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April 13, 2004

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TO: Interested Parties / Applicant

RE: Honeywell International, Inc. / T141-7442-00172

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval – Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).

For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and

- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of an initial Title V operating permit, permit renewal, or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Honeywell International, Inc.
3520 Westmoor Street
South Bend, Indiana 46628**

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

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. 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. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17. **This permit also addresses certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-7-10.5, applicable to those conditions.**

| | |
|---|--|
| Operation Permit No.: T141-7442-00172 | |
| Issued by: Original signed by Janet G. McCabe Janet G. McCabe, Assistant Commissioner Office of Air Quality | Issuance Date: April 13, 2004 Expiration Date: April 13, 2009 |

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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 Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary aircraft landing systems manufacturing operation.

| | |
|------------------------------|---|
| Responsible Official: | Vice President/General Manager |
| Source Address: | 3520 Westmoor Street, South Bend, Indiana 46628 |
| Mailing Address: | 3520 Westmoor Street, South Bend, Indiana 46628 |
| General Source Phone Number: | (574) 231-2302 |
| SIC Code: | 3724, 3728 |
| County Location: | St. Joseph |
| Source Location Status: | Maintenance Attainment for Ozone Attainment for all other criteria pollutants |
| Source Status: | Part 70 Permit Program Minor Source, under PSD Minor Source, Section 112 of the Clean Air Act |

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

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

- (a) Two (2) electric char furnaces, with a maximum capacity of 45 tons of disks per year each, with volatile organic compound emissions controlled by thermal oxidizers with a 90% overall control efficiency, and exhausting through stack 427. Construction dates are as follows: Nos. 5 and 6, 1989.
- (b) Four (4) electric char furnaces, with a maximum capacity of 45 tons of disks per year each, with volatile organic compound emissions controlled by thermal oxidizers with a 95% overall control efficiency. Char furnaces 1 and 2 are controlled by one (1) thermal oxidizer and exhausting through stack 411. Char furnaces 3 and 4 are controlled by one (1) thermal oxidizer and exhausting through stack 407. Construction dates are as follows: Nos. 1 and 2, 1983; Nos. 3 and 4, 1985.
- (c) One (1) chemical vapor deposition (CVD) unit, also known as carbon vapor deposition unit, identified as CVD-1, constructed in 1978, having an estimated batch capacity of 2400 pounds (initial weight) of brakes and a nominal total reactant gas flow rate of 360 scf per soak hour. One (1) enclosed flare, controlling the soak phase VOC emissions from CVD-1, with a rated capacity of 0.9 MMBtu per hour, natural gas combustion, and exhausting through stack S-FL-1.
- (d) Twenty-two (22) chemical vapor deposition (CVD) units, also known as carbon vapor deposition units, identified as CVD-2 through CVD-23, with each unit having an estimated batch capacity of 8800 pounds (initial weight) of brakes for random fiber process or 5300 pounds (initial weight) of brakes for non-woven process. Each CVD has a nominal total reactant gas flow of 2200 scf per soak hour for random fiber process or a nominal total reactant gas flow of 4200 scf per soak hour for non-woven fiber process. Construction dates are as follows: CVD 2, 1978; CVD 3, 1985; CVD 4, 1988; CVD 5, 1989; CVDs 6 and 7, 1990; CVDs 8 and 9, 1991; CVDs 10 and 11, 1992; CVDs 12 and 13, 1993; CVDs 14 through 21, 1995-2000; CVDs 22 and 23, 2000. Twenty-two (22) enclosed flares,

controlling the soak phase VOC emissions from CVD units 2-23, each having a rated capacity of 5.5 MMBtu per hour, natural gas combustion, and exhausting through stacks S-FL-2 through S-FL-23, respectively.

- (e) One (1) chrome anodizing tank, identified as 18, with a wetting agent in the tank to control emissions.
- (f) One (1) double headed sander, identified as emission unit PM1, with a maximum capacity of 300 pounds per hour, constructed in 1987, controlled by a fabric filter dust collector, identified as DC-1, and exhausting through stack S-1.
- (g) One (1) die cutter room, identified as DCR, with a maximum capacity of 188 pounds per hour, installed in 1991, controlled by a fabric filter dust collector, identified as DC-2, and exhausting within the building.
- (h) Four (4) needle machines, identified as NM-1, NM-2, NM-3 and NM-4. NM-1 and NM-2 were constructed in 1988. NM-3 and NM-4 were constructed in 2002. Each machine has a capacity of 15 pounds per hour and all four (4) machines are controlled by a fabric filter dust collector, identified as DC-3, and exhausting within the building.
- (i) Two (2) auto pre-form machines, identified as APM-1 and APM-2, each with a maximum capacity of 54 pounds per hour. APM-2 was constructed in 1990 and is controlled by a fabric filter dust collector, identified as DC-4, and exhausting through stack S-4.
- (j) One (1) EI dynamometer, identified as EID, installed in 1989, controlled by a fabric filter dust collector, identified as DC-5, and exhausting through stack S-5.

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

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

- (a) Space heaters, process heaters, or boilers using the following fuels:
 - (1) Five (5) natural gas-fired boilers with a total heat input capacity of 10.5 MMBtu/hr. Three (3) boilers constructed in 1986, identified as: Plants 12W, 4W and 4E, exhausting to stacks 226, 484 and 485, respectively. Two (2) boilers constructed in 1991, identified as Plants 4BS and 4BN, both exhausting to stack BS-1. [326 IAC 6-1]
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-5]
- (c) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors or electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
 - (1) Numerous mills discharging to Torrit filter systems, with a maximum throughput of less than one hundred (100) pounds per hour. The torrits are less than 4000 CFM and the mills are grinding and machining operations. [326 IAC 6-1]
 - (2) One (1) wheelabrator operation, identified as No. 816710, with a maximum throughput of less than one hundred (100) pounds per hour of plastic media blast, vented through a rotoclone, which is less than 4000 CFM, and exhausting inside the building. [326 IAC 6-1]

- (3) Three (3) shot peening operations, with a maximum throughput of 6000 pounds per hour, vented through dust collectors and exhausting inside the building. [326 IAC 6-1]
- (4) Three (3) sandblasting operations used intermittently to clean metal parts, vented through dust collectors and exhausting inside the building. [326 IAC 6-1]
- (5) Three (3) burr benches, vented through dust collectors and venting inside the building. [326 IAC 6-1]
- (6) One (1) madison grinder, vented through a dust collector and venting inside the building. [326 IAC 6-1]
- (7) One (1) empire blaster, vented through a dust collector and venting inside the building. [326 IAC 6-1]
- (8) Two (2) blast units, vented through a dust collector and venting inside the building. [326 IAC 6-1]
- (d) Trivial Activities: The following equipment related to manufacturing activities not resulting in the emission of HAPs; brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-1]
- (e) Two (2) Binks Paint Booths, installed in 1998, using HVLP spray guns, 3-stage HEPA filters and an electric powered IR curing oven. [40 CFR 63, Subpart GG] [326 IAC 6-1]
- (f) One (1) plastic bead blaster used to remove paint from parts. The machine is vented through a Torit fabric filter system. Uncontrolled emissions were estimated at one (1) pound per hour. [326 IAC 6-1]
- (g) One (1) brake test dynamometer, this shaft dynamometer is vented directly to the atmosphere through two (2) vents in the roof to remove heat and any potential emissions. Particulate emissions were estimated at 50 pounds per year for each vent. [326 IAC 6-1]
- (h) Three (3) burr benches, vented through dust collectors and venting inside the building. [326 IAC 6-1]

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

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

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

SECTION B GENERAL CONDITIONS

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

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

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.3 Enforceability [326 IAC 2-7-7]

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

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

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

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

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

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

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

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, 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. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this

permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

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

and

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate 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 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

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

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

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

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared

and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

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

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

- (b) The Permittee shall implement the PMPs, including any record keeping required by such PMPs, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 Emergency Provisions [326 IAC 2-7-16]

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

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,
Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967
Northern Regional Office
Telephone Number 1-800-753-5519
Facsimile Number (574) 245-4877

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the

attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

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

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

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

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) 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.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.12 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326

IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) In addition to the nonapplicability determinations set forth in Section D of this permit, the IDEM, OAQ has made the following determination regarding this source:
- (1) 40 CFR 63.460, Subpart T - Standards for Halogenated Solvent Cleaning
The degreasing operations are not subject to this rule because there is no halogenated solvents in a total concentration greater than five percent (5%) by weight, as a cleaning and/or drying agent.
 - (2) 40 CFR 63, Subpart MMMM - Standards for Surface Coating of Miscellaneous Metal Parts and Products
This source is not subject to this rule because the surface coating of metal components of aerospace vehicles meet the applicability criteria for Aerospace Manufacturing and Rework (40 CFR 63, Subpart GG).
 - (3) 40 CFR 63, Subpart GGGGG - Standards for Site Remediation
This rule is not applicable because the source is taking limits to be a minor source of hazardous air pollutants (HAPs) (less than twenty-five (25) tons per year of combined HAP emissions and less than ten (10) tons per year of single HAP emissions.
 - (4) 40 CFR 60.40c, Subpart Dc - Standards of Performance of Small Industrial-Commercial-Institutional Steam Generating Units:
The five (5) natural gas-fired boilers, identified as Plants 12W, 4W, 4E, 4BS and 4BN, are not subject to the New Source Performance Standard, 326 IAC 12 (40 CFR 60.40c, Subpart Dc). The three (3) natural gas-fired boilers, identified as Plants 12W, 4W and 4E, were constructed prior to the June 9, 1989 applicability date and they are rated at less than ten (10) MMBtu/hr. The two (2) natural gas-fired boilers, identified as Plants 4BS and 4BN, were constructed after the June 9, 1989 applicability date but they are rated at less than ten (10) MMBtu/hr. Therefore, 40 CFR 60.40c, Subpart Dc does not apply.
 - (5) 326 IAC 2-2 (Prevention of Significant Deterioration (PSD))
This source is an existing minor source, it was constructed prior to 1986 and it is not one of the 28 listed source categories, therefore, 326 IAC 2-2 is not applicable. See the following Conditions of this permit: D.1.1; D.2.1; D.2.2; D.2.3; D.4.7; D.4.8; D.4.10; D.4.13, D.5.2; D.5.4; D.6.1 and D.6.3.
 - (6) 326 IAC 2-4.1-1 (New Source Toxics Control)
 - (A) Each CVD unit (1-23) is independently distinguishable from the other units as a "process or production unit" as defined in 40 CFR 63.41 (incorporated by reference in 326 IAC 2-4.1). The potential to emit (PTE) of combined hazardous air pollutants (HAPs) for each CVD unit (1-23) is less than twenty-five (25) tons per year each and the potential to emit (PTE) of any single hazardous air pollutants (HAPs) for each CVD unit (1-23) is less than ten (10) tons per year each. In addition, most of these CVDs were constructed prior to the July 1997 applicable date. Therefore, the requirements of this rule do not apply.
 - (B) There are no other new facilities with potential emissions greater than major thresholds for HAPs (ten (10) tons per year for a single HAP and twenty-five (25) tons per year for combination HAPs) and constructed

after July 27, 1997. Therefore, the requirements of this rule do not apply.

- (7) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
This rule applies to the portion of St. Joseph County north of Kern Road and east of Pine Road, however the source does not have potential fugitive particulate matter emissions of twenty-five (25) tons per year or more. Therefore, 326 IAC 6-5-1 (Fugitive Particulate Matter Emission Limitations) is not applicable.
 - (8) 326 IAC 6-1-1 (Nonattainment Area Limitations)
Since the source is located in St. Joseph County, it does not have specific emission limits listed in 326 IAC 6-1-18, however, it does have the potential to emit (PTE) one hundred (100) tons or more of PM per year this rule applies.
 - (A) This rule does not apply to the CVD units (1-23), Char furnaces (1-6) and Chrome Anodizing tanks (18 and 19), because the PM emissions from these units are negligible.
 - (9) 326 IAC 7-1.1-1 (Sulfur Dioxide Emission Limitations)
 - (A) This rule is not applicable to the six (6) char furnaces because the potential to emit (PTE) SO₂ is less than twenty-five (25) tons per year.
 - (B) This rule is not applicable to the five (5) natural gas-fired boilers because the potential to emit (PTE) SO₂ is less than twenty-five (25) tons per year per boiler.
 - (10) 326 IAC 8-2-9 (Miscellaneous Metal Coating)
The surface coating operations are used solely for the painting of exterior components of airplanes and are not subject to the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating).
 - (11) 326 IAC 8-3-2 (Cold Cleaner Operation)
The degreaser is located in St. Joseph county and it is at a source which has potential emissions of one hundred (100) tons or greater per year of VOC, however, it was constructed after January 1, 1980, which is the applicability date. Therefore, 326 IAC 8-3-2 (Cold Cleaner Operation) is not applicable.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
 - (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
 - (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

- (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
- (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deletedby this permit.
- (b) All previous registrations and permits are superseded by this permit. The existing approvals superseded by this permit are as follows:
 - (1) CP (71) 1860, OP 3700-00005, issued on July 23, 1990;
 - (2) R 141-4397-00005, issued on April 20, 1995;
 - (3) CP 141-7277-00005, issued on March 26, 1997;
 - (4) CP 141-8117-00005, issued on May 20, 1997;
 - (5) CP 141-8761-00005, issued on July 2, 1998;
 - (6) A 141-10094-00172, issued on September 22, 1998;
 - (7) CP 141-9999-00172, issued on December 14, 1998;
 - (8) SSM 141-10759-00172, issued on October 19, 1999;
 - (9) 141-11205-00172, issued on October 20, 1999;
 - (10) SSM 141-11511-00172, issued on March 8, 2000;
 - (11) AA 141-12090-00172, issued on July 21, 2000;
 - (12) SSM 141-12169-00172, issued on October 6, 2000;
 - (13) SSM 141-13853-00172, issued on September 7, 2001; and
 - (14) EX 141-16729-00172, issued on November 22, 2002

In addition, the existing registrations issued by the St. Joseph County Health Department, which are superceded by the permit, are as follows:

- (1) B-3-4-13, issued on the following dates: November 25, 1988, November 25, 1990, November 25, 1992, November 25, 1994, November 25, 1996 and November 25, 1998.
- (2) B-3-4-30, issued on the following dates: November 25, 1990, November 25, 1992, November 25, 1994, November 25, 1996 and November 25, 1998.

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency

Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

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

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.16 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

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

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
- (1) A timely renewal application is one that is:
- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, 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, OAQ, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.17 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015
- Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]
[326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.19 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 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 Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

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

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and
 - (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).
- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

B.20 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

B.21 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2][IC 13-30-3-1] [IC 13-17-3-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

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

shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.2 Open Burning [326 IAC 4-1] [IC 13-17-9]

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

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

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

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

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

C.5 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-1(3), 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4, and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.

C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

- (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable 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) **Demolition and renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

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

C.7 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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

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

Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.8 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

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

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

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

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

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

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

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

- (a) The Permittee shall install, calibrate, maintain, and operate all necessary continuous emission monitoring systems (CEMS) and related equipment.
- (b) In the event that a breakdown of a continuous emission monitoring system occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem.
- (c) Whenever a continuous emission monitor other than an opacity monitor is malfunctioning

or will be down for calibration, maintenance, or repairs for a period of four (4) hours or more, a calibrated backup CEMS shall be brought online within four (4) hours of shutdown of the primary CEMS, and shall be operated until such time as the primary CEMS is back in operation.

- (d) Nothing in this permit shall excuse the Permittee from complying with the requirements to operate a continuous emission monitoring system pursuant to 326 IAC 3-5 when the unit is operating pursuant to SSM 141-13853-00172, issued on September 7, 2001.

C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

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

C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on December 10, 1996.
- (b) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.
[326 IAC 1-5-3]

C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.14 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition set forth in Section D of this permit, except that no CRP is required for any compliance monitoring condition subject to 40 CFR 63, Subpart N (Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks) and 40 CFR 63, Subpart GG (Aerospace Manufacturing and Rework Facilities). If a Permittee is required to have an Operation, Maintenance and Monitoring (OMM) Plan or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan under 40 CFR 60/63, such plans shall be deemed to satisfy the requirements for a CRP for those compliance monitoring conditions. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan or Parametric Monitoring Plant and Start-up, Shutdown, and Malfunction (SSM) Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan to include such response steps taken.

The Operation, Maintenance and Monitoring (OMM) Plan or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan shall be submitted within the time frames specified by the applicable 40 CFR 60/63 requirement.

- (b) For each compliance monitoring condition of this permit subject to this CRP requirement, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
- (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from, or a violation of, this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall be considered a deviation from this permit.
- (c) For each compliance monitoring condition of this permit subject to this CRP requirement, the Permittee is not required to take any further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) For each compliance monitoring condition of this permit subject to this CRP requirement. The Permittee shall record all instances when, in accordance with Section D, response steps are 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.

- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]
[326 IAC 2-6]

- (a) The Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. This statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6-3 and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period identified in 326 IAC 2-6. The emission statement shall meet the following requirements:
- (1) Indicate estimated actual emissions of pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
- (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

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

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

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

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

-
- (a) Records of all required monitoring data, reports and support information required by this permit 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 physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
 - (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Each deviation from permit requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

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

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

SECTION D.1 FACILITY OPERATION CONDITIONS

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

- (a) Two (2) electric char furnaces, with a maximum capacity of 45 tons of disks per year each, with volatile organic compound emissions controlled by thermal oxidizers with a 90% overall control efficiency, and exhausting through stack 427. Construction dates are as follows: Nos. 5 and 6, 1989.
- (b) Four (4) electric char furnaces, with a maximum capacity of 45 tons of disks per year each, with volatile organic compound emissions controlled by thermal oxidizers with a 95% overall control efficiency. Char furnaces 1 and 2 are controlled by one (1) thermal oxidizer and exhausting through stack 411. Char furnaces 3 and 4 are controlled by one (1) thermal oxidizer and exhausting through stack 407. Construction dates are as follows: Nos. 1, 2, 1983; Nos. 3 and 4, 1985.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

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

D.1.1 BACT Condition [326 IAC 8-1-6] [326 IAC 2-2] [326 IAC 2-3]

- (a) Pursuant to CP (71) 1860, OP 3700-0005, issued on July 23, 1990, Best Available Control Technology (BACT) for char furnaces 5 and 6 has been determined to be the use of a thermal oxidizer. The thermal oxidizer shall have an overall control efficiency of no less than 90%. Compliance with these requirements renders 326 IAC 2-2 not applicable.
- (b) Char furnaces 1-4 shall use thermal oxidizers. The thermal oxidizers shall have an overall control efficiency of no less than 95%.
- (c) The IDEM, OAQ has information that indicates that the char furnaces 1-4 are subject to the requirements of 326 IAC 8-1-6 (New Facilities: General Reduction Requirements (BACT)), 326 IAC 2-2 (PSD) and 326 IAC 2-3 (Emission Offset). Therefore, the Permit Shield provided by Condition B.12 of this permit does not apply to char furnaces 1-4 with regards to 326 IAC 8-1-6 (BACT). The IDEM, OAQ will promptly reopen this permit using the provisions of 326 IAC 2-7-9 (Permit Reopening) to include detailed requirements necessary to comply with 326 IAC 8-1-6 and a schedule for achieving compliance with such requirements.
- (d) The combination of Conditions D.1.1, D.2.1 and D.2.2 plus the potential to emit (PTE) of all other HAP emitting facilities yields single HAPs to less than ten (10) tons per year and combination HAPs to less than twenty-five (25) tons per year.

D.1.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

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

- (a) Within one hundred and eighty (180) days after issuance of this permit, the Permittee shall conduct a performance test to verify the overall efficiency of the thermal oxidizer utilized by char furnaces 5 and 6. The test method shall utilize methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

- (b) Within one hundred and eighty (180) days after issuance of this permit, the Permittee shall conduct a performance test to verify the uncontrolled emissions of char furnaces 1-4 and the overall control efficiency of the two (2) oxidizers controlling char furnaces 1-2 and 3-4. The test method shall utilize methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

Pursuant to 326 IAC 8-1-2(a), the Permittee shall operate the thermal oxidizer at all times whenever the electric char furnaces are operating to achieve compliance with Condition D.1.1. In addition, the char furnaces shall be closed during operation and not re-opened until the batch cycle is complete in order to ensure capture, and during purging the thermal oxidizers shall be operated at all times.

D.1.5 Thermal Oxidizer Temperature

- (a) A continuous monitoring system shall be calibrated, and maintained, on the three (3) thermal oxidizers for measuring operating temperature. The temperature monitoring system shall be operated when the oxidizers are operating and the output of this system shall be recorded as a three (3) hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the three (3) hour average temperature of 1800°F .
- (b) The Permittee shall determine the three (3) hour average temperature from the most recent valid stack test that demonstrates compliance with limits in D.1.1, as approved by IDEM, OAQ.
- (c) On and after the date the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the three (3) hour average temperature as observed during the compliant stack test.

D.1.6 VOC Compliance Determination

Whenever a condition in this permit requires the measurement of temperature or flow rate, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (2%) of full scale reading.

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

D.1.7 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) below shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC limit established in Condition D.1.1.
 - (1) The continuous temperature records (on a three (3) hour average basis) for the three (3) thermal oxidizers and the three (3) hour average temperature used to demonstrate compliance during the most recent compliance stack test.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: CVD Units (1-21)

- (a) One (1) chemical vapor deposition (CVD) unit, also known as carbon vapor deposition unit, identified as CVD-1, Constructed in 1978, having an estimated batch capacity of 2400 pounds (initial weight) of brakes and a nominal total reactant gas flow rate of 360 scf per soak hour. One (1) enclosed flare, controlling the soak phase VOC emissions from CVD-1, with a rated capacity of 0.9 MMBtu per hour, natural gas combustion, and exhausting through stack S-FL-1.
- (b) Twenty-two (22) chemical vapor deposition (CVD) units, also known as carbon vapor deposition units, identified as CVD-2 through CVD-23, with each unit having an estimated batch capacity of 8800 pounds (initial weight) of brakes for random fiber process or 5300 pounds (initial weight) of brakes for non-woven process. Each CVD has a nominal total reactant gas flow of 2200 scf per soak hour for random fiber process or a nominal total reactant gas flow of 4200 scf per soak hour for non-woven fiber process. Construction dates are as follows: CVD 2, 1978; CVD 3, 1985; CVD 4, 1988; CVD 5, 1989; CVDs 6 and 7, 1990; CVDs 8 and 9, 1991; CVDs 10 and 11, 1992; CVDs 12 and 13, 1993; CVDs 14 through 21, 1995-2000; CVDs 22 and 23, 2000. Twenty-two (22) enclosed flares, controlling the soak phase VOC emissions from CVD units 2-23, each having a rated capacity of 5.5 MMBtu per hour, natural gas combustion, and exhausting through stacks S-FL-2 through S-FL-23, respectively.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

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

D.2.1 BACT Condition [326 IAC 8-1-6] [326 IAC 2-2]

- (a) Pursuant to SSM 141-13853-00172, issued on September 7, 2001, enclosed flares have been accepted as BACT for control of the VOC emissions from CVD units 1-21. All exhaust process gas from the soak phase of each CVD unit's cycle shall be directed through the enclosed flares for VOC control. Each enclosed flare shall operate at all times that the corresponding CVD unit is operating in the soak phase and shall achieve an overall control efficiency of 98% with a maximum VOC emission rate of 0.23 pounds of VOC per million British thermal units (MMBtu) of process gas combusted by the flares. Compliance with these requirements renders 326 IAC 2-2 not applicable for CVDs 1-21.
- (b) The combination of Conditions D.1.1, D.2.1 and D.2.2 plus the potential to emit (PTE) of all other HAP emitting facilities yields single HAPs to less than ten (10) tons per year and combination HAPs to less than twenty-five (25) tons per year.

D.2.2 BACT Condition [326 IAC 8-1-6] [326 IAC 2-2]

- (a) Pursuant to SSM 141-11511-00172, issued on March 8, 2000, an enclosed flare has been accepted as BACT for control of the VOC emissions from the CVD units 22-23. All exhaust process gas from the soak phase of the CVD unit's cycle shall be directed through the enclosed flare for VOC control. The enclosed flare shall operate at all times that the CVD unit is operating in the soak phase and shall achieve an overall destruction efficiency of ninety-eight percent (98%).
- (b) The CVDs 22-23 shall use a flare with a 98% control efficiency to control VOC emissions. Compliance with these requirements renders 326 IAC 2-2 not applicable for CVDs 22-23.
- (c) The combination of Conditions D.1.1, D.2.1 and D.2.2 plus the potential to emit (PTE) of all other HAP emitting facilities yields single HAPs to less than ten (10) tons per year and combination HAPs to less than twenty-five (25) tons per year.

D.2.3 PSD Minor Limit [326 IAC 2-2]

Pursuant to SSM 141-13853-00172, issued on September 7, 2001, the carbon monoxide emissions from the enclosed flares for CVD units 1 through 21, shall be limited to 1.62 pounds per hour, each, based on the CVDs estimated soak phase operations per year for the non-woven process, totaling 121,800 soak hours per year for the non-woven process in CVDs 1-21. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) does not apply to CVDs 1-21.

D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for flares on the CVDs.

Compliance Determination Requirements

D.2.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

Within one hundred eighty (180) days after issuance of this permit, in order to demonstrate compliance with Condition D.2.1 and D.2.2, the Permittee shall perform a compliance stack test on 20% of the total or 4, whichever is greater, of the CVD unit flares for overall control efficiency utilizing methods as approved by the Commissioner. The tests shall be repeated at least once every five years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Condition C - Performance Testing.

D.2.6 VOC Compliance Determination

To assure compliance with Conditions D.2.1 and D.2.2:

- (a) The input rate of total reactant gas to each CVD unit shall be measured once per day over the entire batch cycle. To monitor the volatile organic compound (VOC) load to the control flare, the Permittee shall record the number of brake discs per batch.
- (b) Each flare shall be operated at all times that its respective CVD unit is operating. Each enclosed flare shall have a flame present at all times that its respective CVD unit is operating in the soak phase.
- (c) Whenever a condition in this permit requires the measurement of temperature or flow rate, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (2%) of full scale reading.

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

D.2.7 Monitoring

- (a) To assure compliance with Condition D.2.3:
 - (1) Pursuant to 326 IAC 3-5-1(d)(1), the Permittee shall install, calibrate, certify, operate, and maintain a continuous monitoring system for CO on the CVD-21 flare stack designated as S-FL-21 in accordance with 326 IAC 3-5-2 and 3-5-3.
 - (A) The continuous emission monitoring system (CEMS) shall measure CO emission rates in pounds per hour and parts per million (ppmvd).
 - (B) The CEMS shall be in operation at all times when the CVD-21 unit is operating in the soak phase.
 - (C) The Permittee shall submit to IDEM, OAQ, within ninety (90) days after monitor installation, a complete written continuous monitoring standard operating procedure (SOP), in accordance with the requirements of 326 IAC 3-5-4.
- (b) To assure compliance with Conditions D.2.1 and D.2.2:

- (1) A thermocouple or equivalent device shall be installed and operated to monitor the presence of a pilot flame for each flare and to sound an alarm when the flame is not detected. A continuous monitoring system shall be calibrated, maintained, and operated on each flare for measuring operating temperature. The output of this system shall be recorded as a three (3) hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports whenever the three (3) hour average temperature of each flare is below one thousand eight degrees Celsius (1008C). A three (3) hour average temperature that is below one thousand eight degrees Celsius (1008C) is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports shall be considered a deviation from this permit. In the event that a breakdown of the monitoring equipment occurs, the Permittee shall supplement monitoring with visual checks once per hour to ensure that a flame is present.
- (2) The Permittee shall determine the three (3) hour average temperature from the most recent valid stack test that demonstrates compliance with limits in Conditions D.2.1 and D.2.2, as approved by IDEM.

