PART 70 OPERATING PERMIT
OFFICE OF AIR MANAGEMENT

New Venture Gear, Inc., Muncie Transmission Division
1200 West 8th Street
Muncie, Indiana 47302

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

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

Operation Permit No.: T035-7145-00015	
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 automobile and light duty truck transmission manufacturing plant.

Responsible Official:	Jack R. Wagner
Source Address:	1200 West 8th Street, Muncie, Indiana 47302
Mailing Address:	P.O. Box 2527, Muncie, Indiana 47307-2527
Phone Number:	765-281-2251
SIC Code:	3714
County Location:	Delaware
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Rules

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) Two (2) natural gas fired boilers (Boiler 1 and Boiler 2) each with a heat input rate of 85.0 million British thermal units per hour, both exhausting at one (1) stack, identified as #676. Each boiler utilizes No. 4 fuel oil (Internal or External reclaim oil) as a back up fuel.

(2) Eight (8) Wheelabrator steel shot peeners (abrasive cleaning units) each with a maximum capacity of 36,000 pounds of shot circulated per hour, with particulate matter emissions controlled by separate baghouses (two are controlled by one baghouse #27760) exhausting at seven (7) separate stacks identified as #801 through #807 (two exhaust through stack #807).

(3) One (1) Wheelabrator steel shot tumblast (abrasive cleaning unit) with a maximum capacity of 22,500 pounds of shot circulated per hour, with particulate matter emissions controlled by a baghouse exhausting at one (1) stack, identified as #808.

(4) One (1) nozzle shot peen 225, with a maximum capacity of 6,000 pounds per hour of shot, with particulate matter emissions controlled by a cartridge-type baghouse dust collector.

(5) One (1) nozzle shot peen 448208-2, with a maximum capacity of 6,000 pounds per hour of shot, with particulate matter emissions controlled by a cannister-type baghouse dust collector.

(6) One (1) rebuilt nozzle shot peen, with a maximum capacity of 6,000 pounds per hour of shot, with particulate matter emissions controlled by a cartridge-type baghouse dust collector.

(7) One (1) double wheel shot peen 999, with a maximum capacity of 36,000 pounds per hour of shot, with particulate matter emissions controlled by a baghouse dust collector.

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

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

(2) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

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

(4) Activities or categories of activities with individual HAP emissions not previously identified.

Any unit emitting greater than 1 pound per day but less than 5 pounds per day or 1 ton per year of a single HAP.

(a) Welding (laser), and

(b) Electron beam welder.

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

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

(a) It is a major source, as defined in 326 IAC 2-7-1(22).

(b) It is a source 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 [IC 13]

(a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.

(b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."

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

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

B.3 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

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

(a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.

(b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

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

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

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

B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

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

(b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.

(c) Upon request, the Permittee shall also furnish to IDEM, OAM copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

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

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; or

(3) Denial of a permit renewal application.

(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

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

(b) One (1) certification shall be included, on the attached Certification Form, with each submittal.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

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

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

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

and

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

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

(c) The annual compliance certification report shall include the following:

(1) The identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was based on continuous or intermittent data;

(4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);

(5) Any insignificant activity that has been added without a permit revision;

(6) Such other facts, as specified in Sections D of this permit, as IDEM, OAM may require to determine the compliance status of the source.

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

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

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;

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

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

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

(b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) PMP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM.

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

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

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

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

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

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

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

(5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

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

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

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

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

(C) Corrective actions taken.

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

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

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

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

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

(f) Failure to notify IDEM, OAM by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

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

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

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

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

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

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

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

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

(b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:

(1) The applicable requirements are included and specifically identified in this permit; or

(2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.

(c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.

(e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM has issued the modifications. [326 IAC 2-7-12(c)(7)]

(h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM has issued the modification. [326 IAC 2-7-12(b)(7)]

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

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

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

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

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

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

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

(2) An emergency as defined in 326 IAC 2-7-1(12); or

(3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.

(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

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

(c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

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

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAM to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

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

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

Request for renewal shall be submitted to:

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

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due.

(2) If IDEM, OAM upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM any additional information identified as being needed to process the application.

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

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

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

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

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

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

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

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

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

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

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

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

(a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

(b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

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

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

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-1 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

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

and

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

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

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

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

(b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM, or U.S. EPA is required.

(e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.23 Construction Permit Requirement [326 IAC 2]

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

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

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-7-6(6)]

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

(2) The Permittee, and IDEM, OAM acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

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

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

The application which shall be submitted by the Permittee does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

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

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

(a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing or as set forth in 326 IAC 2-7-19. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action, or revocation of this permit.

(c) 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 Advanced Source Modification Approval [326 IAC 2-7-5(16)]

The requirements to obtain a source modification approval under 326 IAC 2-7-10.5 or a permit modification under 326 IAC 2-7-12 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3 and such modifications occur only during the term of this permit.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

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

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

All required notifications shall be submitted to:

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

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

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

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

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

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

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

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

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

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

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

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

C.9 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

(a) Has certified that all facilities at this source are in compliance with all applicable requirements; and

(b) Has submitted a statement that the Permittee will continue to comply with such requirements; and

(c) Will comply with such applicable requirements that become effective during the term of this permit.

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 the compliance schedule an additional ninety (90) days provided the Permittee notifies:

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

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

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

C.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.

C.13 Pressure Gauge Specifications

Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

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

C.14 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.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

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

(a) Submit:

(1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or

(2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

(3) A verification to IDEM, OAM that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

(b) Provide annual certification to IDEM, OAM that the Risk Management Plan is being properly implemented.

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

C.16 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.17 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.18 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.19 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.20 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

(a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM representative, for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or local agency within a reasonable time.

(b) Records of required monitoring information shall include, where applicable:

(1) The date, place, and time of sampling or measurements;

(2) The dates analyses were performed;

(3) The company or entity performing the analyses;

(4) The analytic techniques or methods used;

(5) The results of such analyses; and

(6) The operating conditions existing at the time of sampling or measurement.

(c) Support information shall include, where applicable:

(1) Copies of all reports required by this permit;

(2) All original strip chart recordings for continuous monitoring instrumentation;

(3) All calibration and maintenance records;

(4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

(d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

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

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

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

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due.

(d) Unless otherwise specified in this permit, any semi-annual report shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

(g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

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.22 Stratospheric Ozone Protection [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) Two (2) natural gas fired boilers (Boiler 1 and Boiler 2) each with a heat input rate of 85.0 million British thermal units per hour, both exhausting at one (1) stack, identified as #676. Each boiler utilizes No. 4 fuel oil (Internal or External reclaim oil) as a back up fuel.

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

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

Pursuant to 326 IAC 6-2-3 (d) (Particulate emission limitations for sources of indirect heating: emission limitations for facilities specified in 326 IAC 6-2-1 (b)), particulate emissions from all facilities used for indirect heating purposes which were existing and in operation on or before June 8, 1972, shall in no case exceed 0.8 pounds of particulate matter per million British thermal units heat input.

D.1.2 Sulfur Dioxide Emission Limitations [326 IAC 7-1.1]

Pursuant to 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations), sulfur dioxide (SO_2) emissions from each of the 85.0 million Btu/hour boilers (Boiler 1 and Boiler 2) shall be limited to 1.6 pounds per million BTU heat input when using No. 4 oil for fuel.

Compliance Determination Requirements

D.1.3 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the sulfur dioxide limit specified in Condition 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 [326 IAC 3-7-4]

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 1.6 pounds per million BTU heat input (this is equivalent to 1.5% sulfur by weight when using No. 4 fuel oil with a heat content of 0.146 mmBtu/gallon) 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 two (2) boilers (Boiler 1 and Boiler 2) when using No. 4 fuel oil, 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 the two (2) boilers (Boiler 1 and Boiler 2) stack exhaust shall be performed once per shift during normal daylight operations when burning the No. 4 fuel oil and exhausting to the atmosphere. A trained employee will 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 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 emissions notations of Boiler 1 and Boiler 2 stack exhaust.

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

D.1.7 Reporting Requirements

A semi-annual summary of the information to document compliance with Condition D.1.2 in any compliance period when No. 4 fuel oil was combusted, and the natural gas fired boiler certification, shall be submitted to the address listed in Section C - General Reporting Requirements, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the six (6) months being reported.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]
(2) Eight (8) Wheelabrator steel shot peeners (abrasive cleaning units) each with a maximum capacity of 36,000 pounds of shot circulated per hour, with particulate matter emissions controlled by separate baghouses (two are controlled by one baghouse #27760) exhausting at seven (7) separate stacks identified as #801 through #807 (two exhaust through stack #807).

