emits or has the potential to emit (PTE) 10 tons per year of any HAP or 25 tons per year of any combination of HAPs, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT). All unpermitted facilities at the source were constructed before July 27, 1997, all permitted facilities at the source were constructed and permitted before July 27, 1997, the maintenance paint spray booth has potential single HAP and total HAP emissions less than 10 and 25 tons per year, respectively, and the two (2) new thermal de-oilers do not emit any HAPs, therefore, 326 IAC 2-1-3.4 does not apply.

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

The two (2) 37 MMBtu per hour boilers (ID Nos. BLR1 and BLR2), constructed in 1953, and the two (2) 72 MMBtu per hour boilers (ID Nos. BLR3 and BLR4), constructed in 1966, each firing natural gas or No. 2 distillate fuel oil, are subject to 326 IAC 6-2-3. Pursuant to this rule, particulate emissions from indirect heating facilities existing and in operation before September 21, 1983, shall be limited by the following equation:

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

$$Pt = \frac{50 \times 0.67 \times 55}{76.5 \times 218^{0.75} \times 4^{0.25}} = 0.30 \text{ lb/MMBtu}$$

The allowable particulate emission rate from each of the boilers, based on the above equation, is 0.30 pounds per MMBtu heat input. Each of the four (4) boilers emits a maximum of 0.01 pounds of PM per MMBtu heat input, therefore, each of the boilers is in compliance with 326 IAC 6-2-3 (see pages 2 and 3 of Appendix A).

326 IAC 6-3-2 (Process Operations)

The particulate matter (PM) overspray from the three (3) paint spray booths (ID Nos. 2PNT, 3PNT, and MAINTPAINT) shall be limited by the following:

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:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

This source will comply with the requirements of 326 IAC 6-3-2 by using dry filters for PM overspray control.

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

The two (2) 37 MMBtu per hour boilers (ID Nos. BLR1 and BLR2), constructed in 1953, and the two (2) 72 MMBtu per hour boilers (ID Nos. BLR3 and BLR4), constructed in 1966, each firing natural gas or No. 2 distillate fuel oil, are subject to 326 IAC 7-1.1-2 when firing No. 2 distillate fuel oil. Pursuant to this rule, sulfur dioxide emissions from each of the boilers shall be limited to 0.5 pounds per million Btu when burning No. 2 distillate fuel oil. This is equivalent to a fuel oil sulfur content of 0.5% by weight (see pages 2 and 3 of Appendix A). The source will comply with this rule by using No. 2 distillate fuel oil with a sulfur content of 0.5% or less.

326 IAC 8-1-6 (New Facilities, General Reduction Requirements)

The two (2) paint spray booths (ID Nos. 2PNT and 3PNT), the two (2) degreasing operations (ID Nos. 1DGR and 2DGR), the North Solder Line (ID No. SOLDER1) and the South Solder Line (ID No. SOLDER2) are not subject to the requirements of 326 IAC 8-1-6 because, although each facility has potential VOC emissions greater than 25 tons per year, each facility was constructed prior to January 1, 1980. The metal parts spray cleaning operation (ID No. SPCL), the compressor flushing and testing operation (ID No. FLUSH), and the induction brazing operation (ID No. BRAZING) are not subject to the requirements of 326 IAC 8-1-6 because each facility has potential VOC emissions less than 25 tons per year and each was constructed prior to January 1, 1980. The maintenance paint spray booth (ID No. MAINTPAINT) is not subject to the requirements of 326 IAC 8-1-6 because it has potential VOC emissions less than 25 tons per year. The two (2) thermal de-oilers (De-oiler #1 and #2) are subject to the requirements of 326 IAC 8-1-6. This rule requires all facilities constructed after January 1, 1980, which have potential VOC emission rates of 25 or more tons per year, and which are not otherwise regulated by other provisions of 326 IAC 8, to reduce VOC emissions using Best Available Control Technology (BACT). Each of the thermal de-oilers has potential VOC emissions greater than 25 tons per year and each facility will be constructed after January 1, 1980. Pursuant to CP-041-9441-00004, issued April 27, 1998, BACT for the two (2) thermal de-oilers shall be the use of a thermal incineration system on each thermal de-oiler with an estimated VOC destruction efficiency of 95% and a capture efficiency of 100%.

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

The two (2) paint spray booths (ID Nos. 2PNT and 3PNT) are not subject to the requirements of 326 IAC 8-2-9, because each booth was constructed prior to November 1, 1980, and both are located in Fayette County. The maintenance paint spray booth (ID No. MAINTPAINT) is not subject to the requirements of 326 IAC 8-2-9 because the booth has potential VOC emissions less than 25 tons per year and actual VOC emissions less than 15 pounds per day.

326 IAC 8-3 (Organic Solvent Degreasing Operations)

The two (2) degreasing operations (ID Nos. 1DGR and 2DGR) are not subject to the requirements of 326 IAC 8-3 because each degreaser was constructed prior to January 1, 1980, and are located in Fayette County. The two (2) thermal de-oilers (De-oiler #1 and #2) are not subject to the requirements of 326 IAC 8-3. For facilities constructed after July 1, 1990, this rule only applies to the type of degreasers described in 326 IAC 8-3-1(b)(1)(A) through (1)(C). Because the de-oilers are not the types of degreasers described in subdivision (1)(A) through (1)(C), they are not subject to the requirements of 326 IAC 8-3.

No other 326 IAC 8 rules apply.

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 two (2) degreasing operations (ID Nos. 1DGR and 2DGR) have applicable compliance monitoring conditions as specified below:

- (1) The source shall conduct monitoring and record the results on a monthly basis for the control devices, as appropriate, specified below:
 - (A) If a cover (working-mode, downtime-mode, and/or idling-mode cover) is used to comply with the standards of 40 CFR 63.463(c)(1)(i), the source shall conduct a visual inspection to determine if the cover is opening and closing properly, completely covers the cleaning machine openings when closed, and is free of cracks, holes, and other defects.
 - (B) The source shall determine the actual dwell time by measuring the period of time that parts are held within the freeboard area of the solvent cleaning machine after cleaning.
 - (C) Pursuant to 40 CFR 63.466(e), the source using a carbon adsorber to comply with 40 CFR 63, Subpart T shall measure and record the concentration of halogenated HAP solvent in the exhaust of the carbon adsorber weekly with a colorimetric detector tube. This test shall be conducted while the solvent cleaning machine is in the working mode and is venting to the carbon adsorber. The exhaust concentration shall be determined using the procedure specified below:
 - (i) Use a colorimetric detector tube designed to measure a concentration of 100 parts per million by volume of solvent in air to an accuracy of +25 parts per million by volume.
 - (ii) Use the colorimetric detector tube according to the manufacturer's instructions.