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

D.2.8 Record Keeping Requirements

- (a) To document compliance with Conditions D.2.1 and D.2.2, the Permittee shall maintain a record of the total reactant gas input to the CVDs and a log of the number and type of brake disks per batch run.
- (b) To document compliance with Condition D.2.6, the Permittee shall maintain flare temperature data for CVD units operating the non-woven process.
- (c) To document compliance with Condition D.2.3, the Permittee shall record the hours per month of soak phase operation.
- (d) To document compliance with Condition D.2.7, the Permittee shall record the output of the CEMs and shall perform the required record keeping pursuant to 326 IAC 3-5-6 and reporting pursuant to 326 IAC 3-5-7.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.9 Reporting Requirements

The Permittee shall submit a quarterly excess emissions report, if applicable, based on the continuous emissions monitor (CEM) data for CO, pursuant to 326 IAC 3-5-7. These reports shall be submitted within thirty (30) calendar days following the end of each calendar quarter and in accordance with Section C - General Reporting Requirements, of this permit.

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

- (a) One (1) chrome anodizing tank, identified as 18 , with a wetting agent in the tank to control emissions.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

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

D.3.1 General Provisions Relating to HAPs [326 IAC 20-1-1] [40 CFR Part 63, Subpart A]

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

D.3.2 Chromium Electroplating and Anodizing NESHAP [326 IAC 20-8-1] [40 CFR Part 63, Subpart N]

The provisions of 40 CFR Part 63, Subpart N - National Emission Standards for Chromium Emissions From Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks, which are incorporated by reference as 326 IAC 20-8-1, apply to tank 18. A copy of this rule is attached.

D.3.3 Chromium Emissions Limitation [40 CFR 63.342(c)] [40 CFR 63.343(a)(1)&(2)] [326 IAC 20]

- (a) The emission limitations in this condition apply only during tank operation, and also apply during periods of startup and shutdown as these are routine occurrences for tanks subject to 326 IAC 20-8-1. The emission limitations do not apply during periods of malfunction. The work practice standards that address operation and maintenance must be followed during malfunctions and period of excess emissions.
- (b) During tank operation, the Permittee shall control chromium emissions discharged to the atmosphere from tank 18 by either:
- (1) Not allowing the concentration of total chromium in the exhaust gas stream discharged to the atmosphere to exceed one-hundredth milligrams of total chromium per dry standard cubic meter of ventilation air (0.01 mg/dscm) [equivalent to four and four-tenths times ten raised to the power of negative six grains of total chromium per dry standard cubic foot of ventilation air (4.4×10^{-6} gr/dscf)]; or
 - (2) Not allowing the surface tension of the anodizing bath contained within the tank to exceed forty-five dynes per centimeter (45 dynes/cm) [equivalent to three and one-tenth times ten raised to the power of negative three pound-force per foot (3.1×10^{-3} lb_f/ft)] at any time during operation of tank 18 when a chemical fume suppressant containing a wetting agent is used.

D.3.4 Work Practice Standards [40 CFR 63.342(f)] [326 IAC 20]

The following work practice standards apply to tank 18.

- (a) At all times, including periods of startup, shutdown, malfunction and excess emissions, the Permittee shall operate and maintain tank 18, including the wetting agent and monitoring equipment, in a manner consistent with good air pollution control practices, consistent with the Operation and Maintenance Plan (OMP) required by Condition D.3.6.
- (b) Malfunctions and excess emissions shall be corrected as soon as practicable after their occurrence in accordance with the OMP required by Condition D.3.6.
- (c) These operation and maintenance requirements are enforceable independent of

emissions limitations or other requirements in this section.

- (d) Determination of whether acceptable operation and maintenance procedures are being used will be based on information available to IDEM, OAQ, which may include, but is not limited to, monitoring results; review of the OMP; procedures and records; and inspection of the source.
- (e) Based on the results of a determination made under paragraph (d) of this condition, IDEM, OAQ may require that the Permittee make changes to the OMP required by Condition D.4.6. Revisions may be required if IDEM, OAQ finds that the plan:
 - (1) Does not address a malfunction or period of excess emissions that has occurred;
 - (2) Fails to provide for the operation of tank 18, the wetting agent and process monitoring equipment during a malfunction or period of excess emissions in a manner consistent with good air pollution control practices; or
 - (3) Does not provide adequate procedures for correcting malfunctioning process equipment, the wetting agent, monitoring equipment or other causes of excess emissions as quickly as practicable.

The work practice standards that address operation and maintenance must be followed during malfunctions and periods of excess emissions.

D.3.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for tank 18.

D.3.6 Operation and Maintenance Plan [40 CFR 63.342(f)(3)] [326 IAC 20]

- (a) The Permittee shall prepare an Operation and Maintenance Plan (OMP) to be implemented no later than the compliance date of tank 18. The OMP shall specify the operation and maintenance criteria for tank 18, the wetting agent and monitoring equipment and shall include the following elements:
 - (1) Manufacturers recommendations for maintenance of the monitoring equipment used to measure surface tension.
 - (2) A standardized checklist to document the operation and maintenance criteria for tanks 18 and 19, the air pollution control device and the monitoring equipment.
 - (3) Procedures to be followed to ensure that equipment or process malfunctions due to poor maintenance or other preventable conditions or periods of excess emissions as indicated by monitoring data do not occur.
 - (4) A systematic procedure for identifying malfunctions and periods of excess emissions of tank 18, the air pollution control device and monitoring equipment; and for implementing corrective actions to address such malfunctions and periods of excess emissions.
- (b) The Permittee may use applicable standard operating procedures (SOP) manuals, Occupational Safety and Health Administration (OSHA) plans, or other existing plans such as the PMP required in Condition D.3.5, as the OMP, provided the alternative plans meet the above listed criteria in Condition D.3.6(a).
- (c) If the OMP fails to address or inadequately addresses an event that meets the characteristics of a malfunction or period of excess emissions at the time the plan is initially developed, the Permittee shall revise the OMP within forty-five (45) days after such an event occurs. The revised plan shall include procedures for operating and maintaining

tank 18, the air pollution control device and the monitoring equipment, during similar malfunction or period of excess emissions events, and a program for corrective action for such events.

- (d) If actions taken by the Permittee during periods of malfunction or period of excess emissions are inconsistent with the procedures specified in the OMP, the Permittee shall record the actions taken for that event and shall report by phone such actions within two (2) working days after commencing actions inconsistent with the plan. This report shall be followed by a letter within seven (7) working days after the end of the event, unless the Permittee makes alternative reporting arrangements, in advance, with IDEM, OAQ.
- (e) The Permittee shall keep the written OMP on record after it is developed to be made available, upon request, by IDEM, OAQ for the life of tank 18 or until the tank is no longer subject to the provisions of 40 CFR 63.340. In addition, if the OMP is revised, the Permittee shall keep previous versions of the OMPs on record to be made available for inspection, upon request by IDEM, OAQ for a period of five (5) years after each revision to the plan.

D.3.7 Monitoring to Demonstrate Continuous Compliance [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]
[40 CFR 63.343(c)] [326 IAC 20]

- (a) Pursuant to 40 CFR 63.343(c)(5)(ii) and (iii), when using a wetting agent in the anodizing bath to comply with the limit specified in Condition D.3.3, the Permittee shall monitor the surface tension of the electroplating baths. Operation of tank 18 at a surface tension greater than forty-five (45) dynes per centimeter shall constitute noncompliance with the standards.
 - (1) The Permittee shall monitor the surface tension of the anodizing bath during tank operation according to the following schedule:
 - (A) The surface tension shall be measured once every 4 hours during operation of the tank with a stalagmometer or a tensiometer as specified in Method 306B, appendix A of this part.
 - (B) The time between monitoring can be increased if there have been no exceedances. The surface tension shall be measured once every 4 hours of tank operation for the first 40 hours of tank operation after the compliance date. Once there are no exceedances during 40 hours of tank operation, surface tension measurement may be conducted once every 8 hours of tank operation. Once there are no exceedances during 40 hours of tank operation, surface tension measurements may be conducted once every 40 hours of tank operation on an ongoing basis, until an exceedance occurs. The minimum frequency of monitoring allowed by this subpart is once every 40 hours of tank operation.
 - (C) Once an exceedance occurs as indicated through surface tension monitoring, the original monitoring schedule of once every 4 hours must be resumed. A subsequent decrease in frequency shall follow the schedule laid out in paragraph (B) above. For example, if a Permittee has been monitoring a tank once every 40 hours and an exceedance occurs, subsequent monitoring would take place once every 4 hours of tank operation. Once an exceedance does not occur for 40 hours of tank operation, monitoring can occur once every 8 hours of tank operation. Once an exceedance does not occur for 40 hours of tank operation on this schedule, monitoring can occur once every 40 hours of tank operation.
 - (2) Once a bath solution is drained from tank 18 and a new solution added, the original monitoring schedule of once every 4 hours must be resumed, with a

decrease in monitoring frequency allowed following the procedures in paragraphs (B) and (C) above.

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

D.3.8 Performance Testing [326 IAC 2-1.1-11] [[326 IAC 2-7-6(1)] [40 CFR 63.343(b)(2)] [40 CFR 63.344] [326 IAC 20]

- (a) Pursuant to 40 CFR 63.343(b)(2), the Permittee is not required to conduct an initial performance test since the source meets all of the following criteria:
- (1) Tank 18 is a chrome anodizing tank;
 - (2) A wetting agent is used in the anodizing bath to inhibit chromium emissions from tank 18; and
 - (3) The Permittee is complying with the applicable surface tension limit in Condition D.4.3 as demonstrated through the continuous compliance monitoring required by 40 CFR 63.343(c)(5)(ii).
- (b) Although an initial performance test is not required by this permit, the IDEM may require testing when necessary to determine if tank 18 is in compliance. If testing is required by the IDEM, compliance with the limit specified in Condition D.3.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.
- (c) Any change, modification, or reconstruction of tank 18, the wetting agent or monitoring equipment may require additional performance testing conducted in accordance with 40 CFR 63.344 and Section C - Performance Testing.

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

D.3.9 Record Keeping Requirements [326 IAC 2-7-5(3)] [40 CFR 63.346] [326 IAC 20]

The Permittee shall maintain records to document compliance with Conditions D.3.3, D.3.4 and D.3.6. These records shall be maintained in accordance with Section C - General Record Keeping Requirements of this permit and include a minimum of the following:

- (a) Inspection records for the wetting agent and monitoring equipment to document that the inspection and maintenance required by Conditions D.3.4, D.3.6, D.3.7 and D.3.8 have taken place. The record can take the form of a checklist and should identify the following:
- (1) The device inspected;
 - (2) The date of inspection;
 - (3) A brief description of the working condition for the device during the inspection, including any deficiencies found; and
 - (4) Any actions taken to correct deficiencies found during the inspection, including the date(s) such actions were taken.
- (b) Records of all maintenance performed on tank 18 and monitoring equipment.
- (c) Records of the occurrence, duration, and cause (if known) of each malfunction of tank 18 and monitoring equipment.
- (d) Records of the occurrence, duration, and cause (if known) of each period of excess emissions of tank 18 and monitoring equipment as indicated by monitoring data collected in accordance with this condition.

- (e) Records of actions taken during periods of malfunction or excess emissions when such actions are inconsistent with the OMP.
- (f) Other records, which may take the form of checklists, necessary to demonstrate compliance with the provisions of the OMP.
- (g) Test reports documenting results of all performance tests.
- (h) All measurements as may be necessary to determine the conditions of performance tests, including measurements necessary to determine compliance.
- (i) Records of monitoring data required by 40 CFR 63.343(c) that are used to demonstrate compliance with the standard including the date and time the data is collected.
- (j) Records of the date and time that fume suppressants were added to the anodizing bath, and the amount and type of fume suppressants added.
- (k) All documentation supporting the notifications and reports required by 40 CFR 63.9 and 63.10 (Subpart A, General Provisions) and by Condition D.3.10.

D.3.10 Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 3-6-4(b)] [40 CFR 63.344(a), 63.345 and 63.347] [326 IAC 20]

The notifications and reports required in this section shall be submitted to IDEM, OAQ using the address specified in Section C - General Reporting Requirements.

(a) Notifications:

- (1) A Notification of Compliance Status (NCS) is required each time that the facility becomes subject to the requirements of 40 CFR Part 63, Subpart N.
 - (A) The NCS shall be submitted to IDEM, OAQ, and shall list, for each tank, the information identified in 40 CFR 63.347(e)(2).
 - (B) The NCS for tank 18 shall be submitted to IDEM, OAQ immediately.
- (2) Notification of Construction or Reconstruction
Pursuant to 40 CFR 63.345(b)(1), the Permittee may not construct a new tank subject to 40 CFR 63, Subpart N (including non-affected tanks defined in 40 CFR 63.344(e)) without submitting a Notification of Construction or Reconstruction (NCR) to IDEM, OAQ. In addition, the Permittee may not change, modify, or reconstruct tank 18 without submitting a Notification of Construction or Reconstruction (NCR) to IDEM, OAQ.
 - (A) The NCR shall contain the information identified in 40 CFR 63.345(b)(2) and (3).
 - (B) A change, modification, or reconstruction of this facility includes any change in the air pollution control techniques, the addition of add-on control devices, or the construction of duct work for the purpose of controlling the existing tank and non-affected facilities by a common control technique or device.
 - (C) A complete application to construct new chromium electroplating or chromium anodizing tanks serves as this notification. Likewise, the complete application to modify or reconstruct tank 18 serves as this notification.
 - (D) Pursuant to 326 IAC 2-1.1-2(a), permission must be received from IDEM,

OAQ before construction, modification, or reconstruction may commence.

- (b) **Performance Test Results**
The Permittee shall document results from any future performance tests in a complete test report that contains the information required in 40 CFR 344(a).
- (c) **Ongoing Compliance Status Report**
The Permittee shall prepare summary reports to document the ongoing compliance status of tank 18 using the Ongoing Compliance Status Report form provided with this permit. This report shall contain the information specified in 40 CFR 63.347(g)(3).

Because tank 18 is located at a site that is an area source of hazardous air pollutants (HAPs), the Ongoing Compliance Status Report shall be retained on site and made available to IDEM, OAQ upon request.

- (1) The Ongoing Compliance Status Report shall be completed according to the following schedule except as provided in paragraphs (c)(2).
 - (A) The first report shall cover the period from the issuance date of the permit to December 31 of the year in which the permit is issued.
 - (B) Following the first year of reporting, the report shall be completed on a calendar year basis with the reporting period covering from January 1 to December 31.
- (2) If both of the following conditions are met, semi-annual reports shall be prepared and submitted to IDEM, OAQ:
 - (A) The total duration of excess emissions (as indicated by the monitoring data collected by the Permittee in accordance with 40 CFR 63.343(c)) is one percent (1%) or greater of the total operating time for the reporting period; and
 - (B) The total duration of malfunctions of the add-on air pollution control device and monitoring equipment is five percent (5%) or greater of the total operating time.

Once the Permittee reports an exceedance as defined above, Ongoing Compliance Status Reports shall be submitted semi-annually until a request to reduce reporting frequency in accordance with 40 CFR 63.347(g)(2) is approved.
- (3) IDEM, OAQ may determine on a case-by-case basis that the summary report shall be completed more frequently and submitted, or that the annual report shall be submitted instead of being retained on site, if these measures are necessary to accurately assess the compliance status of the source.

SECTION D.4

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Insignificant Activities: Paint Booths

- (a) Two (2) Binks Paint Booths, installed in 1998, using HVLP spray guns, 3-stage HEPA filters and an electric powered IR curing oven. [40 CFR 63, Subpart GG] [326 IAC 6-1]

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

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

D.4.1 General Provisions Relating to HAPs [326 IAC 20-1-1] [40 CFR 63, Subpart A]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR Part 63.743(a)(4) through (a)(10) and in Table 1 of 40 CFR 63, Subpart GG.

D.4.2. Applicability [326 IAC 20-15-1] [40 CFR 63, Subpart GG]

The provisions of 40 CFR 63, Subpart GG and 326 IAC 20-15-1 which incorporates by reference 40 CFR 63, Subpart GG, National Emission Standards for Aerospace Manufacturing and Rework Facilities, apply to the facilities described in this section.

D.4.3 Standards for Cleaning Operations [40 CFR 63.744] [326 IAC 20]

- (a) Pursuant to 40 CFR 63.744(a), the Permittee shall comply with the housekeeping measures of 40 CFR 63.744(a), paragraphs (1) through (3) below, unless the cleaning solvent used is identified in Table 1 of 40 CFR 63.744, or contains HAP or VOC below the de-minimis levels specified in 63.741(f).
- (1) Pursuant to 40 CFR 63.744(a)(1), the Permittee shall place cleaning solvent-laden cloth, paper, or other absorbent applicators used for cleaning in bags or other closed containers upon completing their use. Ensure that these bags and containers are kept closed at all times, except when depositing or removing these materials from the container. Use bags and containers of such design so as to contain the vapors of the cleaning solvent. Cotton tipped swabs used for very small cleaning operations are exempt from this requirement.
 - (2) Pursuant to 40 CFR 63.744(a)(2), the Permittee shall store fresh and spent cleaning solvents, except semi-aqueous solvent cleaners, used in aerospace cleaning operations in closed containers.
 - (3) Pursuant to 40 CFR 63.744(a)(3), the Permittee shall conduct the handling and transfer of cleaning solvents to or from enclosed systems, vats, waste containers, and other cleaning operation equipment that hold or store fresh or spent cleaning solvents in such a manner that minimizes spills.
- (b) Pursuant to 40 CFR 63.744(b) (Hand-wipe cleaning), the Permittee shall use cleaning solvents that meet (1) or (2) below. Cleaning solvents that contain HAP or VOC below the de-minimis levels specified in 63.741(f) and cleaning operations described in 40 CFR 63.744(e) are exempt from these requirements.
- (1) Pursuant to 40 CFR 63.744(b)(1), the Permittee shall meet one of the composition requirements in Table 1 of 40 CFR 63.744; or
 - (2) Pursuant to 40 CFR 63.744(b)(2), the Permittee shall have a composite vapor pressure of 45 mm Hg (24.1 in H₂O) or less at 20 degrees C (68 degrees F).
- (c) Pursuant to 40 CFR 63.744(c) (Spray gun cleaning) when spray guns are cleaned, the Permittee shall use one of the techniques listed below in paragraphs (1) through (3) or their equivalent. Cleaning solvents that contain HAP and VOC below the de-minimis

levels specified in 63.741(f) are exempt from these requirements.

- (1) Pursuant to 40 CFR 63.744(c)(1), *Enclosed System*, clean the spray gun in an enclosed system that is closed at all times except when inserting or removing the spray gun. Cleaning shall consist of forcing solvent through the gun.
 - (2) Pursuant to 40 CFR 63.744(c)(2), *Nonatomized cleaning*, clean the spray guns by placing cleaning solvent in the pressure pot and forcing the solvent through the spray gun with the atomizing cap in place. No atomizing air is to be used. Direct the cleaning solvent from the spray gun into a vat, drum or other waste container that is closed when not in use.
 - (3) Pursuant to 40 CFR 63.744(c)(3), *Disassembled spray gun cleaning*, clean the disassembled spray gun components by hand in a vat that shall remain closed at all times except when in use or by soaking in a vat that shall remain closed during the soaking period and when not inserting or removing components.
- (d) Pursuant to 40 CFR 63.744(d) (Flush Cleaning), the Permittee shall empty the used cleaning solvent each time aerospace parts or assemblies, or components of a coating unit (with the exception of spray guns) are flush cleaned into an enclosed container or collection system that is kept closed when not in use or into a system with equivalent emission control. This excludes those flush cleaning operations in which Table 1 or semi-aqueous cleaning solvents are used.
- (e) Pursuant to 40 CFR 63.745(c) (Uncontrolled Coatings), the Permittee shall comply with the organic HAP and VOC content limits specified in paragraphs (c)(1) through (c)(4) of this section:
- (1) Pursuant to 40 CFR 63.745(c)(1), organic HAP emissions from primers shall be limited to an organic HAP content level of no more than 650 g/L (5.4 lb/gal) of exterior primer (less water), as applied, to large commercial aircraft components (parts or assemblies).
 - (2) Pursuant to 40 CFR 63.745(c)(2), VOC emissions from primers shall be limited to a VOC content level of no more than 650 g/L (5.4 lb/gal) of exterior primer (less water and exempt solvents), as applied, to large commercial aircraft components (parts or assemblies).
 - (3) Pursuant to 40 CFR 63.745(c)(3), organic HAP emissions from topcoats shall be limited to an organic HAP content level of no more than 420 g/L (3.5 lb/gal) of coating (less water) as applied.
 - (4) Pursuant to 40 CFR 63.745(4), VOC emissions from topcoats shall be limited to a VOC content level of no more than 420 g/L (3.5 lb/gal) of coating (less water and exempt solvents) as applied.

D.4.4 Storage and Handling of Waste [326 IAC 20-15-1] [40 CFR 63, Subpart GG]

Pursuant to 40 CFR 63.748 and 63.741(e), unless exempt under 40 CFR 63.741(e), the Permittee shall conduct the handling and transfer of the waste that contains HAP to or from containers, tanks, vats, vessels, and piping systems in such a manner that minimizes spills.

D.4.5 Spray Gun Cleaning and Coating Operations [326 IAC 20-15-1] [40 CFR 63, Subpart GG]

- (a) The Permittee shall comply with the Spray gun cleaning Enclosed system inspection and repair requirements below.
- (1) Pursuant to 40 CFR 63.751(a), the Permittee shall visually inspect seals and other potential sources of leaks associated with each enclosed gun spray cleaner system at least once per month, while operating.

- (2) Pursuant to 40 CFR 63.744(c)(1)(ii), if a leak is found, repairs shall be made as soon as practicable, but no later than 15 days from detection. If the leak is not repaired by the 15th day after detection, remove the cleaning solvent and shut down the enclosed cleaning system until the leak is repaired.

D.4.6 Primer and Topcoat Application Operations [326 IAC 20-15-1] [40 CFR 63, Subpart GG]

- (a) All primers and topcoats shall be applied using one or more of the application techniques specified below unless the application is exempted in 40 CFR 63.745(f)(3) and shall be operated according to company procedures, and/or the manufacturers specifications, whichever is most stringent, at all times:
 - (1) Flow/curtain coat application;
 - (2) Dip coat application;
 - (3) Roll coating;
 - (4) Brush coating;
 - (5) Cotton-tipped swab application;
 - (6) Electrodeposition (dip) coating;
 - (7) High volume low pressure (HVLP) spraying;
 - (8) Electrostatic spray application; or
 - (9) Other coating application methods that achieve emission reductions equivalent to HVLP or electrostatic spray application methods, as determined according to the requirements in 40 CFR 63.750(i).
- (b) Pursuant to 40 CFR 63.745(g)(1), primer or topcoat applications that are spray applied and contain inorganic HAP shall be applied in a booth or hanger in which air flow is directed downward onto or across the part of assembly being coated and exhausted through one or more outlets.
- (c) Pursuant to 40 CFR 63.745(g)(2), the Permittee must control the air stream from this operation by passing the air stream through a dry particulate filter system certified using the methods described in 40 CFR 63.750(o) to meet or exceed the efficiency data points in Table 1 and 2 of 40 CFR 63.745(g)(2). Pursuant to 40 CFR 63.745(g)(2)(iv), the following requirements shall be met for each dry particulate system used to comply with the primer and topcoat inorganic HAP emissions standards in 40 CFR 63.745(g)(2)(i)(A):
 - (1) Maintain the system in good working order;
 - (2) Install a differential pressure gauge across the filter banks;
 - (3) Continuously monitor pressure drop across the filter and read and record the pressure drop across the filter once per shift; and
 - (4) Take corrective actions when the pressure drop exceeds or falls below the filter manufacturer's recommended limit(s).
- (d) Pursuant to 40 CFR 63.745(g)(3), the Permittee shall comply with the requirements below.
 - (1) If the pressure drop is outside of range, the Permittee shall shut down the operation immediately and take corrective action.
 - (2) If the booth maintenance procedures for the filter system have not been performed as scheduled, shut down the operation immediately and take corrective action.
 - (3) The operation shall not be resumed until the pressure drop is returned within the specified range.
- (e) The requirements of 40 CFR 63.745(g)(1) through (3) do not apply to the situations listed in 40 CFR 63.745(g)(4).

D.4.7 Control Device Requirements [326 IAC 20-15-1] [40 CFR 63, Subpart GG]

Pursuant to 40 CFR 63.743(b) dry particulate filter systems operated per the manufacturer's

instructions are exempt from a startup, shutdown, and malfunction plan.

D.4.8 Particulate Matter (PM) [326 IAC 6-1]

Pursuant to 326 IAC 6-1 (Nonattainment Area Particulate Limitations), the particulate (PM) from the two (2) paint booths shall be limited to 0.03 grains per dry standard cubic foot of exhaust air.

D.4.9 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

D.4.10 Compliance Monitoring Requirements for Aerospace Manufacturing and Rework Facilities [326 IAC 20-15-1] [40 CFR 63.751, Subpart GG]

The compliance monitoring requirements of 40 CFR 63.751 are applicable to the cleaning operations and dry particulate filter system. The Permittee shall perform monthly visual inspection requirements for enclosed spray gun cleaners pursuant to 40 CFR 63.751(a). The Permittee shall also continuously monitor, read and record the pressure drop once per shift pursuant to 40 CFR 63.751(c). Compliance with this monitoring requirement renders the requirements of 326 IAC 2-2 not applicable.

Compliance Determination Requirements

D.4.11 Compliance Dates and Determination for Aerospace Manufacturing and Rework Facilities [326 IAC 20-15-1] [40 CFR 63.749, Subpart GG]

- (a) Pursuant to 40 CFR 63.749(d)(3) (Organic HAP and VOC content levels - primer and topcoat application operations), the primer application operation is considered in compliance when conditions specified below are met. Failure to meet any one of the conditions identified below shall constitute noncompliance:
- (1) For all uncontrolled primers, all values of Hi (as determined using the procedures specified in 40 CFR 63.750(c)) are less than or equal to 350 grams of organic HAP per liter (2.9 lb/gal) or primer (less water) as applied, and all values of Gi (as determined using the procedures specified in 40 CFR 63.750(e)) are less than or equal to 350 grams of organic VOC per liter (2.9 lb/gal) of primer (less water and exempt solvents) as applied.
 - (2) Uses an application technique specified in 40 CFR 63.745(f)(1)(i) through (f)(1)(vii).
 - (3) Operates all application techniques in accordance with the manufacturer's specifications.
- (b) Pursuant to 40 CFR 63.749(d)(4) (Organic HAP and VOC content levels - primer and topcoat application operations), the topcoat application operation is considered in compliance when the conditions specified below are met. Failure to meet any of the conditions identified below shall constitute noncompliance.
- (1) For all uncontrolled topcoats, all values of Hi (as determined using the procedures specified in 40 CFR 63.750(c)) are less than or equal to 420 grams organic HAP per liter (3.5 lb/gal) of topcoat (less water) as applied, and all values of Gi (as determined using the procedures specified in 40 CFR 63.750(e)) are less than or equal to 420 grams organic VOC per liter (3.5 lb/gal) of topcoat (less water and exempt solvents) as applied.
 - (2) Uses an application technique specified in 40 CFR 63.745(f)(1)(i) through (f)(1)(viii).
 - (3) Operates all application techniques in accordance with the manufacturer's specifications.

- (c) Pursuant to 40 CFR 63.749(e) (Organic HAP and VOC content levels - primer and topcoat application operations), for each primer or topcoat application operation that emits inorganic HAP, the operation is in compliance when:
 - (1) It is operated according to the requirements specified in 40 CFR 63.745(g)(1), (g)(2)(i)(A), (g)(2)(iv), and (g)(3).
 - (2) It is shut down immediately whenever the pressure drop is outside the limit(s) established for them and is not restarted until the pressure drop is returned within these limit(s), as required under 40 CFR 63.745(g)(3).