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

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

Pursuant to 326 IAC 6-3-2 (Process operations: particulate emission limitations), the allowable particulate matter emitted from each Wheelabrator steel shot peener unit (#27785, #18186, #21291, #20276, #27886, #31810, #33084, and #32932) shall not exceed 28.43 lbs/hr.

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 and any control devices.

Compliance Determination Requirements

D.2.3 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter 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 Control Equipment Requirements

In order to be in compliance with Condition D.2.1, the baghouses used to control particulate matter emissions from the eight (8) Wheelabrator steel shot peener units (abrasive cleaning units) #27785, #18186, #21291, #20276, #27886, #31810, #33084, and #32932 shall be in operation at all times that the respective abrasive cleaning units are in operation.

D.2.5 Visible Emissions Notations

(a) Weekly visible emission notations of the Wheelabrator steel shot peeners stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee will record whether emissions are normal or abnormal.

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

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

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

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.2.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses used in conjunction with the abrasive cleaning units, at least once daily when the abrasive cleaning operation is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 0.3 and 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

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

D.2.7 Broken or Failed Bag Detection

In the event that bag failure has been observed:

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

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

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

D.2.8 Record Keeping Requirements

(a) To document compliance with Condition D.2.5, the Permittee shall maintain records of weekly visible emission notations of the stack exhaust at each of the abrasive cleaning units.

(b) To document compliance with Condition D.2.6, the Permittee shall maintain the following, when venting to the atmosphere:

(1) Daily records of the following operational parameters during normal operation:

(A) Inlet and outlet differential static pressure; and

(B) Cleaning cycle: frequency and differential pressure.

(2) Documentation of all corrective actions implemented, per event.

(3) Operation and preventive maintenance logs, including work purchase orders, shall be maintained.

(4) Quality Assurance/Quality Control (QA/QC) procedures.

(5) Operator standard operating procedures (SOP).

(6) Manufacturer's specifications or its equivalent.

(7) Equipment "troubleshooting" contingency plan.

(8) Documentation of the dates vents are redirected.

(c) 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)]
(3) One (1) Wheelabrator steel shot tumblast (abrasive cleaning unit) with a maximum capacity of 22,500 pounds of shot circulated per hour, with particulate matter emissions controlled by a baghouse exhausting at one (1) stack, identified as #808.

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

D.3.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process operations: particulate emission limitations), the allowable particulate matter emitted from the Wheelabrator tumblast unit (#35028) shall not exceed 20.75 pounds per hour.

D.3.2 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 and its control device.

Compliance Determination Requirements

D.3.3 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter limit specified in Condition D.3.1 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.3.4 Control Equipment Requirements

In order to be in compliance with Condition D.3.1, the baghouse used to control particulate matter emissions from the one (1) steel shot Wheelabrator tumblast unit (abrasive cleaning unit) #35028, shall be in operation at all time that the abrasive cleaning unit is in operation.

D.3.5 Visible Emissions Notations

(a) Daily visible emission notations of the steel shot Wheelabrator tumblast unit stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee will record whether emissions are normal or abnormal.

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

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

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

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.3.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the one (1) abrasive cleaning unit, at least once daily when the one (1) abrasive cleaning unit is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 0.3 and 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

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

D.3.7 Broken or Failed Bag Detection

In the event that bag failure has been observed:

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

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

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

D.3.8 Record Keeping Requirements

(a) To document compliance with Condition D.3.5, the Permittee shall maintain records of weekly visible emission notations of the stack exhaust at each of the abrasive cleaning units.

(b) To document compliance with Condition D.3.6, the Permittee shall maintain the following:

(1) Daily records of the following operational parameters during normal operation, when exhausting to the atmosphere:

(A) Inlet and outlet differential static pressure; and

(B) Cleaning cycle: frequency and differential pressure.

(2) Documentation of all corrective actions implemented, per event.

(3) Operation and preventive maintenance logs, including work purchase orders, shall be maintained.

(4) Quality Assurance/Quality Control (QA/QC) procedures.

(5) Operator standard operating procedures (SOP).

(6) Manufacturer's specifications or its equivalent.

(7) Equipment "troubleshooting" contingency plan.

(8) Documentation of the dates vents are redirected.

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

SECTION D.4 FACILITY OPERATION CONDITIONS

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

(4) One (1) nozzle shot peen 225, with a maximum capacity of 6,000 pounds per hour of shot, with particulate matter emissions controlled by a cartridge-type baghouse dust collector.

(5) One (1) nozzle shot peen 448208-2, with a maximum capacity of 6,000 pounds per hour of shot, with particulate matter emissions controlled by a cannister-type baghouse dust collector.

(6) One (1) rebuilt nozzle shot peen, with a maximum capacity of 6,000 pounds per hour of shot, with particulate matter emissions controlled by a cartridge-type baghouse dust collector.

(7) One (1) double wheel shot peen 999, with a maximum capacity of 36,000 pounds per hour of shot, with particulate matter emissions controlled by a baghouse dust collector.

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

D.4.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

(a) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration) and Construction Permit CP 035-9670-00015, issued July 24, 1998, the allowable Particulate Matter (PM) emissions from the nozzle shot peen 225, nozzle shot peen 448208-2 and the rebuilt nozzle shot peen shall not exceed 0.867 pounds per hour, each. The allowable Particulate Matter (PM) emissions from the double wheel shot peen 999 shall not exceed 2.88 pounds per hour. These Particulate Matter (PM) emission limits, equivalent to 24 tons per year, will make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable and satisfy the requirements of 326 IAC 6-3 (Process Operations).

(b) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration) and Construction Permit CP 035-9670-00015, issued July 24, 1998, the allowable PM-10 emissions from the nozzle shot peen 225, nozzle shot peen 448208-2 and the rebuilt nozzle shot peen shall not exceed 0.506 pounds per hour each. The allowable PM-10 emissions from the double wheel shot peen 999 shall not exceed 1.68 pounds per hour. These PM-10 emission limits, equivalent to 14.0 tons per year, will make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

Compliance Determination Requirements

D.4.2 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the Particulate Matter (PM) limit specified in Condition D.4.1 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.4.3 Control Equipment Requirements

Pursuant to Construction Permit CP 035-9670-00015, issued July 24, 1998, the baghouses used to control particulate matter emissions from the four (4) shot peens (225, 448208-2, rebuilt and 999) shall be in operation at all times that the respective shot peens are in operation.

D.4.4 Baghouse Inspections

Pursuant to Construction Permit CP 035-9670-00015, issued July 24, 1998, an inspection shall be performed each calender quarter of all bags controlling the four (4) shot peens when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.4.5 Broken or Failed Bag Detection

In the event that bag failure has been observed:

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

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

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

D.4.6 Record Keeping Requirements

(a) To document compliance with Condition D.4.5, the Permittee shall maintain records of the results of the inspections required under Condition D.4.5 and the dates the vents are redirected.

(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)]
Insignificant Activity: Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

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

D.5.1 Cold Cleaner Degreaser Operation and Control

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) the solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F));

(B) the solvent is agitated; or

(C) the solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9^{O}C) (one hundred twenty degrees Fahrenheit (120^{O}F)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
(B) A water cover when solvent is used is insoluble in, and heavier than, water.
(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

Compliance Determination Requirements

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

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

SECTION D.6 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]
Insignificant Activity: Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

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

D.6.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the grinding and machining operations 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 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

Interpolation and extrapolation of the data for the process weight rate in excess of 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 55.0\ P^{0.11} - 40$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Compliance Determination Requirements

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

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter limit specified in Condition D.6.1 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: New Venture Gear, Inc., Muncie Transmission Division
Source Address: 1200 West 8th Street, Muncie, Indiana 47302
Mailing Address: P.O. Box 2527, Muncie, Indiana 47307-2527
Part 70 Permit No.: T035-7145-00015

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

Please check what document is being certified:

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: New Venture Gear, Inc., Muncie Transmission Division
Source Address: 1200 West 8th Street, Muncie, Indiana 47302
Mailing Address: P.O. Box 2527, Muncie, Indiana 47307-2527
Part 70 Permit No.: T035-7145-00015

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: New Venture Gear, Inc., Muncie Transmission Division
Source Address: 1200 West 8th Street, Muncie, Indiana 47302
Mailing Address: P.O. Box 2527, Muncie, Indiana 47307-2527
Part 70 Permit No.: T035-7145-00015

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:

OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT
SEMI-ANNUAL COMPLIANCE MONITORING REPORT

Source Name: New Venture Gear, Inc., Muncie Transmission Division
Source Address: 1200 West 8th Street, Muncie, Indiana 47302
Mailing Address: P.O. Box 2527, Muncie, Indiana 47307-2527
Part 70 Permit No.: T035-7145-00015

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

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

LIST EACH COMPLIANCE REQUIREMENT EXISTING FOR THIS SOURCE:

Requirement (e.g. Permit Condition D.1.3)	**Number of Deviations**	**Date of each Deviations**	**No Deviations**

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

Attach a signed certification to complete this report.