- (iii) Provide a sampling port for monitoring within the exhaust outlet of the carbon adsorber that is easily accessible and located at least 8 stack or duct diameters downstream from any flow disturbance such as a bend, expansion, contraction, or outlet; downstream from no other inlet; and 2 stack or duct diameters upstream from any flow disturbance such as a bend, expansion, contraction, inlet or outlet.
- (2) The Evaporator Plate Fin B & B conveyorized vapor degreaser (ID No. 2DGR), which did not achieve compliance with Subpart T by the December 2, 1997 compliance deadline, shall be replaced by the non-solvent system listed on page 17 of this TSD according to the compliance schedule also listed on page 17 of this TSD.

These monitoring conditions are necessary to ensure compliance with 40 CFR 63, Subpart T 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. The concentrations of these air toxics from the facilities being reviewed under the ENSR process were modeled and found to be (in worst case possible) as follows: The concentrations of these air toxics were compared to the Permissible Exposure Limits (PEL) developed by the Occupational Safety and Health Administration (OSHA). The Office of Air Management (OAM) does not have at this time any specific statutory or regulatory authority over these substances.

Air Toxics Analysis

Pollutant	Rate (lb/hr)	Rate @ 8,760 hr/yr (ton/yr)	Modeled Concentration (Fg/m ³)	OSHA PEL (Fg/m ³)	% OSHA PEL
Trichloroethylene	2.2	9.6	292	536	0.02
Methanol	29.0	127.0	292	260	0.41

Methodology:

Rate ton/yr = (rate lb/hr)*(hr/yr of operation)*(ton/2000 lbs)

Conclusion

The operation of this stationary automotive parts manufacturing plant shall be subject to the conditions of the attached proposed **Part 70 Permit No. T041-6896-00004**.

Indiana Department of Environmental Management Office of Air Management

Addendum to the Technical Support Document for a Part 70 Operating Permit and Enhanced New Source Review (ENSR)

Source Name: Ford Electronics and Refrigeration Corporation
 Source Location: 4747 Western Avenue, Connersville, Indiana 47331
 County: Fayette
 SIC Code: 3714
 Operation Permit No.: T041-6896-00004
 Permit Reviewer: Trish Earls/EVP

On October 29, 1998, the Office of Air Management (OAM) had a notice published in the News Examiner, Connersville, Indiana, stating that Ford Electronics and Refrigeration Corporation had applied for a Part 70 Operating Permit to operate a stationary automotive parts manufacturing plant. 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.

Upon further review, the OAM has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted).

1. IDEM is removing the Credible Evidence provision (Condition B.28) from the Part 70 permit. The IDEM now believes that this condition is not necessary and has remove it from the permit. The issues regarding credible evidence can be adequately addressed during a showing of compliance or noncompliance. Indiana's statutes, and the rules adopted under their authority, govern the admissibility of evidence in any proceeding. Indiana law contains no provisions that limit the use of credible evidence and an explicit statement is not required in the permit.

~~B.28 Credible Evidence [326 IAC 2-7-5(3)][62 Federal Register 8313][326 IAC 2-7-6]~~

~~Notwithstanding the conditions of this permit that state specific methods that may be used to assess compliance or noncompliance with applicable requirements, other credible evidence may be used to demonstrate compliance or non-compliance.~~

2. Condition C.3 (Opacity) has been revised as follows:

~~C.3 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 any one (1) six (6) minute averaging period in twenty four (24) consecutive readings,~~ 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.
3. With the exception of spray booths that qualify as insignificant activities and a positive establishment that controls would never be necessary to comply, the previous Part 70 permit model included daily filter checks, daily visible observations, and weekly checks for abnormal over spray accumulation at the exhaust. This can require a significant amount of resources at a plant with a large number of spray booths. The daily filter checks are one of the very few examples of a direct check on the air pollution control equipment that is included in our compliance monitoring provisions. The OAM believes that this is a very effective means of ensuring ongoing compliance. Additional monitoring of emissions is still useful to ensure that the filter is operating as designed; however, this can be done less frequently. The new Part 70 permit model requires weekly, rather than daily, visible observations and monthly, rather than weekly, rooftop over spray checks. Therefore, condition D.2.5, Monitoring, and condition D.2.6, Record Keeping, have been revised to read as follows:

D.2.5 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, ~~daily~~ **weekly** observations shall be made of the overspray from the surface coating booth stacks (G-22-1, E-23-2, C-2-1, and MAINTPAINT) while one or more of the booths are in operation. 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.
- (b) ~~Weekly~~ **Monthly** inspections shall be performed of the coating emissions from the stack 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 a noticeable change in overspray emission, or evidence of overspray 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.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

D.2.6 Record Keeping Requirements

- (a) To document compliance with Conditions D.2.4 and D.2.5, the Permittee shall maintain a log of ~~daily~~ **weekly** overspray observations, daily and ~~weekly~~ **monthly** inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.
4. A new condition D.3.1 is added to section D.3 citing 40 CFR Part 63, Subpart A - General Provisions, which are applicable to all facilities subject to a NESHAP. All subsequent conditions in section D.3 have been re-numbered accordingly. The new condition D.3.1 reads as follows:

D.3.1 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.

On December 1, 1998, William Shillingford, of Ford Electronics and Refrigeration Corporation, submitted comments on the proposed Part 70 permit. The summary of the comments and responses is as follows:

Comment #1

In the permit application, the description of the degreasers (1DGR and 2DGR) included information on material usage in units of gallons per day. In the permit in conditions A.2(8) and A.2(9), the units were expressed as gallons per hour. Ford requests that the units in the permit be consistent with the permit application. Alternatively, the gallons per day number provided in the permit application should be divided by the actual operating hours per day of the facility, rather than twenty four.

