

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

**CLEVITE ELASTOMERS
503 Weatherhead Street
Angola , Indiana 46703**

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 and 326 IAC 2-1-3.2, as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F151-7170-00015	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM), and presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a rubber and miscellaneous plastics products manufacturing plant.

Responsible Official: **Mr. John Moffitt**
Source Address: **503 Weatherhead Street, Angola , Indiana 46703**
Mailing Address: **503 Weatherhead Street, Angola , Indiana 46703**
SIC Code: **3069**
County Location: **Steuben**
County Status: **Attainment for all criteria pollutants**
Source Status: Federally Enforceable State Operating Permit (FESOP)
Minor Source, under PSD

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

- (1) two (2) Devilbliss Model No. TEX 67-LO-34-M, adhesive coating booths, identified as Emission Unit (EU) ID 001A, with an estimated potential usage of 8,951.5 gallons per year, using water-wash as control, and exhausting to stack S/V ID 1, modified in 1987;
- (2) one (1) Despatch paint dip tank with electric dry oven, identified as EU 001B, with an estimated potential usage of 786 gallons per year, and exhausting to stack S/V ID 1;
- (3) two (2) Wheelabrator grit blast units, each with a maximum rate of 33,000 pounds of blast material per hour, and each using a bagfilter (fabric filters) as control with a maximum flowrate of 1,300 actual cubic feet per minute (acfm).
- (4) two (2) degreasing tanks using an aqueous nonvolatile organic compound cleaner, with an estimated potential usage of 6,634.25 gallons per year.
- (5) one (1) welding operations area, identified as EU 002, and exhausting to stack S/V ID 2 consisting of:
 - (a) three (3) flash butt welding stations and one (1) MIG welding station, with a combined total welding rate of 800 pounds per hour, using a Torit dust collector as control with a maximum flowrate of 6,000 acfm; and
 - (b) five (5) MIG welding stations, with a combined total welding rate of 500 pounds per hour, using "smog-hog" electrostatic precipitators as control.
- (6) One (1) natural gas fired boiler, with a maximum rated heat input of 4.164 million Btu per hour.

A.3 Insignificant Activities [326 IAC 2-7-1(20)] [326 IAC 2-8-3(c)(3)(I)]

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

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (2) Propane or liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour.
- (3) Combustion source flame safety purging on startup.
- (4) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
- (5) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (6) Filling drums, pails or other packaging containers with lubricating oils, waxes, and greases.
- (7) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
- (8) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (9) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (10) Cleaners and solvents characterized as follows:
 - (a) having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 °C (100 °F) or;
 - (b) having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20 °C (68 °F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (11) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (12) Closed loop heating and cooling systems.
- (13) Any of the following structural steel and bridge fabrication activities:
 - (a) Cutting 200.00 linear feet or less of one inch (1") plate or equivalent.
 - (b) Using 80 tons or less of welding consumables.
- (14) Solvent recycling systems with batch capacity less than or equal to 100 gallons.
- (15) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.
- (16) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.
- (17) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.

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

- (19) Quenching operations used with heat treating processes.
- (20) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (21) Heat exchanger cleaning and repair.
- (22) Process vessel degassing and cleaning to prepare for internal repairs.
- (23) Stockpiled soils from soil remediation activities that are covered and waiting transport for disposal.
- (24) Paved and unpaved roads and parking lots with public access.
- (25) 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.
- (26) 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.
- (27) Blowdown for any of the following: sight glass; boiler; compressors; pumps; cooling tower.
- (28) On-site fire and emergency response training approved by the department.
- (29) Stationary fire pumps.
- (30) 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 wood working operations.
- (31) Filter or coalescer media changeout.
- (32) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 °C.)
- (33) A laboratory as defined in 326 IAC 2-7-1(20)(C).
- (34) Activities or categories of activities with individual HAP emissions not previously identified. Including 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: Rubber injection molding and autoclave used for adhesive curing.
- (35) Activities or categories of activities with a combination of HAP emissions not previously identified. Including any unit emitting greater than 1 pound per day but less than 12.5 pounds per day or 2.5 ton per year of any combination of HAPs: Rubber injection

molding and autoclave used for adhesive curing.

- (36) Other activities or categories not previously identified. Including: Rubber injection molding and autoclave used for adhesive curing.

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

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

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

This permit supersedes the operating conditions of all construction and operating permits issued to this stationary source under 326 IAC 2 prior to the effective date of this FESOP.

SECTION B GENERAL CONDITIONS

B.1 General Requirements [IC 13-15] [IC 13-17]

The Permittee shall comply with the provisions of IC 13-15 (Permits Generally), IC 13-17 (Air Pollution Control) and the rules promulgated thereunder.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the 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 2-8-4(2)]

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

B.4 Enforceability [326 IAC 2-8-6]

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

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

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 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)] [326 IAC 2-8-7(a)(3)]

- (a) The provisions of this permit are severable, and if any provisions of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.
- (b) Indiana rules from 326 IAC quoted in conditions in this permit are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]

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

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

- (b) The Permittee shall furnish to IDEM and OAM within a reasonable time, any information that IDEM and 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 and OAM copies of records required to be kept by this permit. For information claimed to be confidential, the Permittee shall furnish such records directly to the U.S. EPA and IDEM and OAM along with a claim of confidentiality.

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

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

IDEM and OAM may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

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

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; and
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

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

- (a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) This certification shall be submitted on the attached Certification Form.
- (c) A responsible official is defined at 326 IAC 2-7-1(33).

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

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

- (b) This annual compliance certification report required by this permit shall be timely if delivered by any method and received and stamped by IDEM and OAM on or before the date it is due. [326 IAC 2-5-3]
- (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 continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM and OAM may require to determine the compliance status of the source.
- (d) The Permittee shall also annually certify that this source is in compliance with additional requirements as may be specified under Sections 114(a)(3) and 504(b) of the Clean Air Act.

B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall prepare, maintain and implement Preventive Maintenance Plans (PMP) within ninety (90) days after the issuance of this permit, including the following information on each:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Corrective actions that will be implemented in the event an inspection indicates an out of specification situation;
 - (4) A time schedule for taking such corrective actions including a schedule for devising additional corrective actions for situations that may not have been predicted; and
 - (5) Identification and quantification of the replacement parts which will be maintained in inventory for quick replacement.
- (b) PMPs shall be submitted to IDEM and OAM upon request and shall be subject to review and approval by IDEM and OAM.

B.14 Emergency Provisions [326 IAC 2-8-12]

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

except as provided in 326 IAC 2-8-12.

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

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM and 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 No.: 1-800-451-6027 (ask for Office of Air Management, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

Failure to notify IDEM and OAM by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

- (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 2-8-4(3)(C)(ii) and must contain the following:

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 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 and OAM may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM and 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 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

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

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

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

- (b) Written notification shall be submitted on the attached Deviation Occurrence Reporting Forms or their substantial equivalent.

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

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

-
- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM and 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 2-8-8(a)]
- (c) Proceedings by IDEM and 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 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM and OAM at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM and OAM may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

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

-
- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM and OAM and shall include, at minimum, the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(20).

Request for renewal shall be submitted to:

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

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
- (1) The Permittee has a duty to submit a timely and complete permit renewal application. A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) Delivered by any method and received and stamped by IDEM and OAM on or before the date it is due. [326 IAC 2-5-3]

- (2) If IDEM and 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 until the renewal permit has been issued or denied.
- (c) **Right to Operate After Application for Renewal** [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM and 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 and OAM any additional information identified as needed to process the application.

B.18 Administrative Permit Amendment [326 IAC 2-8-10]

- (a) An administrative permit amendment is a FESOP revision that makes changes of the type specified under 326 IAC 2-8-10(a).
- (b) An administrative permit amendment may be made by IDEM and OAM consistent with the procedures specified under 326 IAC 2-8-10(b).
- (c) The Permittee may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Minor Permit Modification [326 IAC 2-8-11(a)] [326 IAC 2-8-11(b)(1) and (2)]

- (a) A permit modification is any revision to this permit that cannot be accomplished as an administrative permit amendment under 326 IAC 2-8-10.
- (b) Minor modification of this permit shall follow the procedures specified under 326 IAC 2-8-11(b)(1)(A) through (F).
- (c) An application requesting the use of minor modification procedures shall meet the requirements of 326 IAC 2-8-3(c) and shall include the information required in 326 IAC 2-8-11(b)(3)(A) through (D).
- (d) The Permittee may make the change proposed in its minor permit modification application immediately after it files such application unless the change is subject to the construction permit requirements of 326 IAC 2-1, 326 IAC 2-2, or 326 IAC 2-3. After the Permittee makes the change allowed under minor permit modification procedures, and until IDEM and OAM takes any of the actions specified in 326 IAC 2-8-11(b)(5), the Permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this period, the Permittee need not comply with the existing permit terms and conditions it seeks to modify. If the Permittee fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against it. [326 IAC 2-8-11(b)(6)]

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

- (a) Significant modification procedures shall be used for applications requesting permit modifications that do not qualify as minor permit modifications or as administrative amendments.
- (b) Any significant change in existing monitoring permit terms or conditions and every relaxation of reporting or record keeping permit terms or conditions of this permit shall be

considered significant.