D.4.12 Compliance Testing and Procedures for Aerospace Manufacturing and Rework Facilities
[326 IAC 20-15-1] [40 CFR 63.750, Subpart GG]

- (a) The compliance test methods and procedures of 40 CFR 63.750 are to be used for demonstrating compliance with the cleaning operations. The specific requirements include the following:
 - (1) The composition and vapor pressure requirements for cleaning operations shall be determined by the test methods and procedures specified in 40 CFR 63.750(a) and (b).
 - (2) Dry particulate filters used to comply with 40 CFR 63.745(g)(2) must be certified by the filter manufacturer or distributor, paint/depainting booth supplier, and/or the facility owner or operator using method 319 in appendix A of subpart A of this part, to meet or exceed the efficiency data points found in Tables 1 and 2, or 3 and 4 of 40 CFR 63.745 for existing or new sources respectively as outlined in 40 CFR 63.750(o).
- (b) The procedures in 40 CFR 63.750(c) (Organic HAP content level determination - compliant primers and topcoats) shall be used to determine the mass of organic HAP emitted per volume of coating (less water) as applied.
- (c) The procedures in 40 CFR 63.750(e) (VOC content level determination - compliant primers and topcoats) shall be used to determine the mass of VOC emitted per volume of coating (less water and exempt solvents) as applied.

D.4.13 Particulate Control [326 IAC 6-1]

Particulate from the surface coating shall be controlled by dry particulate filters and the Permittee shall operate the control device at all times the two (2) paint booths are in operation.

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

D.4.14 Record Keeping Requirements

- (a) Pursuant to 40 CFR 63.752(a) and to demonstrate compliance with Condition D.4.3, the Permittee shall fulfill all recordkeeping requirements specified in 40 CFR 63.10(a), (b), (d) and (f).
- (b) Pursuant to 40 CFR 63.752(b)(1) *Cleaning Operations*: and to demonstrate compliance with Condition D.4.3, record the following for each cleaning solvent used for the affected cleaning operations:
 - (1) Name of the product;
 - (2) The vapor pressure; and
 - (3) Documentation showing the organic HAP constituents.
- (c) Pursuant to 40 CFR 63.752(b)(2) *Hand-wipe Cleaning Operations*: and to demonstrate compliance with Condition D.4.3, record the following for each cleaning solvent used in hand-wipe cleaning operations that complies with the composition requirements in 40 CFR 63.744(b)(1) or for semi-aqueous cleaning solvent used for flush cleaning

operations:

- (1) The name of each cleaning solvent used;
 - (2) All data and calculations that demonstrate that the cleaning solvent complies with one of the composition requirements; and
 - (3) Annual records of the volume of each solvent used, from facility purchase or usage records.
- (d) Pursuant to 40 CFR 63.752(b)(3) and to demonstrate compliance with Condition D.4.3, for each cleaning solvent used in hand-wipe cleaning operations that does not comply with the composition requirements in 40 CFR 63.744(b)(1), but does comply with the vapor pressure requirements in 40 CFR 63.744(b)(2):
- (1) The name of each cleaning solvent used;
 - (2) The composite vapor pressure of each cleaning solvent used;
 - (3) All vapor pressure test results, if appropriate, data, and calculations used to determine the composite vapor pressure of each cleaning solvent; and
 - (4) The amount (in gallons) of each cleaning solvent used each month at each operation.
- (e) Pursuant to 40 CFR 63.752(b)(5) and to demonstrate compliance with Condition D.4.5, record the following information for each leak identified from enclosed spray gun cleaners.
- (1) Source identification; and
 - (2) Date leak was discovered and repaired
- (f) Pursuant to 40 CFR 63.752(c) *Primer and topcoat application operations - organic HAP and VOC* and to demonstrate compliance with Conditions D.4.3(e), D.4.11, and D.4.12, the Permittee shall record the information specified in paragraphs (c)(1) through (c)(3) of this section:
- (1) Name and VOC content as received and as applied of each primer and topcoat used at the facility.
 - (2) For primers and topcoats
 - (i) The mass of organic HAP emitted per unit volume of coating as applied (less water) (Hi) and the mass of VOC emitted per unit volume of coating as applied (less water and exempt solvents) (Gi) for each coating formulation within each coating category used each month (as calculated using the procedures specified in 40 CFR 63.750(c) and (e);
 - (ii) All data, calculations, and test results (including EPA Method 24 results) used in determining the values of Hi and Gi; and
 - (iii) The volume (gal) of each coating formulation within each coating category used each month.
 - (3) For "low HAP content" uncontrolled primers with organic HAP content less than or equal to 250 g/l (2.1 lb/gal) less water as applied and VOC content less than or equal to 250 g/l (2.1 lb/gal) less water and exempt solvents as applied:
 - (i) Annual purchase records of the total volume of each primer purchased; and
 - (ii) All data, calculations, and test results (including EPA Method 24 results) used in determining the organic HAP and VOC content as applied. These records shall consist of the manufacturer's certification when the primer is applied as received, or the data and calculations used to determine Hi if not applied as received.
- (g) Pursuant to 40 CFR 63.752(d) *Primer and topcoat application operations - inorganic HAP emissions* and to demonstrate compliance with Conditions D.4.6 and D.4.10, record the pressure drop across the dry filter system once each shift during which coating operations occur. The acceptable limit(s) of pressure drop, as specified by the filter manufacturer should be included in the log.
- (h) To document compliance with Condition D.4.9, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.

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

D.4.15 Reporting Requirements

- (a) The Permittee shall submit a report that identifies the following information semi-annually unless otherwise specified.
 - (1) Pursuant to 40 CFR 63.753(b) *Cleaning Operation*
 - (A) Any instance where a noncompliant cleaning solvent is used for a non-exempt hand-wipe cleaning operation;
 - (B) A list of any new cleaning solvents used for hand-wipe cleaning in the previous 6 months and, as appropriate, their composite vapor pressure or notification that they comply with the composition requirements specified in Sec. 63.744(b)(1);
 - (C) Any instance where a non-compliant spray gun cleaning method is used;
 - (D) Any instance where a leaking enclosed spray gun cleaner remains unrepaired and in use for more than 15 days; and
 - (E) If the operations have been in compliance for the semi-annual period, a statement that the cleaning operations have been in compliance with the applicable standards. The Permittee shall also submit a statement of compliance signed by a responsible company official certifying that the facility is in compliance with all applicable requirements.
 - (2) Pursuant to 40 CFR 63.753(c) *Primer and topcoat application operations*
 - (A) For primers and topcoats where compliance is not being achieved through the use of averaging or a control device, each value of H_i and G_i , as recorded under 40 CFR 63.752.(c)(2)(i), that exceeds the applicable organic HAP or VOC content limit specified in 40 CFR 63.745(c) and Condition D.4.3(e).
 - (B) All times when a primer or topcoat application operation was not immediately shut down when the pressure drop across a dry particulate filter or HEPA filter system, was outside the limit(s) specified by the filter or booth manufacturer;
 - (C) If the operations have been in compliance for the semi-annual period, a statement that the operations have been in compliance with the applicable standards; and
 - (D) Annual reports listing the number of time the pressure drop for each dry filter system was outside the limit(s) specified by the filter or booth manufacturer.
- (b) Pursuant to 40 CFR 63.9(j) any change in the information provided under 40 CFR 63.9 shall be reported to IDEM, OAQ and OES in writing within 15 calendar days after the change.
- (c) All reports shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the report forms located at the end of this permit, or their equivalent. The semi-annual reports required by 40 CFR 63.753(b)(1) and (c)(1) in paragraph (a) of this condition shall be submitted on May 1 and November 1 of each year. The annual reports required by 40 CFR 63.753(c)(2) in paragraph (a)(2)(D) of this

condition shall be submitted on May 1 of each year.

SECTION D.5

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Insignificant Activities and Trivial Activities

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-5]
- (b) Five (5) natural gas-fired boilers with a total heat input capacity of 10.5 MMBtu/hr. Three (3) boilers constructed in 1986, identified as: Plants 12W, 4W and 4E, exhausting to stacks 226, 484 and 485, respectively. Two (2) boilers constructed in 1991, identified as Plants 4BS and 4BN, both exhausting to stack BS-1. [326 IAC 6-1]
- (c) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors or electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
 - (1) Numerous mills discharging to Torrit filter systems, with a maximum throughput of less than one hundred (100) pounds per hour. The torrits are less than 4000 CFM and the mills are grinding and machining operations. [326 IAC 6-1]
 - (2) One (1) wheelabrator operation, identified as No. 816710, with a maximum throughput less than one hundred (100) pounds per hour of plastic media blast, vented through a rotoclone, which is less than 4000 CFM, and exhausting inside the building. [326 IAC 6-1]
 - (3) Three (3) shot peening operations, with a maximum throughput of 6000 pounds per hour, vented through dust collectors and exhausting inside the building. [326 IAC 6-1]
 - (4) Three (3) sandblasting operations used intermittently to clean metal parts, vented through dust collectors and exhausting inside the building. [326 IAC 6-1]
 - (5) Three (3) burr benches, vented through dust collectors and venting inside the building. [326 IAC 6-1]
 - (6) One (1) madison grinder, vented through a dust collector and venting inside the building. [326 IAC 6-1]
 - (7) One (1) empire blaster, vented through a dust collector and venting inside the building. [326 IAC 6-1]
 - (8) Two (2) blast units, vented through a dust collector and venting inside the building. [326 IAC 6-1]
- (d) Trivial Activities: The following equipment related to manufacturing activities not resulting in the emission of HAPs; brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-1]
- (e) One (1) plastic bead blaster used to remove paint from parts. The machine is vented through a Torit fabric filter system. Uncontrolled emissions were estimated at one (1) pound per hour. [326 IAC 6-1]

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

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

- (f) One (1) brake test dynamometer, this shaft dynamometer is vented directly to the atmosphere through two (2) vents in the roof to remove heat and any potential emissions. Particulate emissions were estimated at 50 pounds per year for each vent. [326 IAC 6-1]
- (g) Three (3) burr benches, vented through dust collectors and venting inside the building. [326 IAC 6-1]

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

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

D.5.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaning operations located in St. Joseph County and existing as of July 1, 1990, 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 that as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the US 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 the 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.5.2 Particulate Matter (PM) [326 IAC 6-1]

- (a) Pursuant to 326 IAC 6-1-2(b) (Nonattainment Area Particulate Limitations), the particulate (PM) from the five (5) natural gas-fired boilers shall be limited to 0.01 grains per dry standard cubic foot of exhaust air.
- (b) Pursuant to 326 IAC 6-1 (Nonattainment Area Particulate Limitations), the particulate (PM) from the trivial activities related to manufacturing activities not resulting in the emission of HAPs; brazing equipment, cutting torches, soldering equipment, welding equipment, shall be limited to 0.03 grains per dry standard cubic foot of exhaust air.
- (c) Pursuant to 326 IAC 6-1 (Nonattainment Area Particulate Limitations), the particulate (PM) from the one (1) plastic bead blaster, one (1) brake test dynamometer, and three (3) burr benches shall be limited to 0.03 grains per dry standard cubic foot of exhaust air.
- (d) Pursuant to 326 IAC 6-1 (Nonattainment Area Particulate Limitations), the particulate (PM) from the numerous mills and one (1) wheelabrator, shall be limited to 0.03 grains per dry standard cubic foot of exhaust air.
- (e) Pursuant to 326 IAC 6-1 (Nonattainment Area Particulate Limitations), the particulate (PM) from the shot peening and sandblasting operations shall be limited to 0.03 grains per dry standard cubic foot of exhaust air.
- (f) Pursuant to 326 IAC 6-1 (Nonattainment Area Particulate Limitations), the particulate (PM) from the three (3) burr benches, one (1) madison grinder, one (1) empire blaster and two (2) blast units shall be limited to 0.03 grains per dry standard cubic foot of exhaust air.

D.5.3 Preventive Maintenance Plan [326 IAC 2-7-5(3)]

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

Compliance Determination Requirements

D.5.4 Particulate Control [326 IAC 6-1]

- (a) In order to comply with Condition D.5.2(c), the Torit filter system and rotoclones for the particulate control shall be in operation and control emissions from the numerous mills and wheelabrator at all times that the numerous mills and wheelabrator are in operation. In addition, the numerous mills and wheelabrator operation must meet the criteria of a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate of less than or equal to 4000 actual cubic feet per minute, in order to comply with

this limit.

- (b) In order to comply with Condition D.5.2(c), the dust collectors for the particulate control shall be in operation and control emissions from the shot peening and sandblasting operations at all times that the shot peening and sandblasting operations are in operation. In addition, the shot peening and sandblasting operations must meet the criteria of a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate of less than or equal to 4000 actual cubic feet per minute, in order to comply with this limit.

- (c) In order to comply with Condition D.5.2(e), the dust collectors for the particulate control shall be in operation and control emissions from the three (3) burr benches, one (1) madison grinder, one (1) empire blaster and two (2) blast units at all times that the three (3) burr benches, one (1) madison grinder, one (1) empire blaster and two (2) blast units are in operation. In addition, the three (3) burr benches, one (1) madison grinder, one (1) empire blaster and two (2) blast units must meet the criteria of a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate of less than or equal to 4000 actual cubic feet per minute, in order to comply with this limit.

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

- (a) One (1) double headed sander, identified as emission unit PM1, with a maximum capacity of 300 pounds per hour, constructed in 1987, controlled by a fabric filter dust collector, identified as DC-1, and exhausting through stack S-1.
- (b) One (1) die cutter room, identified as DCR, with a maximum capacity of 188 pounds per hour, installed in 1991, controlled by a fabric filter dust collector, identified as DC-2, and exhausting within the building.
- (c) Four (4) needle machines, identified as NM-1, NM-2, NM-3 and NM-4. NM-1 and NM-2 were constructed in 1988. NM-3 and NM-4 were constructed in 2002. Each machine has a capacity of 15 pounds per hour and all four (4) machines are controlled by a fabric filter dust collector, identified as DC-3, and exhausting within the building.
- (d) Two (2) auto pre-form machines, identified as APM-1 and APM-2, each with a maximum capacity of 54 pounds per hour. APM-2 was constructed in 1990 and is controlled by a fabric filter dust collector, identified as DC-4, and exhausting through stack S-4.
- (e) One (1) EI dynamometer, identified as EID, installed in 1989, controlled by a fabric filter dust collector, identified as DC-5, and exhausting through stack S-5.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

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

D.6.1 Particulate Matter (PM) [326 IAC 6-1]

- (a) Pursuant to 326 IAC 6-1 (Nonattainment Area Particulate Limitations), the particulate (PM) from the one (1) double headed sander, one (1) die cutter room, four (4) needle machines, two (2) auto pre-form machines and one (1) EI dynamometer shall be limited to 0.03 grains per dry standard cubic foot of exhaust air.

D.6.2 Preventive Maintenance Plan [326 IAC 2-7-5(3)]

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

Compliance Determination Requirements

D.6.3 Particulate Control [326 IAC 6-1]

- (a) In order to comply with Condition D.6.1, the dust collectors for the particulate control shall be in operation and control emissions from the one (1) double headed sander, one (1) die cutter room, four (4) needle machines, two (2) auto pre-form machines and one (1) EI dynamometer at all times that the one (1) double headed sander, one (1) die cutter room, four (4) needle machines, two (2) auto pre-form machines and one (1) EI dynamometer are in operation.

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Honeywell International, Inc.
Source Address: 3520 Westmoor Street, South Bend, Indiana 46628
Mailing Address: 3520 Westmoor Street, South Bend, Indiana 46628
Part 70 Permit No.: T141-7442-00172

**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:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

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

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Honeywell International, Inc.
Source Address: 3520 Westmoor Street, South Bend, Indiana 46628
Mailing Address: 3520 Westmoor Street, South Bend, Indiana 46628
Part 70 Permit No.: T141-7442-00172

This form consists of 2 pages

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- 9** This is an emergency as defined in 326 IAC 2-7-1(12)
- C The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
 - C The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

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

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

**PART 70 OPERATING PERMIT
 CHROMIUM ELECTROPLATING AND ANODIZING NESHAP
 ONGOING COMPLIANCE STATUS REPORT**

Source Name: Honeywell International, Inc.
 Source Address: 3520 Westmoor Street, South Bend, Indiana 46628
 Mailing Address: 3520 Westmoor Street, South Bend, Indiana 46628
 Part 70 Permit No.: T141-7442-00172

Tank ID #: 18
 Type of process: Anodizing
 Monitoring Parameter: Surface tension of the anodizing bath
 Parameter Value: 45 dynes per centimeter
 Limits: Total chromium concentration may not exceed 0.01 mg/dscm

This form is to be used to report compliance for the Chromium Electroplating and Anodizing NESHAP only.
 The frequency for completing this report may be altered by IDEM, OAQ, Compliance Branch.

Companies classified as a major source: Submit this report no later than 30 days after the end of the reporting period.
Companies classified as an area source: Complete this report no later than 30 days after the end of the reporting period, and retain on site unless otherwise notified.

This form consists of 2 pages

Page 1 of 2

| |
|---|
| BEGINNING AND ENDING DATES OF THE REPORTING PERIOD: |
| TOTAL OPERATING TIME OF THE TANK DURING THE REPORTING PERIOD: |

| | |
|--|---|
| MAJOR AND AREA SOURCES: CHECK ONE | |
| 9 | NO DEVIATIONS OF THE MONITORING PARAMETER ASSOCIATED WITH THIS TANK FROM THE COMPLIANT VALUE OR RANGE OF VALUES OCCURRED DURING THIS REPORTING PERIOD. |
| 9 | THE MONITORING PARAMETER DEVIATED FROM THE COMPLIANT VALUE OR RANGE OF VALUES DURING THIS REPORTING PERIOD (THUS INDICATING THE EMISSION LIMITATION MAY HAVE BEEN EXCEEDED, WHICH COULD RESULT IN MORE FREQUENT REPORTING). |

| | | | |
|---|-----|-----|-----|
| AREA (I.E., NON-MAJOR) SOURCES OF HAP ONLY: IF DEVIATIONS OCCURRED, LIST THE AMOUNT OF TANK OPERATING TIME EACH MONTH THAT MONITORING RECORDS SHOW THE MONITORING PARAMETER DEVIATED FROM THE COMPLIANT VALUE OR RANGE OF VALUES. | | | |
| JAN | APR | JUL | OCT |
| FEB | MAY | AUG | NOV |
| MAR | JUN | SEP | DEC |
| HARD CHROME TANKS / MAXIMUM RECTIFIER CAPACITY LIMITED IN ACCORDANCE WITH 40 CFR 63.342(c)(2) ONLY: LIST THE ACTUAL AMPERE-HOURS CONSUMED (BASED ON AN AMP-HR METER) BY THE INDIVIDUAL TANK. | | | |
| JAN | APR | JUL | OCT |
| FEB | MAY | AUG | NOV |
| MAR | JUN | SEP | DEC |

**CHROMIUM ELECTROPLATING AND ANODIZING NESHAP
ONGOING COMPLIANCE STATUS REPORT**

ATTACH A SEPARATE PAGE IF NEEDED

Page 2 of 2

IF THE OPERATION AND MAINTENANCE PLAN REQUIRED BY 40 CFR 63.342 (f)(3) WAS NOT FOLLOWED, PROVIDE AN EXPLANATION OF THE REASONS FOR NOT FOLLOWING THE PLAN AND DESCRIBE THE ACTIONS TAKEN FOR THAT EVENT:

DESCRIBE ANY CHANGES IN TANKS, RECTIFIERS, CONTROL DEVICES, MONITORING, ETC. SINCE THE LAST STATUS REPORT:

ADDITIONAL COMMENTS:

ALL SOURCES: CHECK ONE

I CERTIFY THAT THE WORK PRACTICE STANDARDS IN 40 CFR 63.342(f) WERE FOLLOWED IN ACCORDANCE WITH THE OPERATION AND MAINTENANCE PLAN ON FILE; AND, THAT THE INFORMATION CONTAINED IN THIS REPORT IS ACCURATE AND TRUE TO THE BEST OF MY KNOWLEDGE.

THE WORK PRACTICE STANDARDS IN 40 CFR 63.342(f) WERE NOT FOLLOWED IN ACCORDANCE WITH THE OPERATION AND MAINTENANCE PLAN ON FILE, AS EXPLAINED ABOVE AND/OR ON ATTACHED.

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

**PART 70 OPERATING PERMIT
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Honeywell International, Inc.
 Source Address: 3520 Westmoor Street, South Bend, Indiana 46628
 Mailing Address: 3520 Westmoor Street, South Bend, Indiana 46628
 Part 70 Permit No.: T141-7442-00172

Months: _____ to _____ Year: _____

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

| | |
|--|-------------------------------|
| Permit Requirement (specify permit condition #) | |
| Date of Deviation: | Duration of Deviation: |
| Number of Deviations: | |
| Probable Cause of Deviation: | |
| Response Steps Taken: | |
| Permit Requirement (specify permit condition #) | |
| Date of Deviation: | Duration of Deviation: |
| Number of Deviations: | |
| Probable Cause of Deviation: | |
| Response Steps Taken: | |
| Permit Requirement (specify permit condition #) | |
| Date of Deviation: | Duration of Deviation: |
| Number of Deviations: | |
| Probable Cause of Deviation: | |
| Response Steps Taken: | |

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

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

Source Name: Honeywell International, Inc.
Source Address: 3520 Westmoor Street, South Bend, Indiana 46628
Mailing Address: 3520 Westmoor Street, South Bend, Indiana 46628
Part 70 Permit No.: T141-7442-00172

Months: _____ to _____ Year: _____

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

| | |
|--|-------------------------------|
| Permit Requirement (specify permit condition #) | |
| Date of Deviation: | Duration of Deviation: |
| Number of Deviations: | |
| Probable Cause of Deviation: | |
| Response Steps Taken: | |
| Permit Requirement (specify permit condition #) | |
| Date of Deviation: | Duration of Deviation: |
| Number of Deviations: | |
| Probable Cause of Deviation: | |
| Response Steps Taken: | |
| Permit Requirement (specify permit condition #) | |
| Date of Deviation: | Duration of Deviation: |
| Number of Deviations: | |
| Probable Cause of Deviation: | |
| Response Steps Taken: | |

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for a Part 70 Operating Permit

Source Name: Honeywell International, Inc
 Source Location: 3520 Westmoor Street, South Bend, Indiana 46628
 County: St. Joseph
 SIC Code: 3724, 3728
 Operation Permit No.: T141-7442-00172

On December 17, 2003, the Office of Air Quality (OAQ) had a notice published in the South Bend Tribune, South Bend, Indiana, stating that Honeywell International, Inc. had applied for a Part 70 Operating Permit to operate a stationary aircraft landing systems manufacturing operation. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On January 16, 2004, the OAQ received comments from the source. If revisions to the permit are required, bolded language shall indicate language that has been added, language with a line through it has been deleted. The Table of Contents has been revised as needed.

Comment 1:

Condition A.2 - The source made several comments on Condition A.2 regarding typographical error, removal of equipment, addition of equipment and description changes. These comments have been combined as Comment 1.

Response to Comment 1:

IDEM, OAQ agrees. Due to typographical error, removal of equipment, addition of equipment and description changes, Condition A.2 has been revised as follows:

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

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

- (a) Two (26) electric char furnaces, with a maximum capacity of 45 tons of disks per year each, with volatile organic compound emissions controlled by thermal oxidizers with a 90% overall control efficiency, and exhausting through stack 427. Construction dates are as follows: Nos. 5 and 6, 1989.
- (b) Four (4) electric char furnaces, with a maximum capacity of 45 tons of disks per year each, with volatile organic compound emissions controlled by thermal oxidizers with a 95% overall control efficiency. Char furnaces 1 and 2 are controlled by one (1) thermal oxidizer and exhausting through stack 411. Char furnaces 3 and 4 are controlled by one (1) thermal oxidizer and exhausting through stack 407. Construction dates are as follows: ~~Nos. 1, 2, and 3, 1986; No 4, 1987.~~ **Nos. 1 and 2, 1983; Nos. 3 and 4, 1985.**
- (c) One (1) chemical vapor deposition (CVD) unit, also known as carbon vapor deposition

- unit, identified as CVD-1, constructed in 1978, having an estimated batch capacity of 2400 pounds (initial weight) of brakes and a nominal total reactant gas flow rate of 360 scf per soak hour. One (1) enclosed flare, controlling the soak phase VOC emissions from CVD-1, with a rated capacity of 0.9 MMBtu per hour, natural gas combustion, and exhausting through stack S-FL-1.
- (d) Twenty-two (22) chemical vapor deposition (CVD) units, also known as carbon vapor deposition units, identified as CVD-2 through CVD-23, with each unit having an estimated batch capacity of 8800 pounds (initial weight) of brakes for random fiber process or 5300 pounds (initial weight) of brakes for non-woven process. Each CVD has a nominal total reactant gas flow of 2200 scf per soak hour for random fiber process or a nominal total reactant gas flow of 4200 scf per soak hour for non-woven fiber process. Construction dates are as follows: CVD 2, 1978; CVD 3, 1985; CVD 4, 1988; CVD 5, 1989; CVDs 6 and 7, 1990; CVDs 8 and 9, 1991; CVDs 10 and 11, 1992; CVDs 12 and 13, 1993; CVDs 14 through 21, 1995-2000; CVDs 22 and 23, 2000. **Twenty-two (22) enclosed flares, controlling the soak phase VOC emissions from CVD units 2-23, each having a rated capacity of 5.5 MMBtu per hour, natural gas combustion, and exhausting through stacks S-FL-2 through S-FL-23, respectively.**
- ~~(e) Twenty-two (22) enclosed flares, controlling the soak phase VOC emissions from CVD units 2-23, each having a rated capacity of 5.5 MMBtu per hour, natural gas combustion, and exhausting through stacks S-FL-2 through S-FL-23, respectively.~~
- (fe) ~~Two (2)~~ **One (1)** chrome anodizing tanks, identified as 18 and 19, with a wetting agent in each the tank to control emissions.
- (f) **One (1) double headed sander, identified as emission unit PM1, with a maximum capacity of 300 pounds per hour, constructed in 1987, controlled by a fabric filter dust collector, identified as DC-1, and exhausting through stack S-1.**
- (g) **One (1) die cutter room, identified as DCR, with a maximum capacity of 188 pounds per hour, installed in 1991, controlled by a fabric filter dust collector, identified as DC-2, and exhausting within the building.**
- (h) **Four (4) needle machines, identified as NM-1, NM-2, NM-3 and NM-4. NM-1 and NM-2 were constructed in 1988. NM-3 and NM-4 were constructed in 2002. Each machine has a capacity of 15 pounds per hour and all four (4) machines are controlled by a fabric filter dust collector, identified as DC-3, and exhausting within the building.**
- (i) **Two (2) auto pre-form machines, identified as APM-1 and APM-2, each with a maximum capacity of 54 pounds per hour. APM-2 was constructed in 1990 and is controlled by a fabric filter dust collector, identified as DC-4, and exhausting through stack S-4.**
- (j) **One (1) EI dynamometer, identified as EID, installed in 1989, controlled by a fabric filter dust collector, identified as DC-5, and exhausting through stack S-5.**

Comment 2:

Condition A.3 - The source made several comments on Condition A.3 regarding typographical error, removal of equipment, addition of equipment and description changes. These comments have been combined as Comment 2.

