

# **PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT**

**Friction Material Company, Inc.  
1849 East Sabine Street  
Huntington, Indiana 46750**

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

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

Operation Permit No.: T069-7677-00020	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date:

## SECTION A

## SOURCE SUMMARY

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

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

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The Permittee owns and operates a brake linings, brake blocks, automotive clutch facings, industrial clutches, and friction products manufacturing operation.

Responsible Official: Mr. Gordon Towe  
Source Address: 1849 East Sabine Street, Huntington, IN 46750  
Mailing Address: 1849 East Sabine Street, Huntington, IN 46750  
SIC Code: 3292  
County Location: Huntington  
County Status: Attainment for all criteria pollutants  
Source Status: Part 70 Permit Program  
Major Source, under PSD

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

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

- (a) One (1) boiler, identified as Unit ID #1, constructed in 1975, with a maximum heat input capacity of 16.72 million (MM) British thermal units (Btu) per hour, combusting natural gas or No. 2 fuel oil, exhausting through S/V ID #1;
- (b) Two (2) boilers, identified as Unit ID # 2 and 3, each constructed in 1969, each with a maximum heat input capacity of 10 MMBtu per hour, combusting natural gas or No. 2 fuel oil, each exhausting through one (1) stack, identified as S/V ID # 2 and 3, respectively;
- (c) One (1) brake linings manufacturing process, identified as Unit ID #4, where raw materials are mixed and pre-formed or cured to produce brake linings at a maximum production rate of 1600 pieces of brake linings per hour, using two (2) baghouses, ID #1 and 2, for particulate control, exhausting through S/V ID #4;
- (d) One (1) brake blocks manufacturing process, identified as Unit ID #5, where wet and dry materials are mixed, pre-formed and cured to produce brake blocks at a maximum production rate of 6450 pieces of brake blocks per hour, using one (1) baghouse, ID #3, for particulate control, exhausting through S/V ID #5;
- (e) One (1) clutch facing manufacturing process, identified as Unit ID #6, where raw materials are mixed to form clutch facings at a maximum production rate of 2196 pieces of clutch facings per hour, using two (2) baghouses, ID #5 and 6, for particulate control and a condenser, ID #CE-8, for VOC control, exhausting through S/V ID #6 for the baghouses and S/V ID #8 for the condenser; and

- (f) One (1) research and development lab, identified as Unit ID #7, processing a maximum of 100 pounds of clutch faces, brake blocks, and industrial brakes per hour, using one (1) baghouse, ID #7, for particulate control, exhausting through S/V ID #7.

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

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

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

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

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

**SECTION B**

**GENERAL CONDITIONS**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- (1) Enforcement action;
- (2) Permit termination, revocation and reissuance, or modification; or
- (3) Denial of a permit renewal application.

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

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

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

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

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

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

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

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

and

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

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

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

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

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

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

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

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

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

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

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

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

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

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

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
  - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
  - (e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.
  - (f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
  - (g) Operations may continue during an emergency only if the following conditions are met:
    - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

- (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
- (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
  - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

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

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

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

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

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

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

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

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

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

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

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

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

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

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination

[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

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

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

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

Request for renewal shall be submitted to:

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

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

- (1) A timely renewal application is one that is:
  - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
  - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due. [326 IAC 2-5-3]
- (2) If IDEM, OAM, , upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]  
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM, , takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, , any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]  
If IDEM, OAM, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

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

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
  
Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

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

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

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

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

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

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

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

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

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

and

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

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

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

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

- (b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
  - (1) A brief description of the change within the source;
  - (2) The date on which the change will occur;
  - (3) Any change in emissions; and
  - (4) Any permit term or condition that is no longer applicable as a result of the change.

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

- (c) Emission Trades [326 IAC 2-7-20(c)]  
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

**B.23 Construction Permit Requirement [326 IAC 2]**

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

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

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

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.  
[326 IAC 2-7-6(6)]
  - (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]
  - (2) The Permittee, and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]

Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.

- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) IDEM, OAM, shall reserve the right to issue a new permit.

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

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

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

#### C.1 Major Source

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

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

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

#### C.3 Opacity [326 IAC 5-1]

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

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

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

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

#### C.5 Incineration [326 IAC 4-2][326 IAC 9-1-2]

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

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

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

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

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

C.8 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.