- (c) Nothing in 326 IAC 2-8-11(d) shall be construed to preclude the Permittee from making changes consistent with 326 IAC 2-8 that would render existing permit compliance terms and conditions irrelevant.
- (d) Significant modifications of this permit shall meet all requirements of 326 IAC 2-8, including those for application, public participation, and review by U.S. EPA, as they apply to permit issuance and renewal.

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

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

B.22 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-8-15(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional condition: 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.23 Operational Flexibility [326 IAC 2-8-15]

(a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) 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 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM and OAM in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

- (b) For each such change, the required written notification shall include the following:
- (1) A brief description of the change within the source;
 - (2) The date on which the change will occur;
 - (3) Any change in emissions; and
 - (4) Any permit term or condition that is no longer applicable as a result of the change.

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(33).

- (c) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM and 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.24 Construction Permit Requirement [326 IAC 2]

Modification, construction, or reconstruction shall be permitted as required by and in accordance with 326 IAC 2.

B.25 Inspection and Entry [326 IAC 2-8-5(a)(2)]

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

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records 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 2-8-5(a)(4)]

B.26 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-8-10]

Pursuant to 326 IAC 2-1-6 and 2-8-10:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM and 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 current Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner.
- (c) IDEM and OAM shall reserve the right to issue a new permit.

B.27 Annual Fee Payment [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

- (a) The Permittee shall pay annual fees to IDEM and OAM consistent with the fee schedule established in 326 IAC 2-8-16.
- (b) Failure to pay may result in administrative enforcement action, revocation of this permit, referral to the Office of Attorney General for collection, or other appropriate measures.
- (c) The Permittee shall pay the annual fee within thirty (30) calendar days of receipt of a billing by IDEM and OAM or in a time period that is consistent with the payment schedule issued by IDEM and OAM.
- (d) If the Permittee does not receive a bill from IDEM and OAM, thirty (30) calendar days before the due date, the Permittee shall call the following telephone numbers: 1-800-451-6027 or 317-233-5674 (ask for OAM, Data Support Section), to determine the appropriate permit fee. The applicable fee is due April 1 of each year.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:
- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per three hundred sixty-five (365) consecutive day period. This limitation shall also make the requirements of 326 IAC 2-3 (Emission Offset) not applicable;
 - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per three hundred sixty-five (365) consecutive day period; and
 - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per three hundred sixty-five (365) consecutive day period.
- (b) The potential to emit of particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per three hundred sixty-five (365) consecutive day period. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) will not apply.
- (c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(20). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does exceed the above specified limits.
- (d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]

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.

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.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

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

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

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)].

C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

- (a) All equipment that may emit pollutants into the ambient air shall be properly operated to meet the requirements of this permit and maintained in accordance with Section B - Preventive Maintenance Plan.
- (b) Unless otherwise stated in this permit, all air pollution control equipment listed in this permit shall be operated at all times that the emission unit(s) vented to the control equipment are in operation.
- (c) The Permittee shall perform all necessary maintenance according to the Preventive Maintenance Plan and make all necessary attempts to keep all air pollution control equipment in proper operating condition at all times such that the requirements of this permit are met.

**C.7 Asbestos Abatement Projects - Accreditation [326 IAC 14-10] [326 IAC 18-1]
[40 CFR 61, Subpart M]**

Prior to the commencement of any demolition or renovation activities, the Permittee shall use an Indiana accredited asbestos inspector to inspect thoroughly the affected facility or part of the facility where the demolition or renovation operation will occur for the presence of asbestos, including Category I and Category II nonfriable asbestos containing material. The requirement that the inspector must be Indiana accredited is not federally enforceable.

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

C.8 Performance Testing [326 IAC 3-2.1]

All testing shall be performed according to the provisions of 326 IAC 3-2.1 (Source Sampling Procedures), utilizing methods approved by the IDEM, OAM.

The test protocol shall be submitted to:

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

no later than thirty-five (35) days before the intended test date.[326 IAC 3-2.1-2(a)]

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.9 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Compliance with applicable requirements shall be documented in accordance with the provisions of 326 IAC 2-8-4(3). The Permittee shall be responsible for installing any necessary equipment and initiating any 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 shall notify:

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

in writing no more than ninety (90) days after receipt of this permit, with full justification of the reasons for inability to meet this date and a schedule which it expects to meet. If a denial of the request is not received before the monitoring is fully implemented, the schedule shall be deemed approved.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(33).

C.10 Maintenance of Monitoring Equipment [326 IAC 2-8-4(3)(A)(iii)]

- (a) The Permittee shall perform all necessary maintenance and make all necessary and reasonable attempts to keep all required monitoring equipment in proper operating condition at all times.
- (b) 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.
- (c) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment.
- (d) Preventive Maintenance Plans of the monitors shall be implemented. In addition, prompt corrective action shall be initiated whenever indicated.

C.11 Monitoring Methods [326 IAC 3]

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

C.12 Pressure Gauge Specifications

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

C.13 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18-1] [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) Written notification is to be 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
- (3) Waste disposal site.
- (c) The Permittee shall postmark or deliver the notice 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

- (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.

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

C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance is present in more than the threshold quantity that is subject to 40 CFR 68, 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 part of the compliance certification submitted under 326 IAC 2-8-5(a)(1), 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 and OAM that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

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

C.15 Compliance Monitoring Plan - Failure to Take Corrective Action [326 IAC 2-8-4(3)]

(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) The Preventive Maintenance Plan described in Section B, Preventive Maintenance Plan, of this permit.

(b) For each compliance monitoring condition of this permit appropriate corrective actions, as described in the Preventive Maintenance Plan, 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 corrective actions within the prescribed time contained within the Preventive Maintenance Plan shall constitute a violation of the permit unless taking the corrective action set forth in the Preventive Maintenance Plan would be unreasonable.

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

- (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further corrective actions providing that prompt action was taken to correct the monitoring equipment.

- (2) The Permittee has determined that the parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied; or
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The Permittee determines that the process has already returned to operating within "normal" parameters and no corrective action is required.
- (d) Records shall be kept of all instances in which the action values were not met and of all corrective actions taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test

- (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, appropriate corrective actions shall be taken. A description of these corrective actions shall be submitted to IDEM and OAM within thirty (30) days of receipt of the test results. These corrective actions shall be implemented immediately unless notified by IDEM and OAM that they are not acceptable. The Permittee shall make every effort to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM and OAM reserves the right to utilize enforcement activities to resolve the non-compliant stack test(s).
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. 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.

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

C.17 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]

- (a) The Permittee shall submit a certified, annual emission statement that meets the requirements of 326 IAC 2-6 (Emission Reporting). This annual statement must be received by July 1 of each year and must comply with the minimum requirements 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). The annual 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

- (b) This annual emission statement required by this permit shall be timely if delivered by any method and received and stamped by IDEM and OAM on or before the date it is due. [326 IAC 2-5-3]

C.18 Monitoring Data Availability

- (a) 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) 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 in (a) above.

C.19 General Record Keeping Requirements [326 IAC 2-8-4(3)(B)]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location and available within one (1) hour upon verbal request of an IDEM and OAM representative, for a minimum of three (3) years. They may be stored elsewhere for the remaining two (2) years providing they are made available within thirty (30) days after written request.
- (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 any required preventive maintenance and corrective actions that were implemented. Such records shall briefly describe what was done and indicate who did it. Such records may include, but are not limited to: work orders, quality assurance procedures, quality control procedures, operator's standard operating procedures, manufacturer's specifications or their equivalent, and equipment "troubleshooting" guidance.

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

C.20 General Reporting Requirements [326 IAC 2-8-4(3)(C)]

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

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

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be timely if delivered by any method and received and stamped by IDEM and OAM on or before the date it is due. [326 IAC 2-5-3]
- (c) Unless otherwise specified in this permit any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.
- (d) All instances of deviations from any requirements of this permit must be clearly identified in such reports.
- (e) Any corrective actions taken as a result of an exceedance of a limit, an excursion from the parametric values, or a malfunction that may have caused excess emissions must be clearly identified in such reports.
- (f) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

Stratospheric Ozone Protection

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

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

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

SECTION D.1 FACILITY OPERATION CONDITIONS

- (1) Two (2) Devilbliss Model No. TEX 67-LO-34-M, adhesive coating booths, identified as Emission Unit (EU) ID 001A, with an estimated potential usage of 8,951.5 gallons per year, using water-wash as control, and exhausting to stack S/V ID 1, modified in 1987; and
- (2) one (1) Despatch paint dip tank with electric dry oven, identified as EU 001B, with an estimated potential usage of 786 gallons per year, and exhausting to stack S/V ID 1.

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Volatile Organic Compounds (VOC)

The amount of HAP usage in solvents, primers, and top coatings shall be limited to ensure that the emissions of any single HAP from the source are limited to 0.78 tons per month, and that the emissions of any combination of HAP from the source are limited to 2 tons per month. Compliance with this limit makes 326 IAC 2-7 (FESOP) not applicable.