Response #1

The maximum material usage in gallons per hour for the North Condenser conveyORIZED vapor degreaser (1DGR) has been revised by dividing the maximum usage in gallons per day by the actual daily operating hours of 16 hours to get a maximum usage rate of 27.56 gallons per hour. The equipment description and the potential emission calculations have also been revised accordingly. After further discussion with Ford, the maximum usage rate for the Evaporator Plate Fin B&B conveyORIZED vapor degreaser (2DGR) was determined to be correct and has not been revised. The revised equipment description in sections A.2 and D.3 for the degreaser (1DGR) now reads as follows (changes in bold or strikeout):

- (8) one (1) North Condenser conveyORIZED vapor degreaser (ID No. 1DGR), using a maximum of ~~48.4~~ **27.56** gallons of solvent per hour, with a carbon adsorption unit (ID No. ADSORB1) for control of volatile organic compound (VOC) emissions, and exhausting through one (1) stack;

Comment #2

Condition B.9 of the Part 70 Operating permit states that noncompliance with the permit constitutes a violation of the Clean Air Act. This statement should be revised to exclude any non-federally enforceable terms and conditions.

Response #2

326 IAC 2-7-5(6)(A) requires that the permit contain a provision stating the permittee must comply with all conditions of the Part 70 permit. Any Part 70 permit noncompliance constitutes a violation of the CAA and is grounds for enforcement and other actions. No change was made as a result of this comment.

Comment #3

Condition B.11 should be revised to clarify that a compliance certification may consist of a general compliance statement that incorporates by reference all terms and conditions of the permit. For facilities such as Connersville, that have a large number of conditions in their permit, listing all applicable requirements in the annual certification would be overly burdensome and unworkable.

Response #3

The permittee does not need to certify to each and every requirement of the Part 70 permit. IDEM is revising the Nonrule Policy Document 007 so that it includes guidance on the submittal of an annual compliance certification for Title V permits. A copy of AIR 007 NPD, which applies to FESOPs, is included with this addendum.

Comment #4

In condition B.12(a)(1), Ford requests that the words "title of the" be inserted before the word individual(s).

Response #4

Since parts (a)(1) through (3) of this condition are a verbatim quotation of 326 IAC 1-6-3 (Preventive Maintenance Plans), which states what must be included in the Preventive Maintenance Plan (PMP), the condition will remain unchanged. However, it is acceptable for the Permittee to only include the title of the individual responsible for inspecting, maintaining, and repairing emission control devices in the PMP.

Comment #5

Condition B.13(b) seems confusing as it is written. Ford requests that the words "Pursuant to 326 IAC 2-7-16" be inserted at the beginning of the condition.

Response #5

The title of condition B.13 includes the rule cite on which the condition is based. The rule 326 IAC 2-7-16 is cited in the title of the condition, therefore, it is understood that all requirements of the condition are pursuant to that rule.

Comment #6

Condition B.27 states that it provides enhanced new source review for certain previously unpermitted emission units. Conversely, the Technical Support Document, on page 2, states "There are no new facilities to be reviewed under the ENSR process." Ford requests that this matter be clarified and, if appropriate, that condition B.27 be eliminated.

Response #6

Enhanced New Source Review (ENSR) is required for any new or previously existing equipment which has not been permitted. Since there are units at the source which were constructed and operated prior to receipt of the proper permit, as listed in the section of the TSD entitled *Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR*, ENSR is required in this Part 70 permit for those units. Therefore, condition B.27 will remain in the permit.

Comment #7

Condition B.28 states that OAM may use “other credible evidence” in determining the compliance status of this plant. Ford understands that this language is intended to parallel EPA rulemaking in its Any Credible Evidence (ACE) statute. Ford believes that the Title V permit program is intended to create a roadmap for sources to evaluate whether or not they are in compliance with all applicable requirements related to their operations. The presence of this clause leads to uncertainty over the manner in which certain “other evidence” would be used for the purpose of determining compliance. In addition, Ford does not believe that Indiana has a statute comparable to the Federal ACE regulation. Ford requests that this condition be deleted entirely, or at least removed until such time as Indiana Air Pollution Control Rules are amended to contain a requirement comparable to the Federal statute.

Response #7

As stated in item 1 on page 1 above, IDEM is removing condition B.28 (Credible Evidence) from the Part 70 permit.

Comment #8

Condition C.14 requires Ford to develop and submit a compliance plan prior to the submittal date required by the Federal regulations. Under the Risk Management Plan rules, the facility is required to submit a Risk Management Plan by June 21, 1999. Ford believes that we need not supply a plan for meeting compliance until the facility has been shown to be out of compliance, or the date of the first compliance certification, whichever occurs first.

Response #8

Condition C.14 requires the source to either submit a compliance schedule for meeting the requirements of 40 CFR 68 by the date stated in 40 CFR 68.10(a) **or** 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), as part of the compliance certification which must be submitted under 326 IAC 2-7-6(5). A verification to IDEM, OAM that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68 must also be submitted. Therefore, the source does not have to certify that the source is in compliance with the requirements of 40 CFR 68 until the first compliance certification required by 326 IAC 2-7-6(5) is due.

Comment #9

Ford requests that the last phrase of condition C.18(a) be amended to read, “required as a condition of this permit shall be performed in accordance with the requirements of this permit.”

Response #9

Subsection (a) of this condition states:

- (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.

The word "all" modifies the term "times the equipment is operating at normal representative conditions." It does not create a new requirement to do any other monitoring. It clarifies when the observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit are to be performed. This condition is not changed.

Comment #10

Ford requests that the word "additional" be removed from condition C.18(c).

Response #10

When equipment is operating at abnormal conditions, additional monitoring information is required to determine the effects of the abnormal conditions on emissions. Therefore, the condition remains unchanged.

Comment #11

Condition D.1.4(a) provides two different options to demonstrate compliance with the fuel sulfur content limit. Ford suggests that the word "or" be added to the end of subcondition (1) to clarify that a vendor analysis and oil sample are not both required to determine compliance.

Part (b) of condition D.1.4 references a 13 MMBtu per hour heater. Ford does not know what this refers to, and suggests this phrase be deleted.

Response #11

Since pursuant to 326 IAC 3-7-4, the permittee may demonstrate compliance with the fuel sulfur content limit by providing vendor analysis of the fuel or analyzing the fuel oil using 40 CFR 60, Appendix A, Method 19, the condition will be revised to clarify that both are not required. Part (b) of the condition contained a typographical error in its reference to a 13 MMBtu per hour heater. The condition will be changed to include the correct combustion units. The revised condition D.1.4 now reads as follows (changes in bold or strikeout):

D.1.4 Sulfur Dioxide Emissions and Sulfur Content

Compliance shall be determined utilizing one of the following options.