C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

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

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

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

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

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

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

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

All required notifications shall be submitted to:

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

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

(e) Procedures for Asbestos Emission Control

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

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

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

#### **C.10 Performance Testing [326 IAC 3-6]**

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

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

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

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

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

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

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

#### **C.11 Compliance Schedule [326 IAC 2-7-6(3)]**

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The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements; and
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) Will comply with such applicable requirements that become effective during the term of this permit.

**C.12 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

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Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend compliance schedule an additional ninety (90) days provided the Permittee notifies:

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

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

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

**C.13 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]**

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

**C.14 Monitoring Methods [326 IAC 3]**

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

**C.15 Pressure Gauge Specifications**

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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.

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

**C.16 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

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

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

- (b) These ERPs shall be submitted for approval to:

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

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

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

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

C.17 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

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

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

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

C.18 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]  
[326 IAC 1-6]

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

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

C.19 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]  
[326 IAC 2-7-6]

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

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

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

C.20 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]

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

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

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

C.21 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.22 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
- (1) The date, place, and time of sampling or measurements;
  - (2) The dates analyses were performed;
  - (3) The company or entity performing the analyses;

- (4) The analytic techniques or methods used;
  - (5) The results of such analyses; and
  - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
- (1) Copies of all reports required by this permit;
  - (2) All original strip chart recordings for continuous monitoring instrumentation;
  - (3) All calibration and maintenance records;
  - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.23 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.

- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports.
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

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

### **Stratospheric Ozone Protection**

#### **C.24 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)]**

- (a) One (1) boiler, identified as Unit ID #1, constructed in 1975, with a maximum heat input capacity of 16.72 million (MM) British thermal units (Btu) per hour, combusting natural gas or No. 2 fuel oil, exhausting through S/V ID #1;
- (b) Two (2) boilers, identified as Unit ID # 2 and 3, each constructed in 1969, each with a maximum heat input capacity of 10 MMBtu per hour, combusting natural gas or No. 2 fuel oil, each exhausting through one (1) stack, identified as S/V ID # 2 and 3, respectively;

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

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

Pursuant to 326 IAC 6-2-3 (Particulate Emission Limitation for Sources of Indirect Heating), the particulate matter emissions from the three (3) boilers, Unit #1,2 and 3, shall be determined utilizing the following:

- (a) Pursuant to 326 IAC 6-2-3 (d), the PM from each of the two (2) boilers, Unit ID #2 and 3, shall not exceed 0.8 pounds per million Btu input.
- (b) Pursuant to 326 IAC 6-2-3 (e), the PM from the one (1) boiler Unit ID # 1, shall not exceed 0.6 pound per MMBtu input.

#### D.1.2 Sulfur Dioxide Limitation [326 IAC 7-1.1]

- (a) Pursuant to 326 IAC 7-1.1 (Sulfur dioxide Emissions Limitation) the sulfur dioxide emissions from boiler, Unit #1, with heating capacity of 16.72 MMBtu/hour, shall not exceed five tenths (0.5) pounds per MMBtu heat input when burning No. 2 fuel oil.
- (b) Any change or modification which may increase the potential to emit of SO<sub>2</sub> from Boiler 2 and 3 shall require prior approval before such change may occur.

### **Compliance Determination Requirements**

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

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM and SO<sub>2</sub> limits specified in Conditions D.1.1 and D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

#### D.1.4 Sulfur Dioxide Emissions and Sulfur Content

Compliance with Condition D.1.2 (a) shall be determined utilizing one of the following options.

- (a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the fuel oil sulfur content does not exceed five-tenths percent (0.5%) by weight by:
  - (1) Providing vendor analysis of fuel delivered, if accompanied by a certification;
  - (2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
    - (A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
    - (B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling; or
- (b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from each of the three (3) boilers (ID # 1,2, and 3), using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.

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

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

### **D.1.5 Visible Emissions Notations**

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- (a) Daily visible emission notations of each of the three (3) boilers (ID # 1,2, and 3) stack exhausts shall be performed during normal daylight operations when exhausting to the atmosphere when burning No. 2 fuel oil. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

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

### **D.1.6 Record Keeping Requirements**

---

- (a) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (3) below.
  - (1) Calendar dates covered in the compliance determination period;
  - (2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;
  - (3) A certification, signed by the owner or operator, that the records of the fuel supplier certifications represent all of the fuel combusted during the period; and If the fuel supplier certification is used to demonstrate compliance, the following, as a minimum, shall be maintained:
    - (A) Fuel supplier certifications.
    - (B) The name of the fuel supplier; and
    - (C) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