D.1.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 76-10-90-0055, issued on May 27, 1987, the PM from the two (2) adhesive coating booths (EU 001 A) shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

D.1.3 Emission Offset Minor Limit [326 IAC 2-3]

This facility shall use no more than 92.26 tons of VOC (99 tons minus 6.74 tons per year for insignificant facilities), including coatings, dilution solvents, and cleaning solvents, per 365 consecutive day period. Compliance with this limit makes 326 IAC 2-2 and 326 IAC 2-8 (FESOP) not applicable.

D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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.1.5 Testing Requirements [326 IAC 2-8-5(1)]

Testing of this facility is not specifically required by this permit. However, this does not preclude testing requirements on this facility under 326 IAC 2-1-4(f) and 326 IAC 2-8-5(1).

D.1.6 Volatile Organic Compounds (VOC)

Compliance with the HAP and VOC content and usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) and 326 IAC 8-1-2(a)(7) using formulation data supplied by the coating manufacturer. IDEM and OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.7 Particulate Matter (PM)

Pursuant to 76-10-90-0055, issued on May 27, 1987, the water-wash for PM control shall be in operation at all times when the two (2) adhesive coating booths (EU 001A) are in operation.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.8 Monitoring

- (a) Daily visible observations shall be made of the overspray while one or more of the adhesive coating booths are in operation.
- (b) Weekly inspections shall be performed of the adhesive coating booth emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.9 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP and VOC usage limits and/or the HAP and VOC emission limits established in Condition D.1.1 and D.1.2.
 - (1) The amount of HAP and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The volume weighted HAP and VOC content of the coatings used for each month;
 - (4) The cleanup solvent usage for each month;
 - (5) The total HAP and VOC usage for each month; and
 - (6) The weight of HAP and VOC emitted for each compliance period.
- (b) To document compliance with Condition D.1.8, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.10 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 and D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.2 FACILITY OPERATION CONDITIONS

- (3) Two (2) Wheelabrator grit blast units, each using a bagfilter (fabric filters) as control with a maximum flowrate of 1,300 actual cubic feet per minute (acfm).

Emission Limitations and Standards [326 IAC 2-8-4(1)]

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

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from each grit blasting unit shall not exceed 26.8 pounds per hour when operating at a process weight rate of 33,000 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

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:

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

D.2.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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.2.3 Testing Requirements [326 IAC 2-8-5(1)]

Testing of this facility is not specifically required by this permit. However, this does not preclude testing requirements on this facility under 326 IAC 2-1-4(f) and 326 IAC 2-8-4.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.2.4 Visible Emissions Notations

- (a) Daily visible emission notations of the grit blast unit's fabric filter stack exhaust(s) shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

D.2.5 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the grit blast units. All defective bags shall be replaced.

D.2.6 Broken 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.
- (b) Based upon the findings of the inspection, any additional corrective actions will be devised within eight (8) hours of discovery and will include a timetable for completion.

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.7 Record Keeping Requirements

- (a) To document compliance with Condition D.2.4, the Permittee shall maintain records of daily visible emission notations of grit blast unit's fabric filter stack exhaust(s).
- (b) To document compliance with Condition D.2.5, the Permittee shall maintain records of the results of the inspections required under Condition D.2.5.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3

FACILITY OPERATION CONDITIONS

- (5) One (1) welding operations area, identified as EU 002, and exhausting to stack S/V ID 2 consisting of:
- (a) three (3) flash butt welding stations and one (1) MIG welding station, using a Torit dust collector as control with a maximum flowrate of 6,000 acfm; and
 - (b) five (5) MIG welding stations, using "smog-hog" electrostatic precipitators as control.

Emission Limitations and Standards [326 IAC 2-8-4(1)]

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

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the welding operations area (a) shall not exceed 2.22 pounds per hour when operating at a process weight rate of 800 pounds per hour and the allowable PM emission rate from the welding operations area (b) shall not exceed 1.62 pounds per hour when operating at a process weight rate of 500 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

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

SECTION D.4 FACILITY OPERATION CONDITIONS

- (4) two (2) degreasing tanks using an aqueous nonvolatile organic compound cleaner, with an estimated potential usage of 6,634.25 gallons per year.
- (6) One (1) natural gas fired boiler, with a maximum rated heat input of 4.164 million Btu per hour.

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.4.1 Particulate Matter (PM)

Pursuant to 326 IAC 6-2-3 (Particulate Matter Emission Limitations for Sources of Indirect Heating), the PM emissions from the 4.164 mmBtu per hour heat input boiler shall be limited to 0.6 pounds per mmBtu heat input.

D.4.2 Volatile Organic Compounds (VOC)

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.4.3 Volatile Organic Compounds (VOC)

- (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°C) (one hundred degrees Fahrenheit (100°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°C) (one hundred degrees Fahrenheit (100°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°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°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 or 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.

D.4.4 Volatile Organic Compounds (VOC)

The amount of HAP usage in solvents, primers, and top coatings shall be limited to ensure that the emissions of any single HAP from the source are limited to 0.78 tons per month, and that the emissions of any combination of HAP from the source are limited to 2 tons per month. Compliance with this limit makes 326 IAC 2-8 (FESOP) not applicable.

State Form 47738 (5-96)

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

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

Source Name: **CLEVITE ELASTOMERS**
Source Address: **503 Weatherhead Street, Angola, Indiana 46703**
Mailing Address: **503 Weatherhead Street, Angola, Indiana 46703**
FESOP No.: **F151-7170-00015**

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

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

Signature:

Printed Name:

Title/Position:

Date:

State Form 47739 (5-96)

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
 DEVIATION OCCURRENCE REPORT**
 (For Control Equipment Monitoring Only)

Source Name: **CLEVITE ELASTOMERS**
 Source Address: **503 Weatherhead Street, Angola, Indiana 46703**
 Mailing Address: **503 Weatherhead Street, Angola, Indiana 46703**
 FESOP No.: **F151-7170-00015**

If a deviation has occurred, a separate copy of this report must be submitted for each monitoring device on all control equipment listed in this permit. Attach a signed certification to complete this report.	
Stack/Vent ID:	
Control Equipment: (ex: thermal oxidizer, scrubber, baghouses)	
Type of Parameter Monitored: (ex: temperature, pressure drop, efficiency)	
9 Continuously	9 Periodically, at a frequency of:
Parameter Operating Restrictions/Range: (ex: 1,400°F, 2-4 psi pressure drop)	
Report Covers From: (date: month/day/yr)	To:
9 Summary of Deviations from the Parameter Restriction/Range During the Monitoring Period are Identified Below. Complete Records Maintained at the Facility.	

	For Parameter Recorded Continuously	For Parameter Recorded Periodically
Total Unit Operating Time		
Total Time of Deviations (Identify All Deviations)		
Percent of Time Indicating Deviations ([2]/[1]x100)		

Date of Deviation	Start/Stop Time of Deviation (Continuous Monitoring Only)	Actual Value Recorded	Reason for Deviation & Corrective Action Taken

State Form 47741 (5-96)

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

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

Source Name: **CLEVITE ELASTOMERS**
Source Address: **503 Weatherhead Street, Angola, Indiana 46703**
Mailing Address: **503 Weatherhead Street, Angola, Indiana 46703**
FESOP No.: **F151-7170-00015**

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

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

State Form 47738 (5-96)

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
NATURAL GAS FIRED BOILER CERTIFICATION**

Source Name: **CLEVITE ELASTOMERS**
Source Address: **503 Weatherhead Street, Angola, Indiana 46703**
Mailing Address: **503 Weatherhead Street, Angola, Indiana 46703**
FESOP No.: **F151-7170-00015**

**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

(can omit boiler affected if only one gas boiler at this plant)

I certify under penalty of law that at all times, except as otherwise noted above, only natural gas was burned in the indicated boilers during the report period. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

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

FESOP Quarterly Report

Source Name: **CLEVITE ELASTOMERS**
 Source Address: **503 Weatherhead Street, Angola, Indiana 46703**
 Mailing Address: **503 Weatherhead Street, Angola, Indiana 46703**
 FESOP No.: **F151-7170-00015**
 Facility: **Two (2) Adhesive Coating Booths**
 Parameter: **Single HAP Usage (Worst Case) and Total HAP Usage**
 Limit: **Single Worst Case 0.78 tons per month, Total HAP 2 tons per month.**

YEAR: _____

Month	Column 1		Column 2		Column 1 + Column 2	
	This Month		Previous 11 Months		12 Month Total	
	Single HAP	Total HAPs	Single HAP	Total HAPs	Single HAP	Total HAPs
Month 1						
Month 2						
Month 3						

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.
 Deviation has been reported on: _____

Submitted by: _____
 Title / Position: _____
 Signature: _____
 Date: _____
 Phone: _____

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

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

Source Background And Description

Source Name: CLEVITE ELASTOMERS
Source Location: 503 Weatherhead Street, Angola , Indiana 46703
County: Steuben
SIC Code: 3069
Operation Permit No.: F151-7170-00015
Permit Reviewer: Richard A. Moore Jr./EVP

The Office of Air Management (OAM) has reviewed a Federally Enforceable State Operating Permit (FESOP) application from CLEVITE ELASTOMERS relating to the operation of a rubber and miscellaneous plastics products 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) Devilbliss Model No. TEX 67-LO-34-M, adhesive coating booths, identified as Emission Unit (EU) ID 001A, with an estimated potential usage of 8,951.5 gallons per year, using water-wash as control, and exhausting to stack S/V ID 1, modified in 1987;
- (2) one (1) Despatch paint dip tank with electric dry oven, identified as EU 001B, with an estimated potential usage of 786 gallons per year, and exhausting to stack S/V ID 1;

The source also includes the following registered emission units:

- (3) two (2) Wheelabrator grit blast units, each with a maximum rate of 33,000 pounds of blast material per hour, and each using a bagfilter (fabric filters) as control with a maximum flowrate of 1,300 actual cubic feet per minute (acfm). Note that this unit meets the requirements to be included in the insignificant activities category.