Response to Comment 2:

IDEM, OAQ agrees: Due to the removal of equipment, addition of equipment and description changes, Condition A.3 has been revised as follows:

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

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

- (a) Space heaters, process heaters, or boilers using the following fuels:
 - (1) Five (5) natural gas-fired boilers with a total heat input capacity of 10.5 MMBtu/hr. Three (3) boilers constructed in 1986, identified as: Plants 12W, 4W and 4E, exhausting to stacks 226, 484 and 485, respectively. Two (2) boilers constructed in 1991, identified as Plants 4BS and 4BN, both exhausting to stack BS-1. [326 IAC 6-1]
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-5]
- (c) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
 - (1) Numerous mills discharging to Torrit filter systems, with a maximum throughput of less than one hundred (100) pounds per hour. The torrits are less than 4000 CFM and the mills are grinding and machining operations. [326 IAC 6-1]
 - (2) One (1) wheelabrator operation, identified as No. 816710, with a maximum throughput of less than one hundred (100) pounds per hour of plastic media blast, vented through a rotoclone, which is less than 4000 CFM, and exhausting inside the building. [326 IAC 6-1]
 - (3) Three (3) shot peening operations, with a maximum throughput of 6000 pounds per hour, vented through dust collectors and exhausting inside the building. [326 IAC 6-1]
 - (4) Three (3) sandblasting operations used intermittently to clean metal parts, vented through dust collectors and exhausting inside the building. [326 IAC 6-1]
 - (5) **Three (3) burr benches, vented through dust collectors and venting inside the building. [326 IAC 6-1]**
 - (6) **One (1) madison grinder, vented through a dust collector and venting inside the building. [326 IAC 6-1]**
 - (7) **One (1) empire blaster, vented through a dust collector and venting inside the building. [326 IAC 6-1]**
 - (8) **Two (2) blast units, vented through a dust collector and venting inside the building. [326 IAC 6-1]**

- (ed) The following equipment related to manufacturing activities not resulting in the emission of HAPs; brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-1]
- (fe) Two (2) Binks Paint Booths, installed in 1998, using HVLP spray guns, 3-stage HEPA filters and an electric powered IR curing oven. [40 CFR 63, Subpart GG] [326 IAC 6-1]
- (gf) One (1) plastic bead blaster used to remove paint from parts. The machine is vented through a Torit fabric filter system. Uncontrolled emissions were estimated at one (1) pound per hour. [326 IAC 6-1]
- (hg) One (1) brake test dynamometer, this shaft dynamometer is vented directly to the atmosphere through two (2) vents in the roof to remove heat and any potential emissions. Particulate emissions were estimated at 50 pounds per year for each vent. [326 IAC 6-1]
- ~~(i) One (1) EI dynamometer vented through two (2) vent systems to two (2) fabric filter systems. Particulate from the tires and brakes along with the heat generated during tests is vented to these control devices. [326 IAC 6-1]~~
- (h) **Three (3) burr benches, vented through dust collectors and venting inside the building. [326 IAC 6-1]**

Comment 3:

Condition A.3(e) - the brazing equipment, cutting torches, soldering equipment and welding equipment is listed as an insignificant activity. All of these activities are only associated with maintenance activities and as such should be considered "trivial activities", and removed from the Permit and the listing of insignificant activities in the Technical Support Document.

Response to Comment 3:

IDEM, OAQ disagrees: This source is subject to 326 IAC 6-1, and under this rule there are no exemptions for "trivial activities". This equipment, although maintenance activities, is still subject to 326 IAC 6-1 because this rule does not exempt trivial activities and therefore, will stay in the Permit as an insignificant activity labeled as a Trivial Activity. Language has been revised to clarify this. Condition A.3(e), renumbered to A.3(d), has been revised as follows:

- (d) **Trivial Activities:** The following equipment related to manufacturing activities not resulting in the emission of HAPs; brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-1]

Comment 4:

Condition B.3, Enforceability - To clarify the scope of this condition, please insert "with legal standing" after the word "citizens."

Response to Comment 4:

IDEM, OAQ disagrees: A complainant must always have legal standing to bring a lawsuit. The courts will make the determination of whether a citizen or citizens group has standing to bring the lawsuit after a citizens suit has been filed. The requirement of "legal standing" is implicit in the current language. Therefore, no change will be made to Condition B.3.

Comment 5:

Condition B.12(a) - To clarify the scope of the Permit Shield, please insert, in the third sentence "and the federal statutes from the Clean Air Act and the federal rules from 40 CFR" after "326 IAC,".

Response to Comment 5:

IDEM, OAQ disagrees: The Clean Air Act and 40 CFR 70.6(f) does not grant a permit shield and instead gives the permitting authority the authority to include a permit shield provision in the Part 70 permit. Further, the grant of a permit shield is not mandatory pursuant to 40 CFR 70.6(f). IDEM will not change the language of this condition. Therefore, no change will be made to Condition B.12(a).

Comment 6:

Condition B.12(b)(5) - To clarify the PSD status of the source, this condition should state that the source is an existing minor source under the PSD rules.

Response to Condition 6:

IDEM, OAQ agrees: For clarification, language has been changed and the last paragraph is located only in the Technical Support Document (TSD). Condition B.12(b)(5) has been revised as follows:

- (5) 326 IAC 2-2 (Prevention of Significant Deterioration (PSD))
This source is an existing ~~major~~ **minor** source, it was constructed in **prior to 1986** and it is not one of the 28 listed source categories, **therefore, 326 IAC 2-2 is not applicable. See the following Conditions of this Permit: D.1.1; D.2.1; D.2.2; D.2.3; D.4.7; D.4.8; D.4.10; D.4.13; D.5.2; D.5.4; D.6.1 and D.6.3.**
- ~~(A) Pursuant to SSM 141-13853-00172, issued on September 7, 2001, the carbon monoxide emissions from the enclosed flares for CVD units 1-21, shall be limited to 1.62 pounds per hour, each, based on maximum soak phase operations of 5800 hours per year for the non-woven process. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) do not apply.~~
- ~~(B) Compliance with Condition 326 IAC 8-1-6 (New Facilities: General Reduction Requirements (BACT)), for the following units: CVDs 1-23 and Char furnaces 5 and 6, which limits VOC emissions renders 326 IAC 2-2 not applicable.~~
- ~~NOTE: Pursuant to SSM 141-11511-00172, issued on March 8, 2000, for the purpose of PSD review, CVDs 22 and 23 are considered a separate and distinct "project" from CVDs 1-21 based on review of the available USEPA guidance on circumvention.~~

Comment 7:

Condition B.13(b), Permits Superseded - There are a number of operating permits issued by the St. Joseph County Local Agency which would also be superseded. Most were issued in 1994 and would have expired in 1996, but the Title V application provided an application shield and these permits would have remained in force.

Response to Comment 7:

IDEM, OAQ agrees: The following Registrations issued by the St. Joseph County Health Department, which will be superseded by this Part 70 Operating Permit, have been added to Condition B.13(b). Condition B.13(b) has been revised by adding the following language.

In addition, the existing registrations issued by the St. Joseph County Health Department, which are superseded by the permit, are as follows:

- (1) **B-3-4-13, issued on the following dates: November 25, 1988, November 25, 1990, November 25, 1992, November 25, 1994, November 25, 1996 and November 25, 1998.**

- (2) **B-3-4-30, issued on the following dates: November 25, 1990, November 25, 1992, November 25, 1994, November 25, 1996 and November 25, 1998.**

Comment 8:

Condition C.5, Operation of Equipment - This general section of the permit is redundant with specific requirements in each of the D Sections of the permit, and thereby would subject Honeywell to multiple potential violations stemming from the same circumstances. We request that this section be removed.

Response to Comment 8:

IDEM, OAQ agrees: Condition C.5 has been deleted.

~~C.5 — Operation of Equipment [326 IAC 2-7-6(6)]~~

~~Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.~~

Comment 9:

Condition C.8, Performance Testing - To clarify that this Condition applies only to testing required by the terms of this permit, the following changes are appropriate:

Condition C.8(a) - Please insert "required pursuant to the conditions of this permit" after the word "testing" in the first sentence. Please also insert "for such required testing" after "protocol" in the second sentence.

Condition C.8(b) - Please insert "For such required testing," at the beginning of the first sentence.

Condition C.8(c) - Please insert "for testing required by this permit" after "reports" in the first sentence.

Response to Comment 9:

Condition C.8(a) - IDEM, OAQ disagrees: The rule applies to any testing. IDEM, OAQ can require additional testing at any time if deemed necessary as outlined in Condition C.9. The testing requirements in the D Sections precede Condition C.8. In addition, the language that is being proposed does not substantively change the condition. The language that is in IDEM's current Title V model permit has been reviewed extensively by a committee comprised of members of the regulated community. For this reason, IDEM will not change this condition. Therefore, no changes will be made to Condition C.8(a).

Condition C.8(b) - IDEM, OAQ disagrees: See response to Condition C.8(a). Therefore, no changes will be made to Condition C.8(b).

Condition C.8(c) - IDEM, OAQ disagrees: See response to Condition C.8(a). Therefore, no changes will be made to Condition C.8(c).

Comment 10:

Condition C.9, Compliance Requirements - For reasons explained above regarding performance testing, please replace "Any" at the beginning of the second sentence with "Such".

Response to Comment 10:

IDEM, OAQ disagrees: The language that is being proposed does not substantively change the condition. The language that is in IDEM's current Title V permit model has been reviewed extensively by a committee comprised of members of the regulated community. For this reason, IDEM will not change this

condition. Therefore, no changes will be made to Condition C.9.

Comment 11:

Condition C.11, Maintenance of Continuous Emission Monitoring Equipment - Based on discussion with IDEM, this term can and should be deleted to avoid unnecessary burdensome and confusing obligations. If any of the substantive terms herein are appropriate, they should be set forth in Section D.

Response to Comment 11:

IDEM, OAQ disagrees: A CEMS is needed to show a comparison between CO emissions and the temperature needed to achieve the efficiency in this permit (See Comment 32). Therefore, no changes will be made to Condition C.11.

Comment 12:

Condition C.13, Pressure Gauge and Other Instrument Specifications - Based on discussions with IDEM, this term can and should be deleted to avoid unnecessary burdensome and confusing obligations. If any of the substantive terms herein are appropriate, they should be set forth in Section D.

Response to Comment 12:

IDEM, OAQ agrees: The substantive terms of this Condition C.13 have been moved to each of the appropriate D Sections (D.1 and D.2). Therefore, Condition C.13 has been deleted.

~~C.13 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)]
[326 IAC 2-7-6(1)]~~

-
- ~~(a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.~~
- ~~(b) Whenever a condition in this permit requires the measurement of a temperature or flow rate, the instrument 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) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.~~

Comment 13:

Condition C.16, Compliance Response Plan - Please include language developed with the CASE Coalition to recognize that the use of an O&M Plan or SSM Plan is sufficient and replaces the CRP program for those units.

Response to Comment 13:

Specific language has been added and removed from Condition C.16. Therefore, Condition C.16 has been revised as follows:

C.16 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

-
- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition **set forth in Section D** of this permit, **except that no CRP is required for any compliance monitoring condition subject to 40 CFR 63,**

Subpart N (Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks) and 40 CFR 63, Subpart GG (Aerospace Manufacturing and Rework Facilities). If a Permittee is required to have an **Operation, Maintenance and Monitoring (OMM) Plan** or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan under 40 CFR 60/63, such plans shall be deemed to satisfy the requirements for a CRP for those compliance monitoring conditions. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
- (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan **or Operation, Maintenance and Monitoring (OMM) Plan** or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan **or Operation, Maintenance and Monitoring (OMM) Plan** or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan to include such response steps taken.

The **Operation, Maintenance and Monitoring (OMM) Plan** or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan shall be submitted within the time frames specified by the applicable 40 CFR 60/63 requirement.

- (b) For each compliance monitoring condition of this permit **subject to this CRP requirement**, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
 - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan **or Operation, Maintenance and Monitoring (OMM) Plan** or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan **or Operation, Maintenance and Monitoring (OMM) Plan** or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from, **or a violation of**, this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, ~~and it will be 10 days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ~~ **shall be promptly notified** of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall be considered a deviation from

this permit.

- (c) **For each compliance monitoring condition of this permit subject to this CRP requirement**, the Permittee is not required to take any further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) **For each compliance monitoring condition of this permit subject to this CRP requirement**. The Permittee shall record all instances when, in accordance with Section D, response steps are 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.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

Comment 14:

Condition C.20, General Reporting Requirements - To clarify Permittee's obligation, insert "probable" before "cause" in the second sentence of C.20(a).

Response to Comment 14:

IDEM, OAQ agrees: Condition C.20(a) has been revised as follows:

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Each deviation from permit requirements, the date(s) of each deviation, the **probable** cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Comment 15:

Condition C.22, Applicability Requirements for Section 112(j) of the Clean Air Act - This section should be deleted from the Permit because the source is not a major source for purposes of Section 112 and thus,

not subject to these MACT provisions.

Response to Comment 15:

IDEM, OAQ agrees: The source is taking a federally enforceable limit to be a minor source of Hazardous Air Pollutants (HAPs) (less than twenty-five (25) tons per year of combined HAP emissions and less than ten (10) tons per year for single HAP emissions). Therefore, 112(j) of the Clean Air Act is not applicable and Condition C.22 has been revised as follows:

Part 2 MACT Application Submittal Requirement

~~C.22 Application Requirements for Section 112(j) of the Clean Air Act [40 CFR 63.52(e)]
[40 CFR 63.56(a)] [40 CFR 63.9(b)] [326 IAC 2-7-12]~~

~~(a) The Permittee shall submit a Part 2 MACT Application in accordance with 40 CFR 63.52(e)(1). A Part 2 MACT Application shall meet the requirements of 40 CFR 63.53(b).~~

~~(b) Notwithstanding paragraph (a), the Permittee is not required to submit a Part 2 MACT Application if the Permittee no longer meets the applicability criteria of 40 CFR 63.50 by the application deadline in 40 CFR 63.52(e)(1). For example, the Permittee would not have to submit a Part 2 MACT Application if, by the application deadline:~~

~~(1) The source is no longer a major source of hazardous air pollutants, as defined in 40 CFR 63.2;~~

~~(2) The source no longer includes one or more units in an affected source category for which the U.S. EPA failed to promulgate an emission standard by May 15, 2002; or~~

~~(3) The MACT standard or standards for the affected source categories included at the source are promulgated.~~

~~(c) Notwithstanding paragraph (a), pursuant to 40 CFR 63.56(a), the Permittee shall comply with an applicable promulgated MACT standard in accordance with the schedule provided in the MACT standard if the MACT standard is promulgated prior to the Part 2 MACT Application deadline or prior to the issuance of permit with a case-by-case Section 112(j) MACT determination. The MACT requirements include the applicable General Provisions requirements of 40 CFR 63, Subpart A. Pursuant to 40 CFR 63.9(b), the Permittee shall submit an initial notification not later than 120 days after the effective date of the MACT, unless the MACT specifies otherwise. The initial notification shall be submitted to:~~

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

~~and~~

~~United States Environmental Protection Agency, Region V
Director, Air and Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604-3590~~

Comment 16:

D.1 Facility Description(a) - The typographical error in the facility description should be changed to show that there are (2) char furnaces, not (26) char furnaces.

Response to Comment 16:

IDEM, OAQ agrees: Due to typographical error and description changes, D.1 Facility Description (a) has been revised as follows:

**D.1 Facility Operation Conditions
Facility Description [326 IAC 2-7-5(15)]: Electric Furnaces**

- (a) Two (26) electric char furnaces, with a maximum capacity of 45 tons of disks per year each, with volatile organic compound emissions controlled by thermal oxidizers with a 90% overall control efficiency, and exhausting through stack 427. Construction dates are as follows: Nos. 5 and 6, 1989.
- (b) Four (4) electric char furnaces, with a maximum capacity of 45 tons of disks per year each, with volatile organic compound emissions controlled by thermal oxidizers with a 95% overall control efficiency. Char furnaces 1 and 2 are controlled by one (1) thermal oxidizer and exhausting through stack 411. Char furnaces 3 and 4 are controlled by one (1) thermal oxidizer and exhausting through stack 407. Construction dates are as follows: ~~Nos. 1, 2, and 3, 1986; No 4, 1987.~~ **Nos. 1 and 2, 1983; Nos. 3 and 4, 1985.**

Comment 17:

Condition D.1.1, Char Furnances - This section should be modified to reflect only the Emission Limitations on the Char furnace; Compliance Determination Requirements and Compliance Monitoring should be moved to the appropriate conditions within Section D.1. The last sentence of section (a) should be deleted, since the uncontrolled PTE for the two furnaces is less than 40 tons per year of VOCs. The thermal oxidizers are not required in order to avoid PSD applicability. Paragraph (c) should be deleted. Based on uncontrolled PTE, Furnaces 1-4 are not subject to BACT PSD or the Emission Offset Rule. 326 IAC 2-2 and 326 IAC 2-3 should be removed from the header.

Response to Comment 17:

Specific language has been deleted from D.1.1(a) and (b). However D.1.1(c) will remain in the permit. IDEM, OAQ would be agreeable to consider the possibility of this based on a weight loss study that would provide better information on potential emissions. At this date, IDEM, OAQ has not received documentation supporting an alternative emission factor. Based on historical IDEM documents (CP (71) 1860, OP 3700-0005) IDEM determined the potential to emit (PTE) of char furnaces 5 and 6 to be greater than twenty-five (25) tons per year. Based on this information, the PTE of char furnaces 1-2 and 3-4 are greater than twenty-five (25) tons per year since they are identical to char furnaces 5 and 6. In addition, 326 IAC 2-2 and 326 IAC 2-3 will not be removed from the header because this condition is needed to avoid those applicable requirements. Therefore, changes will be made to Condition D.1.1(a) and (b) as follows and no changes will be made to Condition D.1.1(c) or D.1.1 header.

D.1.1 BACT Condition [326 IAC 8-1-6] [326 IAC 2-2] [326 IAC 2-3]

- (a) Pursuant to CP (71) 1860, OP 3700-0005, issued on July 23, 1990, Best Available Control Technology (BACT) for char furnaces 5 and 6 has been determined to be the use of a thermal oxidizer. The thermal oxidizer shall have an overall control efficiency of no less than 90% ~~and shall operate at a temperature no lower than the temperature determined in the compliance test to correspond to 90% control efficiency. Equivalent emissions to the overall control efficiency shall be determined pursuant to the testing requirements in Condition D.1.3. A continuous temperature recording device shall be used to record and document the operation temperature of the thermal oxidizer.~~

Compliance with these requirements renders 326 IAC 2-2 not applicable.

- (b) Char furnaces 1-4 shall use thermal oxidizers. The thermal oxidizers shall have an overall control efficiency of no less than 95% ~~and shall operate at a temperature no lower than the temperature determined in the compliance test to correspond to 95% control efficiency. Equivalent emissions to the overall control efficiency shall be determined pursuant to the testing requirements in Condition D.1.3. A continuous temperature recording device shall be used to record and document the operation temperature of the thermal oxidizers.~~

Comment 18:

Condition D.1.3, Testing Requirements for the Char Furnaces - Section (b) requires that Honeywell test furnaces 1-4 to determine the uncontrolled emission rate. Realistically, this can only be done through a weight loss evaluation, since the Char Furnace batch takes several days. This determination has already been done in support of the 1990 Construction Permit for furnaces 5 and 6. Thus, this testing requirement should be modified to require testing of the oxidizers for control efficiency only.

Response to Comment 18:

Specific language has been added to Condition D.1.3(b). However, no changes will be made to the requirement of a performance test to verify the uncontrolled emissions of char furnaces 1-4 due to the fact that IDEM, OAQ has not received any information pertaining to these furnaces, such as a weight loss study or previous stack tests (See Comment 17). In addition, IDEM, OAQ believes a performance test should be required to validate the emission factor established in this Part 70 Operating Permit. Therefore, Condition D.1.3(b) has been revised as follows:

- (b) Within one hundred and eighty (180) days after issuance of this permit, the Permittee shall conduct a performance test to verify the uncontrolled emissions of char furnaces 1-4 and the overall **control** efficiency of the two (2) oxidizers ~~untitled by char furnaces 1-4.~~ **controlling char furnaces 1-2 and 3-4.** The test method shall utilize methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

Comment 19:

Condition D.1.4 - To clarify, please insert "whenever the electric char furnaces are operating" after "oxidizer".

Response to Comment 19:

IDEM, OAQ agrees: Specific language has been added to Condition D.1.4. Therefore, Condition D.1.4 has been revised as follows:

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

Pursuant to 326 IAC 8-1-2(a), the Permittee shall operate the thermal oxidizers **whenever the electric char furnaces are operating** to achieve compliance with Condition D.1.1~~(a)~~.

Comment 20:

Condition D.1.5(a) - Please insert the word "and" before "maintained" and delete the phrase "and operated" in the first sentence. Please insert "temperature monitoring system shall be operated when the oxidizers are operating and the" after the word "The" in the second sentence. Please insert "Permittee receives from IDEM, OAQ the" before the word "approved" in the third sentence.

Response to Comment 20:

Specific changes have been made to Condition D.1.5(a). Language has been added and removed. However, the phrase "Permittee receives from IDEM, OAQ the" will not be added to this condition because IDEM, OAQ is not required to send copies of the stack tests to the Permittee. In addition, operating at the specific temperature specified is not contingent upon the Permittee receiving the stack test results from IDEM, OAQ.

Condition D.1.5(a) has been revised as follows:

D.1.5 Thermal Oxidizer Temperature

- (a) A continuous monitoring system shall be calibrated, **and** maintained, ~~and operated~~ on the three (3) thermal oxidizers for measuring operating temperature. The **temperature monitoring system shall be operated when the oxidizers are operating and the** output of this system shall be recorded as a three (3) hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the three (3) hour average temperature of 1800°F .

Comment 21:

Condition D.1.5(c) - To clarify the Permittee's obligations, please insert "Permittee receives from IDEM, OAQ," before "approved".

Response to Comment 21:

IDEM, OAQ disagrees: The phrase "Permittee receives from IDEM, OAQ the" will not be added to this condition because IDEM, OAQ is not required to send copies of the stack tests to the Permittee. In addition, operating at the specific temperature specified is not contingent upon the Permittee receiving the stack test results from IDEM, OAQ. Therefore, no changes will be made to Condition D.1.5(c).

Comment 22:

Condition D.1.6, Parametric Monitoring - This condition is not an appropriate parametric monitoring provision for the Char furnaces. The Char furnaces are essentially closed vessels during their operation. Once the brake discs are placed in the furnaces, the furnace is closed and not re-opened until the "char" batch cycle is complete. The furnaces themselves operate under a negative pressure. In addition, condition D.1.7(a)(2) should be deleted from the permit.

Response to Comment 22:

IDEM, OAQ agrees: Condition D.1.6 has been revised as follows:

~~D.1.6 Parametric Monitoring~~

- ~~(a) The Permittee shall determine the appropriate duct pressure or fan amperage from the most recent valid stack test that demonstrates compliance with limits in condition D.1.1, as approved by IDEM, OAQ.~~
- ~~(b) The duct pressure or fan amperage shall be observed at least once per day when the thermal oxidizer is in operation. On and after the date of the approved stack test results are available, the duct pressure or fan amperage shall be maintained within the normal range as established in the most recent compliant stack test.~~

Comment 23:

The source would like Condition C.13 (Pressure Gauge and Other Instrument Specification) removed from the C Section and placed in the specific D Sections that it pertains to.

Response to Comment 23:

IDEM, OAQ agrees: Due to the removal of C.13 (Pressure Gauge and Other Instrument Specifications) from the permit, language has been added to this condition to cover those requirements. A new condition has been added which will now be Condition D.1.6. Therefore, Condition D.1.6 has been revised as follows:

D.1.6 VOC Compliance Determination

Whenever a condition in this permit requires the measurement of temperature or flow rate, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus

two percent (2%) of full scale reading.

Comment 24:

Condition D.1.7, Record Keeping - Condition D.1.7(a)(2) and D.1.7(b) should be deleted because these terms are unnecessary, burdensome and without legal authority.

Response to Comment 24:

IDEM, OAQ agrees: Language has been removed from this Condition D.1.7. Condition D.1.7 has been revised as follows:

D.1.7 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) below shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC limit established in Condition D.1.1.
- (1) The continuous temperature records (on a three (3) hour average basis) for the three (3) thermal oxidizers and the three (3) hour average temperature used to demonstrate compliance during the most recent compliance stack test.
- ~~(2) Daily records of the duct pressure or fan amperage.~~
- ~~(b) To document compliance with Condition D.1.2, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.~~
- (eb) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Comment 25:

D.2 Facility Description(b) and (c) - The description change in the facility description should be changed to show that the two sections should be combined under a single description. The enclosed flares are control devices for the CVD units and not separate emissions sources.

Response to Comment 25:

IDEM, OAQ agrees: Due to description changes and a typographical error in the header, D.2 Facility Description (b) and (c) has been revised as follows:

**D.2 Facility Operation Conditions
Facility Description [326 IAC 2-7-5(15)]: CVD Units (1-21 23)**

- (b) Twenty-two (22) chemical vapor deposition (CVD) units, also known as carbon vapor deposition units, identified as CVD-2 through CVD-23, with each unit having an estimated batch capacity of 8800 pounds (initial weight) of brakes for random fiber process or 5300 pounds (initial weight) of brakes for non-woven process. Each CVD has a nominal total reactant gas flow of 2200 scf per soak hour for random fiber process or a nominal total reactant gas flow of 4200 scf per soak hour for non-woven fiber process. Construction dates are as follows: CVD 2, 1978; CVD 3, 1985; CVD 4, 1988; CVD 5, 1989; CVDs 6 and 7, 1990; CVDs 8 and 9, 1991; CVDs 10 and 11, 1992; CVDs 12 and 13, 1993; CVDs 14 through 21, 1995-2000; CVDs 22 and 23, 2000. **Twenty-two (22) enclosed flares, controlling the soak phase VOC emissions from CVD units 2-23, each having a rated capacity of 5.5 MMBtu per hour, natural gas combustion, and exhausting through stacks S-FL-2 through S-FL-23, respectively.**
- ~~(c) Twenty-two (22) enclosed flares, controlling the soak phase VOC emissions from CVD units 2-23, each having a rated capacity of 5.5 MMBtu per hour, natural gas combustion, and exhausting through stacks S-FL-2 through S-FL-23, respectively.~~

Comment 26:

Condition D.2.1(a), BACT Condition - The second to last sentence in Condition D.2.1(a) should be moved to the Technical Support Document (TSD).

Response to Comment 26:

IDEM, OAQ agrees: The requested language has been removed from Condition D.2.1(a). However, the Technical Support Document (TSD) is used by IDEM for historical purposes. IDEM, OAQ does not make any changes to the original TSD but the Permit will have the updated changes. Condition D.2.1(a) has been revised as follows:

D.2.1 BACT Condition [326 IAC 8-1-6] [326 IAC 2-2]

- (a) Pursuant to SSM 141-13853-00172, issued on September 7, 2001, enclosed flares have been accepted as BACT for control of the VOC emissions from CVD units 1-21. All exhaust process gas from the soak phase of each CVD unit's cycle shall be directed through the enclosed flares for VOC control. Each enclosed flare shall operate at all times that the corresponding CVD unit is operating in the soak phase and shall achieve an overall control efficiency of 98% with a maximum VOC emission rate of 0.23 pounds of VOC per million British thermal units (MMBtu) of process gas combusted by the flares. ~~This limitation is equivalent to 25.09 tons VOC emitted per year from CVD units 1-21 combined, based on average heat content of the process gases being 713 Btu per cubic foot for CVD units 1-21 and the maximum reactant gas inputs for each unit.~~ Compliance with these requirements renders 326 IAC 2-2 not applicable for CVDs 1-21.

Comment 27:

Condition D.2.2(b), BACT Condition - The second to last sentence in Condition D.2.2(b) should be moved to the Technical Support Document (TSD).

Response to Comment 27:

IDEM, OAQ agrees: The requested language has been removed from Condition D.2.2(b). However, the Technical Support Document (TSD) is used by IDEM for historical purposes. IDEM, OAQ does not make any changes to the original TSD but the Permit will have the updated changes. Condition D.2.2(b) has been revised as follows:

- (b) The CVDs 22-23 shall use a flare with a 98% control efficiency to control VOC emissions. ~~This limitation is equivalent to 2.39 tons VOC emitted per year from CVDs 22-23 combined.~~ Compliance with these requirements renders 326 IAC 2-2 not applicable for CVDs 22-23.

Comment 28:

Condition D.2.3, PSD Minor Limit - To clarify the soak phase operation hours per year for the non-woven process, this term is modified to more appropriately reflect an annual total of soak hours for the non-woven process in CVDs 1-21.

Response to Comment 28:

IDEM, OAQ agrees: Condition D.2.3 has been revised as follows:

D.2.3 PSD Minor Limit [326 IAC 2-2]

Pursuant to SSM 141-13853-00172, issued on September 7, 2001, the carbon monoxide emissions from the enclosed flares for CVD units 1 through 21, shall be limited to 1.62 pounds per hour, each, ~~based on maximum soak phase operations of 5800 hours per year for the non-woven process.~~ **based on the CVDs estimated soak phase operations per year for the non-woven process, totaling 121,800 soak hours per year for the non-woven process in CVDs 1-21.** Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) does not apply to CVDs 1-21.