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

- (b) To document compliance with Condition D.1.5, the Permittee shall maintain records of daily visible emission notations of each of the three (3) boilers (ID# 1, 2 and 3) stack exhausts.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.7 Reporting Requirements

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

### SECTION D.2 FACILITY OPERATION CONDITIONS

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

- (a) One (1) brake linings manufacturing process, identified as Unit ID #4, where raw materials are mixed and pre-formed or cured to produce brake linings at a maximum production rate of 1600 pieces of brake linings per hour, using two (2) baghouses, ID #1 and 2, for particulate control, exhausting through S/V ID #4;
- (b) One (1) brake blocks manufacturing process, identified as Unit ID #5, where wet and dry materials are mixed, pre-formed and cured to produce brake blocks at a maximum production rate of 6450 pieces of brake blocks per hour, using one (1) baghouse, ID #3, for particulate control, exhausting through S/V ID #5;
- (c) One (1) clutch facing manufacturing process, identified as Unit ID #6, where raw materials are mixed to form clutch facings at a maximum production rate of 2196 pieces of clutch facings per hour, using two (2) baghouses, ID #5 and 6, for particulate control and a condenser, ID #CE-8, for VOC control, exhausting through S/V ID #6 for the baghouses and S/V ID #8 for the condenser; and
- (d) One (1) research and development lab, identified as Unit ID #7, processing a maximum of 100 pounds of clutch faces, brake blocks, and industrial brakes per hour, using one (1) baghouse, ID #7, for particulate control, exhausting through S/V ID #7.

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

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

Pursuant to 326 IAC 6-3 (Process Operations), the Permittee shall comply with the following:

- (a) the allowable PM emission rate from the Brake Linings Manufacturing Process (Unit ID #4) shall not exceed 6.52 pounds per hour, when operating at a process weight rate of 4,000 pounds per hour,
- (b) the allowable PM emission rate from the Brake Blocks Manufacturing Process (Unit ID #5) shall not exceed 18.34 pounds per hour, when operating at a process weight rate of 18,705 pounds per hour,

- (c) the allowable PM emission rate from the Clutch Facing Manufacturing Process (Unit ID #6) shall not exceed 4.92 pounds per hour, when operating at a process weight rate of 2,626 pounds per hour, and
- (d) the allowable PM emission rate from the Research and Development Lab (Unit ID #7) shall not exceed 0.55 pounds per hour, when operating at a process weight rate of 100 pounds per hour.

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

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

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

#### D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

### **Compliance Determination Requirements**

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

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

#### D.2.4 Particulate Matter (PM)

The baghouses for PM control shall be in operation at all times when the Brake Linings Manufacturing Process (Unit ID #4), the Brake Blocks Manufacturing Process (Unit ID #5), the Clutch Facing Manufacturing Process (Unit ID #6), and Research and Development Lab (Unit ID #7) are in operation and exhausting to the outside atmosphere.

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

#### D.2.5 Visible Emissions Notations

- (a) Daily visible emission notations of the Brake Linings Manufacturing Process (Unit ID #4), the Brake Blocks Manufacturing Process (Unit ID #5), the Clutch Facing Manufacturing Process (Unit ID #6), and Research and Development Lab (Unit ID #7) stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

#### D.2.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses used in conjunction with the Brake Linings Manufacturing Process (Unit ID #4), the Brake Blocks Manufacturing Process (Unit ID #5), the Clutch Facing Manufacturing Process (Unit ID #6), and Research and Development Lab (Unit ID #7), at least once daily when the Brake Linings Manufacturing Process (Unit ID #4), the Brake Blocks Manufacturing Process (Unit ID #5), the Clutch Facing Manufacturing Process (Unit ID #6), and Research and Development Lab (Unit ID #7) are in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across each of the baghouses shall be maintained within the range of 1.0 to 4.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

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

#### D.2.7 Baghouse Inspections

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

#### D.2.8 Broken or Failed Bag Detection

In the event that bag failure has been observed.