The source also includes the following exempt emission units:

- (4) two (2) degreasing tanks using an aqueous nonvolatile organic compound cleaner, with an estimated potential usage of 6,634.25 gallons per year.
- (5) one (1) welding operations area, identified as EU 002, and exhausting to stack S/V ID 2 consisting of:
 - (a) three (3) flash butt welding stations and one (1) MIG welding station, with a combined total welding rate of 800 pounds per hour, using a Torit dust collector as control with a maximum flowrate of 6,000 acfm; and

- (b) five (5) MIG welding stations, with a combined total welding rate of 500 pounds per hour, using "smog-hog" electrostatic precipitators as control.
- (6) One (1) natural gas fired boiler, with a maximum rated heat input of 4.164 million Btu per hour.

The source has removed the following permitted emission units and pollution control devices:

- (1) one (1) adhesive/enamel coating booth, using dry filters as control;
- (2) one (1) Beringer reclaim unit, using a coalescing filter and condenser as control; and
- (3) one (1) parts cleaning process using 360 cold cleaner.

Unpermitted Emission Units and Pollution Control Equipment

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

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

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

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(20):

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (2) Propane or liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour.
- (3) Combustion source flame safety purging on startup.
- (4) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
- (5) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (6) Filling drums, pails or other packaging containers with lubricating oils, waxes, and greases.
- (7) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
- (8) Machining where an aqueous cutting coolant continuously floods the machining

interface.

- (9) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (10) Cleaners and solvents characterized as follows:
 - (a) having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 °C (100 °F) or;
 - (b) having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20 °C (68 °F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (11) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (12) Closed loop heating and cooling systems.
- (13) Any of the following structural steel and bridge fabrication activities:
 - (a) Cutting 200.00 linear feet or less of one inch (1") plate or equivalent.
 - (b) Using 80 tons or less of welding consumables.
- (14) Solvent recycling systems with batch capacity less than or equal to 100 gallons.
- (15) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.
- (16) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.
- (17) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.
- (18) Forced and induced draft cooling tower system not regulated under a NESHAP.
- (19) Quenching operations used with heat treating processes.
- (20) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (21) Heat exchanger cleaning and repair.
- (22) Process vessel degassing and cleaning to prepare for internal repairs.
- (23) Stockpiled soils from soil remediation activities that are covered and waiting transport for disposal.
- (24) Paved and unpaved roads and parking lots with public access.
- (25) 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.

- (26) 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.
- (27) Blowdown for any of the following: sight glass; boiler; compressors; pumps; cooling tower.
- (28) On-site fire and emergency response training approved by the department.
- (29) Stationary fire pumps.
- (30) 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 wood working operations.
- (31) Filter or coalescer media changeout.
- (32) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 °C.)
- (33) A laboratory as defined in 326 IAC 2-7-1(20)(C).
- (34) Activities or categories of activities with individual HAP emissions not previously identified. Including 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: Rubber injection molding and autoclave used for adhesive curing.
- (35) Activities or categories of activities with a combination of HAP emissions not previously identified. Including any unit emitting greater than 1 pound per day but less than 12.5 pounds per day or 2.5 ton per year of any combination of HAPs: Rubber injection molding and autoclave used for adhesive curing.
- (36) Other activities or categories not previously identified. Including: Rubber injection molding and autoclave used for adhesive curing.

Existing Approvals

This source has been operating under the following approvals:

- (1) 76-10-90-0055, issued on May 27, 1987.

This one approval specified facilities that were considered permitted, registered, and exempted.

Enforcement Issue

There are no Enforcement actions pending.

Recommendation

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

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

An administratively complete FESOP application for the purposes of this review was received on November 14, 1996. Additional information was received on March 28, 1997, August 13, 1997, August 19, 1997 and September 2, 1997.

Emissions Calculations

See Appendix A: Emissions Calculations for detailed calculations (10 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	23.67
PM-10	23.67
SO ₂	0.03
VOC	38.41
CO	1.23
NO _x	5.59

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

See attached spreadsheets for detailed calculations (page numbers 1, 2, 7, 9 and 10 in Appendix A).

HAP	Potential Emissions (tons/year)
Formaldehyde	0.1
MEK	5.05
MIBK	6.09
Xylene	9.49
Toluene	2.11
Trichloroethylene	0.92
Tetrachloroethylene	1.43
Carbon Tetrachloride	0.07
Ethylbenzene	2.05
TOTAL	27.31

See attached spreadsheets for detailed calculations (page numbers 3 and 4 in Appendix A).

- (a) The potential emissions (as defined in Indiana Rule) of all combinations of HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) This source, otherwise required to obtain a Title V permit, has agreed to accept a permit with federally enforceable limits that restrict its PTE to below the Title V emission levels. Therefore, this source will be issued a Federally Enforceable State Operating Permit (FESOP), pursuant to 326 IAC 2-8.

Limited Potential To Emit

- (a) The source has accepted a limit on potential to emit of 9.4 tons per year for any single HAP and 24 tons per year for any combination of HAPs.
- (b) The table below summarizes the total limited potential to emit of the significant and insignificant emission units.

	Limited Potential to Emit (tons/year)						
Process/ facility	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Adhesive Coatings & Solvents	2.36	2.36	---	27.90	---	---	23.98
Insignificant Activities *	20.97	20.97	0.03	6.74	1.23	5.59	---
Total Emissions	23.33	23.33	0.03	34.64	1.23	5.59	23.98

* Includes the grit blasting facilities.

Attached Tables A through D summarize the permit conditions and requirements.

County Attainment Status

The source is located in Steuben County.

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

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

Federal Rule Applicability

- (a) There are no New Source Performance Standards (326 IAC 12) applicable to this source.
- (b) The two adhesive coating booths, EU 001A, and two degreasing tanks are not subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart T because these facility do not use one of the listed halogenated solvents for cleaning.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

Since this source is located in Steuben County and the potential to emit VOC is less than one hundred (100) tons per year, 326 IAC 2-6 does not apply. Since this source is not one of the 28 listed sources and its potential to emit PM10 is less than one-hundred (100) tons per year when added to fugitive emissions, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Visible Emissions Limitations)

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

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

State Rule Applicability - Individual Facilities

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

The natural gas fired boiler rated at 4.164 million Btu/hr is subject to 326 IAC 6-2 (Particulate Emissions Limitations for Sources of Indirect Heating). Using $Pt = 1.09 / Q^{0.26}$, the facility would be limited to 0.75 pounds of particulate matter per million Btu. However, because the rated heat input is less than 10 million Btu/hr, the facility is limited to emissions of less than 0.6 pounds of particulate matter per million Btu. The AP-42 emission factor for this facility is equal to 0.012 pounds of particulate matter per million Btu which is less than the allowable.

326 IAC 6-3-2 (Process Operations)

The two adhesive coating booths and welding operations area are subject to 326 IAC 6-3-2, the following limitations apply:

- (a) the particulate matter (PM) overspray from the two adhesive coating booths shall be

limited by the following:

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

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

The two adhesive coating booths will comply with this allowable emission rate by using water wash as control.

(b) the particulate matter (PM) emissions from each grit blasting shall be limited by the following:

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

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

$$P = 33,000 \text{ lbs/hr (each)} = 16.5 \text{ tons per hour (each unit)} \\ E = 4.10 \times (16.5)^{0.67} = 26.8 \text{ pounds of PM per hour} = 117.38 \text{ tpy}$$

The two grit blasting facilities will comply with this allowable emission rate because their total PTE is 0.67 pounds of PM per hour (2.93 tpy). Since the PTE is less than the allowable and the allowable is less than 250 tpy, 326 IAC 2-2 does not apply.