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:	**New Venture Gear, Inc., Muncie Transmission Division**
Source Location:	**1200 West 8th Street, Muncie, Indiana 47302**
County:	**Delaware**
SIC Code:	**3714**
Operation Permit No.:	**T035-7145-00015**
Permit Reviewer:	**Angie Lee / Catherine Moore**

The Office of Air Management (OAM) has reviewed a Part 70 permit application from New Venture Gear, Inc. relating to the operation of an automobile and light duty truck transmission manufacturing plant.

Permitted Emission Units and Pollution Control Equipment

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

(1) Two (2) natural gas fired boilers (Boiler 1 and Boiler 2) each with a heat input rate of 85.0 million British thermal units per hour, both exhausting at one (1) stack, identified as #676. Each boiler utilizes No. 4 fuel oil (Internal or External reclaim oil) as a back up fuel.

(2) Eight (8) Wheelabrator steel shot peeners (abrasive cleaning units) each with a maximum capacity of 36,000 pounds of shot circulated per hour, with particulate matter emissions controlled by separate baghouses (two are controlled by one baghouse #27760) exhausting at seven (7) separate stacks identified as #801 through #807 (two exhaust through stack #807).

(3) One (1) Wheelabrator steel shot tumblast (abrasive cleaning unit) with a maximum capacity of 22,500 pounds of shot circulated per hour, with particulate matter emissions controlled by a baghouse exhausting at one (1) stack, identified as #808.

(4) One (1) nozzle shot peen 225, with a maximum capacity of 6,000 pounds per hour of shot, with particulate matter emissions controlled by a cartridge-type baghouse dust collector.

(5) One (1) nozzle shot peen 448208-2, with a maximum capacity of 6,000 pounds per hour of shot, with particulate matter emissions controlled by a cannister-type baghouse dust collector.

(6) One (1) rebuilt nozzle shot peen, with a maximum capacity of 6,000 pounds per hour of shot, with particulate matter emissions controlled by a cartridge-type baghouse dust collector.

(7) One (1) double wheel shot peen 999, with a maximum capacity of 36,000 pounds per hour of shot, with particulate matter emissions controlled by a baghouse dust collector.

Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR

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

(1) Six (6) natural gas fired endothermic gas generators each with a heat input rate of 0.00097 million cubic feet per hour which produce gas for the thirteen (13) natural gas fired heat treating furnaces.

(2) Thirteen (13) natural gas fired heat treating units each with a heat input rate of 1000 cubic feet per hour which have thirteen (13) carburizing furnaces connected to them: (a) three (3) having an individual heat input rate of 0.0045 million cubic feet per hour, (b) six (6) having an individual heat input rate of 0.00296 million cubic feet per hour, (c) two (2) having an individual heat input rate of 0.001275 million cubic feet per hour, (d) and two (2) electric.

The thirteen (13) natural gas fired heat treating units also have thirteen (13) draw furnaces which are connected to them: (a) three (3) having an individual heat input rate of 0.00055 million cubic feet per hour, (b) six (6) having an individual heat input rate of 0.00093 million cubic feet per hour, (c) two (2) having an individual heat input rate of 0.00025 million cubic feet per hour, (d) and two (2) electric.

The above facilities are not required to undergo Enhanced New Source Review because there are no applicable 326 IAC 2-1-3.2 rules. Combined potential emissions are at Registration level but several of the facilities are “Grandfathered” facilities and the remainder of the facilities constructed at later dates only add up to Exemption level.

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.

(2) Fuel oil-fired combustion sources with heat input equal to or less than two million (2,000,000) Btu per hour and firing fuel containing less than five-tenths (0.5) percent sulfur by weight.

(3) Combustion source flame safety purging on startup.

(4) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.

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

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

(7) Refractory storage not requiring air pollution control equipment.

(8) Application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings.

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

(10) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

(11) Cleaners and solvents characterized as follows:
(a) having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38 degrees C (100 degrees F) or;
(b) having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20 degrees C (68 degrees F);
the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

(12) Closed loop heating and cooling systems.

(13) Any operation using aqueous solutions containing less than 1% by weight of VOCs, excluding HAPs.

(14) Water based adhesives that are less than or equal to 5% by volume of VOCs, excluding HAPs.

(15) Forced and induced draft cooling tower system not regulated under a NESHAP.

(16) Quenching operations used with heat treating processes.

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

(18) Heat exchanger cleaning and repair.

(19) Process vessel degassing and cleaning to prepare for internal repairs.

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

(21) Underground conveyors.

(22) Asbestos abatement projects regulated by 326 IAC 14-10.

(23) 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.

(24) 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.

(25) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

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

(27) Diesel generators not exceeding 1600 horsepower.

(28) Stationary fire pumps.

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

(30) Filter or coalescer media changeout.

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

(32) Activities or categories of activities with individual HAP emissions not previously identified.

Any unit emitting greater than 1 pound per day but less than 5 pounds per day or 1 ton per year of a single HAP.

(a) Welding (laser), and

(b) Electron beam welder.

(33) Other activities or categories not previously identified:
Insignificant Thresholds: Activities with emissions equal to or less than thresholds require listing only.

Lead (Pb) = 0.6 ton/year or 3.29 lbs/day
Sulfur Dioxide (SO2) = 5 lbs/hr or 25 lbs/day
Nitrogen Oxides (NOx) = 5 lbs/hr or 25 lbs/day
Particulate Matter (PM) = 5 lbs/hr or 25 lbs/day
Carbon monoxide (CO) = 25 lbs/day
Volatile Organic Compounds (VOC) = 3 lbs/hr or 15 lbs/day

(a) No-carb paint applicator (BT# 34691),
(b) Maintenance paint room,
(c) East Cutter/Grinder operations, and
(d) Wastewater Treatment (oil/grease content less than one (1) percent by volume).

Existing Approvals

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

(1) OP 18-02-90-0249, issued on September 21, 1987,

(2) OP 18-02-90-0250, issued on September 21, 1987,

(3) OP 18-02-90-0251, issued on September 21, 1987,

(4) CP 035-2781-00015, issued on April 27, 1994,

(5) Registration (no number was listed on Registration, but it does have the following numbers in which it had replaced: 18-02-86-0204, 18-02-86-0205, 18-02-86-0206) issued on February 10, 1986, and

(6) Construction Permit CP 035-9670-00015, issued July 24, 1998.

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

Enforcement Issue

There are no enforcement actions pending.

Recommendation

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

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

An administratively complete Part 70 permit application for the purposes of this review was received on November 13, 1996.

A Notice of Completeness letter was mailed to New Venture Gear, Inc., Muncie Transmission Division on December 2, 1996.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (5 pages). Calculations submitted by the applicant for the heat treating operations and abrasive cleaning operations have been verified and found to be accurate and correct. These calculations are provided in Appendix A of this document (4 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 250
PM-10	greater than 250
SO_2	greater than 250
VOC	less than 100
CO	less than 100
NO_x	greater than 250

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)
Benzene	less than 10
Methyl Chloroform	less than 10
Toluene	less than 10
Xylenes	less than 10
Polycyclic Organic Matter	less than 10
TOTAL	less than 25

(a) The potential emissions (as defined in the Indiana Rule) of total suspended particulate, PM-10, sulfur dioxide, and nitrogen oxides are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

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

Pollutant	Actual Emissions (tons/year)
PM	2.876
PM-10	2.876
SO_2	0.152
VOC	20.475
CO	7.360
HAP	
Benzene	0.001937
Methyl Chloroform	6.68
Toluene	6.00
Xylenes	5.44848
Polycyclic Organic Matter	0.0000016
NO_x	31.480

Limited Potential to Emit

The table below summarizes the total limited potential to emit of the significant emission units.