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

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

### **D.2.9 Record Keeping Requirements**

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- (a) To document compliance with Condition D.2.5, the Permittee shall maintain records of daily visible emission notations of the Brake Linings Manufacturing Process (Unit ID #4), the Brake Blocks Manufacturing Process (Unit ID #5), the Clutch Facing Manufacturing Process (Unit ID #6), and Research and Development Lab (Unit ID #7) baghouses stack exhaust.
- (b) To document compliance with Condition D.2.6, the Permittee shall maintain the following:
  - (1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:
    - (A) Inlet and outlet differential static pressure; and
    - (B) Cleaning cycle: frequency and differential pressure
  - (2) Documentation of all response steps implemented, per event .
  - (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.
  - (4) Quality Assurance/Quality Control (QA/QC) procedures.
  - (5) Operator standard operating procedures (SOP).
  - (6) Manufacturer's specifications or its equivalent.
  - (7) Equipment "troubleshooting" contingency plan.
  - (8) Documentation of the dates vents are redirected.
- (c) To document compliance with Condition D.2.7, the Permittee shall maintain records of the results of the inspections required under Condition D.2.7 and the dates the vents are redirected.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

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

**PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: Friction Material Company  
Source Address: 1849 East Sabine Street, Huntington, IN 46750  
Mailing Address: 1849 East Sabine Street, Huntington, IN 46750  
Part 70 Permit No.: T060-7677-00020

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

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

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

Source Name: Friction Material Company  
Source Address: 1849 East Sabine Street, Huntington, IN 46750  
Mailing Address: 1849 East Sabine Street, Huntington, IN 46750  
Part 70 Permit No.: T069-7677-00020

**This form consists of 2 pages**

**Page 1 of 2**

Check either No. 1 or No.2

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

**9** 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c)  
C The Permittee must submit notice in writing within ten (10) calendar days

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

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency/Deviation:

Describe the cause of the Emergency/Deviation:

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

**Page 2 of 2**

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

Form Completed by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

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

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

Source Name: Friction Material Company  
Source Address: 1849 East Sabine Street, Huntington, IN 46750  
Mailing Address: 1849 East Sabine Street, Huntington, IN 46750  
Part 70 Permit No.: T069-7677-00020

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

Report period

Beginning: \_\_\_\_\_

Ending: \_\_\_\_\_

Boiler Affected

Alternate Fuel

Days burning alternate fuel

From

To


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

Signature:

Printed Name:

Title/Position:

Date:

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

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

Source Name: Friction Material Company  
Source Address: 1849 East Sabine Street, Huntington, IN 46750  
Mailing Address: 1849 East Sabine Street, Huntington, IN 46750  
Part 70 Permit No.: T069-7677-00020

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

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

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

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

Form Completed By: \_\_\_\_\_  
Title/Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

## Indiana Department of Environmental Management Office of Air Management

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

#### Source Background and Description

**Source Name:** Friction Material Company, Inc.  
**Source Location:** 1849 East Sabine Street, Huntington, IN 46750  
**County:** Huntington  
**SIC Code:** 3292  
**Operation Permit No.:** T069-7677-00020  
**Permit Reviewer:** Yvette de los Angeles/EVP

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Friction Material Company, Inc. relating to the operation of a brake linings, brake blocks, automotive clutch facings, industrial clutches, and friction products manufacturing operation.

#### Permitted Emission Units and Pollution Control Equipment

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

- (a) One (1) boiler, identified as Unit ID #1, constructed in 1975, with a maximum heat input capacity of 16.72 million (MM) British thermal units (Btu) per hour, combusting natural gas or No. 2 fuel oil, exhausting through S/V ID #1;
- (b) Two (2) boilers, identified as Unit ID # 2 and 3, each constructed in 1969, each with a maximum heat input capacity of 10 MMBtu per hour, combusting natural gas or No. 2 fuel oil, each exhausting through one (1) stack, identified as S/V ID # 2 and 3, respectively;
- (c) One (1) brake linings manufacturing process, identified as Unit ID #4, where raw materials are mixed and pre-formed or cured to produce brake linings at a maximum production rate of 1600 pieces of brake linings per hour, using two (2) baghouses, ID #1 and 2, for particulate control, exhausting through S/V ID #4;
- (d) One (1) brake blocks manufacturing process, identified as Unit ID #5, where wet and dry materials are mixed, pre-formed and cured to produce brake blocks at a maximum production rate of 6450 pieces of brake blocks per hour, using one (1) baghouse, ID #3, for particulate control, exhausting through S/V ID #5;
- (e) One (1) clutch facing manufacturing process, identified as Unit ID #6, where raw materials are mixed to form clutch facings at a maximum production rate of 2196 pieces of clutch facings per hour, using two (2) baghouses, ID #5 and 6, for particulate control and a condenser, ID #CE-8, for VOC control, exhausting through S/V ID #6 for the baghouses and S/V ID #8 for the condenser; and

- (f) One (1) research and development lab, identified as Unit ID #7, processing a maximum of 100 pounds of clutch faces, brake blocks, and industrial brakes per hour, using one (1) baghouse, ID #7, for particulate control, exhausting through S/V ID #7.