(c) the particulate matter (PM) emissions from the welding operations area shall be limited by the following:

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

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

$$P = 800 \text{ lbs/hr [area (a)]} = 0.4 \text{ tons per hour} \\ P = 500 \text{ lbs/hr [area (b)]} = 0.25 \text{ tons per hour}$$

$$E = 4.10 \times (0.4)^{0.67} = 2.22 \text{ pounds of PM per hour for area (a)} \\ E = 4.10 \times (0.25)^{0.67} = 1.62 \text{ pounds of PM per hour for area (b)}$$

$$E = 2.22 + 1.62 = 3.84 \text{ pounds of PM per hour (16.82 tpy) for the welding areas}$$

The welding area facilities will comply with this allowable emission rate because their total PTE is 3.09 pounds of PM per hour (13.52 tpy). Since the PTE is less than the allowable and the allowable is less than 250 tpy, 326 IAC 2-2 does not apply.

326 IAC 6-4 (Fugitive Dust Emissions)

This source is subject to 326 IAC 6-4 for fugitive dust emissions. Pursuant to 326 IAC 6-4, fugitive particulate matter emissions shall not be visible crossing the property lines.

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

This source is not subject to 326 IAC 6-5 for fugitive particulate matter emissions. Pursuant to 326 IAC 6-5, for any new source constructed in a particulate matter non-attainment county after December 13, 1985, a fugitive dust control plan must be submitted, reviewed and approved. This source is located in Steuben County which is not in a particulate matter non-attainment

area.

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

This source is not subject to 326 IAC 7-1.1 since no facility has the PTE more than 25 tons per year or 10 lbs per hour. Therefore, pursuant to 326 IAC 7-1.1-1, the requirements of 326 IAC 7-1.1 and 7.2 do not apply.

326 IAC 8-1-6 (New Facilities)

This rule applies to facilities located anywhere in the state that were constructed on or after January 1, 1980, and which have potential volatile organic compound (VOC) emissions of 25 tons per year or more and which are not regulated by other provisions of 326 IAC 8. The one facility (adhesive coating booths EU 001A) with greater than 25 tons per year of VOC emissions covered by this permit was modified after January 1, 1980; however, since the modification did not involve any new equipment, but consisted of a change in solvent usage, it was not a new facility and this rule does not apply.

326 IAC 8-3-2 (Cold Cleaner - Organic Solvent Degreasing Operations) & 326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)

The two (2) degreaser tanks are a cold cleaner type degreasing facility which received a permit to construct after January 1, 1980 and is therefore, subject to the operation and control provisions of 326 IAC 8-3-2 and 326 IAC 8-3-5.

- (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°C) (one hundred degrees Fahrenheit (100°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°C) (one hundred degrees Fahrenheit (100°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°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°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.

326 IAC 8-6 (Organic Solvent Emission Limitations)

This rule applies to sources commencing operation after October 7, 1974 and prior to January 1, 1980, located anywhere in the state, with potential VOC emissions of 100 tons per year or more, and not regulated by any other provision of Article 8. This source does not have potential VOC emissions at, or in excess of 100 tons per year; therefore, this rule does not apply.

Compliance Requirements

Permits issued under 326 IAC 2-8 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 2-8-4. 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 two adhesive coating booths controlled by water-wash units have applicable compliance monitoring conditions as specified below:
 - (a) The usage of solvents, primer and top coatings shall be limited such that the actual emissions are less than 9.4 tons per year for any single HAP and 24 tons per year for any combination of HAPs, in order to ensure compliance with 326 IAC 2-8 (FESOP).
 - (b) The monthly usage of solvents, primer and top coatings for each type of material must be measured and recorded.
 - (c) Daily visible emissions notations of the adhesive coating booth stack exhaust(s) 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.

These monitoring conditions are necessary because the water-wash units for the adhesive coating booths must operate properly to ensure compliance with 326 IAC 2-8 (FESOP), 326 IAC 5 (Visible Emission Limitations), 326 IAC 6-3 (Process Operations), and 326 IAC 6-4 (Fugitive Dust Emissions).

- (2) The two grit blast units controlled by fabric filters (baghouses) have applicable compliance monitoring conditions as specified below:
 - (a) Daily visible emissions notations of the grit blast units stack exhaust(s) 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 conduct an inspection each calendar quarter of all bags controlling the grit blast units. All defective bags shall be replaced. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when a defective bag(s) are found during none routine inspections.

These monitoring conditions are necessary because the baghouses for the grit blast units must operate properly to ensure compliance with 326 IAC 5 (Visible Emission Limitations), 326 IAC 6-3 (Process Operations) and 326 IAC 6-4 (Fugitive Dust Emissions).

- (3) The Torit dust collector (canister filter) has applicable compliance monitoring conditions as specified below:
 - (a) Daily visible emissions notations of the welding operations area stack exhaust(s) 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 canister filter controlling the welding operations area, at least once daily when welding is in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the canister filter shall be maintained within the range of 2.0 to 10.0 inches of water or a range established during the latest stack test. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of the above mentioned range for any one reading.

These monitoring conditions are necessary because the canister filter for the welding operations must operate properly to ensure compliance with 326 IAC 5 (Visible Emission Limitations) and 326 IAC 6-3 (Process Operations).

- (4) The five (5) electrostatic precipitators (ESPs) [and/or new dust collector/canister filter] have applicable compliance monitoring conditions as specified below:
 - (a) Daily visible emissions notations of the welding operations area stack exhaust(s) 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 ESPs (or canister filter) controlling the welding operations area, at least once daily when welding is in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the ESPs (or canister filter) shall be maintained within the range of 2.0 to 10.0 inches of water or a range established during the latest stack test. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of the above mentioned range for any one reading.

These monitoring conditions are necessary because the ESPs (or canister filter) for the welding operations must operate properly to ensure compliance with 326 IAC 5 (Visible Emission Limitations) and 326 IAC 6-3 (Process Operations).

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) FESOP Application Form GSD-08.

- (a) This source has accepted federally enforceable air toxic emission limits of 9.4 tons per year for any single HAP and/or 24 tons per year for any combination of HAPs.

Conclusion

The operation of this rubber and miscellaneous plastics products manufacturing plant will be subject to the conditions of the attached proposed FESOP No. F151-7170-00015.

Table A

Stack/Vent ID: 1				
Stack/Vent Dimensions: Ht: Dia: Temp: Flow:				
Emission Unit: EU 001A, two (2) Devilbliss Model No. TEX 67-LO-34-M coating booths				
Date of Construction: Modified 1987				
Alternative Scenario:				
Pollution Control Equipment: Water-wash				
General Description of Requirement:	record keeping & reporting			
Numerical Emission Limit:	24 tons HAPs/yr 9.4 tons/yr any single HAP*			
Regulation/Citation:	326 IAC 2-8-4			
Compliance Demonstration:	record keeping & reporting			
PERFORMANCE TESTING N/A				
Parameter/Pollutant to be Tested:				
Testing Method/Analysis:				
Testing Frequency/Schedule:				
Submittal of Test Results:				
COMPLIANCE MONITORING				
Monitoring Description:	visible emissions			
Monitoring Method:	trained employee			
Monitoring Regulation/Citation:	326 IAC 2-8-5			
Monitoring Frequency:	daily			
RECORD KEEPING				
Parameter/Pollutant to be Recorded:	gallons of coatings, solvents and degreasers used			
Recording Frequency:	Monthly			
Submittal Schedule of Reports:	Quarterly			
REPORTING REQUIREMENTS				
Information in Report:	gallons of each material used			
Reporting Frequency/Submittal:	within 30 days after each calendar quarter			
Additional Comments:				

* Reflects source-wide FESOP limit of 24 tons per year for any combination of HAPs and 9.4 tons per year for any single HAP.

Table B

Stack/Vent ID: Grit Blast Unit Stacks					
Stack/Vent Dimensions:		Ht:	Dia:	Temp:	Flow:
Emission Unit: Each Grit Blast Unit Baghouse (Fabric Filters)					
Date of Construction: N/A					
Alternative Scenario: N/A					
Pollution Control Equipment: two (2 Fiber Filter (one per facility))					
General Description of Requirement:	parameter monitoring	parameter monitoring			
Numerical Emission Limit:	**	**			
Regulation/Citation:	326 IAC 2-8-4	326 IAC 2-8-4			
Compliance Demonstration:	parameter monitoring	parameter monitoring			
PERFORMANCE TESTING N/A					
Parameter/Pollutant to be Tested:					
Testing Method/Analysis:					
Testing Frequency/Schedule:					
Submittal of Test Results:					
COMPLIANCE MONITORING					
Monitoring Description:	bag inspection	visible emissions			
Monitoring Method:	visual	trained employee			
Monitoring Regulation/Citation:	326 IAC 2-8-5	326 IAC 2-8-5			
Monitoring Frequency:	quarterly	daily			
RECORD KEEPING					
Parameter/Pollutant to be Recorded:	bag inspection	visible emissions			
Recording Frequency:	quarterly	daily			
Submittal Schedule of Reports:	upon request	upon request			
REPORTING REQUIREMENTS N/A N/A					
Information in Report:					
Reporting Frequency/Submittal:					
Additional Comments:					