Comment 29:

Condition D.2.4, Preventive Maintenance Plan - To clarify the Permittee's obligation, please replace "this facility" with "flares on CVD units 1-21".

Response to Comment 29:

IDEM, OAQ agrees: Since the flares are a control device and an emission unit Condition D.2.4 has been revised as follows:

D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Comment 30:

Condition D.2.5, Testing Requirements - To clarify the Permittee's obligation, please correct the references in the first sentence to "Conditions D.2.1 and D.2.2".

Response to Comment 30:

IDEM, OAQ agrees: Due to a typographical error, Condition D.2.5 has been revised as follows:

D.2.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

Within one hundred eighty (180) days after issuance of this permit, in order to demonstrate compliance with Condition D.2.1 **and D.2.2**, the Permittee shall perform a compliance stack test on 20% of the total or 4, whichever is greater, of the CVD unit flares for overall control efficiency utilizing methods as approved by the Commissioner. The tests shall be repeated at least once every five years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Condition C - Performance Testing.

Comment 31:

Condition D.2.6, VOC Compliance Determinations - This condition must be modified to delete unnecessary obligations and to reflect the compliance monitoring terms being moved to Condition D.2.7.

Response to Comment 31:

IDEM, OAQ agrees: This condition has been modified to reflect Compliance Determination Requirements. Language from this condition has been moved under the Compliance Monitoring Requirements, Condition D.2.7, to better reflect the intent of Condition D.2.6. Therefore, Condition D.2.6 has been revised as follows:

D.2.6 VOC Compliance Determination

To assure compliance with Conditions D.2.1 and D.2.2:

- (a) The input rate of total reactant gas to each CVD unit shall be measured once per day over the entire batch cycle. To monitor the volatile organic compound (VOC) load to the control flare, the Permittee shall record the number ~~and type~~ of brake discs per batch.
- (b) Each enclosed flare shall have a flame present at all times that its respective CVD unit is operating in the soak phase. ~~A thermocouple or equivalent device shall be installed and operated to monitor the presence of a pilot flame for each flare and to sound an alarm when the flame is not detected. For each CVD unit operating the non-woven process, the flare shall maintain, at a minimum, the operating temperature determined in the most recent approved stack test(s) to achieve compliance with the limits established in Conditions D.2.1 and D.2.2. In addition, a continuous monitoring system shall be installed and operated to monitor and record the operating temperature of the flare. This system shall be accurate to ± 5.0 percent and capture temperature data at least once every fifteen (15) minutes. If the operating temperature of the flare for a CVD unit operating the non-woven process drops below the minimum operating temperature, the Permittee shall take and document response steps to return the operating temperature to the required minimum level. In the event that a breakdown of the monitoring equipment occurs, the Permittee shall supplement monitoring with visual checks once per hour to ensure that a flame is present.~~
- ~~(c) The Permittee shall include in its PMP a maintenance program to inspect regularly the thermocouples or equivalent devices for monitoring and recording the presence of a pilot flame, to conduct routine maintenance and calibration on such monitors, and to initiate and record appropriate response steps in the event that the monitor fails.~~
- (c) **Whenever a condition in this permit requires the measurement of temperature or flow rate, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (2%) of full scale reading.**

Comment 32:

Condition D.2.7, Monitoring - Honeywell continues to object to the inclusion of the requirement for a Continuous Emissions Monitor for Carbon Monoxide on CVD 21. This term is not an existing requirement and there is no factual or legal basis for including it in this permit. Honeywell has demonstrated compliance with the emission limitation, and continues to monitor temperatures at each of the flare units.

Response to Comment 32:

IDEM, OAQ disagrees: Initially, the US EPA required CEMS because of the highly variable nature of the CVD process that the source may not be able to comply with their established limits specified in the permit on a continuous basis. It was determined that once the company sent in additional information showing a comparison between CO emissions and the temperature needed to achieve the efficiency specified in the permit, the CEMS could be removed. The source has not submitted any additional information since the last stack test was performed. IDEM, OAQ believes the source should install and operate a CEMS for a period of time in which the source can send in additional information to show the comparison between CO emissions and the temperature needed to achieve the efficiency in this permit. Therefore, IDEM, OAQ believes CEMS is still necessary to determine the emission factor and temperature, related to CO emissions in light of 2 failed stack tests. In addition, due to ambient air differences a CEMS should be operated no less than one (1) year. A CEMS shall be installed within one hundred eighty (180) days after issuance of this permit. Data from the CEMS shall be reported annually to the IDEM, OAQ.

In addition, language that was moved from Condition D.2.6 under Compliance Determination has been added to Condition D.2.7 under Compliance Monitoring to better reflect the intent of Condition D.2.7. Therefore, Condition D.2.7 has been revised as follows:

D.2.7 Monitoring

(a) To assure compliance with Condition D.2.3:

- ~~(a)~~ **(1)** Pursuant to 326 IAC 3-5-1(d)(1), the Permittee shall install, calibrate, certify, operate, and maintain a continuous monitoring system for CO on the CVD-21 flare stack designated as S-FL-21 in accordance with 326 IAC 3-5-2 and 3-5-3.
- ~~(1)~~ **(A)** The continuous emission monitoring system (CEMS) shall measure CO emission rates in pounds per hour and parts per million (ppmvd).
- ~~(2)~~ **(B)** The CEMS shall be in operation at all times when the CVD-21 unit is operating in the soak phase.
- ~~(3)~~ **(C)** The Permittee shall submit to IDEM, OAQ, within ninety (90) days after monitor installation, a complete written continuous monitoring standard operating procedure (SOP), in accordance with the requirements of 326 IAC 3-5-4.

(b) To assure compliance with Conditions D.2.1 and D.2.2:

- (1)** **A thermocouple or equivalent device shall be installed and operated to monitor the presence of a pilot flame for each flare and to sound an alarm when the flame is not detected. A continuous monitoring system shall be calibrated, maintained, and operated on each flare for measuring operating temperature. The output of this system shall be recorded as a three (3) hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports whenever the three (3) hour average temperature of each flare is below one thousand eight degrees Celsius (1008C). A three (3) hour average temperature that is below one thousand eight degrees Celsius (1008C) is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports shall be considered a deviation from this permit. In the event that a breakdown of the monitoring equipment occurs, the Permittee shall supplement monitoring with visual checks once per hour to ensure that a**

flame is present.

- (2) The Permittee shall determine the three (3) hour average temperature from the most recent valid stack test that demonstrates compliance with limits in Conditions D.2.1 and D.2.2, as approved by IDEM.**

Comment 33:

Condition D.2.8, Recordkeeping - Consistent with earlier comments, Honeywell requests this Condition reflect only the appropriate recordkeeping terms.

Response to Comment 33:

Condition D.2.8(b) - IDEM, OAQ disagrees: Based on monitoring requirements for the CVD flare temperature and requirements to take response steps, a failure to respond to a low temperature is a deviation. Records taken of response steps are necessary to demonstrate compliance in cases where they had to take response steps. Therefore, no changes will be made to Condition D.2.8(b).

Condition D.2.8(d) - IDEM, OAQ disagrees: The permit requires the use of a continuous emission monitoring system in Condition D.2.7, record keeping of this data is also required. See Response 32. Therefore, no changes will be made to Condition D.2.8(d).

Condition D.2.8(e) - IDEM, OAQ agrees: Condition D.2.8(e) has been revised as follows:

- ~~(e) To document compliance with Condition D.2.4, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.~~

Comment 34:

Condition D.2.9, Reporting Requirements - Consistent with earlier comments, we request that this condition requiring CEM excess emission reports be deleted from the permit.

Response to Comment 34:

IDEM, OAQ disagrees: The permit requires the use of a continuous emission monitoring system in Condition D.2.7, reporting of this data is also required. See Response 32. Therefore, no changes will be made to Condition D.2.9.

Comment 35:

Section D.3, Chrome Anodizing Tanks - Note that chrome anodizing tank #19 has been decommissioned and removed. Reference to tank #19 in the permit should be deleted.

Response to Comment 35:

IDEM, OAQ agrees: References to the chrome anodizing tank #19 have been removed from the permit, including Section D.3 and Condition A.2

Comment 36:

Condition D.3.3(a) - The last sentence of Condition D.3.3(a) is redundant with Condition D.3.4, and should be deleted.

Response to Comment 36:

IDEM, OAQ disagrees: This language comes directly out of the NESHAP, 40 CFR 63.342 Subpart N. Therefore, no changes will be made to Condition D.3.3(a).

Comment 37:

Condition D.3.7(b) - This section defines "operating time" and establishes a 15 minute time frame when parts are not in the tank as non-operational time. This specification is not found in 40 CFR 63.343, and would require the source to time when parts go into and are removed from the tank. We request that these terms of condition D.3.7(b) be deleted.

Response to Comment 37:

IDEM, OAQ agrees: Conditions D.3.7(b) and D.3.9(j) have been removed from the permit. However, for historical purposes this language will remain in the TSD. IDEM, OAQ does not make any changes to the

original Technical Support Document. Therefore, Conditions D.3.7(b) and D.3.9(j) have been revised as follows:

- ~~(b) — Tank operation or operating time is defined as that time when a part is in the tank and there is a current running through the tank. If the amount of time that no part is in the tank is fifteen minutes or longer, that time is not considered operating time. Likewise, if the amount of time between placing parts in the tank (i.e., when no part is in the tank) is less than fifteen minutes, that time between plating the two parts may be considered operating time.~~
- ~~(j) — The total process operating time, as defined in Condition D.3.7(b), of the tank, during the reporting period.~~

Comment 38:

Condition D.3.9(f) - Please replace the word “consistency” with the word “compliance”.

Response to Comment 38:

IDEM, OAQ agrees: Condition D.3.9(f) has been revised as follows:

- (f) Other records, which may take the form of checklists, necessary to demonstrate ~~consistency~~ **compliance** with the provisions of the OMP.

Comment 39:

Condition D.3.10(b) - Please delete the second paragraph which is already covered adequately by Condition C.8(c).

Response to Comment 39:

IDEM, OAQ agrees: Condition D.3.10(b) is redundant and it is previously covered in Condition C.8(c). Therefore, Condition C.3.10(b) has been revised as follows:

- (b) Performance Test Results
The Permittee shall document results from any future performance tests in a complete test report that contains the information required in 40 CFR 344(a).

~~The Permittee shall submit reports of performance test results as part of the Notification of Compliance Status, as defined in 40 CFR 63.347(e), no later than forty-five (45) days following the completion of the performance test.~~

Comment 40:

Condition D.3.10(c) - Please change the word “is” with “was” and add in the sentence “at the time that final compliance was required under 40 CFR 63 Subpart N” after “(HAPs)”.

Response to Comment 40:

Condition D.3.10(c) is specific to tanks located at a major source for hazardous air pollutants (HAPs). The source is taking a limit on HAPs (less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year combined HAP) and is no longer a major source of HAPs. However, the source is still an area source for HAPs. This language has been revised to reflect this change. Therefore, Condition D.3.10(c) has been revised as follows:

- (c) Ongoing Compliance Status Report
The Permittee shall prepare summary reports to document the ongoing compliance status of tanks 18 and 19 using the Ongoing Compliance Status Report form provided with this permit. This report shall contain the information specified in 40 CFR 63.347(g)(3).

~~Because tanks 18 and 19 are located at a site that is a major source of hazardous air pollutants (HAPs), the Ongoing Compliance Status Report shall be completed and submitted according to the following schedule:~~

- ~~(2) This report shall be submitted semi-annually on a calendar year basis, unless~~

~~otherwise directed by IDEM, OAQ. The report shall be submitted within thirty (30) days after the end of each reporting period (which ends June 30 and December 31 respectively).~~

~~(3) If the monitoring data collected by the Permittee in accordance with 40 CFR 63.343(c) show that the emission limit has been exceeded, quarterly reports shall be submitted.~~

~~Once the Permittee reports an exceedance as defined above, Ongoing Compliance Status Reports shall be submitted quarterly until a request to reduce reporting frequency in accordance with 40 CFR 63.347(g)(2) is approved.~~

~~(4) IDEM, OAQ may determine on a case-by-case basis that more frequent reporting is necessary to accurately assess the compliance status of this facility.~~

Because tank 18 is located at a site that is an area source of hazardous air pollutants (HAPs), the Ongoing Compliance Status Report shall be retained on site and made available to IDEM, OAQ upon request.

- (1) The Ongoing Compliance Status Report shall be completed according to the following schedule except as provided in paragraphs (c)(2).**
 - (A) The first report shall cover the period from the issuance date of the permit to December 31 of the year in which the permit is issued.**
 - (B) Following the first year of reporting, the report shall be completed on a calendar year basis with the reporting period covering from January 1 to December 31.**
- (2) If both of the following conditions are met, semi-annual reports shall be prepared and submitted to IDEM, OAQ:**
 - (A) The total duration of excess emissions (as indicated by the monitoring data collected by the Permittee in accordance with 40 CFR 63.343(c)) is one percent (1%) or greater of the total operating time for the reporting period; and**
 - (B) The total duration of malfunctions of the add-on air pollution control device and monitoring equipment is five percent (5%) or greater of the total operating time.**

Once the Permittee reports an exceedance as defined above, Ongoing Compliance Status Reports shall be submitted semi-annually until a request to reduce reporting frequency in accordance with 40 CFR 63.347(g)(2) is approved.

- (3) IDEM, OAQ may determine on a case-by-case basis that the summary report shall be completed more frequently and submitted, or that the annual report shall be submitted instead of being retained on site, if these measures are necessary to accurately assess the compliance status of the source.**

Comment 41:

Condition D.4.8, Particulate Matter - Please delete the reference to 326 IAC 2-2 in the Title line and remove the last sentence of this condition.

Response to Comment 41:

IDEM, OAQ agrees: Due to new information the potential to emit (PTE) of PM is less than two hundred fifty (250) tons per year, therefore, Condition D.4.8 has been revised as follows:

D.4.8 Particulate Matter (PM) [326 IAC 6-1] ~~[326 IAC 2-2]~~

Pursuant to 326 IAC 6-1 (Nonattainment Area Particulate Limitations), the particulate (PM) from the two (2) paint booths shall be limited to 0.03 grains per dry standard cubic foot of exhaust air. ~~Compliance with this limitation renders the requirements of 326 IAC 2-2 not applicable.~~

Comment 42:

Condition D.4.10 - Please delete the reference to 326 IAC 2-2 in the Title line of this condition.

Response to Comment 42:

IDEM, OAQ agrees: Due to new information the potential to emit (PTE) of PM is less than two hundred fifty (250) tons per year, therefore, Condition D.4.10 has been revised as follows:

D.4.10 Compliance Monitoring Requirements for Aerospace Manufacturing and Rework Facilities [326 IAC 20-15-1] [40 CFR 63.751, Subpart GG] ~~[326 IAC 2-2]~~

The compliance monitoring requirements of 40 CFR 63.751 are applicable to the cleaning operations and dry particulate filter system. The Permittee shall perform monthly visual inspection requirements for enclosed spray gun cleaners pursuant to 40 CFR 63.751(a). The Permittee shall also continuously monitor, read and record the pressure drop once per shift pursuant to 40 CFR 63.751(c).

Comment 43:

Condition D.4.11(a) and (b), D.4.14(f) and D.4.15(a)(2)(A) - These Subpart GG conditions are appropriate where averaging is used to demonstrate compliance with the primer and topcoat limits. Honeywell uses all compliant primers and topcoats as applied, and therefore should not be required to calculate values for monthly average primer and topcoat values.

Response to Comment 43:

IDEM, OAQ will remove the references to requirements that apply only when averaging is used to demonstrate compliance. The conditions will not be removed entirely because portions of the requirements of 40 CFR 63.749, 63.750, 63.752, and 63.753 continue to apply when averaging is not used to demonstrate compliance. It should be noted that 40 CFR 63.749 and 63.750 do not require an owner or operator to calculate monthly average values for primer and topcoat when averaging is not used to determine compliance. The applicable provisions require that the owner or operator calculate the mass of organic HAP emitted per volume of coating less water, as applied, and compare those values to the applicable emission limits. 40 CFR 63.750(c) indicates that manufacturers' supplied data may be used; therefore, if Honeywell uses primers and topcoats as supplied, it is possible that no calculations will be necessary if the coating manufacturers supply the proper data.

Condition D.4.11(a) and (b) includes rule requirements for using averaging to comply with 40 CFR 63, Subpart GG. The values "Ha" and "Ga" and the rule requirements of 40 CFR 63.750(d) and 40 CFR 63.750(f) are only necessary when averaging is used to demonstrate compliance. The references to these values and rule cites in Condition D.4.11(a) and (b) will be removed.

Condition D.4.14(f) only includes those requirements of 40 CFR 63.752(c) that are applicable when using uncontrolled, compliant coatings without averaging (i.e., 40 CFR 63.752(c)(1) through (3)); therefore, no change will be made to Condition D.4.14(f).

Condition D.4.15(a)(2)(A) is from 40 CFR 63.753(c)(1)(i), and it specifically requires an owner or operator that uses compliant coatings without averaging to report instances where a non-compliant coating has been used during the reporting period. It does not include any additional requirements that apply when averaging is used; therefore, no change will be made to Condition D.4.15(a)(2)(A).

IDEM, OAQ has made changes to Conditions D.4.11(a) and (b) to reflect the appropriate portions of the rules that are applicable when using compliant coatings without averaging.

Condition D.4.11(a) and (b) has been revised as follows:

D.4.11 Compliance Dates and Determination for Aerospace Manufacturing and Rework Facilities [326 IAC 20-15-1] [40 CFR 63.749, Subpart GG]

(a) Pursuant to 40 CFR 63.749(d)(3) (Organic HAP and VOC content levels - primer and topcoat application operations), the primer application operation is considered in

compliance when conditions specified below are met. Failure to meet any one of the conditions identified below shall constitute noncompliance:

- (1) For all uncontrolled primers, all values of ~~Hi and Ha~~ (as determined using the procedures specified in 40 CFR 63.750(c) ~~and (d)~~) are less than or equal to 350 grams of organic HAP per liter (2.9 lb/gal) or primer (less water) as applied, and all values of ~~Gi and Ga~~ (as determined using the procedures specified in 40 CFR 63.750(e) ~~and (f)~~) are less than or equal to 350 grams of organic VOC per liter (2.9 lb/gal) of primer (less water and exempt solvents) as applied.
 - (2) Uses an application technique specified in 40 CFR 63.745(f)(1)(i) through (f)(1)(vii).
 - (3) Operates all application techniques in accordance with the manufacturer's specifications.
- (b) Pursuant to 40 CFR 63.749(d)(4) (Organic HAP and VOC content levels - primer and topcoat application operations), the topcoat application operation is considered in compliance when the conditions specified below are met. Failure to meet any of the conditions identified below shall constitute noncompliance.
- (1) For all uncontrolled topcoats, all values of ~~Hi and Ha~~ (as determined using the procedures specified in 40 CFR 63.750(c) ~~and (d)~~) are less than or equal to 420 grams organic HAP per liter (3.5 lb/gal) of topcoat (less water) as applied, and all values of ~~Gi and Ga~~ (as determined using the procedures specified in 40 CFR 63.750(e) ~~and (f)~~) are less than or equal to 420 grams organic VOC per liter (3.5 lb/gal) of topcoat (less water and exempt solvents) as applied.
 - (2) Uses an application technique specified in 40 CFR 63.745(f)(1)(i) through (f)(1)(viii).
 - (3) Operates all application techniques in accordance with the manufacturer's specifications.

Comment 44:

Condition D.4.13 - Please delete the reference to 326 IAC 2-2 in the Title line of this condition.

Response to Comment 44:

IDEM, OAQ disagrees: The potential to emit (PTE) of particulate matter (PM) is greater than two hundred fifty (250) tons per year. In order to render 326 IAC 2-2 (PSD) not applicable emissions need to be limited to below two hundred fifty (250) tons per year. The source needs to comply with 326 IAC 6-1 (Nonattainment Area Limitations) to keep below the two hundred fifty (250) ton per year threshold. Therefore, no changes will be made to Condition D.4.13

Comment 45:

Condition D.4.15(c), Reporting Requirements - The federal Subpart GG reporting requirements are the applicable requirements and the terms in Condition D.4.15(c) should be deleted.

Response to Comment 45:

IDEM, OAQ agrees: The reporting requirements in 40 CFR 63, Subpart GG are the applicable requirements; however, the United States Environmental Protection Agency (US EPA) has delegated the authority of 40 CFR 63, Subpart GG to IDEM, OAQ. Therefore, the Permittee must submit reports to IDEM, OAQ. The permit references the address to which to send the report, and provides an optional form. IDEM, OAQ agrees that the phrase "within thirty (30) days after the end of the calendar quarter being reported" is not appropriate for the 40 CFR 63, Subpart GG reporting requirements since the specific reporting requirements are within 40 CFR 63, Subpart GG and 40 CFR 63, Subpart A. IDEM, OAQ has removed this phrase from the language. The semi-annual reports are required to be submitted every six months from the date of the notification of compliance status, in accordance with 40 CFR 63.753(b)(1) and (c)(1). The annual reports are required to be submitted every twelve months after the date of the notification of compliance status, in accordance with 40 CFR 63.753(c)(2).

Condition D.4.15(c) has been revised as follows:

D.4.15 Reporting Requirements

- (c) All reports shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the report forms located at the end of this permit, or their equivalent, ~~within thirty (30) days after the end of the calendar quarter being reported.~~ **The semi-annual reports required by 40 CFR 63.753(b)(1) and (c)(1) in paragraph (a) of this condition shall be submitted on May 1 and November 1 of each year. The annual reports required by 40 CFR 63.753(c)(2) in paragraph (a)(2)(D) of this condition shall be submitted on May 1 of each year.**

Comment 46:

D.5 Facility Description - The units described in this Section should be consistent with the descriptions provided in Section A.3 of the permit.

Response to Comment 46:

IDEM, OAQ agrees: Due to the removal of equipment, addition of equipment and description changes, Condition D.5 Facility Description has been revised as follows:

SECTION D.5

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Insignificant Activities and Trivial Activities

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-5]
- (b) Five (5) natural gas-fired boilers with a total heat input capacity of 10.5 MMBtu/hr. Three (3) boilers constructed in 1986, identified as: Plants 12W, 4W and 4E, exhausting to stacks 226, 484 and 485, respectively. Two (2) boilers constructed in 1991, identified as Plants 4BS and 4BN, both exhausting to stack BS-1. [326 IAC 6-1]
- (c) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
 - (1) Numerous mills discharging to Torrit filter systems, with a maximum throughput of less than one hundred (100) pounds per hour. The torrits are less than 4000 CFM and the mills are grinding and machining operations. [326 IAC 6-1]
 - (2) One (1) wheelabrator operation, identified as No. 816710, with a maximum throughput less than one hundred (100) pounds per hour of plastic media blast, vented through a rotoclone, which is less than 4000 CFM, and exhausting inside the building. [326 IAC 6-1]
 - (3) Three (3) shot peening operations, with a maximum throughput of 6000 pounds per hour, vented through dust collectors and exhausting inside the building. [326 IAC 6-1]
 - (4) Three (3) sandblasting operations used intermittently to clean metal parts, vented through dust collectors and exhausting inside the building. [326 IAC 6-1]
 - (5) **Three (3) burr benches, vented through dust collectors and venting inside the building. [326 IAC 6-1]**
 - (6) **One (1) madison grinder, vented through a dust collector and venting inside the building. [326 IAC 6-1]**
 - (7) **One (1) empire blaster, vented through a dust collector and venting inside the building. [326 IAC 6-1]**
 - (8) **Two (2) blast units, vented through a dust collector and venting inside the building. [326 IAC 6-1]**
- (d) **Trivial Activities:** The following equipment related to manufacturing activities not resulting in the emission of HAPs; brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-1]
- (e) One (1) plastic bead blaster used to remove paint from parts. The machine is vented through a Torit fabric filter system. Uncontrolled emissions were estimated at one (1) pound per hour. [326 IAC 6-1]

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

- (f) One (1) brake test dynamometer, this shaft dynamometer is vented directly to the atmosphere through two (2) vents in the roof to remove heat and any potential emissions. Particulate emissions were estimated at 50 pounds per year for each vent. [326 IAC 6-1]
- ~~(g) One (1) EI dynamometer vented through two (2) vent systems to two (2) fabric filter systems. Particulate from the tires and brakes along with the heat generated during tests is vented to these control devices. [326 IAC 6-1]~~
- (g) Three (3) burr benches, vented through dust collectors and venting inside the building. [326 IAC 6-1]**

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Comment 47:

Condition D.5(d) and D.5.2(b), PM emission limits - Please remove these paragraphs. These processes are related to facility maintenance and not to production; therefore, they are properly classified as trivial activities under the Part 70 regulations.

Response to Comment 47:

IDEM, OAQ disagrees: This source is subject to 326 IAC 6-1, and under this rule there are no exemptions for "trivial activities". This equipment, although maintenance activities, is still subject to 326 IAC 6-1 because this rule does not exempt trivial activities and therefore, will stay in the Permit as an insignificant activity labeled as a Trivial Activity.. Therefore, no change will be made to Conditions D.5(d) and D.5.2(b). However, the description of Condition D.5(d) has been revised in Response 46.

Comment 48:

Condition D.5.2 - Add reference to Facility Descriptions (c) numbers (5), (6), (7) and (8). Please make the changes for Facility Description (g).

Response to Comment 48:

IDEM, OAQ agrees: Due to new information the potential to emit (PTE) of PM is less than two hundred fifty (250) tons per year, therefore, the 326 IAC 2-2 header will be removed. Due to the removal of equipment, addition of equipment and description changes, Condition D.5.2 has been revised as follows:

D.5.2 Particulate Matter (PM) [326 IAC 6-1] ~~[326 IAC 2-2]~~

- (a) Pursuant to 326 IAC 6-1-2(b) (Nonattainment Area Particulate Limitations), the particulate (PM) from the five (5) natural gas-fired boilers shall be limited to 0.01 grains per dry standard cubic foot of exhaust air.
- (b) Pursuant to 326 IAC 6-1 (Nonattainment Area Particulate Limitations), the particulate (PM) from the ~~following equipment~~ **trivial activities** related to manufacturing activities not resulting in the emission of HAPs; brazing equipment, cutting torches, soldering equipment, welding equipment, shall be limited to 0.03 grains per dry standard cubic foot of exhaust air.
- (c) Pursuant to 326 IAC 6-1 (Nonattainment Area Particulate Limitations), the particulate (PM) from the one (1) plastic bead blaster, one (1) brake test dynamometer, and ~~one (1) EI dynamometer~~ **three (3) burr benches** shall be limited to 0.03 grains per dry standard cubic foot of exhaust air.
- (d) Pursuant to 326 IAC 6-1 (Nonattainment Area Particulate Limitations), the particulate (PM) from the numerous mills and one (1) wheelabrator, shall be limited to 0.03 grains per dry standard cubic foot of exhaust air.
- (e) Pursuant to 326 IAC 6-1 (Nonattainment Area Particulate Limitations), the particulate

(PM) from the shot peening and sandblasting operations shall be limited to 0.03 grains per dry standard cubic foot of exhaust air

- (f) Pursuant to 326 IAC 6-1 (Nonattainment Area Particulate Limitations), the particulate (PM) from the three (3) burr benches, one (1) madison grinder, one (1) empire blaster and two (2) blast units shall be limited to 0.03 grains per dry standard cubic foot of exhaust air.

Comment 49:

Conditions D.5.4, D.5.5, D.5.6, D.5.7 and D.5.8 - All of the particulate sources listed in this section of the permit are controlled by dust collectors with flow rates less than or equal to 4000 cfm and are required to meet a limit of 0.03 gr/dscf. It is Honeywell's understanding that IDEM's policy is not to require compliance monitoring activities for relatively small emission units with allowable emissions less than 10 pounds per hour. All of these units have allowable emissions much less than 10 pounds per hour. These small units are clearly well below the size criteria the State has used for determining the appropriateness of compliance monitoring requirements, and Honeywell believes that it is appropriate to focus compliance resources on larger, more significant emission units. As such Honeywell requests that Sections D.5.4, D.5.5, D.5.6, D.5.7 and D.5.8 of the Permit be deleted.