### **Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR**

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

### **New Emission Units and Pollution Control Equipment Requiring ENSR**

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

### **Insignificant Activities**

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour.
- (b) Fuel oil-fired combustion sources with heat input equal to or less than two (2) million BTU per hour and firing fuel containing less than five-tenths (0.5) percent sulfur by weight.
- (c) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu/hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu/hour.
- (d) Combustion source flame safety purging on startup.
- (e) The following VOC and HAP storage containers:
  - (1) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (f) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (g) Noncontact cooling tower systems with forced and induced draft cooling tower not regulated under NESHAP.
- (h) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (i) Blowdown for any of the following: sight glass; boiler; compressor; pumps; and cooling tower.
- (j) Stationary fire pumps.
- (k) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees C).
- (l) One (1) underground storage tank, identified as ID #8, with a maximum storage capacity of 20,000 gallons, used to store rubber solvent.

- (m) One (1) above ground storage tank, identified as ID #9, with a maximum storage capacity of 20,000 gallons, used to store fuel oil.

### Existing Approvals

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

- (a) OP 35-01-93-0175, issued on November 17, 1989; and
- (b) OP 35-01-93-0176 issued on November 17, 1989.

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

### Enforcement Issue

There are no enforcement actions pending.

### Recommendation

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

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

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

A notice of completeness letter was mailed to the source on January 24, 1997.

### Emission Calculations

See Appendix A of this document for detailed emissions calculations (4 pages).

### Potential Emissions

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

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

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

(a) The potential emissions (as defined in 326 IAC 1-2-55) of PM10 and VOC are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) 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 particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

**Actual Emissions**

The following table shows the actual emissions from the source. This information reflects the 1996 OAM emission data.

Pollutant	Actual Emissions (tons/year)
PM	0.1540
PM-10	9.3505
SO <sub>2</sub>	2.6800
VOC	313.0454
CO	1.2625
NO <sub>x</sub>	5.3100
HAP (specify)	0.0000

**Limited Potential to Emit**

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

Process/facility	Limited Potential to Emit (tons/year)						
	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Brake Linings Manufacturing Process (Unit #4)	3.42	3.42	—	—	—	—	—
Brake Blocks Manufacturing Process (Unit #5)	18.35	18.35	—	—	—	—	—
Clutch Facing Manufacturing Process (Unit #6)	20.83	20.83	—	—	—	—	—
Research and Development Lab (Unit #7)	0.54	0.54	—	—	—	—	—
<b>Total Emissions</b>	<b>43.15</b>	<b>43.15</b>	—	—	—	—	—

\*Note: Controlled PM and PM-10 emissions comply with 326 IAC 6-3-2. Controlled emissions are lower than allowable emissions.

### County Attainment Status

The source is located in Huntington County.

Pollutant	Status
PM-10	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO<sub>x</sub>) are precursors for the formation of ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Huntington County has been designated as attainment or unclassifiable for ozone.

### Part 70 Permit Conditions

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

- (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) The three (3) boilers, Unit #1, 2, and 3, are not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.4, Subpart Dc) because the installation date of the three (3) boilers are before June 9, 1989.
- (b) The one (1) underground storage tank, Unit ID #8, is not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.4, Subpart Ka) because the storage capacity is less than 40,000 gallons.
- (c) The one (1) above ground storage tank, Unit ID #9, is not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.4, Subpart K) because the storage capacity is less than 40,000 gallons.
- (d) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs), 40 CFR Part 63, applicable to this source.

### State Rule Applicability - Entire Source

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

The source has submitted a Preventive Maintenance Plan (PMP) on December 13, 1996. This PMP has been verified to fulfill the requirements of 326 IAC 1-6-3 (Preventive Maintenance Plan).

### 326 IAC 2-2 (Prevention of Significant Deterioration)

This source is not subject to the requirements of 326 IAC 2-2. This source was constructed prior to the August 7, 1977 applicability date. The one (1) underground storage tank, installed in 1982, has total potential emissions less than the PSD major modification emissions thresholds, therefore, the installation of this unit was a minor modification to a major PSD source. Any future modification which results in an emissions increase greater than the significant emissions thresholds shall subject the source to the requirements of 326 IAC 2-2.