** Reflects source-wide Potential of less than 99 tons particulate matter per year

Table C

Stack/Vent ID: 2					
Stack/Vent Dimensions:		Ht:	Dia:	Temp:	Flow:
Emission Unit: EU 002 welding operations area					
Date of Construction: N/A					
Alternative Scenario: N/A					
Pollution Control Equipment: one Torit Dust Collector (Canister filter)					
General Description of Requirement:	parameter monitoring	parameter monitoring			
Numerical Emission Limit:	**	**			
Regulation/Citation:	326 IAC 2-8-4	326 IAC 2-8-4			
Compliance Demonstration:	parameter monitoring	parameter monitoring			
PERFORMANCE TESTING N/A					
Parameter/Pollutant to be Tested:					
Testing Method/Analysis:					
Testing Frequency/Schedule:					
Submittal of Test Results:					
COMPLIANCE MONITORING					
Monitoring Description:	pressure drop	visible emissions			
Monitoring Method:	gauge reading	trained employee			
Monitoring Regulation/Citation:	326 IAC 2-8-5	326 IAC 2-8-5			
Monitoring Frequency:	daily	daily			
RECORD KEEPING					
Parameter/Pollutant to be Recorded:	pressure drop	visible emissions			
Recording Frequency:	daily	daily			
Submittal Schedule of Reports:	upon request	upon request			
REPORTING REQUIREMENTS N/A N/A					
Information in Report:					
Reporting Frequency/Submittal:					
Additional Comments:					

** Reflects source-wide Potential of less than 99 tons particulate matter per year

Table D

Stack/Vent ID: 2					
Stack/Vent Dimensions:		Ht:	Dia:	Temp:	Flow:
Emission Unit: EU 002 welding operations area					
Date of Construction: N/A					
Alternative Scenario: N/A					
Pollution Control Equipment: 5 ESPs (Equivalent to one canister filter)					
General Description of Requirement:	parameter monitoring	parameter monitoring			
Numerical Emission Limit:	**	**			
Regulation/Citation:	326 IAC 2-8-4	326 IAC 2-8-4			
Compliance Demonstration:	parameter monitoring	parameter monitoring			
PERFORMANCE TESTING N/A					
Parameter/Pollutant to be Tested:					
Testing Method/Analysis:					
Testing Frequency/Schedule:					
Submittal of Test Results:					
COMPLIANCE MONITORING					
Monitoring Description:	pressure drop	visible emissions			
Monitoring Method:	gauge reading	trained employee			
Monitoring Regulation/Citation:	326 IAC 2-8-5	326 IAC 2-8-5			
Monitoring Frequency:	daily	daily			
RECORD KEEPING					
Parameter/Pollutant to be Recorded:	pressure drop	visible emissions			
Recording Frequency:	daily	daily			
Submittal Schedule of Reports:	upon request	upon request			
REPORTING REQUIREMENTS N/A N/A					
Information in Report:					
Reporting Frequency/Submittal:					
Additional Comments:					

** Reflects source-wide Potential of less than 99 tons particulate matter per year

**Appendix A: Emission Calculations
Additional Insignificant & Trivial Activities**

Potential Emissions

Source Name:	CLEVITE ELASTOMERS
Source Location:	503 Weatherhead Street, Angola , Indiana 46703
County:	Steuben
SIC Code:	3069
Operation Permit No.:	F151-7170-00015
Permit Reviewer:	Richard A. Moore Jr./EVP
Date:	8/15/97

Welding Operations

There are two (2) welding categories:

- Welding Stations equipped with Torit Dust Collector
- Welding Stations equipped with ESPs

Emissions (TPY)

$$= \text{Flow Rate (acfm)} \times \text{Grain Loading (gr/ft}^3\text{)} \times 8760 \text{ hr/yr} \times 60 \text{ mins/hr} \times \text{lb/7000 gr} \times \text{tons/2000 lbs}$$

$$\text{Design Flow Rate} = 6,000 \text{ acfm}$$

$$\text{Grain Loading} = 0.03 \text{ grains per cubic foot}$$

Two units

$$\begin{aligned} \text{Emissions (TPY)} &= 6,000 \text{ acfm} \times 0.03 \text{ gr/ft}^3 \times 8760 \text{ hr/yr} \times 60 \text{ mins/hr} \times \text{lb/7000 gr} \times \text{tons/2000 lbs} \times 2 \\ &= 13.52 \text{ tons per year of particulate matter} \\ &= 27,040 \text{ pounds per year PM} \end{aligned}$$

Grit Blasting Operations

There are two grit blasters each equipped with a separate dust collector (baghouse).

Emissions (TPY)

$$= \text{Flow Rate (acfm)} \times \text{Grain Loading (gr/ft}^3\text{)} \times 8760 \text{ hr/yr} \times 60 \text{ mins/hr} \times \text{lb/7000 gr} \times \text{tons/2000 lbs}$$

$$\text{Design Flow Rate} = 1,300 \text{ acfm}$$

$$\text{Grain Loading} = 0.03 \text{ grains per cubic foot}$$

Two units

$$\begin{aligned} \text{Emissions (TPY)} &= 1,300 \text{ acfm} \times 0.03 \text{ gr/ft}^3 \times 8760 \text{ hr/yr} \times 60 \text{ mins/hr} \times \text{lb/7000 gr} \times \text{tons/2000 lbs} \times 2 \\ &= 2.93 \text{ tons per year of particulate matter} \\ &= 5,860 \text{ pounds per year PM} \end{aligned}$$

**Appendix A: Emission Calculations
Additional Insignificant & Trivial Activities**

Potential Emissions

Source Name:	CLEVITE ELASTOMERS
Source Location:	503 Weatherhead Street, Angola , Indiana 46703
County:	Steuben
SIC Code:	3069
Operation Permit No.:	F151-7170-00015
Permit Reviewer:	Richard A. Moore Jr./EVP
Date:	8/15/97

Cooling Tower Operations

There are two cooling towers.

Emissions (lbs/hr)

$$= \text{Flow Rate (gpm)} \times \text{Density (lb/gal)} \times 60 \text{ mins/hr} \times \text{Solids conc. (ppm)} \times \text{Liquid Drift \%}$$

Times a safety or contingency factor of 2X per applicant

Design Flow Rate = 195 gpm per tower

Solids conc. (Total Dissolved Solids - TDS) = 450 parts per million (ppm)

Percent Liquid Drift = 0.5%

Two units

Emissions (lbs/hr)

$$\begin{aligned} &= (195 \text{ gpm} \times 2) \times 8.34 \text{ lb/gal} \times 60 \text{ mins/hr} \times 450 \text{ ppm} \times 0.5 \% \times 2 \\ &= 0.88 \text{ pounds per hour} \\ &= 7708.8 \text{ pounds per year} \\ &= 3.85 \text{ tons per year} \end{aligned}$$

Small Parts Washers

There are several small Safety-Kleen small parts washers.

Emissions (lbs/yr)

$$= [\text{Purchases (gallons/yr)} - \text{Returns (gallons/yr)}] \times \text{Density (lbs/gal)} \times \text{Contingency Factor}$$

Purchases = 2,076 gallons (1995)

Returns = 1,690 gallons (1995)

Density = 8.34 lbs/gal

Contingency Factor = 4X (per applicant)

Emissions (lbs/yr)

$$\begin{aligned} &= (2,076 \text{ gallons/yr} - 1,690 \text{ gallons/yr}) \times 8.34 \text{ lb/gal} \times 4 \\ &= 12,877 \text{ pounds per year} \qquad \qquad \qquad = 6.44 \text{ tons per year} \end{aligned}$$

**Appendix A: Emission Calculations
VOC and Particulate
From Surface Coating Operations**

Potential Emissions

**Company Name: CLEVITE ELASTOMERS
Address City IN Zip: 503 Weatherhead Street, Angola, IN 46703
FESOP: F151-7170-00015
Reviewer: Richard A. Moore Jr./EVP
Date: 7/16/97**

State Potential Emissions (uncontrolled):																				
Material (as applied)	Process	Density (Lb/Gal)	Weight % Volatile (H2O& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency			
Solvent (MEK)		6.71	100.00%	0.00%	100.00%	0.00%	0.00%	0.165	1.00	6.7	6.71	1.11	26.54	4.84	0.00	ERR	0.5			
Solvent (Toluene)		7.22	100.00%	0.00%	100.00%	0.00%	0.00%	0.044	1.00	7.2	7.22	0.32	7.62	1.39	0.00	ERR	0.5			
Solvent (Xylene)		7.35	100.00%	0.00%	100.00%	0.00%	0.00%	0.011	1.00	7.4	7.35	0.08	1.94	0.35	0.00	ERR	0.5			
Primer		7.81	81.00%	0.00%	81.00%	0.00%	19.00%	0.297	1.00	6.3	6.33	1.88	45.04	8.22	0.96	66.59	0.5			
Top Coat 2		7.99	80.00%	0.00%	80.00%	0.00%	20.00%	0.275	1.00	6.4	6.39	1.76	42.14	7.69	0.96	63.92	0.5			
Top Coat 3		9.08	80.00%	0.00%	80.00%	0.00%	20.00%	0.077	1.00	7.3	7.26	0.56	13.41	2.45	0.31	72.64	0.5			
Top Coat 4		10.62	88.00%	0.00%	88.00%	0.00%	12.00%	0.154	1.00	9.3	9.35	1.44	34.50	6.30	0.43	155.76	0.5			
Dip Paint		9.40	97.70%	86.10%	11.60%	86.10%	2.30%	0.090	1.00	7.8	1.09	0.10	2.35	0.43	0.04	94.82	0.5			
Total State Potential Emissions:												7.23	173.54	31.67	2.70					
Federal Potential Emissions (controlled):																				
Total Federal Potential Emissions:												0.00%	0.00%	7.23	173.54	31.67	2.70			