	Limited Potential to Emit (tons/year)						
Process/facility	**PM**	**PM-10**	**SO_2**	**VOC**	**CO**	**NO_X**	**HAPs**
Natural gas fired Boiler 1	35.80	35.80	382.60	5.40	26.00	341.80	-
Natural gas fired Boiler 2	35.80	35.80	382.60	5.40	26.00	341.80	-
Wheelabrator shot peener (1)	124.52	124.52	-	-	-	-	-
Wheelabrator shot peener (2)	124.52	124.52	-	-	-	-	-
Wheelabrator shot peener (3)	124.52	124.52	-	-	-	-	-
Wheelabrator shot peener (4)	124.52	124.52	-	-	-	-	-
Wheelabrator shot peener (5)	124.52	124.52	-	-	-	-	-
Wheelabrator shot peener (6)	124.52	124.52	-	-	-	-	-
Wheelabrator shot peener (7)	124.52	124.52	-	-	-	-	-
Wheelabrator shot peener (8)	124.52	124.52	-	-	-	-	-
Wheelabrator tumblast unit	90.89	90.89	-	-	-	-	-
Shot Peen 225, Shot Peen 448208-2, rebuilt Shot Peen and Shot Peen 999	24	14	-	-	-	-	-
Total Emissions	1182.6	1172.6	765.20	10.80	52.00	683.60	-

Please refer to Appendix A for detailed calculations (5 pages).

County Attainment Status

The source is located in Delaware County.

Pollutant	Status
PM-10	attainment or unclassifiable
SO_2	attainment
NO_2	attainment or unclassifiable
Ozone	attainment or unclassifiable
CO	attainment or unclassifiable
Lead	attainment

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

Federal Rule Applicability

(1) The two natural gas fired boilers (Boiler 1 and Boiler 2 each rated at 85.0 MMBtu/hr) are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.60.40), Subparts D, Da, Db, and Dc, because both of the boilers have a heat input rate of less than 250 MMBtu per hour and both boilers were constructed in 1954, prior to the applicability date.

(2) The insignificant degreasing operations are not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63.460, Subpart T because they do not use any of the solvents listed in this subpart.

(3) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)

The source is required to submit a Preventive Maintenance Plan (PMP) for the two (2) boilers (Boiler #1 and Boiler #2), the eight (8) Wheelabrator Shot Peens (#27785, #18186, #21291, #20276, #27886, #31810, #33084, and #32932) and the one (1) shot tumblast (#35028).

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 total suspended particulate, PM-10, sulfur dioxide, and nitrogen oxides. 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)

The permittee shall be in violation of 326 IAC 6-4 (Fugitive Dust Emissions) if any of the criteria specified in 326 IAC 6-4-2(1) through (4) are violated. Observations of visible emissions crossing the property line of the source at or near ground level must be made by a qualified representative of IDEM. [326 IAC 6-4-5(c)]

326 IAC 2-2-2 (PSD rule: applicability)

This major stationary source was not reviewed under PSD (Prevention of Significant Deterioration) because construction of the source commenced before August 7, 1977. The plant was started in 1920.

State Rule Applicability - Individual Facilities

Boilers 1 and 2, each rated at 85.0 MMBtu per hour, constructed in 1954:

(1) Particulate Matter Limitation

Pursuant to 326 IAC 6-2-3 (Particulate emission limitations for sources of indirect heating: emission limitations for facilities specified in 326 IAC 6-2-1 (b)), particulate emissions from indirect heating facilities existing and in operation before September 21, 1983, shall be limited by the following equation:

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

Pt = lbs of PM emitted per MMBtu heat input
C = maximum ground level concentration (default = 50 u/m^3
a = plume rise factor (default = 0.67 for Q less than 1,000 MMBtu/hr)
h = stack height in feet
Q = total source maximum operating capacity
N = number of stacks in fuel burning operation

$$Pt = \frac{50\ u/m^3 * 0.67 * 170}{76.5 * 170^{0.75} * 1^{0.25}}$$ = 1.58 pounds of particulate matter emitted per MMBtu heat input (1176.47 tons/year)

Pursuant to 326 IAC 6-2-3 (d) (Particulate emission limitations for sources of indirect heating: emission limitations for facilities specified in 326 IAC 6-2-1 (b)), particulate emissions from all facilities used for indirect heating purposes which were existing and in operation on or before June 8, 1972, shall in no case exceed 0.8 pounds of particulate matter per million British thermal units heat input.

Since the potential particulate matter emissions of 35.80 tons per year from Boilers 1 and 2 are less than 595.68 tons per year (0.8 pounds of particulate matter per million British thermal units heat input), then the boilers are in compliance with 326 IAC 6-2-3.

(2) 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, when using No. 4 fuel oil, does not exceed 1.6 pounds per million BTU heat input by:

(1) Providing vendor analysis of fuel delivered, if accompanied by a certification;

(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) million Btu per hour heater, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-2.1.

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.

(3) Sulfur Dioxide Emission Limitations
That pursuant to 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations), sulfur dioxide (SO_2) emissions from each of the 85.0 million BTU/hour boilers (Boiler 1 and Boiler 2) shall be limited to 1.6 pounds per million Btu heat input.

The following calculation shows that Boilers 1 and 2 are in compliance with the 1.6 pounds of SO_2 per million Btu heat input limit stated in the above condition:

1.6 lbs SO_2 /MMBtu * 146 MMBtu/kgal / 150 = % sulfur = 1.5 % sulfur

Since the sulfur content of the No. 4 fuel oil is 0.67%, then Boilers 1 and 2 are in compliance with 326 IAC 7-1.1.

Abrasive Cleaning Operation

Particulate Matter Limitation
326 IAC 6-3-2 (Process Operations)
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

(a) The following calculation is for the eight (8) Wheelabrator shot peener units used in the abrasive cleaning operation. Each of the eight units have a throughput of 36,000 pounds of shot circulated per hour.

36,000 lbs/hr (18 tons/hr)
$E = 4.10(18)^{0.67}$
= 28.43 lbs/hr (124.52 tons/yr) for each unit

Since the potential particulate matter emissions of 0.368 tons per year after controls are less than 124.52 tons per year (allowable 6-3-2 limit), then the units are in compliance with 326 IAC 6-3-2.

(b) The following calculation is for the one (1) Wheelabrator tumblast unit also used in the abrasive cleaning operation. The Wheelabrator tumblast unit has a throughput of 22,500 pounds of shot circulated per hour.

22,500 lbs/hr (11.25 tons/hr)
$E = 4.10(11.25)^{0.67}$
= 20.75 lbs/hr (90.89 tons/yr)

Since the potential particulate matter emissions of 0.368 tons per year after controls are less than 90.89 tons per year (allowable emissions under 326 IAC 6-3-2 limit), then the unit is in compliance with 326 IAC 6-3-2.

Four Shot Peens

PSD Minor Limit

(a) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration) and Construction Permit CP 035-9670-00015, issued July 24, 1998, the allowable Particulate Matter (PM) emissions from the nozzle shot peen 225, nozzle shot peen 448208-2 and the rebuilt nozzle shot peen shall not exceed 0.867 pounds per hour, each. The allowable Particulate Matter (PM) emissions from the double wheel shot peen 999 shall not exceed 2.88 pounds per hour. These Particulate Matter (PM) emission limits, equivalent to 24 tons per year, will make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable and satisfy the requirements of 326 IAC 6-3 (Process Operations).