- (a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the fuel oil sulfur content does not exceed five-tenths percent (0.5%) by weight by:
 - (1) Providing vendor analysis of fuel delivered, if accompanied by a certification; **or**
 - (2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
 - (A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
 - (B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling; or

- (b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from ~~the thirteen (13) MMBtu per hour heater~~ **each of the four (4) boilers (ID Nos. BLR1, BLR2, BLR3, and BLR4)**, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.

A determination of noncompliance pursuant to either of the methods specified in (a) or (b) above shall not be refuted by evidence of compliance pursuant to the other method.

Comment #12

Condition D.1.5(a) requires daily visible emission notations of each of the four boilers when in operation. Ford does not believe that this requirement is necessary during occasions that the boilers are operating using natural gas. Ford requests that this condition be revised to clarify that visual emission notations are necessary only during times that the boilers are operating with fuel oil.

Response #12

Daily visible emission notations are required only when the boilers burn No. 2 distillate oil for fuel, in order to indicate compliance with limits in 326 IAC 5-1 and 326 IAC 6. To clarify that the daily visible emissions notations are only required when the boilers are burning No. 2 distillate fuel oil, section (a) of Condition D.1.5 has been changed as follows (added language appears in **bold**):

- (a) Daily visible emission notations of each of the four (4) boilers (ID Nos. BLR1, BLR2, BLR3, and BLR4) stack exhausts shall be performed during normal daylight operations when **the boilers are burning No. 2 distillate fuel oil and** exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

Comment #13

Condition D.1.7 refers to the requirement to submit a Natural Gas Boiler Certification form at any time when submitting documents to IDEM related to permit requirements. Ford does not understand the purpose of this form, as its boilers have been permitted to burn natural gas or number 2 fuel oil without restriction in the past. In addition, Ford believes that the wording of this condition is overly broad in requiring the submission of this form "...when submitting other documents required by this permit..." This, as written, would require the submission of the Natural Gas Boiler Certification at any time Ford submits a document to IDEM, even though the submission may have nothing to do with the boilers.

Response #13

When the boilers are burning natural gas for fuel, the natural gas boiler certification, on page 51 of 52, is used to certify when the boilers are burning natural gas indicating compliance with 326 IAC 5-1. It must be submitted when the permittee is submitting any test results, monitoring results, or other reports required by the permit to avoid multiple mailings. For instance, this form would always be mailed with the Semi-Annual Compliance Monitoring Report.

Comment #14

In section D.2, Ford requests that the "Note" in the Facility Description be deleted. The note, as written, implies that the MAINTPAINT facility was installed as a replacement for the radiator spray booth. This is not the case. The radiator coating process was removed and radiators are no longer coated.

Response #14

The "Note" listed under the equipment description for the maintenance paint spray booth (ID No. MAINTPAINT) stating that the maintenance paint spray booth replaced the radiator paint spray booth (ID No. 1PNT) will be removed from the TSD and sections A.2 and D.2 of the Part 70 permit since it is incorrect.

Comment #15

In condition D.2.2, Ford requests that the requirement for the Preventive Maintenance Plan be made specific to the dry filters for particulate control.

Response #15

It is clear from the structure of the wording in 326 IAC 1-6-3 (Preventive Maintenance Plans) that the Preventive Maintenance Plan (PMP) requirement affects the entirety of the applicable facilities, not just the control equipment. Only 326 IAC 1-6-3(a)(1) is limited, in that it requires identification of the personnel in charge of only the emission control equipment, and not any other facility equipment. Therefore, since the PMP requirement applies to each paint booth facility in its entirety, the condition will not be made specific to the dry filters for PM control. However, the condition will be revised to clarify that a PMP is required for each booth. The revised condition now reads as follows (changes in bold or strikeout):

D.2.2 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~~ **each of the three (3) paint spray booths (ID Nos. 2PNT, 3PNT, and MAINTPAINT)** and ~~any~~ **their respective** control devices.

Comment #16

Condition D.2.5 establishes monitoring requirements for paint booths operated at the Connersville facility. Subcondition (a) outlines procedures that must be followed daily, while subcondition (b) specifies measures to follow weekly. As currently written, (a) states that observations of overspray from one or more of the paint booth stacks shall be made daily. Subcondition (b) requires weekly checks of stacks for overspray. Ford believes that these conditions overlap, and requests that (a) be modified to require daily checks of the placement and integrity of filters only.

Response #16

As noted in item 3, on page 2 above, the frequency of monitoring for surface coating operations has been changed. Condition D.2.5 has been revised to require weekly observations of overspray from the coating booth stacks instead of daily observations and to require monthly inspections of coating emissions and overspray on rooftops instead of weekly inspections. Condition D.2.6 was also revised to reflect these changes in monitoring requirements. See page 2 above for the revised conditions D.2.5 and D.2.6.

Comment #17

Section D.3 contains requirements for two vapor degreasing operations and two thermal de-oilers. The vapor degreasing operations are subject to regulation under 40 CFR 63, Subpart T, while the two thermal de-oilers are not. Because the regulatory requirements for these units are so different, Ford requests that the thermal de-oilers be placed in a separate section of the permit. Lastly, we request that instead of reprinting the entire standard that IDEM only list the parts that are applicable to the Connersville plant.

Response #17

The conditions in section D.3 listing the requirements of 40 CFR 63, Subpart T will remain unchanged since it is IDEM's policy to state all of the requirements of the regulation. Since the regulatory requirements for the thermal de-oilers and the degreasers are quite different, a new section D.4 is added to the Part 70 permit for the two (2) thermal de-oilers. This makes it easier to read the requirements applicable to only those units. The original section D.4 is now re-numbered as section D.5. The new section D.4 reads as follows (changes in bold or strikeout):

SECTION D.4 FACILITY OPERATION CONDITIONS

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

- (10) one (1) thermal de-oiler (De-oiler #1) processing a maximum of 6,000 pounds of metal parts per hour, using a maximum of 30 pounds of oil per hour, with a thermal incinerator using natural gas as supplementary fuel at a heat input rate of 7.5 million (MM) British thermal units (Btu) per hour for control of volatile organic compounds (VOC), exhausting through two (2) stacks (DO1 and DO2); and
- (11) one (1) thermal de-oiler (De-oiler #2) processing a maximum of 2,400 pounds of metal parts per hour, using a maximum of 40 pounds of oil per hour, with a thermal incinerator using natural gas as supplementary fuel at a heat input rate of 2.5 MMBtu per hour for control of VOC, exhausting through one (1) stack (DO3).