Methodology:

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids) * Transfer Efficiency

Total = Worst Coating + Sum of all solvents used

Controlled emission rate = uncontrolled emission rate * (1 - control efficiency)

Gal of Mat (gal/unit) = (Potential Gallons/yr)/(8760 hr/yr)/(1 unit/hour)

Maximum (unit/hour) = (units/yr)/(8760 hr/yr)

**Appendix A: Emission Calculations
VOC and Particulate
From Surface Coating Operations**

Limited Emissions

**Company Name: CLEVITE ELASTOMERS
Address City IN Zip: 503 Weatherhead Street, Angola, IN 46703
FESOP: F151-7170-00015
Reviewer: Richard A. Moore Jr./EVP
Date: 7/16/97**

State Potential Emissions (uncontrolled):																				
Material (as applied)	Process	Density (Lb/Gal)	Weight % Volatile (H2O& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency			
Solvent (MEK)		6.71	100.00%	0.00%	100.00%	0.00%	0.00%	0.144	1.00	6.7	6.71	0.97	23.16	4.23	0.00	ERR	0.5			
Solvent (Toluene)		7.22	100.00%	0.00%	100.00%	0.00%	0.00%	0.044	1.00	7.2	7.22	0.32	7.60	1.39	0.00	ERR	0.5			
Solvent (Xylene)		7.35	100.00%	0.00%	100.00%	0.00%	0.00%	0.011	1.00	7.4	7.35	0.08	1.93	0.35	0.00	ERR	0.5			
Primer		7.81	81.00%	0.00%	81.00%	0.00%	19.00%	0.247	1.00	6.3	6.33	1.56	37.44	6.83	0.80	66.59	0.5			
Top Coat 2		7.99	80.00%	0.00%	80.00%	0.00%	20.00%	0.247	1.00	6.4	6.39	1.58	37.83	6.90	0.86	63.92	0.5			
Top Coat 3		9.08	80.00%	0.00%	80.00%	0.00%	20.00%	0.068	1.00	7.3	7.26	0.50	11.94	2.18	0.27	72.64	0.5			
Top Coat 4		10.62	88.00%	0.00%	88.00%	0.00%	12.00%	0.137	1.00	9.3	9.35	1.28	30.73	5.61	0.38	155.76	0.5			
Dip Paint		9.40	97.70%	86.10%	11.60%	86.10%	2.30%	0.090	1.00	7.8	1.09	0.10	2.37	0.43	0.04	94.82	0.5			
Total State Potential Emissions:												6.37	152.99	27.92	2.36					
Federal Potential Emissions (controlled):																				
Total Federal Potential Emissions:												0.00%	0.00%	6.37	152.99	27.92	2.36			

Methodology:

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids) * Transfer Efficiency

Total = Worst Coating + Sum of all solvents used

Controlled emission rate = uncontrolled emission rate * (1 - control efficiency)

Gal of Mat (gal/unit) = (Potential Gallons/yr)/(8760 hr/yr)/(1 unit/hour)

Maximum (unit/hour) = (units/yr)/(8760 hr/yr)

HAP Emission Calculations

Potential Emissions

Company Name: CLEVITE ELASTOMERS
Address City IN Zip: 503 Weatherhead Street, Angola, IN 46703
FESOP: F151-7170-00015
Reviewer: Richard A. Moore Jr./EVP
Date: 7/16/97

Material	Density (Lb/Gal)	Potential Gallons per Year	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % Formaldehyde	Weight % MEK	Weight % MIBK	Weight % Xylene	Weight % Toluene	Weight % Trichloroethylene	Weight % Trichloroethane	Weight % Tetrachloroethylene	Weight % Carbon Tetrachloride	Weight % Ethylbenzene
Solvent (MEK)	6.71	1443.80	0.165	1.00	0.00%	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Solvent (Toluene)	7.22	385.00	0.044	1.00	0.00%	0.00%	0.00%	0.00%	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Solvent (Xylene)	7.35	96.30	0.011	1.00	0.00%	0.00%	0.00%	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Primer	7.81	2598.80	0.297	1.00	1.00%	2.00%	60.00%	15.00%	0.00%	0.00%	0.00%	0.00%	0.00%	3.00%
Top Coat 2	7.99	2406.30	0.275	1.00	0.00%	0.00%	0.00%	65.00%	0.00%	0.00%	0.00%	0.00%	0.00%	15.00%
Top Coat 3	9.08	673.80	0.077	1.00	0.00%	0.00%	0.00%	40.00%	0.00%	30.00%	0.00%	0.00%	0.00%	10.00%
Top Coat 4	10.62	1347.50	0.154	1.00	0.00%	0.00%	0.00%	2.00%	10.00%	0.00%	0.00%	20.00%	1.00%	0.00%
Dip Paint	9.40	792.00	0.090	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
					0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

Total State Potential Emissions

Total Potential HAP Emissions = **27.31** Tons/year

METHODOLOGY

Gal of Mat = (Gallons/year)/(8760 hour/year)

HAPS (TPY) = Density*Gallons/yr*Wt %HAP*ton/2000 lbs

HAP Emission Calculations

Limited Emissions

Company Name: CLEVITE ELASTOMERS
Address City IN Zip: 503 Weatherhead Street, Angola, IN 46703
FESOP: F151-7170-00015
Reviewer: Richard A. Moore Jr./EVP
Date: 7/16/97

Material	Density (Lb/Gal)	Potential Gallons per Year	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % Formaldehyde	Weight % MEK	Weight % MIBK	Weight % Xylene	Weight % Toluene	Weight % Trichloroethylene	Weight % Trichloroethane	Weight % Tetrachloroethylene	Weight % Carbon Tetrachloride	Weight % Ethylbenzene
Solvent (MEK)	6.71	1260.00	0.144	1.00	0.00%	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Solvent (Toluene)	7.22	384.00	0.044	1.00	0.00%	0.00%	0.00%	0.00%	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Solvent (Xylene)	7.35	96.00	0.011	1.00	0.00%	0.00%	0.00%	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Primer	7.81	2160.00	0.247	1.00	1.00%	2.00%	60.00%	15.00%	0.00%	0.00%	0.00%	0.00%	0.00%	3.00%
Top Coat 2	7.99	2160.00	0.247	1.00	0.00%	0.00%	0.00%	65.00%	0.00%	0.00%	0.00%	0.00%	0.00%	15.00%
Top Coat 3	9.08	600.00	0.068	1.00	0.00%	0.00%	0.00%	40.00%	0.00%	30.00%	0.00%	0.00%	0.00%	10.00%
Top Coat 4	10.62	1200.00	0.137	1.00	0.00%	0.00%	0.00%	2.00%	10.00%	0.00%	0.00%	20.00%	1.00%	0.00%
Dip Paint	9.40	792.00	0.090	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
					0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
					0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

Total State Potential Emissions

Total Potential HAP Emmissions = **23.98** Tons/year

METHODOLOGY

Gal of Mat = (Gallons/year)/(8760 hour/year)

HAPS (TPY) = Density*Gallons/yr*Wt %HAP*ton/2000 lbs

HAP Emission Calculations

Potential Emissions

Company Name: CLEVITE ELASTOMERS
Address City IN Zip: 503 Weatherhead Street, Angola, IN 46703
FESOP: F151-7170-00015
Reviewer: Richard A. Moore Jr./EVP
Date: 7/16/97

Material	Density (Lb/Gal)	Potential Gallons per Year	Gal of Mat (gal/unit)	Maximum (unit/hour)	Formaldehyde Emissions (ton/yr)	MEK Emissions (ton/yr)	MIBK Emissions (ton/yr)	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Trichlorethylene Emissions (ton/yr)	Trichlorethane Emissions (ton/yr)	Tetrachlorethylene Emissions (ton/yr)	Carbon Tetrachloride Emissions (ton/yr)	Ethylbenzene Emissions (ton/yr)
Solvent (MEK)	6.71	1443.80	0.165	1.00	0.00	4.84	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Solvent (Toluene)	7.22	385.00	0.044	1.00	0.00	0.00	0.00	0.00	1.39	0.00	0.00	0.00	0.00	0.00
Solvent (Xylene)	7.35	96.30	0.011	1.00	0.00	0.00	0.00	0.35	0.00	0.00	0.00	0.00	0.00	0.00
Primer	7.81	2598.80	0.297	1.00	0.10	0.20	6.09	1.52	0.00	0.00	0.00	0.00	0.00	0.30
Top Coat 2	7.99	2406.30	0.275	1.00	0.00	0.00	0.00	6.25	0.00	0.00	0.00	0.00	0.00	1.44
Top Coat 3	9.08	673.80	0.077	1.00	0.00	0.00	0.00	1.22	0.00	0.92	0.00	0.00	0.00	0.31
Top Coat 4	10.62	1347.50	0.154	1.00	0.00	0.00	0.00	0.14	0.72	0.00	0.00	1.43	0.07	0.00
Dip Paint	9.40	792.00	0.090	1.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
					0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
					0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Total State Potential Emissions
0.10 5.05 6.09 9.49 2.11 0.92 0.00 1.43 0.07 2.05