Response to Comment 49:

Specific Conditions, Compliance Monitoring Requirements and Record Keeping Requirements have been removed from the permit. However, Condition D.5.4 will remain in the permit because controls are needed for these emission units to be insignificant activities. Therefore, Conditions D.5.5, D.5.6, D.5.7 and D.5.8 have been revised as follows:

Compliance Monitoring Requirements

~~D.5.5 Parametric Monitoring~~

~~The Permittee shall record the total static pressure drop across the dust collectors used in conjunction with the one (1) plastic bead blaster, one (1) brake test dynamometer, numerous mills, one (1) wheelabrator, shot peening, sandblasting, and six (6) burr benches, one (1) madison grinder, one (1) empire blaster and two (2) blast units at least once per shift when the one (1) plastic bead blaster, one (1) brake test dynamometer, numerous mills, one (1) wheelabrator, shot peening, sandblasting and six (6) burr benches, one (1) madison grinder, one (1) empire blaster and two (2) blast units are in operation. When for any one reading, the pressure drop across the dust collectors is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.~~

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

~~D.5.6 Dust Collector Inspections~~

~~An inspection shall be performed each calendar quarter of all dust collectors controlling the one (1) plastic bead blaster, one (1) brake test dynamometer, numerous mills, one (1) wheelabrator, shot peening, sandblasting and six (6) burr benches, one (1) madison grinder, one (1) empire blaster and two (2) blast units. A dust collector inspection shall be performed within three (3) months of redirecting the vents to the atmosphere and every three (3) months thereafter. Inspections required by this condition shall not be performed in consecutive months. All defective dust collectors shall be replaced.~~

~~D.5.7 Broken or Failed Dust Collector Detection~~

~~In the event that dust collector failure has been observed:~~

- ~~(a) For multi-compartment units, the affected compartments will be shut down immediately~~

~~until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the time table described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit. If operations continue after dust collector failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.~~

- ~~(b) For single compartment dust collectors, if failure is indicated by a significant drop in the dust collector's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if the dust collector failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).~~

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

~~D.5.8 Record Keeping Requirements~~

- ~~(a) To document compliance with Condition D.5.5, the Permittee shall maintain records once per shift of the total static pressure drop during normal operation.~~
- ~~(b) To document compliance with Condition D.5.6, the Permittee shall maintain records of the results of the inspections required under Condition D.5.6.~~
- ~~(c) To document compliance with Condition D.5.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.~~
- ~~(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements.~~

Comment 50:

D.6 - A new section should be added to the Permit to address the "Significant" PM emission sources as identified in earlier comments. These sources would be subject to an emission limit of 0.03 gr/dscf pursuant to 326 IAC 6-1. None of these units would have an allowable emission limit of greater than 10 pounds per hour and as such Honeywell does not believe that it is appropriate that these units be required to conduct parametric monitoring.

Response to Comment 50:

IDEM, OAQ agrees that a new section should be added: Section D.6 has been added for the particulate matter equipment that is being added to the permit. Therefore, Section D.6 has been added as follows:

SECTION D.6

FACILITY OPERATION CONDITIONS

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

- (a) One (1) double headed sander, identified as emission unit PM1, with a maximum capacity of 300 pounds per hour, constructed in 1987, controlled by a fabric filter dust collector, identified as DC-1, and exhausting through stack S-1.
- (b) One (1) die cutter room, identified as DCR, with a maximum capacity of 188 pounds per hour, installed in 1991, controlled by a fabric filter dust collector, identified as DC-2, and exhausting within the building.
- (c) Four (4) needle machines, identified as NM-1, NM-2, NM-3 and NM-4. NM-1 and NM-2 were constructed in 1988. NM-3 and NM-4 were constructed in 2002. Each machine has a capacity of 15 pounds per hour and all four (4) machines are controlled by a fabric filter dust collector, identified as DC-3, and exhausting within the building.
- (d) Two (2) auto pre-form machines, identified as APM-1 and APM-2, each with a maximum capacity of 54 pounds per hour. APM-2 was constructed in 1990 and is controlled by a fabric filter dust collector, identified as DC-4, and exhausting through stack S-4.
- (e) One (1) EI dynamometer, identified as EID, installed in 1989, controlled by a fabric filter dust collector, identified as DC-5, and exhausting through stack S-5.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

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

D.6.1 Particulate Matter (PM) [326 IAC 6-1]

- (a) Pursuant to 326 IAC 6-1 (Nonattainment Area Particulate Limitations), the particulate (PM) from the one (1) double headed sander, one (1) die cutter room, four (4) needle machines, two (2) auto pre-form machines and one (1) EI dynamometer shall be limited to 0.03 grains per dry standard cubic foot of exhaust air.

D.6.2 Preventive Maintenance Plan [326 IAC 2-7-5(3)]

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

Compliance Determination Requirements

D.6.3 Particulate Control [326 IAC 6-1]

- (a) In order to comply with Condition D.6.1, the dust collectors for the particulate control shall be in operation and control emissions from the one (1) double headed sander, one (1) die cutter room, four (4) needle machines, two (2) auto pre-form machines and one (1) EI dynamometer at all times that the one (1) double headed sander, one (1) die cutter room, four (4) needle machines, two (2) auto pre-form machines and one (1) EI dynamometer are in operation.

Comment 51:

Deviation Reporting Forms - Forms are provided at the end of the Permit for reporting both quarterly and semi-annually. Because Honeywell's required to report quarterly, the semi-annual reports would appear to be redundant and should be removed from the Permit. Further, these forms should be modified to reflect any relevant substantive changes made to the permit.

Response to Comment 51:

IDEM, OAQ disagrees: Pursuant to 40 CFR 63, Subpart GG (Aerospace Manufacturing and Rework Facilities) the source has to submit their reports semi-annually, as covered in Section D.4. The quarterly report forms are for reporting the continuous emissions monitor (CEM) data for CO, as covered in Section D.2.

Comment 52:

Technical Support Document - The source made several comments regarding the Technical Support Document. Those comments have all been combined as Comment 52.

Unpermitted Emission Units and Pollution Control Devices - This section of the TSD lists four of the electric char furnaces and the two chrome anodizing tanks as un-permitted emission units. The four char furnaces were issued Operating Permits by the St. Joseph County Health Department's Air Pollution Control Division (Permits B-3-4-13 and B-3-4-30). These operating permits were last issued on November 25, 1994. We are submitting copies of these permits. In addition, we do not believe that the chrome anodizing tanks were required to obtain permits based on the permitting requirements found at 326 IAC Article 2.

Existing Approvals - The list appears incomplete as it does not include a number of operating permits. We are submitting copies of the most recent issued operating permits.

Enforcement Issue - Based on the available information, Honeywell is unaware of any outstanding enforcement issues regarding the permitting status of the char furnaces and the chrome anodizing tanks.

State Rule Applicability, Item (c), State BACT Applicability for Char Furnaces - This portion of the TSD concludes that 326 IAC 8-1-6 is applicable to the char furnaces, since each of the furnaces has an uncontrolled PTE greater than 25 tons per year. This is not correct. The uncontrolled PTE for each unit is only 10.9 tons per year as shown in the following calculation:

$$\frac{45 \text{ tons discs/year} \times 484 \text{ lbs VOC/ton discs}}{2000 \text{ lbs/ton}} = 10.9 \text{ tons VOCs/year}$$

Each furnace, as combined with its incinerator would have a combined PTE of 21.8 tons per year uncontrolled and 326 IAC 8-1-6 would not apply. Honeywell accepted a 90% control requirement for units 5 and 6 as part of construction permit CP (71) 1860, OP 3700-0005 issued on July 23, 1990. Honeywell has proposed to accept a limit of 95% overall control for units 1 through 4 in order to restrict voluntarily VOC and HAP emissions from the facility. Based on the facts and law, the permit shield does apply to char furnaces 1-4.

Response to Comment 52:

IDEM, OAQ disagree: The Technical Support Document is used by IDEM for historical purposes. IDEM, OAQ does not make any changes to the original Technical Support Document, however, the Permit will have the updated changes. In addition, IDEM, OAQ would be agreeable to consider the possibility of this based on a weight loss study that would provide better information on potential emissions. At this date, IDEM, OAQ has not received documentation supporting an alternative emission factor. Based on historical IDEM documents (CP (71) 1860, OP 3700-0005) IDEM determined the potential to emit (PTE) of char furnaces 5 and 6 to be greater than twenty-five (25) tons per year. Based on this information, the PTE of char furnaces 1-2 and 3-4 are greater than twenty-five (25) tons per year since they are identical to char furnaces 5 and 6.

Upon further review, the OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table Of Contents has been modified to reflect these changes.

1. Condition A.3(c) and D.5(c) are revised to allow for the flexibility to use one or more of the control devices listed. Condition A.3(c) and D.5(c) are revised as follows:
 - (c) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors ~~and or~~ electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000

actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

2. Condition B.21 (Inspection and Entry) - Rule cite IC 13-17-3-2 has been added to the header of this condition. Therefore, Condition B.21 has been revised as follows:

B.21 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2][IC 13-30-3-1] [IC 13-17-3-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

3. Condition C.8(c) (Performance Testing) - The word "source" has been replaced with the word "Permittee". Therefore, Condition C.8(c) has been revised as follows:

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the ~~source~~ **Permittee** submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

4. Condition C.15 (Risk Management Plan) - The word "source" has been replaced with the word "Permittee". Therefore, Condition C.15 has been revised as follows:

C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the ~~source~~ **Permittee** must comply with the applicable requirements of 40 CFR 68.

5. Condition C.16 is revised because the rule was revised on March 27, 2004. Condition C.16 is revised as follows:

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

(a) The Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. This statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6-3 and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period identified in 326 IAC 2-6. The emission statement shall meet the following requirements:

- (1) Indicate estimated actual emissions of pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);**
- (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.**

The statement must be submitted to:

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

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

- (b) The emission statement required by this permit shall be considered timely if the**

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

~~(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:~~

~~(1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);~~

~~(2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant which is used only for purposes of Section 19 of this rule") from the source, for purposes of Part 70 fee assessment.~~

~~(b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:~~

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

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

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

6. Condition C.20(a) (General Reporting Requirements) - The word "source" has been replaced with the word "Permittee". Therefore, Condition C.20(a) has been revised as follows:

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(a) The ~~source~~ **Permittee** shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Each deviation from permit requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

7. Condition D.1.4 - Due to the removal of Condition C.5 (Operation of Equipment) and Condition D.1.6 (Parametric Monitoring), language has been added to Condition D.1.4 for clarification. Previous changes from this addendum that were made to Condition D.1.4 are incorporated here. Condition D.1.4 has been revised as follows:

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

Pursuant to 326 IAC 8-1-2(a), the Permittee shall operate the thermal oxidizers **at all times** whenever the electric char furnaces are operating to achieve compliance with Condition D.1.1. **In addition, the char furnaces shall be closed during operation and not re-opened until the batch cycle is complete in order to ensure capture, and during purging the thermal oxidizers shall be operated at all times.**

8. Condition D.2.6(b) - Due to the removal of Condition C.5 (Operation of Equipment), language has been added to Condition D.2.6(b) for clarification. Previous changes from this addendum that were made to Condition D.2.6(b) are incorporated here. Condition D.2.6(b) has been revised as

follows:

- (b) **Each flare shall be operated at all times that its respective CVD unit is operating.**
Each enclosed flare shall have a flame present at all times that its respective CVD unit is operating in the soak phase.

9. Condition D.2.8(b) is revised to delete the requirement to keep records of the response steps taken as a result of operating temperature readings below the minimum operating temperature of the flares since this is covered under C.14 of the permit. Condition D.2.8(b) has been revised as follows:

- (b) To document compliance with Condition D.2.6, the Permittee shall maintain flare temperature data for CVD units operating the non-woven process. ~~and records of response steps taken as a result of operating temperature readings below the minimum operating temperature of the flares for these units.~~

10. Condition D.5.3 - Due to a typographical error, Condition D.5.3 has been revised as follows:

D.5.3 Preventive Maintenance Plan [326 IAC 2-7-5(3)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for ~~this facility~~ **each facility** and its control device.

11. Condition D.5.4 - Due to new information the potential to emit (PTE) of PM is less than two hundred fifty (250) tons per year, therefore, the 326 IAC 2-2 header will be removed. Due to the addition of equipment and typographical error language has been added to show compliance with 326 IAC 6-1 by the use of particulate control. Therefore, Condition D.5.4 has been revised as follows:

D.5.4 Particulate Control [326 IAC 6-1] ~~[326 IAC 2-2]~~

- (a) In order to comply with Condition D.65.2(~~dc~~), the Torit filter system and rotocones for the particulate control shall be in operation and control emissions from the numerous mills and wheelabrator at all times that the numerous mills and wheelabrator are in operation. In addition, the numerous mills and wheelabrator operation must meet the criteria of a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate of less than or equal to 4000 actual cubic feet per minute, in order to comply with this limit.
- (b) In order to comply with Condition D.65.2(~~ed~~), the dust collectors for the particulate control shall be in operation and control emissions from the shot peening and sandblasting operations at all times that the shot peening and sandblasting operations are in operation. In addition, the shot peening and sandblasting operations must meet the criteria of a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate of less than or equal to 4000 actual cubic feet per minute, in order to comply with this limit.
- (c) **In order to comply with Condition D.5.2(e), the dust collectors for the particulate control shall be in operation and control emissions from the three (3) burr benches, one (1) madison grinder, one (1) empire blaster and two (2) blast units at all times that the three (3) burr benches, one (1) madison grinder, one (1) empire blaster and two (2) blast units are in operation. In addition, the three (3) burr benches, one (1) madison grinder, one (1) empire blaster and two (2) blast units must meet the criteria of a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate of less than or equal to 4000 actual cubic feet per minute, in order to comply with this limit.**

12. Condition D.4.7 - Due to new information the potential to emit (PTE) of PM is less than two hundred fifty (250) tons per year, therefore, the 326 IAC 2-2 header will be removed. Therefore, Condition D.4.7 has been revised as follows:

D.4.7 Control Device Requirements [326 IAC 20-15-1] [40 CFR 63, Subpart GG] ~~[326 IAC 2-2]~~

Pursuant to 40 CFR 63.743(b) dry particulate filter systems operated per the manufacturer's

instructions are exempt from a startup, shutdown, and malfunction plan.

13. Condition D.4.13 - Due to new information the potential to emit (PTE) of PM is less than two hundred fifty (250) tons per year, therefore, the 326 IAC 2-2 header will be removed. Therefore, Condition D.4.13 has been revised as follows:

D.4.13 Particulate Control [326 IAC 6-1] [326 IAC 2-2]

Particulate from the surface coating shall be controlled by dry particulate filters and the Permittee shall operate the control device at all times the two (2) paint booths are in operation.

14. Due to the removal of one of the chrome anodizing tanks (19), the following Chrome Electroplating and Anodizing NESHAP Ongoing Compliance Status Report has been revised as follows:

Source Name: Honeywell International, Inc. _____
 Source Address: 3520 Westmoor Street, South Bend, Indiana 46628 _____
 Mailing Address: 3520 Westmoor Street, South Bend, Indiana 46628 _____
 Part 70 Permit No.: T141-7442-00172

Tank ID #: _____ 19 _____
 Type of process: Anodizing
 Monitoring Parameter: Surface tension of the anodizing bath
 Parameter Value: 45 dynes per centimeter
 Limits: Total chromium concentration may not exceed 0.01 mg/dscm

This form is to be used to report compliance for the Chromium Electroplating and Anodizing NESHAP only.
 The frequency for completing this report may be altered by IDEM, OAQ, Compliance Branch.

Companies classified as a major source: Submit this report no later than 30 days after the end of the reporting period.

Companies classified as an area source: Complete this report no later than 30 days after the end of the reporting period, and retain on site unless otherwise notified.

This form consists of 2 pages

Page 1 of 2

| |
|---|
| BEGINNING AND ENDING DATES OF THE REPORTING PERIOD: |
| TOTAL OPERATING TIME OF THE TANK DURING THE REPORTING PERIOD: |

| |
|---|
| MAJOR AND AREA SOURCES: CHECK ONE |
| <input type="radio"/> NO DEVIATIONS OF THE MONITORING PARAMETER ASSOCIATED WITH THIS TANK FROM THE COMPLIANT VALUE OR RANGE OF VALUES OCCURRED DURING THIS REPORTING PERIOD. |
| <input type="radio"/> THE MONITORING PARAMETER DEVIATED FROM THE COMPLIANT VALUE OR RANGE OF VALUES DURING THIS REPORTING PERIOD (THUS INDICATING THE EMISSION LIMITATION MAY HAVE BEEN EXCEEDED, WHICH COULD RESULT IN MORE FREQUENT REPORTING). |

| | | | |
|---|-----|-----|-----|
| AREA (I.E., NON-MAJOR) SOURCES OF HAP ONLY: IF DEVIATIONS OCCURRED, LIST THE AMOUNT OF TANK OPERATING TIME EACH MONTH THAT MONITORING RECORDS SHOW THE MONITORING PARAMETER DEVIATED FROM THE COMPLIANT VALUE OR RANGE OF VALUES: | | | |
| JAN | APR | JUL | OCT |
| FEB | MAY | AUG | NOV |
| MAR | JUN | SEP | DEC |

| | | | |
|--|-----|-----|-----|
| HARD CHROME TANKS / MAXIMUM RECTIFIER CAPACITY LIMITED IN ACCORDANCE WITH 40 CFR 63.342(c)(2) ONLY: LIST THE ACTUAL AMPERE-HOURS CONSUMED (BASED ON AN AMP-HR METER) BY THE INDIVIDUAL TANK: | | | |
| JAN | APR | JUL | OCT |
| FEB | MAY | AUG | NOV |
| MAR | JUN | SEP | DEC |

**CHROMIUM ELECTROPLATING AND ANODIZING NESHAP
ONGOING COMPLIANCE STATUS REPORT**

ATTACH A SEPARATE PAGE IF NEEDED

Page 2 of 2

IF THE OPERATION AND MAINTENANCE PLAN REQUIRED BY 40 CFR 63.342 (f)(3) WAS NOT FOLLOWED, PROVIDE AN EXPLANATION OF THE REASONS FOR NOT FOLLOWING THE PLAN AND DESCRIBE THE ACTIONS TAKEN FOR THAT EVENT:

DESCRIBE ANY CHANGES IN TANKS, RECTIFIERS, CONTROL DEVICES, MONITORING, ETC. SINCE THE LAST STATUS REPORT:

ADDITIONAL COMMENTS:

ALL SOURCES: CHECK ONE

- I CERTIFY THAT THE WORK PRACTICE STANDARDS IN 40 CFR 63.342(f) WERE FOLLOWED IN ACCORDANCE WITH THE OPERATION AND MAINTENANCE PLAN ON FILE; AND, THAT THE INFORMATION CONTAINED IN THIS REPORT IS ACCURATE AND TRUE TO THE BEST OF MY KNOWLEDGE.
- THE WORK PRACTICE STANDARDS IN 40 CFR 63.342(f) WERE NOT FOLLOWED IN ACCORDANCE WITH THE OPERATION AND MAINTENANCE PLAN ON FILE, AS EXPLAINED ABOVE AND/OR ON ATTACHED.

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

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

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

Source Background and Description

Source Name: Honeywell International, Inc.
Source Location: 3520 Westmoor Street, South Bend, IN 46628
County: St. Joseph
SIC Code: 3724, 3728
Operation Permit No.: T141-7442-00172

The Office of Air Quality (OAQ) has reviewed a Part 70 permit application from Honeywell International, Inc. relating to an aircraft landing systems manufacturing operation.

Permitted Emission Units and Pollution Control Equipment

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

- (a) Two (2) electric char furnaces, with a maximum capacity of 45 tons of disks per year each, with volatile organic compound emissions controlled by a thermal oxidizer with a 90% overall control efficiency, and exhausting through stack 427. Construction dates are as follows: Nos 5 and 6, 1989.
- (b) One (1) chemical vapor deposition (CVD) unit, also known as carbon vapor deposition unit, identified as CVD-1, constructed in 1978, having an estimated batch capacity of 2400 pounds (initial weight) of brakes and a nominal total reactant gas flow rate of 360 scf per soak hour. One (1) enclosed flare, controlling the soak phase VOC emissions from CVD-1, with a rated capacity of 0.9 MMBtu per hour, natural gas combustion, and exhausting through stack S-FL-1.
- (c) Twenty-two (22) chemical vapor deposition (CVD) units, also known as carbon vapor deposition units, identified as CVD-2 through CVD-23, with each unit having an estimated batch capacity of 8800 pounds (initial weight) of brakes for random fiber process or 5300 pounds (initial weight) of brakes for non-woven process. Each CVD has a nominal total reactant gas flow of 2200 scf per soak hour for random fiber process or a nominal total reactant gas flow of 4200 scf per soak hour for non-woven fiber process. Construction dates are as follows: CVD 2, 1978; CVD 3, 1985; CVD 4, 1988; CVD 5, 1989; CVDs 6 and 7, 1990; CVDs 8 and 9, 1991; CVDs 10 and 11, 1992; CVDs 12 and 13, 1993; CVDs 14 through 21, 1995-2000; CVDs 22 and 23, 2000.
- (d) Twenty-two (22) enclosed flares, controlling the soak phase VOC emissions from CVD units 2-23, each having a rated capacity of 5.5 MMBtu per hour, natural gas combustion, and exhausting through stacks S-FL-2 through S-FL-23, respectively.

Unpermitted Emission Units and Pollution Control Equipment

- (a) Four (4) electric char furnaces, with a maximum capacity of 45 tons of disks per year, with volatile organic compound emission controlled by a thermal oxidizer with a 95% overall

control efficiency. Char furnaces 1 and 2 are controlled by one (1) thermal oxidizer and exhausting through stack 411. Char furnaces 3 and 4 are controlled by one (1) thermal oxidizer and exhausting through stack 407. Construction dates are as follows: Nos. 1, 2, and 3, 1986; No. 4, 1987.

- (b) Two (2) chrome anodizing tanks, identified as 18 and 19, with a wetting agent in each tank to control emissions. [40 CFR 63, Subpart N]

Insignificant Activities

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

- (a) Space heaters, process heaters, or boilers using the following fuels:
 - (1) Five (5) natural gas-fired boilers with a total heat input capacity of 10.5 MMBtu/hr combined. Three (3) boilers constructed in 1986 identified as: Plants 12W, 4W and 4E, exhausting to stacks 226, 484 and 485, respectively. Two (2) boilers constructed in 1991 identified as: Plants 4BS and 4BN, both exhausting to stack BS-1. [326 IAC 6-1]
- (b) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
- (c) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (d) The following VOC and HAP storage containers:
 - (1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
- (e) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (f) Degreasing operations that do not exceed 145 gallons per 12 months, except is subject to 326 IAC 20-6. [326 IAC 8-3-5]
- (g) Cleaners and solvents characterized as follows:
 - (1) Having a vapor pressure equal to or less than 2kPa; 15mm Hg; or 0.3 psi measure at 38 degrees C (100° F); or
 - (2) Having a vapor pressure equal to or less than 0.7kPa; 5mm Hg; or 0.1 psi measured at 20 degrees C (68° F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (h) Closed loop heating and cooling systems.
- (i) Quenching operations used with heat treating processes.
- (j) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (k) Paved and unpaved roads and parking lots with public access.
- (l) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

- (m) Emergency generators as follows:
 - (1) Gasoline generators not exceeding 110 horsepower.
- (n) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing, polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
 - (1) Numerous mills discharging to Torrit filter systems, with a maximum throughput of less than one hundred (100) pounds per hour. The torrits are less than 4000 CFM and the mills are grinding and machining operations. [326 IAC 6-1]
 - (2) One (1) wheelabrator operation, identified as No. 816710, with a maximum throughput of less than one hundred (100) pounds per hour of plastic media blast, vented through a rotoclone, which is less than 4000 CFM, and exhausting inside the building. [326 IAC 6-1]
 - (3) Three (3) shot peening operations, with a maximum throughput of 6000 pounds per hour, vented through dust collectors and exhausting inside the building. [326 IAC 6-1]
 - (4) Three (3) sandblasting operations used intermittently to clean metal parts, vented through dust collectors and exhausting inside the building. [326 IAC 6-1]
- (o) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees (C)).
- (p) A laboratory as defined in 326 IAC 2-7-1(21)(D).
- (q) Activities or categories of activities with individual HAP emissions not previously identified; Any unit emitting greater than 1 pound per day but less than 5 pounds per day or 1 ton per year of a single HAP:
 - (1) Six (6) electric preheat ovens emitting benzene.
 - (2) Four (4) devolitzation ovens emitting benzene.
 - (3) Two (2) preform ovens emitting benzene.
 - (4) One (1) methanol freezer emitting methanol.
- (r) The following equipment related to manufacturing activities not resulting in the emission of HAPs; brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-1]
- (s) Other activities or categories not previously identified:
 - (1) Soil vapor extraction (SVE) and air sparging system, which includes seven (7) ART™ Integrated Remediation System wells. The soil vapor extraction system is capable of extracting air at a total rate of 345 standard cubic feet per minute (scfm). The VOC/HAP emissions from the soil and groundwater remediation is controlled by two (2) vapor phase carbon adsorption units.
 - (2) Acid etch operation. The batch utilizes nitric acid to etch aluminum parts. Ammonium bifluoride is added to the batch. Calculations show that emission of

hydrogen fluoride will not exceed 544 pounds per year and that NOX emissions will not exceed 4.8 tons per year. Neither level is high enough to require permitting.

- (3) Two (2) electric heat treat furnaces (ID Nos. HTT 15 and HTT 16), each with a maximum capacity of 13.35 pounds per hour of carbon micro-beads, exhausting through stack 4A-32.
- (4) Electric Arc (Heat Treat) furnaces ducted through two (2) external discharge stacks.
- (5) Two (2) Binks Paint Booths, installed in 1998, using HVLP spray guns, 3-stage HEPA filters and an electric powered IR curing oven. [40 CFR 63, Subpart GG] [326 IAC 6-1]
- (6) One (1) lab char furnace used for research purposes and emitting 0.14 tons per year of VOC.
- (7) Two (2) high temperature heat treatment systems used to process disks. A flexible vent line removes any emissions from the open flames.
- (8) Two (2) electric harper furnaces used to dry batches of disks following the oxidation process. Nitrogen is used to blanket the disks. There are no regulated emissions from these furnaces.
- (9) Six (6) electric preheat ovens used to heat disks prior to the disks entering the mold presses. Each oven is vented directly to the atmosphere. The emission of regulated compounds from these ovens is negligible. VOC screenings showed essentially no VOC emissions.
- (10) Fourteen (14) wabash mold presses, a manual operation which utilizes heated molds to press disks into a more finished form. A mold releasing agent consisting of water/wax is sprayed on the mold. There are no visible emissions.
- (11) One (1) plastic bead blaster used to remove paint from parts. The machine is vented through a Torit fabric filter system. Uncontrolled emissions were estimated at one (1) pound per hour. [326 IAC 6-1]
- (12) One (1) brake test dynamometer, this shaft dynamometer is vented directly to the atmosphere through two (2) vents in the roof to remove heat and any potential emissions. Particulate emissions were estimated at 50 pounds per year for each vent. [326 IAC 6-1]
- (13) One (1) EI dynamometer vented through two (2) vent systems to two (2) fabric filter systems. Particulate from the tires and brakes along with the heat generated during tests is vented to these control devices. [326 IAC 6-1]
- (14) Two (2) preform ovens, the two (2) semi-automated machines receive bulk molding compound and compresses the compound into rough circular brake disks. The preformers are vented directly to the atmosphere.
- (15) Five (5) post cure ovens which heat molded disks. VOC screenings showed an hourly VOC emission rate of 0.16 pounds per hour per each oven.
- (16) Two (2) densification where disks for limited special applications are treated at ambient temperature in tanks containing solutions or furfural and furfuryl alcohol and phthalic anhydride which impregnate the disk. The disks are then placed into baths of sulfuric acid and tetra ethylene glycol which cures the coating.