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

~~D.3.2~~ **D.4.1** BACT Condition [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 and CP-041-9441-00004, issued April 27, 1998, the thermal incinerators (rated at 7.5 MMBtu per hour and 2.5 MMBtu per hour, respectively) on each of the two (2) thermal de-oilers (De-oiler #1 and #2) shall be in operation at all times that each of the de-oilers is in operation. When operating, the thermal incinerators on De-oiler #1 and De-oiler #2 shall maintain minimum operating temperatures of 1,500° F and 1,560° F, respectively, and a gas residence time in the oxidizing zone for each incinerator of 1.0 second, or a temperature and gas residence time determined in the compliance tests (described in Condition ~~D.3.4~~ **D.4.3**) to maintain at least 95% destruction of VOC captured and a capture efficiency of 100%.

~~D.3.3~~ **D.4.2** 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 **each thermal de-oiler (De-oiler #1 and #2) and each of the thermal incinerators controlling VOC emissions.**

Compliance Determination Requirements

~~D.3.4~~ **D.4.3** Testing Requirements [326 IAC 2-7-6(1),(6)]

Within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, the Permittee shall perform VOC testing on each of the two (2) thermal incinerators, controlling VOC emissions from the two (2) thermal de-oilers, to demonstrate compliance with Condition ~~D.3.2~~ **D.4.1** utilizing 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.

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

D.4.4 Record Keeping Requirements

- (a) **The Permittee shall maintain records of the operating temperature and the gas residence time in the oxidizing zone for each of the two (2) thermal incinerators, controlling VOC emissions from the two (2) thermal de-oilers.**
- (b) **All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.**

Comment #18

In condition D.3.3, Ford requests that the requirement for the Preventive Maintenance Plan be more directed towards the specific equipment requiring the Preventive Maintenance Plan.

Response #18

Condition D.3.3 will be revised to state the specific equipment for which a Preventive Maintenance Plan is required. The condition now reads as follows (changes in bold or strikeout):

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 ~~this facility and its control devices~~ **each degreaser (ID Nos. 1DGR and 2DGR) and each of the carbon adsorption units (ADSORB1 and ADSORB2) controlling VOC emissions.**

Comment #19

In condition D.3.5(1), Ford requests that the word "all" be replaced by the word "affected".

Response #19

To clarify that condition D.3.5 only applies to solvent cleaning operations that are subject to 40 CFR 63, Subpart T, paragraph (1) of this condition is revised to read as follows (changes in bold or strikeout):

D.3.5 Hazardous Air Pollutants (HAPs) [326 IAC 20-6-1] [40 CFR 63, Subpart T]

- (1) Pursuant to 40 CFR 63.465(e), the potential to emit from all solvent cleaning operations at the source **that are subject to this subpart** shall be determined using the procedures described in paragraphs (1)(A) through (1)(C) below. A source's total potential to emit is the sum of the HAP emissions from all solvent cleaning operations, plus all HAP emissions from other facilities within the source.

Comment #20

Condition D.3.6 outlines the Compliance Schedule for the Evaporator Plate Fin B&B conveyORIZED vapor degreaser. This schedule calls for the removal of this equipment from operation by December 1, 1998, prior to the date the Title V permit for the Connersville plant will become effective. Ford is in the final stages of removing this equipment from operation, and suggests that all reference to this equipment in the Title V permit be deleted.

In the event this language is retained, Ford suggests the following:

The wording under subcondition (3) be clarified to indicate that the removal of this equipment will go beyond regulatory requirements by achieving zero HAP emissions (not VOC, as currently written), and subcondition (2) should include the reference to the Part and Subpart in 40 CFR on which this permit requirement is based.

Response #20

Since Ford submitted a compliance schedule, which was also submitted to the U.S. EPA to request a federally enforceable Compliance Order under Section 113(a) of the Clean Air Act, for this degreaser, this unit and the permit conditions that apply to it will remain in the permit to address how the non-compliance issue was resolved. Parts (2) and (3) of condition D.3.6 have been revised to include the above requested changes. The revised parts (2) and (3) of condition D.3.6 now read as follows (changes in bold or strikeout):

(2) **Interim emission control steps that Ford will take to reduce halogenated solvent emissions until the non-compliant degreaser (2DGR) is removed from the source**

The Plate Fin B & B degreaser is currently equipped with a carbon adsorption unit for controlling VOCs. Ford will continue to operate this control for as long as the solvent degreaser is in operation. Additionally, the Connersville plant will implement all applicable work and operational practice standards detailed in 40 CFR **63.463(d)(1)** through (d)(12).

(3) **Steps that Ford is willing to take to reduce emissions of pollutants below levels required under Subpart T or other regulations**

First, it should be noted that an additional consideration for Ford's inability to meet the December 2, 1997 compliance deadline is the fact that over the past five (5) years, the Connersville plant has implemented major projects to replace four (4) solvent degreasing systems with non-solvent systems. Also, the previously existing non-compliant Plate Fin Tube degreaser has been recently removed from the source. These replacement projects, coupled with their present plans to eliminate one (1) more solvent system, represents not only a substantial commitment to go beyond regulatory requirements (achieving zero (0) ~~VOC HAP~~ emissions), but also is the approach which certainly is of most benefit to the environment in the long term.

Comment #21

Ford requests that parts (1) and (2) of condition D.3.9 be deleted from the permit as these requirements have already been met.

Response #21

Parts (1) and (2) of condition D.3.9 will not be deleted because they are applicable requirements pursuant to 40 CFR 63, Subpart T. If these reports have already been submitted, then Ford can consider those requirements satisfied.

Comment #22

Section D.4 of the Ford Title V permit lists several emission units that have no applicable requirements under the Clean Air Act. Condition D.4.2 indicates that IDEM may require compliance testing in the future to determine compliance "... with the VOC limit specified in Condition D.4.1..." Since condition D.4.1 does not contain a VOC limit, Ford requests that condition D.4.2 be deleted.