Total Potential HAP Emissions = **27.31** Tons/year

METHODOLOGY

Gal of Mat = (Gallons/year)/(8760 hour/year)

HAPS (TPY) = Density*Gallons/yr*Wt %HAP*ton/2000 lbs

HAP Emission Calculations

Limited Emissions

Company Name: CLEVITE ELASTOMERS
Address City IN Zip: 503 Weatherhead Street, Angola, IN 46703
FESOP: F151-7170-00015
Reviewer: Richard A. Moore Jr./EVP
Date: 7/16/97

Material	Density (Lb/Gal)	Potential Gallons per Year	Gal of Mat (gal/unit)	Maximum (unit/hour)	Formaldehyde Emissions (ton/yr)	MEK Emissions (ton/yr)	MIBK Emissions (ton/yr)	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Trichlorethylene Emissions (ton/yr)	Trichlorethane Emissions (ton/yr)	Tetrachlorethylene Emissions (ton/yr)	Carbon Tetrachloride Emissions (ton/yr)	Ethylbenzene Emissions (ton/yr)
Solvent (MEK)	6.71	1260.00	0.144	1.00	0.00	4.23	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Solvent (Toluene)	7.22	384.00	0.044	1.00	0.00	0.00	0.00	0.00	1.39	0.00	0.00	0.00	0.00	0.00
Solvent (Xylene)	7.35	96.00	0.011	1.00	0.00	0.00	0.00	0.35	0.00	0.00	0.00	0.00	0.00	0.00
Primer	7.81	2160.00	0.247	1.00	0.08	0.17	5.06	1.27	0.00	0.00	0.00	0.00	0.00	0.25
Top Coat 2	7.99	2160.00	0.247	1.00	0.00	0.00	0.00	5.61	0.00	0.00	0.00	0.00	0.00	1.29
Top Coat 3	9.08	600.00	0.068	1.00	0.00	0.00	0.00	1.09	0.00	0.82	0.00	0.00	0.00	0.27
Top Coat 4	10.62	1200.00	0.137	1.00	0.00	0.00	0.00	0.13	0.64	0.00	0.00	1.27	0.06	0.00
Dip Paint	9.40	792.00	0.090	1.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
					0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
					0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Total State Potential Emissions	0.08	4.40	5.06	8.44	2.02	0.82	0.00	1.27	0.06	1.82
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Total Potential HAP Emmissions = **23.98** Tons/year

METHODOLOGY

Gal of Mat = (Gallons/year)/(8760 hour/year)

HAPS (TPY) = Density*Gallons/yr*Wt %HAP*ton/2000 lbs

**Appendix A: Emission Calculations
Natural Gas Combustion**

Company Name: CLEVITE ELASTOMERS
Address City IN Zip: 503 Weatherhead Street, Angola, IN 46703
FESOP: F151-7170-00015
Reviewer: Richard A. Moore Jr./EVP
Date: 8/13/97

1. Emissions from facilities rated < 0.3 MMBtu/hr

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
0.65	5.7

Heat Input Capacity includes:

Emission Factor in lb/MMCF	Pollutant						HAPs
	PM	PM10	SO2	NOx	VOC	CO	
11.2	11.2	0.6	94.0	7.3	40.0		
Potential Emission in tons/yr	0.03	0.03	0.00	0.27	0.02	0.11	0.00

Methodology:

MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, Residential Furnaces (no SCC)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

2. Emissions from facilities rated < 10.0 MMBtu/hr

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
12.2	106.5

Heat Input Capacity includes:

Emission Factor in lb/MMCF	Pollutant						HAPs
	PM	PM10	SO2	NOx	VOC	CO	
12.0	12.0	0.6	100.0	5.3	21.0		
Potential Emission in tons/yr	0.64	0.64	0.03	5.33	0.28	1.12	0.00

Methodology:

MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Emission Factors for NOx: uncontrolled = 100, Low Nox Burner = 17, Flue gas recirculation = 36
Emission Factors for CO: uncontrolled = 21, Low NOx Burner = 27, Flue gas recirculation = ND
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-03-006-03
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Total Potential Emissions from both in tons/yr	Pollutant						HAPs
	PM	PM10	SO2	NOx	VOC	CO	
0.67	0.67	0.03	5.59	0.30	1.23	0.00	

**Appendix A: Emission Calculations
(SOURCE WIDE SUMMARY)**

Potential Emissions

Company Name: CLEVITE ELASTOMERS
Address City IN Zip: 503 Weatherhead Street, Angola, IN 46703
FESOP: F151-7170-00015
Reviewer: Richard A. Moore Jr./EVP
Date: 8/13/97

SOURCE DESCRIPTION CATEGORY	S/V ID	Pollutants (lbs/yr)						
		PM	PM10	SO2	VOC	CO	NOX	HAPS
		A	A	A	A	A	A	A

Significant Activities

Adhesive Coatings & Solvents	5320	5320		62459				54620
Dip paint Tank	80	80		876				0

Insignificant Subtotal, lbs/yr	5400	5400	0	63334.8	0	0	0	54620
Subtotal, TPY	2.70	2.70	0.00	31.67	0.00	0.00	0.00	27.31

Insignificant Activities

All Boilers	1340	1340	60	600	2460	11180	0	0
Cooling Towers	7708.8	7708.8						0
Parts washers				12877				

Insignificant Subtotal, lbs/yr	9048.8	9048.8	60	13477	2460	11180	0	0
Subtotal, TPY	4.52	4.52	0.03	6.74	1.23	5.59	0.00	0.00

Trivial Activities

Degreasing: Cold Cleaners				0				0
Grit Blasting	5860	5860						
Welding Operations	27040.00	27040.00						

Trivial Subtotal, lbs/yr	32900	32900	0	0	0	0	0	0
Subtotal, TPY	16.45	16.45	0.00	0.00	0.00	0.00	0.00	0.00

Fugitive Emissions

Grinding & Machining

Fugitive Subtotal, lbs/yr	0	0	0	0	0	0	0	0
Subtotal, TPY	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Grand Total, lbs/yr	47348.8	47348.8	60	76811.8	2460	11180	54620	
, TPY	23.67	23.67	0.03	38.41	1.23	5.59	27.31	

Grand Total less Fugitive, lbs/yr	47348.8	47348.8	60	76811.8	2460	11180	54620	
, TPY	23.67	23.67	0.03	38.41	1.23	5.59	27.31	

**Appendix A: Emission Calculations
(SOURCE WIDE SUMMARY)**

Limited Emissions

Company Name: CLEVITE ELASTOMERS
Address City IN Zip: 503 Weatherhead Street, Angola, IN 46703
FESOP: F151-7170-00015
Reviewer: Richard A. Moore Jr./EVP
Date: 8/13/97

SOURCE DESCRIPTION CATEGORY	S/V ID	Pollutants (lbs/yr)						
		PM	PM10	SO2	VOC	CO	NOX	HAPS
		A	A	A	A	A	A	A

Significant Activities

Adhesive Coatings & Solvents	4640	4640		54925				47960
Dip paint Tank	80	80		876				0

Insignificant Subtotal, lbs/yr	4720	4720	0	55801.2	0	0	0	47960
Subtotal, TPY	2.36	2.36	0.00	27.90	0.00	0.00	0.00	23.98

Insignificant Activities

All Boilers	1340	1340	60	600	2460	11180	0	0
Cooling Towers	7708.8	7708.8						0
Parts washers				12877				

Insignificant Subtotal, lbs/yr	9048.8	9048.8	60	13477	2460	11180	0	0
Subtotal, TPY	4.52	4.52	0.03	6.74	1.23	5.59	0.00	0.00

Trivial Activities

Degreasing: Cold Cleaners				0				0
Grit Blasting	5860	5860						
Welding Operations	27040.00	27040.00						

Trivial Subtotal, lbs/yr	32900	32900	0	0	0	0	0	0
Subtotal, TPY	16.45	16.45	0.00	0.00	0.00	0.00	0.00	0.00

Fugitive Emissions

Grinding & Machining

Fugitive Subtotal, lbs/yr	0	0	0	0	0	0	0	0
Subtotal, TPY	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Grand Total, lbs/yr	46668.8	46668.8	60	69278.2	2460	11180	47960	
, TPY	23.33	23.33	0.03	34.64	1.23	5.59	23.98	

Grand Total less Fugitive, lbs/yr	46668.8	46668.8	60	69278.2	2460	11180	47960	
, TPY	23.33	23.33	0.03	34.64	1.23	5.59	23.98	