- (17) One (1) hot water plate cleaner where plates for the mold presses are cleaned in nitric acid solution and rinsed in hot water. This process is being phased out and replaced with carbon dioxide pellet blasting. There are no emissions of regulated compounds from either process.
- (18) Zyglo application line where metal parts are sprayed with fluorescent compound having a petroleum base. Emissions of VOCs.
- (19) Three (3) paint ovens operated by infrared lights heat cures painted parts driving off VOCs of approximately 0.5 tons per year.
- (20) Four (4) devolatilization ovens operated at 65 degrees C to remove humidity from carbon brakes. Negligible VOCs are emitted.
- (21) Laboratory oven and press exhaust.
- (22) Tank farm vapour recovery system.
- (23) Lab CVD unit used for conducting research and development on carbon brakes.
- (24) Test cell area sources - Plant 3 - assemble test stations for aircraft fuel controls.
- (25) Test cell area sources - Engineering building 14 - research and development to stimulate aircraft take-off for fuel controls.
- (26) Production testing - Plant 14 - calibration of aircraft fuel controls.
- (27) Test cell area sources - Plant 16 - inactive, unoccupied building.
- (28) Test cell area sources - Plant 19 - engineer, calibrate and test aircraft fuel systems.

Existing Approvals

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

- (a) CP (71) 1860, OP 3700-00005, issued on July 23, 1990;
- (b) R 141-4397-00005, issued on April 20, 1995;
- (c) CP 141-7277-00005, issued on March 26, 1997;
- (d) CP 141-8117-00005, issued on May 20, 1997;
- (e) CP 141-8761-00005, issued on July 2, 1998;
- (f) A 141-10094-00172, issued on September 22, 1998;
- (g) CP 141-9999-00172, issued on December 14, 1998;
- (h) SSM 141-10759-00172, issued on October 19, 1999;
- (i) 141-11205-00172, issued on October 20, 1999;
- (j) SSM 141-11511-00172, issued on March 8, 2000;

- (k) AA 141-12090-00172, issued on July 21, 2000;
- (l) SSM 141-12169-00172, issued on October 6, 2000;
- (m) SSM 141-13853-00172, issued on September 7, 2001; and
- (n) EX 141-16729-00172, issued on November 22, 2002

All conditions from previous approvals were incorporated into this Part 70 permit except the following:

- (a) R 141-4397-00005, issued on April 20, 1995
Condition: All terms and conditions in this permit are no longer in effect.
Reason not incorporated: The electric carbonization furnace permitted was removed.
- (b) CP 141-7277-00005, issued on March 26, 1997
Condition: All terms and conditions in this permit are no longer in effect.
Reason not incorporated: This permit was superceded by permit CP 141-8761-00005, issued on July 2, 1998.
- (c) CP 141-8117-00005, issued on May 20, 1997
Condition: All terms and conditions in this permit are no longer in effect.
Reason not incorporated: This permit was superceded by permit CP 141-8761-00005, issued on July 2, 1998.
- (d) CP 141-8761-00005, issued on July 2, 1998
Condition: All terms and conditions in this permit are no longer in effect.
Reason not incorporated: This permit was superceded by permit CP 141-9999-00172, issued on December 14, 1998.
- (e) CP 141-9999-00172, issued on December 14, 1998
Condition: All terms and conditions relating to the four (4) electric carbonization furnaces (ID Nos. ECF-2, ECF-3, ECF-4 and ECF-5).
Reason not incorporated: The two (2) electric carbonization furnaces (ID Nos. ECF-4 and ECF-5) were never put into production as electric carbonization furnaces and they were converted to heat treat furnaces (ID Nos. HTT 15 and HTT 16) in 2002. The two (2) electric carbonization furnaces (ID Nos. ECF-2 and ECF-3) were never constructed.
- (f) SSM 141-10759-00172, issued on October 19, 1999
Condition: All terms and conditions in this permit are no longer in effect.
Reason not incorporated: This permit was superceded by permit SSM 141-13853-00172, issued on September 7, 2001
- (g) 141-11205-00172, issued on October 20, 1999
Condition: All terms and conditions in this permit are no longer in effect.

Reason not incorporated: This permit was superceded by permit SSM 141-13853-00172, issued on September 7, 2001.

- (h) SSM 141-11511-00172, issued on March 8, 2000

Condition: All terms and conditions relating to the CVD unit, identified as CVD- 24.

Reason not incorporated: This CVD unit (CVD- 24) was never constructed.

- (i) AA 141-12090-00172, issued on July 21, 2000

Condition: All terms and conditions in this permit are no longer in effect.

Reason not incorporated: This permit is an administrative amendment to CP 141-8761-00172, which was superceded by CP 141-9999-00172, the two (2) electric carbonization furnaces (ID Nos. ECF-2 and ECF-3) were never constructed, and the two (2) electric carbonization furnaces (ID Nos. ECF-4 and ECF-5) were never put into production as electric carbonization furnaces and they were converted to heat treat furnaces (ID Nos. HTT 15 and HTT 16) in 2002.

- (j) SSM 141-12169-00172, issued on October 6, 2000

Condition: All terms and conditions in this permit are no longer in effect.

Reason not incorporated: The eight (8) natural gas-fired turbines have been disconnected from the gas lines and will no longer be used.

Enforcement Issue

IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled "Unpermitted Emission Units and Pollution Control Equipment". IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Recommendation

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

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

An administratively complete Part 70 permit application for the purposes of this review was received on December 10, 1996. Additional information was received on December 12, 1996; September 12, 1997; August 3, 1998; July 16, 2003; August 13, 2003.

A notice of completeness letter was mailed to the source on December 26, 1996.

Emission Calculations

Calculations for the potential emissions of criteria and HAP pollutants for CVDs 1-21 can be found in SSM 141-13853-00172, issued on September 7, 2001. This same methodology was used to calculate the potential emissions of criteria and HAP pollutants for CVDs 22 and 23. These calculations can be found in Appendix A (pages 1 through 2).

Emission from the char furnaces 1-4 are unvalidated and the source will be required to test these units.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

| Pollutant | Potential To Emit (tons/year) |
|-----------------|-------------------------------|
| PM | greater than 250 |
| PM-10 | greater than 250 |
| SO ₂ | less than 100 |
| VOC | greater than 250 |
| CO | less than 250 |
| NOx | less than 250 |

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

| HAP's | Potential To Emit (tons/year) |
|--------------|-------------------------------|
| Benzene | 140.74 |
| Toluene | 15.00 |
| Styrene | 13.95 |
| Phenol | 11.76 |
| o-Cresol | 7.83 |
| Chromium | 1.0 |
| Formaldehyde | 0.31 |
| TOTAL | 190.59 |

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM10, VOC, CO and NOx is equal to or greater than one hundred (100) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) **Fugitive Emissions**
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2002 OAQ emission data.

| Pollutant | Actual Emissions (tons/year) |
|-----------|------------------------------|
| PM | 1.12 |
| PM-10 | 1.12 |

| | |
|-----------------|--------------|
| SO ₂ | 0.00 |
| VOC | 33.80 |
| CO | 50.08 |
| NO _x | 32.69 |
| HAP | not reported |

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 operating permit.

| Process/facility | Potential to Emit (tons/year) | | | | | | |
|--|----------------------------------|--------|-----------------|-----------|--------|-----------------|-----------|
| | PM | PM-10 | SO ₂ | VOC | CO | NO _x | HAPs |
| Two (2) char furnaces (5 - 6) | -- | -- | -- | a | -- | -- | a |
| Four (4) char furnaces (1-4) | -- | -- | -- | a | -- | -- | a |
| Twenty-one (21) CVD units (1-21) | 2.52 | 2.52 | -- | 25.09 | 98.66 | 31.17 | 3.09 |
| Two (2) CVD units (22-23) | 0.24 | 0.24 | -- | 2.39 | 13.98 | 4.49 | 0.29 |
| Two (2) Paint Booths | 6.87 | 6.87 | -- | 8.95 | -- | -- | 4.66 |
| Five (5) natural gas-fired boilers (12W, 4W, 4E, 4BS, 4BN) | 0.34 | 0.34 | 0.03 | 0.25 | 3.79 | 4.51 | -- |
| Two (2) Chrome Anodizing tanks (18 and 19) | 0.004 | 0.004 | -- | -- | -- | -- | 0.004 |
| Soil Vapor Extraction | -- | -- | -- | 8.80 | -- | -- | 8.80 |
| Insignificant Activities: (numerous mills, one wheelabrator, three shotpeening, three sandblasting, one plastic bead blaster, one brake test dynamometer, one EI dynamometer, cutting torches, brazing, soldering and welding equipment) | 175 | 175 | -- | -- | -- | -- | -- |
| Total Emissions | 184.97 | 184.97 | 0.03 | 45.48 + a | 116.43 | 40.17 | 16.84 + a |

NOTE: Char furnaces 5-6 pursuant to 326 IAC 2-2 and 326 IAC 8-1-6
 Insignificant activities pursuant to 326 IAC 2-2 and 326 IAC 6-1
 "a" = Not yet determined. Emissions need to be validated by a performance test.
 See D.1.3.

County Attainment Status

The source is located in St. Joseph County.

| Pollutant | Status |
|-----------------|------------------------|
| PM-10 | attainment |
| SO ₂ | attainment |
| Ozone | maintenance attainment |
| CO | attainment |
| Lead | attainment |

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the

ozone standards. St. Joseph County has been designated as maintenance attainment for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (b) St. Joseph County has been classified as attainment or unclassifiable for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Part 70 Permit Conditions

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

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

Federal Rule Applicability

- (a) 40 CFR 63, Subpart N - Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing
The requirements of 40 CFR 63, Subpart A (General Provisions), 40 CFR 63, Subpart N (Hard and Decorative Chromium Electroplating and Chromium Anodizing), 326 IAC 20-1 and 326 IAC 20-8 are applicable to this source because the source was a major source of hazardous air pollutants (HAPs) (25 tons per year combined HAP emissions and 10 tons per year single HAP emissions) when this rule became final and the source contains two (2) chrome anodizing tanks, identified as 18 and 19.

Emission Limitations

- (a) The emission limitations in this condition apply only during tank operation, and also apply during periods of startup and shutdown as these are routine occurrences for tanks subject to 326 IAC 20-8-1. The emission limitations do not apply during periods of malfunction. The work practice standards that address operation and maintenance must be followed during malfunctions and periods of excess emissions.
- (b) The Permittee shall comply with the requirements of this condition on and after the compliance date for the tanks. During tank operation, the Permittee shall control chromium emissions discharged to the atmosphere from the two (2) tanks, 18 and 19, by:

Not allowing the surface tension of the anodizing bath contained within the tank to exceed forty-five dynes per centimeter (45 dynes/cm) [equivalent to three and one-tenth times ten raised to the power of negative three pound-force per foot (3.1×10^{-3} lb_f/ft)] at any time during operation of tanks 18 and 19 when a wetting agent is used.

- (c) Work practice standards pursuant to 40 CFR 63.342(f)(1) and (2) apply at all

times including periods of startup, shutdown, malfunction and excess emissions, the Permittee shall operate and maintain tanks 18 and 19, including the wetting agent and monitoring equipment, in a manner consistent with good air pollution control practices, consistent with the Operation and Maintenance Plan (OMP) required by this permit and which has been incorporated into the Part 70 Operating Permit by reference.

A monitoring requirement directly from a NESHAP or NSPS is not considered a Compliance Monitoring requirement for the Compliance Monitoring section of our permits. These requirements and any monitoring schedules identified in the NESHAP or NSPS should be incorporated into the "Emission Limitations and Standards" section of the permit. The Compliance Monitoring section of the permit is reserved for any additional monitoring not expressly required by a NESHAP or NSPS.

Compliance Monitoring

- (a) Pursuant to 40 CFR 63.343(c)(5)(ii) and (iii), when using a wetting agent in the anodizing bath to comply with the limit specified above, the Permittee shall monitor the surface tension of the electroplating baths. Operation of tanks 18 and 19 at a surface tension greater than 45 dynes per centimeter shall constitute noncompliance with the standards.
- (1) The Permittee shall monitor the surface tension of the anodizing bath during tank operation according to the following schedule:
- (A) The surface tension shall be measured once every 4 hours during operation of the tank with a stalagmometer or a tensiometer as specified in Method 306B, appendix A of this part.
- (B) The time between monitoring can be increased if there have been no exceedances. The surface tension shall be measured once every 4 hours of tank operation for the first 40 hours of tank operation after the compliance date. Once there are no exceedances during 40 hours of tank operation, surface tension measurement may be conducted once every 8 hours of tank operation. Once there are no exceedances during 40 hours of tank operation, surface tension measurements may be conducted once every 40 hours of tank operation on an ongoing basis, until an exceedance occurs. The minimum frequency of monitoring allowed by this subpart is once every 40 hours of tank operation.
- (C) Once an exceedance occurs as indicated through surface tension monitoring, the original monitoring schedule of once every 4 hours must be resumed. A subsequent decrease in frequency shall follow the schedule laid out in paragraph (B) above. For example, if a Permittee has been monitoring a tank once every 40 hours and an exceedance occurs, subsequent monitoring would take place once every 4 hours of tank operation. Once an exceedance does not occur for 40 hours of tank operation, monitoring can occur once every 8 hours of tank operation. Once an exceedance does not occur for 40 hours of tank operation on this schedule, monitoring can occur once every 40 hours of tank operation.
- (2) Once a bath solution is drained from tanks 18 and 19 and a new solution added, the original monitoring schedule of once every 4 hours must be resumed, with a decrease in monitoring frequency allowed following the

procedures in paragraphs (B) and (C) above.

- (b) Tank operation or operating time is defined as that time when a part is in the tank and there is a current running through the tank. If the amount of time that no part is in the tank is fifteen minutes or longer, that time is not considered operating time. Likewise, if the amount of time between placing parts in the tank (i.e. when no part is in the tank) is less than fifteen minutes, that time between plating the two parts is considered operating time.

Record Keeping and Reporting Requirements

- (a) Inspection records for the wetting agent and monitoring equipment to document that the inspection and maintenance required have taken place.
 - (1) The device inspected;
 - (2) The date of inspection;
 - (3) A brief description of the working condition for the device during the inspection, including any deficiencies found; and
 - (4) Any actions taken to correct deficiencies found during the inspection, including the date(s) such actions were taken.
- (b) Records of all maintenance performed on tanks 18 and 19 and monitoring equipment.
- (c) Records of the occurrence, duration, and cause (if known) of each malfunction of tanks 18 and 19 and monitoring equipment.
- (d) Records of the occurrence, duration, and cause (if known) of each period of excess emissions of tanks 18 and 19 and monitoring equipment as indicated by monitoring data collected in accordance with this condition.
- (e) Records of actions taken during periods of malfunction or excess emissions when such actions are inconsistent with the OMP.
- (f) Other records, which may take the form of checklists, necessary to demonstrate consistency with the provisions in the OMP.
- (g) Test reports documenting results of all performance tests.
- (h) All measurements as may be necessary to determine the conditions of performance tests, including measurements necessary to determine compliance.
- (i) Records of monitoring data required by 40 CFR 63.343(c) that are used to demonstrate compliance with the standard including the date and time the data is collected.
- (j) The total process operating time, of each tank, during the reporting period.
- (k) Records of the date and time that fume suppressants were added to the anodizing bath, and the amount and type of fume suppressant added.
- (l) All documentation supporting the notifications and reports required by 40 CFR 63.9 and 63.10 (Subpart A, General Provisions).

The notifications and reports required in this section shall be submitted to IDEM, OAQ using the address specified in Section C - General Reporting Requirements, of the permit.

- (a) Notifications:

- (1) A Notification of Compliance Status (NCS) is required each time that the facility becomes subject to the requirements of 40 CFR Part 63, Subpart N.
 - (A) The NCS shall be submitted to IDEM, OAQ, and shall list, for each tank, the information identified in 40 CFR 63.347(e)(2).
 - (B) The NCS for tanks 18 and 19 shall be submitted to IDEM, OAQ immediately.
- (2) Notification of Construction or Reconstruction
Pursuant to 40 CFR 63.345(b)(1), the Permittee may not construct a new tank subject to 40 CFR 63, Subpart N (including non-affected tanks defined in 40 CFR 63.344(e)) without submitting a Notification of Construction or Reconstruction (NCR) to IDEM, OAQ. In addition, the Permittee may not change, modify, or reconstruct tanks 18 and 19 without submitting a Notification of Construction or Reconstruction (NCR) to IDEM, OAQ.
 - (A) The NCR shall contain the information identified in 40 CFR 63.345(b)(2) and (3).
 - (B) A change, modification, or reconstruction of this facility includes any change in the air pollution control techniques, the addition of add-on control devices, or the construction of duct work for the purpose of controlling both existing tanks and non-affected facilities by a common control technique or device.
 - (C) A complete application to construct new chromium electroplating or chromium anodizing tanks serves as this notification. Likewise, the complete application to modify or reconstruct tanks 18 and 19 serves as this notification.
 - (D) Pursuant to 326 IAC 2-1.1-2(a), permission must be received from IDEM, OAQ before construction, modification, or reconstruction may commence.
- (b) Performance Test Results:
The Permittee shall document results from any future performance tests in a complete test report that contains the information required in 40 CFR 344(a).

The Permittee shall submit reports of performance test results as part of the Notification of Compliance Status, as defined in 40 CFR 63.347(e), no later than forty-five (45) days following the completion of the performance test.
- (c) Ongoing Compliance Status Report:
The Permittee shall prepare summary reports to document the ongoing compliance status of tanks 18 and 19 using the Ongoing Compliance Status Report form provided with this permit. This report shall contain the information specified in 40 CFR 63.347(g)(3).

Because tanks 18 and 19 are located at a site that is a major source of hazardous air pollutants (HAPs), the Ongoing Compliance Status Report shall be completed and submitted according to the following schedule:

- (1) This report shall be submitted semi-annually on a calendar year basis, unless otherwise directed by IDEM, OAQ. The report shall be submitted within thirty (30) days after the end of each reporting period (which ends

June 30 and December 31 respectively).

- (2) If the monitoring data collected by the Permittee in accordance with 40 CFR 63.343(c) show that the emission limit has been exceeded, quarterly reports shall be submitted.

Once the Permittee reports an exceedance as defined above, Ongoing Compliance Status Reports shall be submitted quarterly until a request to reduce reporting frequency in accordance with 40 CFR 63.347(g)(2) is approved.

- (3) IDEM, OAQ may determine on a case-by-case basis that more frequent reporting is necessary to accurately assess the compliance status of this facility.

- (b) 40 CFR 63.460, Subpart T - Standards for Halogenated Solvent Cleaning
 The degreasing operations are not subject to this rule because there is no halogenated solvents in a total concentration greater than five percent (5%) by weight, as a cleaning and/or drying agent.
- (c) 40 CFR 63, Subpart GG - Standards for Aerospace Manufacturing and Rework Facilities
 The requirements of 40 CFR 63, Subpart A (General Provisions), 40 CFR 63, Subpart GG (Aerospace Manufacturing and Rework), 326 IAC 20-1 and 326 IAC 20-15 are applicable to this source because the source was a major source of hazardous air pollutants (HAPs) (25 tons per year combined HAP emissions and 10 tons per year single HAPs emissions) when this rule became final and the source includes units engaged in the manufacturing or rework of commercial, civil, or military aerospace vehicles or components.

Emission Limitations and Standards

- (a) Unless a cleaning solvent contains HAP or VOC below the de minimis levels specified in 40 CFR 63.741(f) or meets the composition requirements listed in Table 1 of 40 CFR 63.744 and provided below, the standards for cleaning measures pursuant to 40 CFR 63.744 apply.

| Cleaning Solvent Type | Composition Requirements |
|-----------------------|--|
| Aqueous | <ul style="list-style-type: none"> • Cleaning solvents in which water is the primary ingredient (≥ 80 percent of cleaning solvent solution as applied must be water) • Aqueous solutions must have a flash point greater than 93°C (200°F) as reported by the manufacturer • Solution must be miscible with water |
| Hydrocarbon-Based | <ul style="list-style-type: none"> • Cleaners that are composed of photochemically reactive hydrocarbons and/or oxygenated hydrocarbons • Have a maximum vapor pressure of 7 mm Hg at 20°C (3.75 in H₂O and 68°F) • Contain no HAP |

The Permittee will comply with the standards in 40 CFR 63.744 by complying with sections 63.744(a)(1), (2) and (3), 63.744(b)(1), (b)(2), 63.744(c)(1), (2), and (3), 63.744(d), and 63.745(c)(1), (2), (3), and (4) unless using a solvent that is exempt due to containing HAP and VOC below de minimis levels specified in 40 CFR 63.741(f).

- (b) Storage and Handling of Waste
Pursuant to 40 CFR 63.748 and 63.741(e), unless exempt under 40 CFR 63.741(e), the Permittee shall conduct the handling and transfer of the waste that contains HAP to or from containers, tanks, vats, vessels, and piping systems in such a manner that minimizes spills.
- (c) Spray gun cleaning *Enclosed system*
 - (1) Pursuant to 40 CFR 63.751(a) visually inspect seals and other potential sources of leaks of each enclosed gun spray cleaner system monthly, while operating.
 - (2) Pursuant to 40 CFR 63.744(c)(1)(ii) if a leak is found, repair within 15 days from detection or remove cleaning solvent and shut down system until leak is repaired.
- (d) The dry particulate filter systems are exempt from the Startup, Shutdown, Malfunction plan requirements in accordance with 40 CFR 63.743(b) when operated per the manufacturer's instructions. The Permittee will comply with this exemption by operating the dry particulate filter system per the manufacturer's instructions at all times.
- (e) Primer and Topcoat Application Operations
 - (1) All primers and topcoats shall be applied using one or more of the application techniques specified below unless the application is exempted in 40 CFR 63.745(f)(3) and shall be operated according to company procedures, and/or the manufacturers specifications, whichever is most stringent, at all times:
 - (A) Flow/curtain coat application;
 - (B) Dip coat application;
 - (C) Roll coating;
 - (D) Brush coating;
 - (E) Cotton-tipped swab application;
 - (F) Electrodeposition (dip) coating;
 - (G) High volume low pressure (HVLP) spraying;
 - (H) Electrostatic spray application; or
 - (I) Other coating application methods that achieve emission reductions equivalent to HVLP or electrostatic spray application methods, as determined according to the requirements in 40 CFR 63.750(i).
 - (2) Pursuant to 40 CFR 63.745(g)(1), primer or topcoat applications that are spray applied and contain inorganic HAP shall be applied in a booth or hanger in which air flow is directed downward onto or across the part of assembly being coated and exhausted through one or more outlets.
 - (3) Pursuant to 40 CFR 63.745(g)(2), the Permittee must control the air stream from this operation by passing the air stream through a dry particulate filter system certified using the methods described in 40 CFR 63.750(o) to meet or exceed the efficiency data points in Table 1 and 2 of 40 CFR 63.745(g)(2). Pursuant to 40 CFR 63.745(g)(2)(iv), the following requirements shall be met for each dry particulate system used to comply with the primer and topcoat inorganic HAP emissions standards in 40 CFR 63.745(g)(2)(i)(A):
 - (A) Maintain the system in good working order;
 - (B) Install a differential pressure gauge across the filter banks;

- (C) Continuously monitor pressure drop across the filter and read and record the pressure drop across the filter once per shift; and
 - (D) Take corrective actions when the pressure drop exceeds or falls below the filter manufacturer's recommended limit(s).
- (4) Pursuant to 40 CFR 63.745(g)(3), the Permittee shall comply with the requirements below.
- (A) If the pressure drop is outside of range, the Permittee shall shut down the operation immediately and take corrective action.
 - (B) If the booth maintenance procedures for the filter system have not been performed as scheduled, shut down the operation immediately and take corrective action.
 - (C) The operation shall not be resumed until the pressure drop is returned within the specified range.
- (5) The requirements of 40 CFR 63.745(g)(1) through (3) do not apply to the situations listed in 40 CFR 63.745(g)(4).
- (f) The compliance monitoring requirements of 40 CFR 63.751 are applicable to the cleaning operations and dry particulate filter system. The Permittee shall perform monthly visual inspection requirements for enclosed spray gun cleaners pursuant to 40 CFR 63.751(a). The Permittee shall also continuously monitor, read and record the pressure drop once per shift pursuant to 40 CFR 63.751(c).

Compliance Determination

- (a) Pursuant to 40 CFR 63.749(d)(3) (Organic HAP and VOC content levels - primer and topcoat application operations), the primer application operation is considered in compliance when conditions specified below are met. Failure to meet any one of the conditions identified below shall constitute noncompliance:
- (1) For all uncontrolled primers, all values of Hi and Ha (as determined using the procedures specified in 40 CFR 63.750(c) and (d)) are less than or equal to 350 grams of organic HAP per liter (2.9 lb/gal) or primer (less water) as applied, and all values of Gi and Ga (as determined using the procedures specified in 40 CFR 63.750(e) and (f)) are less than or equal to 350 grams of organic VOC per liter (2.9 lb/gal) of primer (less water and exempt solvents) as applied.
 - (2) Uses an application technique specified in 40 CFR 63.745(f)(1)(i) through (f)(1)(vii).
 - (3) Operates all application techniques in accordance with the manufacturer's specifications.
- (b) Pursuant to 40 CFR 63.749(d)(4) (Organic HAP and VOC content levels - primer and topcoat application operations), the topcoat application operation is considered in compliance when the conditions specified below are met. Failure to meet any of the conditions identified below shall constitute noncompliance.
- (1) For all uncontrolled topcoats, all values of Hi and Ha (as determined using the procedures specified in 40 CFR 63.750(c) and (d)) are less than or equal to 420 grams organic HAP per liter (3.5 lb/gal) of topcoat (less water) as applied, and all values of Gi and Ga (as determined using the procedures specified in 40 CFR 63.750(e) and (f)) are less than or equal to 420 grams organic VOC per liter (3.5 lb/gal) of topcoat (less water and exempt solvents) as applied.

- (2) Uses an application technique specified in 40 CFR 63.745(f)(1)(i) through (f)(1)(viii).
 - (3) Operates all application techniques in accordance with the manufacturer's specifications.
- (c) Pursuant to 40 CFR 63.749(e) (Organic HAP and VOC content levels - primer and topcoat application operations), for each primer or topcoat application operation that emits inorganic HAP, the operation is in compliance when:
- (1) It is operated according to the requirements specified in 40 CFR 63.745(g)(1), (g)(2)(i)(A), (g)(2)(iv), and (g)(3).
 - (2) It is shut down immediately whenever the pressure drop is outside the limit(s) established for them and is not restarted until the pressure drop is returned within these limit(s), as required under 40 CFR 63.745(g)(3).
- (d) The compliance test methods and procedures of 40 CFR 63.750 are to be used for demonstrating compliance with the cleaning operations. The specific requirements include the following:
- (1) The composition and vapor pressure requirements for cleaning operations shall be determined by the test methods and procedures specified in 40 CFR 63.750(a) and (b).
 - (2) Dry particulate filters used to comply with 40 CFR 63.745(g)(2) must be certified by the filter manufacturer or distributor, paint/depainting booth supplier, and/or the facility owner or operator using method 319 in appendix A of subpart A of this part, to meet or exceed the efficiency data points found in Tables 1 and 2, or 3 and 4 of 40 CFR 63.745 for existing or new sources respectively as outlined in 40 CFR 63.750(o).
- (e) The procedures in 40 CFR 63.750(c) (Organic HAP content level determination - compliant primers and topcoats) shall be used to determine the mass of organic HAP emitted per volume of coating (less water) as applied.
- (f) The procedures in 40 CFR 63.750(e) (VOC content level determination - compliant primers and topcoats) shall be used to determine the mass of VOC emitted per volume of coating (less water and exempt solvents) as applied.

Compliance Monitoring

Compliance monitoring requirements listed specifically in the NESHAP rule are considered requirements under Emission Limitations and Standards.