(b) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration) and Construction Permit CP 035-9670-00015, issued July 24, 1998, the allowable PM-10 emissions from the nozzle shot peen 225, nozzle shot peen 448208-2 and the rebuilt nozzle shot peen shall not exceed 0.506 pounds per hour each. The allowable PM-10 emissions from the double wheel shot peen 999 shall not exceed 1.68 pounds per hour. These PM-10 emission limits, equivalent to 14.0 tons per year, will make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

Degreasing

The following requirements are for the degreasing operations indicated on the insignificant activities forms:

(1) Cold Cleaner Degreaser Operation and Control

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) the solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius ($38^{O}C$) (one hundred degrees Fahrenheit ($100^{O}F$));

(B) the solvent is agitated; or

(C) the solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius ($38^{O}C$) (one hundred degrees Fahrenheit ($100^{O}F$)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9^{O}C) (one hundred twenty degrees Fahrenheit (120^{O}F)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent is used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

Per conversation with the consultant representing the company, the degreasing operations are in compliance with 326 IAC 8-3-5(a).

(2) General provisions relating to VOC rules
326 IAC 8-1-6 (General provisions relating to VOC rules: general reduction requirement for new facilities), does not apply to the degreasing operations because the plant was constructed prior to January 1, 1980.

(3) Organic solvent emission limitations
326 IAC 8-6 (Organic solvent emission limitations: applicability), does not apply to the degreasing operations because the plant was constructed prior to October 7, 1974 and January 1, 1980.

(4) There are no other 326 IAC 8 rules that 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:

1. The abrasive cleaning units, eight (8) Wheelabrator shot peeners, and one (1) Wheelabrator tumblast, have applicable compliance monitoring conditions as specified below:

   (a) Daily visible emissions notations of each abrasive cleaning unit stack exhaust (Wheelabrator shot peeners #1, #2, #3, #4, #5, #6, #7, #8, and the Wheelabrator tumblast) shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

   (b) The Permittee shall record the total static pressure drop across the baghouse controlling the abrasive cleaning operation, at least once daily when the abrasive cleaning operation is in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 1.0 to 6.0 inches of water or a range established during the latest stack test. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of the above mentioned range for any one reading.

These monitoring conditions are necessary because each baghouse for the abrasive cleaning process must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

2. The four (4) shot peens have applicable compliance monitoring conditions as specified below:

   (a) The baghouses used to control particulate matter emissions from the four (4) shot peens (225, 448208-2, rebuilt and 999) shall be in operation at all times that the respective shot peens are in operation.

   (b) An inspection shall be performed each calender quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

   (c) In the event that bag failure has been observed:

      (1) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced.

      (2) Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion.

These monitoring conditions are necessary because each baghouse for the four (4) shot peens must operate properly to ensure compliance with 326 IAC 2-2 (Prevention of Significant Deterioration), 326 IAC 6-3 (Process Operations) 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 less than those which constitute a major source according to Section 112 of the 1990 Amendments to the Clean Air Act.

Conclusion

The operation of this automotive transmission manufacturing plant shall be subject to the conditions of the attached proposed **Part 70 Permit No. T035-7145-00015.**

Indiana Department of Environmental Management
Office of Air Management

Addendum to the
Technical Support Document for Part 70 Operating Permit

Source Name:	New Venture Gear, Inc., Muncie Transmission Division
Source Location:	1200 West 8th Street, Muncie, Indiana 47302
County:	Delaware
SIC Code:	3714
Operation Permit No.:	T035-7145-00015
Permit Reviewer:	Angie Lee / Catherine Moore

On October 21, 1998, the Office of Air Management (OAM) had a notice published in the Muncie Star Press, Muncie, Indiana, stating that New Venture Gear, Inc., Muncie Transmission Division had applied for a Part 70 Operating Permit to operate an automobile and light duty truck transmission 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.

On November 20, 1998, Phillip Landes of New Venture Gear submitted comments on the proposed Part 70 Operating Permit. The summary of the comments is as follows (~~strikeout~~ added to show what was deleted and **bold** added to show what was added):

Comment 1:

We are in the process of rearranging a shot peener from Department 16 to Department 15. Please include this information in our Part 70 permit. It is our opinion that no change in emissions will result from this move.

Response to Comment 1:

IDEM, OAM agrees that no change in emissions will result from this move. No changes to any conditions in the final permit are necessary due to the rearranging of this shot peener.

Comment 2:

Please change the individual listed as Responsible Official from Richard J. Sullivan to Jack R. Wagner in Condition A.1 "General Information". New Venture Gear has made this change effective November 1, 1998.

Response to Comment 2:

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

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

The Permittee owns and operates a stationary automobile and light duty truck transmission manufacturing plant.

Responsible Official: ~~Richard J. Sullivan~~ **Jack R. Wagner**
Source Address: 1200 West 8th Street, Muncie, Indiana 47302
Mailing Address: P.O. Box 2527, Muncie, Indiana 47307-2527

Phone Number:	**765-281-2251**
SIC Code:	3714
County Location:	Delaware
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Rules

On December 1, 1998, David R. Jordan, P.E., of ERM, consultant for New Venture Gear submitted comments on the proposed Part 70 Operating Permit. The summary of the comments is as follows (~~strikeout~~ added to show what was deleted and **bold** added to show what was added):

Comment 1:

Condition B.14(b)(2)

This subcondition states that the Permit Shield applies to the extent that "The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable." The permit does not contain any such determinations of nonapplicability, although the Technical Support Document does contain a review of the applicability or nonapplicability of several rules. New Venture Gear assumes that, through this subcondition, IDEM is incorporating its applicability analysis contained in its Technical Support Document. New Venture Gear would appreciate feedback from IDEM should it not view the Technical Support Document analysis in this manner.

Response to Comment 1:

The Permit Shield covers only the Part 70 Permit. If a rule has been determined to be not applicable in the Technical Support Document and therefore, no conditions are listed in the Part 70 Permit, the source does not have a permit shield for this rule. There will be no changes to this condition in the final permit due to this comment.

Comment 2:

Condition B.26

This condition outlines fee payment requirements for New Venture Gear. The condition refers to Indiana Rule 326 IAC 2-7-19. This rule contains considerably more language regarding fee payment requirements, including provisions dealing with disputes and provisions dealing with payment procedures available in the event hardship is demonstrated. New Venture Gear suggests that the wording of the first sentence of (a) of this condition be reworded to read "The Permittee shall pay annual fees to IDEM, OAM, ~~within thirty (30) calendar days of receipt of a billing~~ **as set forth in 326 IAC 2-7-19.**"

Response to Comment 2:

Condition B.26 "Annual Fee Payment" has been changed to be as follows:

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

(a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing **or as set forth in 326 IAC 2-7-19**. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action, or revocation of this permit.

(c) 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.

Comment 3:

Condition B.27

This condition 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." New Venture Gear request that this matter be clarified and, if appropriate, that Condition B.27 be eliminated.

Response to Comment 3:

The Technical Support Document, on page 2, lists "Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR" which is the equipment that is being reviewed as Enhanced New Source Review now known as "Advanced Source Modification Approval" for this permit. Therefore, Condition B.27 is necessary. Condition B.27 "Enhanced New Source Review" has been deleted from the final permit and replaced with the following:

~~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.~~

B.27 Advanced Source Modification Approval [326 IAC 2-7-5(16)]

The requirements to obtain a source modification approval under 326 IAC 2-7-10.5 or a permit modification under 326 IAC 2-7-12 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3 and such modifications occur only during the term of this permit.

Comment 4:

Condition B.28

This condition states that OAM may use "other credible evidence" in determining the compliance status of this plant. It is New Venture Gear's belief that this language is intended to parallel U.S. EPA's Any Credible Evidence (ACE) rule. However, New Venture Gear believes that the Title V permit program is intended not to create an amorphous enforcement document in which a source has no definitive compliance objectives, but rather to create a roadmap for sources to evaluate whether or not they are in compliance with all applicable requirements related to their operations as set forth in the permit. 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, New Venture Gear does not believe that Indiana has enacted a statute or promulgated a rule comparable to the Federal ACE regulation. Accordingly, New Venture Gear requests that this condition be deleted entirely.

Response to Comment 4:

IDEM, OAM now believes that this condition is not necessary and has removed it from the final 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 any credible evidence and an explicit statement is not required in the permit. Condition B.28 "Credible Evidence" has been deleted from the final permit as follows:

~~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 noncompliance.~~

Comment 5:

Condition D.1.3

This condition requires that a preventive maintenance plan be developed for Boiler 1 and Boiler 2. New Venture Gear believes that Indiana Rule 326 IAC 1-6, which contains the preventive maintenance plan requirements, requires a preventive maintenance plan solely for air pollution control equipment. Boilers 1 and 2 are natural gas or oil fired boilers that are not, and do not, utilize air pollution control equipment. For this reason, New Venture Gear requests that this condition be deleted.