Response #22

While condition D.4.1 (now re-numbered as D.5.1) does not contain a specific VOC limit it does state that any change or modification to the facilities listed in section D.4 (now re-numbered as D.5) that would cause an increase in allowable emissions greater than exempt levels shall be subject to New Source Review and must be approved by the OAM before the change can occur. Therefore, testing could only be done to verify that the potential emissions have not changed, and condition D.4.2 (now re-numbered as D.5.2) is revised to state this. The revised condition now reads as follows (changes in bold or strikeout):

D.4.5.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, ~~compliance with the VOC limit specified in Condition D.4.1~~ **verification that any VOC emissions increase is less than exempt levels** shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Appendix A: Emission Calculations

Company Name: Ford Electronics and Refrigeration Corporation
Address City IN Zip: 4747 Western Avenue, Connersville, Indiana 47331
Operation Permit No.: T041-6896
Pit ID: 041-00004
Reviewer: Trish Earls
Date: April 21, 1998

Total Potential To Emit (tons/year)

Emissions Generating Activity

Pollutant	Degreasing	Metal Parts Spray Cleaning	Compressor Flushing and Testing	Surface Coating	Soldering	Induction Brazing	Thermal De-oilers	Combustion	TOTAL
PM	0.00	0.00	0.00	175.49	0.00	0.00	0.00	7.30	182.8
PM10	0.00	0.00	0.00	175.49	0.00	0.00	0.00	7.30	182.8
SO2	0.00	0.00	0.00	0.00	0.00	0.00	0.00	115.00	115.0
NOx	0.00	0.00	0.00	0.00	0.00	0.00	0.00	73.50	73.5
VOC	3290.13	10.14	12.80	264.20	127.02	10.07	306.60	1.50	4022.5
CO	0.00	0.00	0.00	0.00	0.00	0.00	0.00	18.30	18.3
total HAPs	3290.13	9.63	0.00	198.66	127.02	0.00	0.00	0.00	3625.4
worst case single HAP	3290.13	9.63	0.00	180.83	127.02	0.00	0.00	0.00	3607.6

Total emissions based on rated capacities at 8,760 hours/year.

**For the purposes of determining Title V applicability, PM10 (not PM) is the regulated pollutant in consideration

Total Limited Potential To Emit (tons/year)

Emissions Generating Activity

Pollutant	Degreasing	Metal Parts Spray Cleaning	Compressor Flushing and Testing	Surface Coating	Soldering	Induction Brazing	Thermal De-oilers	Combustion	TOTAL
PM	0.00	0.00	0.00	12.28	0.00	0.00	0.00	7.30	19.6
PM10	0.00	0.00	0.00	12.28	0.00	0.00	0.00	7.30	19.6
SO2	0.00	0.00	0.00	0.00	0.00	0.00	0.00	115.00	115.0
NOx	0.00	0.00	0.00	0.00	0.00	0.00	0.00	73.50	73.5
VOC	493.52	10.14	12.80	264.20	127.02	10.07	15.33	1.50	934.6
CO	0.00	0.00	0.00	0.00	0.00	0.00	0.00	18.30	18.3
total HAPs	493.52	9.63	0.00	198.66	127.02	0.00	0.00	0.00	828.8
worst case single HAP	493.52	9.63	0.00	180.83	127.02	0.00	0.00	0.00	811.0

Total emissions based on rated capacities at 8,760 hours/year.

**For the purposes of determining Title V applicability, PM10 (not PM) is the regulated pollutant in consideration

**Appendix A: Emission Calculations
VOC and Particulate
From Degreasing, Cleaning, Flushing, Surface Coating, Brazing, and Soldering Operations**

Company Name: Ford Electronics and Refrigeration Corporation
Address City IN Zip: 4747 Western Avenue, Connersville, Indiana 47331
Operation Permit No.: T041-6896
Plt ID: 041-00004
Reviewer: Trish Earls
Date: April 21, 1998

State Potential Emissions (uncontrolled):																		
Material (as applied)	Process	Density (Lb/Gal)	Weight % Volatile (H2O& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency	
Degreasing																		
Trichloroethylene	1DGR	12.11	94.47%	0.00%	94.47%	0.00%	0.00%	27.560	1.00	11.4	11.44	315.30	7567.08	1380.99	0.00	N/A	100.00%	
Trichloroethylene	2DGR	12.11	94.47%	0.00%	94.47%	0.00%	0.00%	38.100	1.00	11.4	11.44	435.88	10461.03	1909.14	0.00	N/A	100.00%	
Metal Parts Spray Cleaning																		
FordTox042300	SPCL	12.18	100.00%	0.00%	100.00%	0.00%	0.00%	0.190	1.00	12.2	12.18	2.31	55.54	10.14	0.00	N/A	100.00%	
Compressor Flushing and Testing																		
Solvent Cleaner	FLUSH	4.79	100.00%	0.00%	100.00%	0.00%	0.00%	0.610	1.00	4.8	4.79	2.92	70.13	12.80	0.00	N/A	100.00%	
Surface Coating																		
Base Ford Tox #023966	Maintenance Booth	8.34	60.00%	0.00%	60.00%	0.00%	40.00%	0.188	1.00	5.0	5.00	0.94	22.52	4.11	0.68	16.68	75.00%	
White Ford Tox #023967	Maintenance Booth	8.83	60.00%	0.00%	60.00%	0.00%	40.00%	0.188	1.00	5.3	5.30	0.99	23.84	4.35	0.73	17.66	75.00%	
Solvent Ford Tox #040144	Maintenance Booth	7.02	100.00%	0.00%	100.00%	0.00%	0.00%	0.188	1.00	7.0	7.02	1.32	31.59	5.77	0.00	N/A	75.00%	
Engine Ford Tox #047695	Maintenance Booth	5.71	55.00%	0.00%	55.00%	0.00%	45.00%	0.188	1.00	3.1	3.14	0.59	14.13	2.58	1.06	13.96	50.00%	
Gloss Ford Tox #031022	Maintenance Booth	6.69	58.50%	0.00%	58.50%	0.00%	41.50%	0.188	1.00	3.9	3.91	0.73	17.61	3.21	1.14	18.86	50.00%	
Ford Tox 142380	2PNT	8.59	39.70%	0.00%	39.70%	0.00%	22.92%	15.100	1.00	3.4	3.41	51.49	1235.77	225.53	171.30	29.76	50.00%	
Ford Tox 041404	3PNT	12.10	28.48%	0.00%	28.48%	0.00%	71.52%	1.230	1.00	3.4	3.45	4.24	101.73	18.57	2.33	5.07	95.00%	
Butyl Cellosolve	3PNT	7.03	100.00%	0.00%	100.00%	0.00%	0.00%	0.220	1.00	7.0	7.03	1.55	37.12	6.77	0.00	N/A	95.00%	
Soldering and Brazing																		
Ford Tox 022388 (Methanol)	SOLDER1	6.63	100.00%	0.00%	100.00%	0.00%	0.00%	14.500	lb/hr	6.6	6.63	14.50	348.00	63.51	0.00	N/A	N/A	
Ford Tox 022388 (Methanol)	SOLDER2	6.63	100.00%	0.00%	100.00%	0.00%	0.00%	14.500	lb/hr	6.6	6.63	14.50	348.00	63.51	0.00	N/A	N/A	
Ford Tox 017206 (IPA)	BRAZING	6.57	100.00%	0.00%	100.00%	0.00%	0.00%	2.300	lb/hr	6.6	6.57	2.30	55.20	10.07	0.00	N/A	N/A	
Total State Potential Emissions:												848.03	20352.64	3714.36	175.49			
Federal Potential Emissions (controlled):																		
										Control Efficiency:		Controlled VOC lbs per Hour	Controlled VOC lbs per Day	Controlled VOC tons per Year	Controlled PM tons/yr			
										Degreasing VOC	Surface Coating PM							
Total Federal Potential Emissions:										85.00%	93.00%	209.53	5028.75	917.75	12.28			