Record Keeping and Reporting Requirements

- (a) Pursuant to 40 CFR 63.752(b)(1) *Cleaning Operations*: record the following for each solvent used:
 - (1) Name of the product;
 - (2) The vapor pressure of the solvent;
 - (3) Documentation showing the organic HAP constituents
- (b) Pursuant to 40 CFR 63.752(b)(2) *Hand-wipe Cleaning Operations*: record the following for each semi-aqueous cleaning solvent used for flush cleaning operations:
 - (1) Name of each cleaning solvent used;
 - (2) Demonstration that the cleaning solvent complies with one of the composition requirements;
 - (3) Annual records of the volume of each solvent used, from facility

purchase or usage records

- (c) Pursuant to 40 CFR 63.752(b)(3), for each cleaning solvent used in hand-wipe cleaning operations that does not comply with the composition requirements in 40 CFR 63.744(b)(1), but does comply with the vapor pressure requirements in 40 CFR 63.744(b)(2).
 - (1) The name of each cleaning solvent used;
 - (2) The composite vapor pressure of each cleaning solvent used;
 - (3) All vapor pressure test results, if appropriate, data and calculations used to determine the composite vapor pressure or each cleaning solvent used; and
 - (4) The amount (in gallons) of each cleaning solvent used each month at each operation.

- (d) Pursuant to 40 CFR 63.752(b)(5) record each leak from enclosed spray gun cleaners:
 - (1) Source identification;
 - (2) Date leak was discovered and repaired

- (e) Pursuant to 40 CFR 63.752(c) *Primer and topcoat application operations - organic HAP and VOC* : record the information specified in paragraphs (c)(1) through (c)(3) of this section:
 - (1) Name and VOC content as received and as applied of each primer and topcoat used at the facility.
 - (2) For primers and topcoats
 - (i) The mass of organic HAP emitted per unit volume of coating as applied (less water) (Hi) and the mass of VOC emitted per unit volume of coating as applied (less water and exempt solvents) (Gi) for each coating formulation within each coating category used each month (as calculated using the procedures specified in 40 CFR 63.750(c) and (e);
 - (ii) All data, calculations, and test results (including EPA Method 24 results) used in determining the values of Hi and Gi; and
 - (iii) The volume (gal) of each coating formulation within each coating category used each month.
 - (3) For "low HAP content" uncontrolled primers with organic HAP content less than or equal to 250 g/l (2.1 lb/gal) less water as applied and VOC content less than or equal to 250 g/l (2.1 lb/gal) less water and exempt solvents as applied:
 - (i) Annual purchase records of the total volume of each primer purchased; and
 - (ii) All data, calculations, and test results (including EPA Method 24 results) used in determining the organic HAP and VOC content as applied. These records shall consist of the manufacturer's certification when the primer is applied as received, or the data and calculations used to determine Hi if not applied as received.

- (f) Pursuant to 40 CFR 63.752(d) *Primer and topcoat application operations - inorganic HAP emissions*: record the pressure drop across the dry filter system once each shift during which coating operations occur. The following should be included in the log:
 - (1) Acceptable limit(s) of pressure drop;
 - (2) The filter manufacturer recommended parameters that include the filters performance.

- (g) The following reports shall be submitted semi-annually unless otherwise specified:
 - (1) Pursuant to 40 CFR 63.753(b) *Cleaning Operations*

- (A) Any instance where a noncompliant cleaning solvent is used for a non-exempt hand-wipe cleaning operation;
 - (B) A list of any new cleaning solvents used for hand-wipe cleaning in the previous 6 months and, as appropriate, their composite vapor pressure or notification that they comply with the composition requirements specified in Sec. 63.744(b)(1);
 - (C) Any instance where a noncompliant spray gun cleaning method is used;
 - (D) Any instance where a leaking enclosed spray gun cleaner remains unrepaired and in use for more than 15 days; and
 - (E) If the operations have been in compliance for the semiannual period, a statement that the cleaning operations have been in compliance with the acceptable standards. Sources shall also submit a statement of compliance signed by a responsible company official certifying that the facility is in compliance with all applicable requirements.
- (2) Pursuant to 40 CFR 63.753(c) *Primer and topcoat application operations:*
- (A) For primers and topcoats where compliance is not being achieved through the use of averaging or a control device, each value of H_i and G_i , as recorded under 40 CFR 63.752.(c)(2)(i), that exceeds the applicable organic HAP or VOC content limit specified in 40 CFR 63.745(c) and Condition D.4.3(e).
 - (B) All times when a primer or topcoat application operation was not immediately shut down when the pressure drop across a dry particulate filter or HEPA filter system, was outside the limit(s) specified by the filter or booth manufacturer;
 - (C) If the operations have been in compliance for the semi-annual period, a statement that the operations have been in compliance with the applicable standards; and
 - (D) Annual reports listing the number of time the pressure drop for each dry filter system was outside the limit(s) specified by the filter or booth manufacturer.
- (g) Pursuant to 40 CFR 63.9(j) any change in the information provided under 40 CFR 63.9 shall be reported to IDEM, OAQ and OES in writing within 15 calendar days after the change.
- (d) 40 CFR 63, Subpart MMMM - Standards for Surface Coating of Miscellaneous Metal Parts and Products
This source is not subject to this rule because the surface coating of metal components of aerospace vehicles meet the applicability criteria for Aerospace Manufacturing and Rework (40 CFR 63, Subpart GG).
- (e) 40 CFR 63, Subpart GGGGG - Standards for Site Remediation
This rule is not applicable because the source is taking limits to be a minor source of hazardous air pollutants (HAPs) (less than twenty-five (25) tons per year of combined HAP emissions and less than ten (10) tons per year of single HAP emissions).
- (f) 40 CFR 60.40c, Subpart Dc - Standards of Performance of Small Industrial-Commercial-Institutional Steam Generating Units:
The five (5) natural gas-fired boilers, identified as Plants 12W, 4W, 4E, 4BS and 4BN, are not subject to the New Source Performance Standard, 326 IAC 12 (40 CFR 60.40c, Subpart Dc). The three (3) natural gas-fired boilers, identified as Plants 12W, 4W and 4E, were constructed prior to the June 9, 1989 applicability date and they are rated at less than ten (10) MMBtu/hr. The two (2) natural gas-fired boilers, identified as

Plants 4BS and 4BN, were constructed after the June 9, 1989 applicability date but they are rated at less than ten (10) MMBtu/hr. Therefore, 40 CFR 60.40c, Subpart Dc does not apply.

State Rule Applicability - Entire Source

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

The source has submitted a Preventive Maintenance Plan (PMP) on December 12, 1996. This PMP has been verified to fulfill the requirements of 326 IAC 1-6-3 (Preventive Maintenance Plan).

326 IAC 1-5-2 (Emergency Reduction Plans)

The source has submitted an Emergency Reduction Plan (ERP) on December 10, 1996. The ERP has been verified to fulfill the requirements of 326 IAC 1-5-2 (Emergency Reduction Plans).

326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-3 (Emission Offset)

The source was constructed in 1978 and at this time St. Joseph was considered a non-attainment county. Therefore, 326 IAC 2-3 was the applicable major source rule. During 1978-1993, fourteen (14) CVD units were constructed and operating without obtaining a proper air permit. During this time, actual emissions from CVD unit No. 13 exceeded the major source threshold of 100 tons per year under 326 IAC 2-3. Based on EPA's injunctive relief memo, the source was required to comply fully with all applicable New Source Review (NSR) requirements, including major NSR permitting. The source was required to use BACT/LAER-equivalent emissions reductions. Pursuant to Agreed Order A-3871 issued on December 28, 1999 and CP (71) 1860 issued on July 23, 1990 and modified through permits 141-11205-00172 issued on October 20, 1999 and 141-13853-00172 issued on September 7, 2001, the CO emissions were limited to less than 250 tons per year so that 326 IAC 2-2 does not apply. These permits did not discuss 326 IAC 2-2 implications for other criteria pollutants. On December 4, 2003, the source requested that the entire source be made minor for PSD. Based on this request, the OAQ has determined that VOC and PM/PM10 need to be restricted such that PSD does not apply in addition to the existing CO limitations. Therefore, the source will be required to perform the following:

1. Operate the flares for CVD units 1-23 pursuant to the existing requirements of 326 IAC 8-1-6;
2. Operate the thermal oxidizer for char furnaces 5 and 6 pursuant to the requirements of 326 IAC 8-1-6;
3. Operate the two (2) thermal oxidizers for char furnaces 1-4 as outlined in Condition D.1.1(b) of the Part 70 Operating permit;
4. Operate the rotoclone for the wheelabrator per the requirements listed in Section D.6 of the permit and per the requirements of 326 IAC 6-1;
5. Operate the dust collectors for the three (3) shot peening and sand blasting operations per the requirements listed in Section D.6 of the permit and per the requirements of 326 IAC 6-1; and
6. Operate the Torit fabric filter system for the plastic bead blaster per the requirements listed in Section D.6 of the permit and per the requirements of 326 IAC 6-1.

On March 8, 2000, the OAQ issued a SSM for the addition of two (2) CVD units identified as CVD 22 and 23. These units were considered a separate PSD and distinct "project" from CVDs 1-21 based on review of the available EPA guidance on major source circumvention.

No other modifications have been reviewed at this time and this source is not considered one of the 28 listed source categories.

326 IAC 2-4.1-1 (New Source Toxics Control)

- (a) Each CVD unit (1-23) is independently distinguishable from the other units as a "process or production unit" as defined in 40 CFR 63.41 (incorporated by reference in 326 IAC 2-4.1). The potential to emit (PTE) of combined hazardous air pollutants (HAPs) for each CVD unit (1-23) is less than twenty-five (25) tons per year each and the potential to emit (PTE) of any single hazardous air pollutants (HAPs) for each CVD unit (1-23) is less than

ten (10) tons per year each. In addition, most of these CVDs were constructed prior to the July 1997 applicable date. Therefore, the requirements of this rule do not apply.

- (b) There are no other new facilities with potential emissions greater than major thresholds for HAPs (ten (10) tons per year for a single HAP and twenty-five (25) tons per year for combination HAPs) and constructed after July 27, 1997. Therefore, the requirements of this rule do not apply.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of VOC and it is located in St. Joseph County. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Opacity Limitations)

The source, which is located in St. Joseph County north of Kern Road and east of Pine Road, is subject to 326 IAC 5-1-2 (Opacity Limitations) which limits opacity from a source or facility. Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4. Pursuant to 326 IAC 5-1-1 this rule applies since the source is located in the portion of St. Joseph county north of Kern Road and east of Pine Road.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-4 (Fugitive Dust Emissions)

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

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

This rule applies to the portion of St. Joseph County north of Kern Road and east of Pine Road, however the source does not have potential fugitive particulate matter emissions of twenty-five (25) tons per year or more. Therefore, 326 IAC 6-5-1 (Fugitive Particulate Matter Emission Limitations) is not applicable.

State Rule Applicability - Individual Facilities

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

- (a) This rule is applicable to CVD units 1-21 because the units were constructed after January 1, 1980, with the potential uncontrolled VOC emissions from each unit being greater than twenty-five (25) tons per year.
 - (1) Pursuant to SSM 141-13853-00172, issued on September 7, 2001, enclosed flares have been accepted as BACT for control of the VOC emissions from CVD units 1-21. All exhaust process gas from the soak phase of each CVD unit's cycle shall be directed through the enclosed flares for VOC control. Each enclosed flare shall operate at all times that the corresponding CVD unit is operating in the soak phase and shall achieve an overall control efficiency of

- 98% with a maximum VOC emission rate of 0.23 pounds of VOC per million British thermal units (MMBtu) of process gas combusted by the flares. This limitation is equivalent to 25.09 tons VOC emitted per year from CVD units 1-21 combined, based on average heat content of the process gases being 713 Btu per cubic foot for CVD units 1-21 and the maximum reactant gas inputs for each unit. Compliance with these requirements renders 326 IAC 2-2 not applicable for CVDs 1-21.
- (2) The combination of Conditions D.1.1, D.2.1 and D.2.2 plus the potential to emit (PTE) of all other HAP emitting facilities yields single HAPs to less than ten (10) tons per year and combination HAPs to less than twenty-five (25) tons per year.
- (b) This rule is applicable to CVD units 22-23 because the units were constructed after January 1, 1980, with the potential uncontrolled VOC emissions from each unit being greater than twenty-five (25) tons per year.
- (1) Pursuant to SSM 141-11511-00172, issued on March 8, 2000, an enclosed flare has been accepted as BACT for control of the VOC emissions from the CVD units 22-23. All exhaust process gas from the soak phase of the CVD unit's cycle shall be directed through the enclosed flare for VOC control. The enclosed flare shall operate at all times that the CVD unit is operating in the soak phase and shall achieve an overall destruction efficiency of ninety-eight percent (98%).
- (2) The CVD's 22-23 shall use a flare with a 98% control efficiency to control VOC emissions. This limitation is equivalent to 2.39 tons VOC emitted per year from CVDs 22-23 combined. Compliance with these requirements renders 326 IAC 2-2 not applicable for CVDs 22-23.
- (3) The combination of Conditions D.1.1, D.2.1 and D.2.2 plus the potential to emit (PTE) of all other HAP emitting facilities yields single HAPs to less than ten (10) tons per year and combination HAPs to less than twenty-five (25) tons per year.
- (c) This rule is applicable to Char furnaces 1-6 because the units were constructed after January 1, 1980, with the potential uncontrolled VOC emissions from each unit being greater than twenty-five (25) tons per year.
- (1) Pursuant to CP (71) 1860, OP 3700-0005, issued on July 23, 1990, Best Available Control Technology (BACT) for char furnaces 5 and 6 has been determined to be the use of a thermal oxidizer. The thermal oxidizer shall have an overall control efficiency of no less than 90% and shall operate at a temperature no lower than the temperature determined in the compliance test to correspond to 90% control efficiency. Equivalent emissions to the overall control efficiency shall be determined pursuant to the testing requirements in Condition D.1.3. A continuous temperature recording device shall be used to record and document the operation temperature of the thermal oxidizer. Compliance with these requirements renders 326 IAC 2-2 not applicable.
- (2) Char furnaces 1-4 shall use thermal oxidizers. The thermal oxidizers shall have an overall control efficiency of no less than 95% and shall operate at a temperature no lower than the temperature determined in the compliance test to correspond to 95% control efficiency. Equivalent emissions to the overall control efficiency shall be determined pursuant to the testing requirements in Condition D.1.3. A continuous temperature recording device shall be used to record and document the operation temperature of the thermal oxidizers.
- (3) The IDEM, OAQ has information that indicates that the char furnaces 1-4 are subject to the requirements of 326 IAC 8-1-6 (New Facilities: General Reduction Requirements (BACT)). Therefore, the Permit Shield provided by Condition B.12

of this permit does not apply to char furnaces 1-4 with regards to 326 IAC 8-1-6 (BACT), 326 IAC 2-2 (PSD) and 326 IAC 2-3 (Emission Offset). The IDEM, OAQ will promptly reopen this permit using the provisions of 326 IAC 2-7-9 (Permit Reopening) to include detailed requirements necessary to comply with 326 IAC 8-1-6 and a schedule for achieving compliance with such requirements.

- (4) The combination of Conditions D.1.1, D.2.1 and D.2.2 plus the potential to emit (PTE) of all other HAP emitting facilities yields single HAPs to less than ten (10) tons per year and combination HAPs to less than twenty-five (25) tons per year.
- (d) This rule is not applicable to the Soil vapor extraction system, and the two (2) paint booths because the potential uncontrolled VOC emissions from each unit are less than twenty-five (25) tons per year.

326 IAC 8-1-2 (Volatile Organic Compounds (VOC))

Pursuant to 326 IAC 8-1-2(a), the Permittee shall operate the thermal oxidizer on the char furnaces to achieve compliance with 326 IAC 8-1-6 (New Facilities: General Reduction Requirements (BACT)).

326 IAC 7-1.1-1 (Sulfur Dioxide Emission Limitations)

This rule is not applicable to the six (6) char furnaces because the potential to emit (PTE) SO₂ is less than twenty-five (25) tons per year.

326 IAC 6-1-1 (Nonattainment Area Limitations)

This source is located in St. Joseph County, and it does not have specific emission limits listed in 326 IAC 6-1-18. However, it does have the potential to emit (PTE) one hundred (100) tons or more of PM per year this rule applies.

- (a) This rule does not apply to the CVD units (1-23), Char furnaces (1-6) and Chrome Anodizing tanks (18 and 19), because the PM emissions from these units are negligible.

State Rule Applicability - Insignificant Activities

326 IAC 7-1.1-1 (Sulfur Dioxide Emission Limitations)

This rule is not applicable to the five (5) natural gas-fired boilers because the potential to emit (PTE) SO₂ is less than twenty-five (25) tons per year per boiler.

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

The surface coating operations are used solely for the painting of exterior components of airplanes and are not subject to the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating).

326 IAC 6-1 (Nonattainment Area Particulate Limitations)

This source is located in St. Joseph County, and it does not have specific emission limits listed in 326 IAC 6-1-18. However, it does have the potential to emit (PTE) one hundred (100) tons or more of PM per year this rule applies.

- (a) The particulate (PM) from the two (2) paint booths shall be limited to 0.03 grains per dry standard cubic foot of exhaust air. Compliance with this limitation renders 326 IAC 2-2 not applicable.

Particulate from the surface coating shall be controlled by dry particulate filters and the Permittee shall operate the control device at all times the two (2) paint booths are in operation.

- (b) The particulate (PM) from the five (5) natural gas-fired boilers shall be limited to 0.01 grains per dry standard cubic foot of exhaust air.

- (c) The particulate (PM) from the following equipment related to manufacturing activities not resulting in the emission of HAPs; brazing equipment, cutting torches, soldering equipment, welding equipment, shall be limited to 0.03 grains per dry standard cubic foot of exhaust air.
- (d) The particulate (PM) from the one (1) plastic bead blaster, one (1) brake test dynamometer, and one (1) EI dynamometer shall be limited to 0.03 grains per dry standard cubic foot of exhaust air.
- (e) The particulate (PM) from the 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 of less than or equal to 4000 actual cubic feet per minute, including the following, shall be limited to 0.03 grains per dry standard cubic foot of exhaust air:
 - (1) Numerous mills discharging to Torrit filter systems, with a maximum throughput of less than one hundred (100) pounds per hour. The torrits are less than 4000 CFM and the mills are grinding and machining operations.
 - (2) One (1) wheelabrator operation, identified as No. 816710, with a maximum throughput of less than one hundred (100) pounds per hour of plastic media blast, vented through a rotoclone, which is less than 4000 CFM, and exhausting inside the building.

The Torit filter system and rotoclones for the particulate control shall be in operation and control emissions from the numerous mills and wheelabrator at all times that the numerous mills and wheelabrator are in operation. In addition, the numerous mills and wheelabrator operation must meet the criteria of a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate of less than or equal to 4000 actual cubic feet per minute, in order to comply with 326 IAC 6-1.

- (3) Three (3) shot peening operations, with a maximum throughput of 6000 pounds per hour, vented through dust collectors and exhausting inside the building.
- (4) Three (3) sandblasting operations used intermittently to clean metal parts, vented through dust collectors and exhausting inside the building.

The dust collectors for the particulate control shall be in operation and control emissions from the shot peening and sandblasting operations at all times that the shot peening and sandblasting operations are in operation. In addition, the shot peening and sandblasting operations must meet the criteria of a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate of less than or equal to 4000 actual cubic feet per minute, in order to comply with 326 IAC 6-1.

326 IAC 8-3-2 (Cold Cleaner Operation)

The degreaser is located in St. Joseph county and it is at a source which has potential emissions of one hundred (100) tons or greater per year of VOC, however, it was constructed after January 1, 1980, which is the applicability date. Therefore, 326 IAC 8-3-2 (Cold Cleaner Operation) is not applicable.

326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaning operations located in St. Joseph County and existing as of July 1, 1990, 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 that as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the US 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 the 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.

Testing Requirements

- (a) Char furnaces 1-6 with a Thermal Oxidizer:
 - (1) Within one hundred and eighty (180) days after issuance of this permit, the Permittee shall conduct a performance test to verify the overall efficiency of the

thermal oxidizer utilized by char furnaces 5 and 6. The test method shall utilize methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

- (2) Within one hundred and eighty (180) days after issuance of this permit, the Permittee shall conduct a performance test to verify the uncontrolled emissions of char furnaces 1-4 and the overall efficiency of the two (2) oxidizers untitled by char furnaces 1-4. . The test method shall utilize methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

- (b) CVDs 1-23:
Within one hundred eighty (180) days after issuance of this permit, in order to demonstrate compliance with Condition 326 IAC 8-1-6, the Permittee shall perform a compliance stack test on 20% of the total or 4, whichever is greater, of the CVD unit flares for overall control efficiency utilizing methods as approved by the Commissioner. The tests shall be repeated at least once every five years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Condition C - Performance Testing.

Compliance Requirements

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

1. The char furnaces 1 through 6 equipped with a thermal oxidizer have compliance determination conditions as specified below:

Thermal Oxidizer Temperature

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the three (3) thermal oxidizers for measuring operating temperature. The output of this system shall be recorded as a three (3) hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the three (3) hour average temperature of 1800°F.
- (b) The Permittee shall determine the three (3) hour average temperature from the most recent valid stack test that demonstrates compliance with limits in Condition D.1.1, as approved by IDEM, OAQ.
- (c) On and after the date the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the three (3) hour average temperature as observed during the compliant stack test.

Parametric Monitoring

- (a) The Permittee shall determine the appropriate duct pressure or fan amperage from the most recent valid stack test that demonstrates compliance with limits in Condition 326 IAC 8-1-6, as approved by IDEM, OAQ.
- (b) The duct pressure or fan amperage shall be observed at least once per day when the thermal oxidizer is in operation. On and after the date of the approved stack test results are available, the duct pressure or fan amperage shall be maintained within the normal range as established in the most recent compliant stack test.

The Permittee shall operate the thermal oxidizer to achieve compliance with 326 IAC 8-1-6. Compliance with 326 IAC 8-1-6 renders 326 IAC 2-2 not applicable.

2. The CVD units, identified as 1-23, have applicable compliance determination conditions as specified below:
 - (a) The input rate of total reactant gas to each CVD unit shall be measured once per day over the entire batch cycle. To monitor the volatile organic compound (VOC) load to the control flare, the Permittee shall record the number and type of brake discs per batch.
 - (b) Each enclosed flare shall have a flame present at all times that its respective CVD unit is operating in the soak phase. A thermocouple or equivalent device shall be installed and operated to monitor the presence of a pilot flame for each flare and to sound an alarm when the flame is not detected. For each CVD unit operating the non-woven process, the flare shall maintain, at a minimum, the operating temperature determined in the most recent approved stack test(s) to achieve compliance with the limits established in Conditions. D.3.1 and D.3.2. In addition, a continuous monitoring system shall be installed and operated to monitor and record the operating temperature of the flare. This system shall be accurate to ± 5.0 percent and capture temperature data at least once every fifteen (15) minutes. If the operating temperature of the flare for a CVD unit operating the non-woven process drops below the minimum operating temperature, the Permittee shall take and document response steps to return the operating temperature to the required minimum level. In the event that a breakdown of the monitoring equipment occurs, the Permittee shall supplement monitoring with visual checks once per hour to ensure that a flame is present.
 - (c) The Permittee shall include in its PMP a maintenance program to inspect regularly the thermocouples or equivalent devices for monitoring and recording the presence of a pilot flame, to conduct routine maintenance and calibration on such monitors, and to initiate and record appropriate response steps in the event that the monitor fails.

These monitoring conditions are necessary because the flares for the CVD units must operate properly to ensure compliance with 326 IAC 8-1-6 (New Facilities, General Reduction Requirements (BACT)).

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

Compliance Determination Requirements in Section D of the permit 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 Section D of the permit. 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 CVD unit, identified as CVD-21, has applicable compliance monitoring conditions as specified below:
 - (a) Pursuant to 326 IAC 3-5-1(d)(1), the Permittee shall install, calibrate, certify, operate, and maintain a continuous monitoring system for CO on the CVD-21 flare stack designated as S-FL-21 in accordance with 326 IAC 3-5-2 and 3-5-3.
 - (1) The continuous emission monitoring system (CEMS) shall measure CO emission rates in pounds per hour and parts per million (ppmvd).
 - (2) The CEMS shall be in operation at all times when the CVD-21 unit is operating in the soak phase.
 - (3) The Permittee shall submit to IDEM, OAQ, within ninety (90) days after monitor installation, a complete written continuous monitoring standard operating procedure (SOP), in accordance with the requirements of 326 IAC 3-5-4.

These monitoring conditions are necessary because the flares for the CVD units must operate properly to ensure compliance with 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) avoidance.

2. The one (1) plastic bead blaster, one (1) brake test dynamometer, one (1) EI dynamometer, numerous mills, one (1) wheelabrator, shot peening and sandblasting operations have applicable compliance monitoring conditions as specified below:
 - (a) The Permittee shall record the total static pressure drop across the dust collectors used in conjunction with the one (1) plastic bead blaster, one (1) brake test dynamometer, one (1) EI dynamometer, numerous mills, one (1) wheelabrator, shot peening and sandblasting operations at least once per shift when the one (1) plastic bead blaster, one (1) brake test dynamometer, one (1) EI dynamometer, numerous mills, one (1) wheelabrator, shot peening and sandblasting operations are in operation. When for any one reading, the pressure drop across the dust collectors is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.
 - (b) An inspection shall be performed each calendar quarter of all dust collectors controlling the one (1) plastic bead blaster, one (1) brake test dynamometer, one (1) EI dynamometer, numerous mills, one (1) wheelabrator, shot peening and sandblasting operations. A dust collector inspection shall be performed within three (3) months of redirecting the vents to the atmosphere and every three (3) months thereafter. Inspections required by this condition shall not be performed in consecutive months. All defective dust collectors shall be replaced.
 - (c) In the event that dust collector failure has been observed:

For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8)

business hours of the determination of failure, response steps according to the time table described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit. If operations continue after dust collector failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

For single compartment dust collectors, if failure is indicated by a significant drop in the dust collector's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if the dust collector failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

These monitoring conditions are necessary because the dust collectors for the one (1) plastic bead blaster, one (1) brake test dynamometer, one (1) EI dynamometer, numerous mills, one (1) wheelabrator, shot peening and sandblasting operations must operate properly to ensure compliance with 326 IAC 6-1 (Nonattainment Area Particulate Limitations) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)).

Conclusion

The operation of this aircraft landing systems manufacturer shall be subject to the conditions of the attached proposed **Part 70 Permit No. T141-7442-00172**.

CVDs 1-21 Calculations:

Potential Emissions are from SSM 141-13853-00172, issued September 7, 2001

| | |
|--------------|-----------------|
| PM: ---- | Benzene: 128.50 |
| PM10: ---- | Toluene: 13.70 |
| SO2: ---- | Styrene: 12.73 |
| VOC: 1254.54 | |
| CO: 146.77 | Total: 154.93 |
| Nox: 31.17 | |

Limited PTE: (Flares control efficiency is 98%)

CO: $1.62 \text{ lb/hr each} \times 5800 \text{ hr} / 2000 = 4.698 \times 21 = 98.66 \text{ ton/yr of CO (limited)}$

VOC: $1254.54 \text{ ton/yr} \times (1 - 0.98) = 25.09 \text{ ton/yr of VOC (limited)}$

CVDs 22 and 23 Calculations:

Potential Emissions for CVDs 1-21 are from SSM 141-13853-00172, issued September 7, 2001; The same methodology was used to figure the potential emissions for CVDs 22-23.

| | |
|-------------|----------------|
| PM: ---- | Benzene: 12.24 |
| PM10: ---- | Toluene: 1.30 |
| SO2: ---- | Styrene: 1.22 |
| VOC: 119.48 | |
| CO: 13.98 | Total: 14.76 |
| Nox: 4.49 | |

[CO: $2.41 \times 5800 / 2000 \times 2 = 13.98$ NOX: $7000 \times 5800 \times 762 \times 1.45E-7 / 2000 \times 2 = 4.49$]
[emission factor as supplied by company]

Limited PTE: (Flares control efficiency is 98%)

VOC: $119.48 \text{ ton/yr} \times (1 - 0.98) = 2.39 \text{ ton/yr of VOC (limited)}$