Response to Comment 5:

Pursuant to 326 IAC 2-7-4(c)(9) (Permit Application), confirmation that the source maintains on-site a preventive maintenance plan as described in 326 IAC 1-6-3, must be included in the permit application. Pursuant to 326 IAC 2-7-5(13) (Permit Content), a provision that requires the source to do all of the following must be included in each Part 70 permit:

1) Maintain on-site the preventive maintenance plan as required under 326 IAC 2-7-4(c)(9);
2) Implement the preventive maintenance plan; and,
3) Forward to the department upon request the preventive maintenance plan.

The requirements in 326 IAC 1-6-1 and 326 IAC 1-6-3 specify that the requirement to maintain a Preventive Maintenance Plan is applicable to any facility that is required to obtain a permit under 326 IAC 2-1-2 (Registration) and 326 IAC 2-1-4 (Operating Permits). IDEM's compliance monitoring guidance states that a compliance monitoring plan is required only for:

(a) the unit emits particulate matter, sulfur dioxide, or volatile organic compounds; and
(b) the unit has existing applicable requirements; and
(c) the unit is subject to a NSPS or NESHAP (for these units current requirements will satisfy as a compliance monitoring plan); or
(d) the unit has a control device and the allowable emissions exceed 10 pounds per hour; or
(e) the unit does not have a control device and has actual emissions exceeding 25 tons per year.

The guidance does not state that if a facility does not meet the above requirements, compliance monitoring will never be necessary, it does state that a compliance monitoring plan is not required to be submitted with the application. In most cases, the requirement to maintain a preventive maintenance plan and perform compliance monitoring has followed the same guidelines as specified above. However, there are some types of operations (i.e. woodworking) that the OAM has determined that compliance monitoring and preventive maintenance plans are necessary to ensure continuous compliance.

Since the two 85.0 million British thermal units do not fit into any of the above requirements, Condition D.1.3 "Preventive Maintenance Plan" has been deleted from the final permit as follows. The remaining conditions of this section have been renumbered:

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

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

Comment 6:

Condition D.1.5(a)

This condition states that the fuel oil sulfur content shall not exceed "... 1.6 pounds per million BTU heat input..." Since sulfur content is characterized in weight percent, not in pounds per million BTU, New Venture Gear recommends that this provision be reworded to read "... the fuel oil sulfur content does not exceed **a value that correlates to a sulfur dioxide emission rate of** 1.6 pounds per million BTU heat input..."

Response to Comment 6:

Condition D.1.5(a) (now renumbered Condition D.1.4(a)) "Sulfur Dioxide Emissions and Sulfur Content" has been changed to be as follows:

(a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the fuel oil sulfur content does not exceed 1.6 pounds per million BTU heat input **(this is equivalent to 1.5% sulfur by weight when using No. 4 fuel oil with a heat content of 0.146 mmBtu/gallon)** by:

Comment 7:

Condition D.1.5(a)(1) and (2)

These subconditions outline procedures to determine fuel oil sulfur content. New Venture Gear presumes that it may make this demonstration through the procedure in D.1.5(a)(1) or D.1.5(a)(2). To clarify that it is not required to utilize both methods to determine sulfur content, New Venture Gear requests that the word "or" be added to the end of subcondition D.1.5(a)(1).

Response to Comment 7:

Condition D.1.5(a)(1) (now renumbered Condition D.1.4(a)(1)) "Sulfur Dioxide Emissions and Sulfur Content" has been changed to be as follows:

(1) Providing vendor analysis of fuel delivered, if accompanied by a certification; **or**

Comment 8:

Condition D.1.7(a)

This condition outlines record keeping requirements for Boiler 1 and Boiler 2. The paragraph at the end of this subcondtion discusses record retention requirements. Because this requirement is discussed in a prior section of the Title V permit, New Venture Gear requests that this paragraph be deleted and replaced with the sentence "The Permittee shall retain records as required in Condition C.20."

Response to Comment 8:

The record retention requirements listed in Condition D.1.7(a) (now renumbered Condition D.1.6(a)) "Record Keeping Requirements" are required by 326 IAC 3-7-5 "Record Keeping Requirements" and are more stringent than the general record keeping requirements under Section C - General Record Keeping Requirements. Therefore, these requirements can not be deleted from the final permit.

Comment 9:

Condition D.1.8

This condition outlines reporting requirements for Boiler 1 and Boiler 2. As currently written, this condition requires that certain information be submitted on a quarterly basis. Condition C.21 of the draft permit states that "...the source shall submit a Semi-Annual Compliance Monitoring Report." New Venture Gear requests that the language of Condition D.1.8 be modified to require submission of Boiler 1 and Boiler 2 data semi-annually, consistent with Condition C.21.

Response to Comment 9:

Condition D.1.8 (now renumbered Condition D.1.7) "Reporting Requirements" has been changed to be as follows:

D.1.~~8~~**7** Reporting Requirements

A ~~quarterly~~ **semi-annual** summary of the information to document compliance with Condition D.1.2 in any compliance period when No. 4 fuel oil was combusted, and the natural gas fired boiler certification, shall be submitted to the address listed in Section C - General Reporting Requirements, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the ~~quarter~~ **six (6) months** being reported.

Comment 10:

Condition D.2.1

This condition establishes emission limitations that are applicable to eight Wheelabrator steel shot peeners. Allowable particulate matter emissions from each of the shot blast units are limited to no more than 28.43 pounds per hour. It appears that this computation was made using the Indiana Rule 326 IAC 6-3 process weight rate formula, with the process weight rate set equal to the weight of shot recirculated in the shot blast unit. New Venture Gear believes that the process weight rate for these units should be set equal to the weight of parts introduced to units to be processed rather than the weight of the shot recirculated. Using this approach, the allowable limit for this units is 1.77 pounds per hour for all units combined.

Response to Comment 10:

According to STAAPA/ALAPCO, Section 3 "Abrasive Blasting", the particulate emissions come from the abrasive rather than the material being blasted. The allowable emissions of 28.43 pounds per hour were calculated correctly and will not be changed. The emission factor for Steel Shot is 0.004 pounds PM per pound abrasive. Each of the eight (8) shot peeners has a throughput of 36,000 pounds of shot circulated per hour. This is equivalent to potential Particulate Matter (PM) emissions before control of 144 pounds per hour. Therefore the baghouses shall be in operation at all times the respective shot peener is in operation to ensure compliance with these requirements. There will be no changes to this condition in the final permit due to this comment.

Comment 11:

Condition D.2.5

This condition establishes a requirement to perform daily visible emission notations on the Wheelabrator shot peeners stack exhaust. During conversations regarding the possible change to the particulate matter emission rate as discussed in Comment 10 above, it was indicated that since the allowable emissions for the shot peeners was now below 10 pounds per hour, that daily visual observations would not be necessary. In the event that this requirement is maintained in the permit, New Venture Gear requests that the frequency of visual emission notations be changed from daily to weekly. New Venture Gear has evaluated the logistics of performing the visible emission readings and has discovered that the configuration of the plant and the location of the stacks for certain of these emission units make it very difficult for operators to visually observe stack exhausts. As an alternative to the procedure contained in the draft permit (should compliance monitoring procedures be retained in the permit), New Venture Gear requests that these requirements be modified to require the daily monitoring of pressure drop and weekly records of visible emissions.

Response to Comment 11:

1. Condition D.2.5(a) "Visible Emissions Notations" has been changed to be as follows:

   (a) ~~Daily~~ **Weekly** visible emission notations of the Wheelabrator steel shot peeners stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee will record whether emissions are normal or abnormal.

2. Condition D.2.6 "Parametric Monitoring" has been changed to be as follows:

D.2.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses used in conjunction with the abrasive cleaning units, at least once ~~weekly~~ **daily** when the abrasive cleaning operation is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of ~~1.0~~ **0.3** and 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

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

3. Condition D.2.8(a) and (b) "Record Keeping Requirements" has been changed to be as follows:

   (a) To document compliance with Condition D.2.5, the Permittee shall maintain records of ~~daily~~ **weekly** visible emission notations of the stack exhaust at each of the abrasive cleaning units.