Methodology:
Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids) * Transfer Efficiency
Total = Worst Coating + Sum of all solvents used
Controlled emission rate = uncontrolled emission rate * (1 - control efficiency)

HAP Emission Calculations

Company Name: Ford Electronics and Refrigeration Corporation
Address City IN Zip: 4747 Western Avenue, Connersville, Indiana 47331
Operation Permit No.: T041-6896
Pit ID: 041-00004
Reviewer: Trish Earls
Date: April 21, 1998

Material	Process	Density (Lb/Gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % Trichloroethylene	Weight % Glycol Ethers	Weight % Xylene	Weight % Methyl Ethyl Ketone	Weight % Toluene	Weight % Methanol	Weight % Ethylbenzene	Trichloroethylene Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Xylene Emissions (ton/yr)	Methyl Ethyl Ketone Emissions (ton/yr)	Toluene Emissions (ton/yr)	Methanol Emissions (ton/yr)	Ethylbenzene Emissions (ton/yr)	
Degreasing																			
Trichloroethylene	1DGR	12.11	27.560	1.00	94.47%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	1380.99	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Trichloroethylene	2DGR	12.11	38.100	1.00	94.47%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	1909.14	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Metal Parts Spray Cleaning																			
Ford Tox 042300	SPCL	12.18	0.190	1.00	95.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	9.63	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Compressor Flushing and Testing																			
Solvent Cleaner	FLUSH	4.79	0.610	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Surface Coating																			
Base Ford Tox #023966	Maint. Booth	8.34	0.188	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
White Ford Tox #023967	Maint. Booth	8.83	0.188	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Solvent Ford Tox #040144	Maint. Booth	7.02	0.188	1.00	0.00%	15.00%	30.00%	5.00%	10.00%	0.00%	0.00%	0.00	0.87	1.73	0.29	0.58	0.00	0.00	0.00
Engine Ford Tox #047695	Maint. Booth	5.71	0.188	1.00	0.00%	0.00%	10.00%	0.00%	15.00%	0.00%	0.00%	0.00	0.00	0.47	0.00	0.71	0.00	0.00	0.00
Gloss Ford Tox #031022	Maint. Booth	6.69	0.188	1.00	0.00%	0.00%	18.00%	10.00%	0.00%	0.00%	3.00%	0.00	0.00	0.99	0.55	0.00	0.00	0.00	0.17
Ford Tox 142380	2PNT	8.59	15.100	1.00	0.00%	31.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	176.12	0.00	0.00	0.00	0.00	0.00	0.00
Ford Tox 041404	3PNT	12.10	1.230	1.00	0.00%	5.00%	5.00%	10.00%	0.00%	0.00%	0.00%	0.00	3.26	3.26	6.52	0.00	0.00	0.00	0.00
Butyl Cellosolve	3PNT	7.03	0.220	1.00	0.00%	8.53%	29.87%	4.98%	9.96%	0.00%	0.00%	0.00	0.58	2.02	0.34	0.67	0.00	0.00	0.00
Soldering and Brazing																			
Ford Tox 022388 (Methanol)	SOLDER1	6.63	14.500	lb/hr	0.00%	0.00%	0.00%	0.00%	0.00%	100.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	63.51	0.00
Ford Tox 022388 (Methanol)	SOLDER2	6.63	14.500	lb/hr	0.00%	0.00%	0.00%	0.00%	0.00%	100.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	63.51	0.00
Ford Tox 017206 (IPA)	BRAZING	6.57	2.300	lb/hr	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
												3299.76	180.82	8.01	7.70	1.96	127.02	0.17	

Total State Potential Emissions: 3625.43

Degreasing VOC Control Eff.	85.00%	503.15	180.82	8.01	7.70	1.96	127.02	0.17
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Total State Controlled Emissions: 828.82

METHODOLOGY

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

**Appendix A: Potential Emissions Calculations
Natural Gas or No. 2 Distillate Fuel Oil Combustion
10 < MM BTU/HR <100
Small Industrial Boiler**

Company Name: Ford Electronics and Refrigeration Corporation
Address City IN Zip: 4747 Western Avenue, Connersville, Indiana 47331
Operation Permit No.: T041-6896
Pit ID: 041-00004
Reviewer: Trish Earls
Date: April 21, 1998

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr	Potential Throughput kgals/year	S = Weight % Sulfur
37.00	324.1	2315.1	0.35

Heat Input Capacity includes:
 Boiler 1 (BLR1) or Boiler 2 (BLR2), each rated at 37.0 MMBtu/hr, each capable of burning natural gas or No. 2 distillate fuel oil.

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF (natural gas combustion)	14.0	14.0	0.6	140.0	2.8	35.0
Emission Factor in lb/kgal (No. 2 fuel oil combustion)	2.0	1.0	142S	20.0	0.2	5.0
Potential Emissions burning natural gas, tons/yr	2.3	2.3	0.1	22.7	0.5	5.7
Potential Emissions burning No. 2 fuel oil, tons/yr	2.3	1.2	57.5	23.2	0.2	5.8
Worst Case Potential Emissions, tons/yr	2.3	2.3	57.5	23.2	0.5	5.8

Methodology:

MMBtu = 1,000,000 Btu
 MMCF = 1,000,000 Cubic Feet of Gas
 Emission Factors for CO from natural gas combustion: Uncontrolled = 35, Low NOx Burner = 61, Flue gas recirculation = 37
 Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
 Emission Factors for natural gas combustion are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02
 Emissions from natural gas combustion (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
 1 gallon of No. 2 Fuel Oil has a heating value of 142,000 Btu
 Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.140 MM Btu
 Emission Factors for No. 2 fuel oil combustion are from AP 42, Tables 1.3-2 and 1.3-4 (SCC 1-02-005-01/02/03)
 Emissions from No. 2 fuel oil combustion (tons/yr) = Throughput (kgals/ yr) x Emission Factor (lb/kgal)/2,000 lb/ton

Compliance with 326 IAC 6-2-3

The following calculation demonstrates compliance with the allowable PM emission limit of 0.3 lb/MMBtu pursuant to 326 IAC 6-2-3:

$$\text{Potential PM emission rate} = \frac{2.3 \text{ tons/yr}}{37 \text{ MMBtu/hr}} = 0.062 \text{ lb PM / MMBtu}$$

(will comply)

Compliance with 326 IAC 7-1.1-2

The following calculations determine the maximum sulfur content of #2 distillate fuel allowed by 326 IAC 7-1.1-2:

$$\frac{0.5 \text{ lb/MMBtu} \times 142,000 \text{ Btu/gal}}{71 \text{ lb/1000 gal}} = 1.0 \text{ lb/1000 gal} = 0.5 \%$$

Sulfur content must be less than or equal to 0.5 % to comply with 326 IAC 7-1.1-2.
 Facility will comply with 326 IAC 7-1.1-2 by using fuel oil with a sulfur content less than 0.5%.

**Appendix A: Potential Emissions Calculations
Natural Gas or No. 2 Distillate Fuel Oil Combustion
10 < MM BTU/HR <100
Small Industrial Boiler**

Company Name: Ford Electronics and Refrigeration Corporation
Address City IN Zip: 4747 Western Avenue, Connorsville, Indiana 47331
Operation Permit No.: T041-6896
Pit ID: 041-00004
Reviewer: Trish Earls
Date: April 21, 1998

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr	kgals/year	S = Weight % Sulfur
72.00	630.7	4505.1	0.35

Heat Input Capacity includes:
 Boiler 4 (BLR4) or Boiler 5 (BLR5), each rated at 72.0 MMBtu/hr, each capable of burning natural gas or No. 2 distillate fuel oil.

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF (natural gas combustion)	14.0	14.0	0.6	140.0	2.8	35.0
Emission Factor in lb/kgal (No. 2 fuel oil combustion)	2.0	1.0	142S	20.0	0.2	5.0
Potential Emissions burning natural gas, tons/yr	4.4	4.4	0.2	44.2	0.9	11.0
Potential Emissions burning No. 2 fuel oil, tons/yr	2.3	1.2	57.5	23.2	0.2	5.8
Worst Case Potential Emissions, tons/yr	4.4	4.4	57.5	44.2	0.9	11.0

Methodology:

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for CO from natural gas combustion: Uncontrolled = 35, Low NOx Burner = 61, Flue gas recirculation = 37

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors for natural gas combustion are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02

Emissions from natural gas combustion (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

1 gallon of No. 2 Fuel Oil has a heating value of 142,000 Btu

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.140 MM Btu

Emission Factors for No. 2 fuel oil combustion are from AP 42, Tables 1.3-2 and 1.3-4 (SCC 1-02-005-01/02/03)

Emissions from No. 2 fuel oil combustion (tons/yr) = Throughput (kgals/ yr) x Emission Factor (lb/kgal)/2,000 lb/ton

Compliance with 326 IAC 6-2-3

The following calculation demonstrates compliance with the allowable PM emission limit of 0.3 lb/MMBtu pursuant to 326 IAC 6-2-3:

$$\begin{aligned} \text{Potential PM emission rate} &= 4.4 \text{ tons/yr} / 72 \text{ MMBtu/hr} = 0.061 \text{ lb PM / MMBtu} \\ &= 0.01 \text{ lb PM / MMBtu} \end{aligned} \quad \begin{aligned} &4.38 \text{ lb/hr} / \text{tons/yr} / \\ &\text{(will comply)} \end{aligned}$$

Compliance with 326 IAC 7-1.1-2

The following calculations determine the maximum sulfur content of #2 distillate fuel allowed by 326 IAC 7-1.1-2:

$$\begin{aligned} 0.5 \text{ lb/MMBtu} \times 142,000 \text{ Btu/gal} &= 71 \text{ lb/1000 gal} \\ 71 \text{ lb/1000 gal} / 142 \text{ lb/1000 gal} &= 0.5 \% \end{aligned}$$

Sulfur content must be less than or equal to 0.5 % to comply with 326 IAC 7-1.1-2.

Facility will comply with 326 IAC 7-1.1-2 by using fuel oil with a sulfur content less than 0.5%.

Appendix A: Emissions Calculations

Natural Gas Combustion Only

10 < MM BTU/HR <100

Supplementary Fuel Heat Input Rate for Thermal Incinerators

Company Name: Ford Electronics and Refrigeration Corporation
Address City IN Zip: 4747 Western Avenue, Connersville, Indiana 47331
Operation Permit No.: 041-9441
Pit ID: 041-00004
Reviewer: Trish Earls
Date: April 21, 1998

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

10.0

87.6

Heat Input Capacity includes:
Supplementary fuel heat input rate for the thermal incinerators on De-oiler #1 and #2.

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	14.0	14.0	0.6	140.0	2.8	35.0
Potential Emission in tons/yr	0.6	0.6	0.0	6.1	0.1	1.5

Methodology:

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: Uncontrolled = 100, Low NOx burner = 83, Flue gas recirculation = 30

Emission Factors for CO: Uncontrolled = 35, Low NOx Burner = 61, Flue gas recirculation = 34

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

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

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