   (b) To document compliance with Condition D.2.6, the Permittee shall maintain the following, when venting to the atmosphere:

      (1) ~~Weekly~~ **Daily** records of the following operational parameters during normal operation:

         (A) Inlet and outlet differential static pressure; and

(B) Cleaning cycle: frequency and differential pressure.

(2) Documentation of all corrective actions implemented, per event.

(3) Operation and preventive maintenance logs, including work purchase orders, shall be maintained.

(4) Quality Assurance/Quality Control (QA/QC) procedures.

(5) Operator standard operating procedures (SOP).

(6) Manufacturer's specifications or its equivalent.

(7) Equipment "troubleshooting" contingency plan.

(8) Documentation of the dates vents are redirected.

Comment 12:

Condition D.2.6

This condition requires that New Venture Gear periodically monitor the pressure drop across certain baghouse dust collectors. As part of this requirement, acceptable ranges for these units are established. With the change in allowable emission rate as discussed in Comment 10 above, New Venture Gear is not certain that IDEM will need to retain this condition in the permit. In the event that this condition is retained, New Venture Gear has determined that while in normal operation, some of these units routinely operate at a pressure drop less than 1.0 inch of water. New Venture Gear requests that the pressure drop range established in this condition be modified to indicate that the equipment will be operated in the range of 0.3 to 6.0 inches of water (if the condition remains in the permit).

Response to Comment 12:

Condition D.2.6 "Parametric Monitoring" has been changed to be as follows:

D.2.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses used in conjunction with the abrasive cleaning units, at least once ~~weekly~~ **daily** when the abrasive cleaning operation is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of ~~1.0~~ **0.3** and 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

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

Comment 13:

Condition D.3.1

This condition establishes an allowable particulate matter emission rate for one Wheelabrator tumblast. This limit is set at 20.75 pounds per hour. As discussed in Comment 10, above, New Venture Gear believes that the computation of allowable emissions for this unit should be based upon the weight of parts introduced to units to be processed, not the weight of shot recirculated. New Venture Gear believes that the allowable rate for all shot cleaning operations combined (equipment identified in Sections D.2 and D.3) should be 1.77 pounds per hour total for all units combined.

Response to Comment 13:

According to STAAPA/ALAPCO, Section 3 "Abrasive Blasting", the particulate emissions come from the abrasive rather than the material being blasted. The allowable emissions of 20.75 pounds per hour were calculated correctly and will not be changed. The emission factor for Steel Shot is 0.004 pounds PM per pound abrasive. The shot tumblast has a throughput of 22,500 pounds of shot circulated per hour. This is equivalent to potential Particulate Matter (PM) emissions before control of 90 pounds per hour. Therefore the baghouse shall be in operation at all times the shot tumblast is in operation to ensure compliance with these requirements. There will be no changes to this condition in the final permit due to this comment.

Comment 14:

Condition D.3.5

This condition establishes a requirement to perform daily visible emission notations on the Wheelabrator tumblast. During conversations regarding the possible change to the particulate matter emission rate as discussed in Comment 13 above, it was indicated that since the allowable emissions for the tumblast was now below 10 pounds per hour, that daily visual observations would not be necessary. In the event that this requirement is maintained in the permit, New Venture Gear requests that these requirements be modified to require the daily monitoring of pressure drop and weekly records of visible emissions.

Response to Comment 14:

1. Condition D.3.5(a) "Visible Emissions Notations" has been changed to be as follows:

   (a) ~~Daily~~ **Weekly** visible emission notations of the steel shot Wheelabrator tumblast unit stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee will record whether emissions are normal or abnormal.

2. Condition D.3.6 "Parametric Monitoring" has been changed to be as follows:

D.3.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse~~s~~ used in conjunction with the **one (1)** abrasive cleaning unit~~s~~, at least once ~~weekly~~ **daily** when the **one (1)** abrasive cleaning **unit** ~~operation~~ is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of ~~1.0~~ **0.3** and 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

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

3. Condition D.3.8 (a) and (b) "Record Keeping Requirements" has been changed to be as follows:

(a) To document compliance with Condition D.3.5, the Permittee shall maintain records of ~~daily~~ **weekly** visible emission notations of the stack exhaust at each of the abrasive cleaning units.

(b) To document compliance with Condition D.3.6, the Permittee shall maintain the following:

(1) ~~Weekly~~ **Daily** records of the following operational parameters during normal operation, when exhausting to the atmosphere:

(A) Inlet and outlet differential static pressure; and

(B) Cleaning cycle: frequency and differential pressure.

(2) Documentation of all corrective actions implemented, per event.

(3) Operation and preventive maintenance logs, including work purchase orders, shall be maintained.

(4) Quality Assurance/Quality Control (QA/QC) procedures.

(5) Operator standard operating procedures (SOP).

(6) Manufacturer's specifications or its equivalent.

(7) Equipment "troubleshooting" contingency plan.

(8) Documentation of the dates vents are redirected.

Comment 15:

Condition D.3.6

This condition requires that New Venture Gear periodically monitor the pressure drop across the Wheelabrator baghouse. As discussed in Comment 12 above, an acceptable pressure drop range for this unit is established. With the change in allowable emission rate as discussed in Comment 13 above, New Venture Gear has determined that this unit typically operates at a pressure drop of approximately 1.0 inch of water while in normal operation. New Venture Gear requests that the pressure drop range established in this condition be modified to indicate that the equipment will be operated in the range of 0.3 to 6.0 inches of water (if the condition remains in the permit). New Venture Gear also requests that the wording of this condition be clarified to make it clear that only one abrasive cleaning unit is covered under this section (or combined with other shot units in Section D.2).

Response to Comment 15:

Condition D.3.6 "Parametric Monitoring" has been changed to be as follows:

D.3.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse~~s~~ used in conjunction with the **one (1)** abrasive cleaning unit~~s~~, at least once ~~weekly~~ **daily** when the **one (1)** abrasive cleaning **unit** ~~operation~~ is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of ~~1.0~~ **0.3** and 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

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

Comment 16:

Condition D.4.1(a)

The word "no" in the last sentence should be changed to "not".

Response to Comment 16:

Condition D.4.1(a) "PSD Minor Limit" has been changed to be as follows:

(a) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration) and Construction Permit CP 035-9670-00015, issued July 24, 1998, the allowable Particulate Matter (PM) emissions from the nozzle shot peen 225, nozzle shot peen 448208-2 and the rebuilt nozzle shot peen shall not exceed 0.867 pounds per hour, each. The allowable Particulate Matter (PM) emissions from the double wheel shot peen 999 shall not exceed 2.88 pounds per hour. These Particulate Matter (PM) emission limits, equivalent to 24 tons per year, will make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) ~~no~~ **not** applicable and satisfy the requirements of 326 IAC 6-3 (Process Operations).

Comment 17:

Condition D.4.2

This condition requires that the four shot peen units covered under Section D.4 be stack tested after initial startup and every five years thereafter. This condition was established in the Construction Permit for these emission units. Although New Venture Gear has completed installation of two of the units, the two additional units are on order. The design of this equipment is such that no stack or exhaust exists for the units, but rather, filtered air from the shot peen operations is simply exhausted back into the plant. Under separate cover, a request will be filed for an exemption from this stack testing requirement. Due to the nature of these operations, actual emissions are anticipated to be extremely low. The Technical Support Document for the Construction Permit for these units estimated emissions after control to be 0.53 tons per year of particulate matter and 0.46 tons per year of PM10 from all four units combined (assuming each was operated at its maximum rated capacity for 8,760 hours). For this reason, New Venture Gear requests that the stack testing requirements of Condition D.4.2 be deleted from the Title V Permit.

Response to Comment 17:

Condition D.4.2 "Testing Requirements" has been changed to be as follows:

D.4.2 Testing Requirements [326 IAC 2-7-6(1),(6)] **[326 IAC 2-1.1-11]**

~~Pursuant to Construction Permit CP-035-9670-00015, issued July 24, 1998, within 60 days after achieving maximum production rate, but no later than 180 days after initial start up, the Permittee shall perform PM and PM-10 testing utilizing Methods 5 or 17 (40 CFR 60, Appendix A) for PM and Methods 201 or 201A and 202 (40 CFR 51, Appendix M) for PM-10, or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM-10 includes filterable and condensible PM-10. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.~~

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the Particulate Matter (PM) limit specified in Condition D.4.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Comment 18:

Condition D.4.4

This condition references the "woodworking operation". There is no woodworking associated with this emission unit.

Response to Comment 18:

Condition D.4.4 "Baghouse Inspections" has been changed to be as follows:

D.4.4 Baghouse Inspections

Pursuant to Construction Permit CP 035-9670-00015, issued July 24, 1998, an inspection shall be performed each calender quarter of all bags controlling the ~~woodworking operation~~ **four (4) shot peens** when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

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

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

   This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 ~~and 326 IAC 2-1.3.2~~ as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

2. The title of Condition B.1 "Permit No Defense" has been changed to be as follows:

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

3. Condition B.10(a) “Annual Compliance Certification” has been changed to be as follows:

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

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

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

5. Condition B.14(h) “Permit Shield” has been changed to be as follows:

(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)]~~ **[326 IAC 2-7-12(b)(7)]**

6. Condition B.18(b)(1)(B) “Permit Renewal” has been changed to be as follows:

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due. ~~[326 IAC 2-5-3]~~

7. Condition B.25 “Transfer of Ownership or Operation” has been deleted from the final permit and replaced with the following:

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

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

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

8. Condition C.2 "Opacity" has been changed to be as follows:

C.2 Opacity [326 IAC 5-1]

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

(a) ~~Visible emissions~~ **Opacity** shall not exceed an average of forty percent (40%) ~~opacity~~ in ~~twenty four (24) consecutive readings~~ **any one (1) six minute averaging period**, as determined in 326 IAC 5-1-4.

(b) ~~Visible emissions~~ **Opacity** shall not exceed sixty percent (60%) ~~opacity~~ for more than a cumulative total of fifteen (15) minutes (sixty (60) readings **as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor**) in a six (6) hour period.

9. Condition C.10 "Compliance Monitoring" has been changed to be as follows:

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 **the** compliance schedule an additional ninety (90) days provided the Permittee notifies:

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

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

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

10. The first sentence of Condition C.15 "Risk Management Plan" has been changed to be as follows:

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

11. Condition C.21 "General Reporting Requirements" has been changed to be as follows:

C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

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

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

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

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due.

(d) Unless otherwise specified in this permit, any semi-annual report shall be submitted within thirty (30) days of the end of the reporting period. **The reports do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

(e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. **The Emergency/Deviation Occurrence Report does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

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

(g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

~~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).~~

12. Condition D.1.3 "Testing Requirements" has been changed to be as follows:

D.1.3 Testing Requirements [326 IAC 2-7-6(1),(6)] **[326 IAC 2-1.1-11]**

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

13. Condition D.2.3 "Testing Requirements" has been changed to be as follows:

D.2.3 Testing Requirements [326 IAC 2-7-6(1),(6)] **[326 IAC 2-1.1-11]**

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing ~~at any specific time~~ when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

14. Condition D.2.7 "Broken Bag or Failure Detection" has been changed to be as follows:

D.2.7 Broken **or Failed** Bag ~~or Failure~~ Detection

In the event that bag failure has been observed:

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

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

15. Condition D.3.3 "Testing Requirements" has been changed to be as follows:

D.3.3 Testing Requirements [326 IAC 2-7-6(1),(6)] **[326 IAC 2-1.1-11]**

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing ~~at any specific time~~ when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter limit specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

16. Condition D.3.7 “Broken Bag or Failure Detection” has been changed to be as follows:

D.3.7 Broken **or Failed** Bag ~~or Failure~~ Detection

In the event that bag failure has been observed:

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

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

17. Condition D.4.5 “Broken Bag or Failure Detection” has been changed to be as follows:

D.4.5 Broken **or Failed** Bag ~~or Failure~~ Detection

In the event that bag failure has been observed:

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

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

18. Condition D.5.2 “Testing Requirements” has been changed to be as follows:

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

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 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

19. Condition D.6.2 “Testing Requirements” has been changed to be as follows:

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

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 particulate matter limit specified in Condition D.6.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

New Venture Gear, Inc., Muncie Transmission Division
Muncie, Indiana 47302
T035-7145-00015

The following are example potential and allowable calculations for one of the Wheelabrator abrasive cleaning units. There are nine (9) total abrasive cleaning units in which all of them have separate stacks except for two. Also, all of the units have the same throughput except for one, so it was not necessary to calculate emissions for each of the units. The amount of emissions that I calculated corresponded with what the applicant submitted as well.

(A) Potential particulate matter emissions (before controls) from the abrasive cleaning:

inlet
1.4 gr/dscf * 700 acf/min * 60 min/hr * 1 lb/7000 gr = 8.40 lb/hr (36.79 ton/yr)

(B) Particulate matter emissions (after controls) from the abrasive cleaning:

outlet
0.014 gr/dscf * 700 acf/min * 60 min/hr * 1 lb/7000 gr = 0.084 lb/hr (0.368 ton/yr)

(C) Allowable particulate matter emissions from the abrasive cleaning:

326 IAC 6-3-2 (Particulate emission limitations)

$E = 4.10P^{0.67}$

where E= emission rate (lbs/hr)
P= process weight rate (tons/hr)
= 36,000 lbs/hr (18 tons/hr)

$E = 4.10(18)^{0.67}$
= 28.43 lbs/hr (124.52 tons/yr)

Since the allowable emissions are greater than the potential emissions, then the potential emissions are used to satisfy 326 IAC 6-3-2.

The attached is a copy of the summary of emissions from the abrasive cleaning units submitted by the applicant.

Appendix A: Emission Calculations
Abrasive Blasting

Company Name: New Venture Gear, Inc.
Address City IN Zip: Muncie, Indiana
CP: T035-7145
Plt ID: 035-00015
Reviewer: Angie Lee
Date: 5/21/97

Table 1 - Emission Factors for Abrasives

	Emission Factor	
Abrasive	lb PM / lb abrasive	lb PM10 / lb PM
Sand	0.041	0.70
Grit	0.010	0.70
Steel Shot	0.004	0.86
Other	0.010	

Table 2 - Density of Abrasives (lb/ft3)

Abrasive	Density (lb/ft3)
Al oxides	160
Sand	99
Steel	487

Table 3 - Sand Flow Rate (FR1) Through Nozzle (lb/hr)

Flow rate of Sand Through a Blasting Nozzle as a Function of Nozzle pressure and Internal Diameter

	Nozzle Pressure (psig)							
Internal diameter, in	30	40	50	60	70	80	90	100
1/8	28	35	42	49	55	63	70	77
3/16	65	80	94	107	122	135	149	165
1/4	109	138	168	195	221	255	280	309
5/16	205	247	292	354	377	420	462	507
3/8	285	355	417	477	540	600	657	720
7/16	385	472	560	645	755	820	905	940
1/2	503	615	725	835	945	1050	1160	1265
5/8	820	990	1170	1336	1510	1680	1850	2030
3/4	1140	1420	1670	1915	2160	2400	2630	2880
1	2030	2460	2900	3340	3780	4200	4640	5060

Calculations

Adjusting Flow Rates for Different Abrasives and Nozzle Diameters

Flow Rate (FR) = Abrasive flow rate (lb/hr) with internal nozzle diameter (ID)
FR1 = Sand flow rate (lb/hr) with internal nozzle diameter (ID1) From Table 3 = 0
D = Density of abrasive (lb/ft3) From Table 2 = 0
D1 = Density of sand (lb/ft3) = 99
ID = Actual nozzle internal diameter (in) = 0
ID1 = Nozzle internal diameter (in) from Table 3 = 0

Flow Rate (FR) (lb/hr) = **ERR** per nozzle

Uncontrolled Emissions (E, lb/hr)

EF = emission factor (lb PM/ lb abrasive) From Table 1 = 0.000
FR = Flow Rate (lb/hr) = ERR
w = fraction of time of wet blasting = 0 %
N = number of nozzles = 1

Uncontrolled Emissions = ERR lb/hr
ERR ton/yr

METHODOLOGY

Emission Factors from Stappa Alapco, Section 3 "Abrasive Blasting"
Ton/yr = lb/hr X 8760 hr/yr X ton/2000 lbs
Flow Rate (FR) (lb/hr) = FR1 x (ID/ID1)2 x (D/D1)
E = EF x FR x (1-w/200) x N
w should be entered in as a whole number (if w is 50%, enter 50)