### 326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of PM10 and VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

### 326 IAC 5-1 (Visible Emissions Limitations)

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

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

## State Rule Applicability - Individual Facilities

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

The particulate matter (PM) emissions from each of the three (3) boilers, Unit ID #1, 2, and 3, shall be limited by the following:

- (a) The two (2) boilers, Unit #2 and 3, with a combined maximum heat input capacity of 20.00 MMBtu per hour, each constructed in 1969, are subject to 326 IAC 6-2-3. Pursuant to this rule, particulate emissions from indirect heating facilities existing and in operation before June 8, 1972, shall be limited by the following equation:

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

$$Pt = \frac{50 \times 0.67 \times 38}{76.5 \times 20.00^{0.75} \times 2^{0.25}} = 1.48 \text{ lb/MMBtu}$$

The allowable particulate emission rate from the two (2) boilers, based on the above equation, is 1.48 pounds per MMBtu heat input. However, pursuant to 326 IAC 6-2-3(d), the allowable PM emission rate from any facility which began operation before June 8, 1972, shall in no case exceed 0.8 pounds per MMBtu heat input. Therefore, the allowable PM emission rate from each of the two (2) boilers is limited to 0.8 pounds per MMBtu heat input. The two (2) boilers have a potential PM emission rate of 0.05 pounds per MMBtu heat input, therefore, they will comply with 326 IAC 6-2-3 (see Appendix A, page 1 of 4, for detailed compliance calculations).

- (b) The one (1) boiler, Unit #1, with a combined maximum heat input capacity of 36.72 MMBtu per hour, constructed after June 8, 1972 and before September 21, 1983, is subject to 326 IAC 6-2-3. Pursuant to this rule, particulate emissions from indirect heating facilities existing and in operation after June 8, 1972 and before September 21, 1983, shall be limited by the following equation:

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

$$Pt = \frac{50 \times 0.67 \times 38}{76.5 \times 36.72^{0.75} \times 3^{0.25}} = 0.80 \text{ lb/MMBtu}$$

The allowable particulate emission rate from the one (1) boiler, based on the above equation, is 0.80 pounds per MMBtu heat input. However, pursuant to 326 IAC 6-2-3(e), the allowable PM emission rate from any facility which began operation after June 8, 1972 and before September 21, 1983, shall in no case exceed 0.6 pounds per MMBtu heat input. Therefore, the allowable PM emission rate from the one (1) boiler is limited to 0.6 pounds per MMBtu heat input. The one (1) boiler has a potential PM emission rate of 0.03 pounds per MMBtu heat input, therefore, it will comply with 326 IAC 6-2-3 (see Appendix A, page 1 of 4, for detailed compliance calculations).

#### 326 IAC 6-3-2 (Process Operations)

The particulate matter (PM) emissions from the Brake Linings Manufacturing Process (Unit ID #4), the Brake Blocks Manufacturing Process (Unit ID #5), the Clutch Facing Manufacturing Process (Unit ID #6), and Research and Development Lab (Unit ID #7), shall be limited by the following:

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

- (a) For Brake Linings Manufacturing Process (Unit ID #4)

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

$$P = 2.00 \text{ tons per hour}$$

$$E = 4.10 \times (2.00)^{0.67} = 6.52 \text{ pounds per hour} = 28.57 \text{ tons per year}$$

The baghouse (ID #4) shall be in operation at all times the Brakes Linings Manufacturing Process is in operation, in order to comply with this limit.

- (b) For Brake Blocks Manufacturing Process (Unit ID #5)

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

$$P = 9.35 \text{ tons per hour}$$

$$E = 4.10 \times (9.35)^{0.67} = 18.34 \text{ pounds per hour} = 80.31 \text{ tons per year}$$

The baghouse (ID #5) shall be in operation at all times the Brake Blocks Manufacturing Process is in operation, in order to comply with this limit.

(c) For Clutch Facing Manufacturing Process (Unit ID #6)

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

$$P = 1.31 \text{ tons per hour} \\ E = 4.10 * (1.31)^{0.67} = 4.92 \text{ pounds per hour} = 21.55 \text{ tons per year}$$

The baghouse (ID #6) shall be in operation at all times the Brakes Linings Manufacturing Process is in operation, in order to comply with this limit.

(d) For Research and Development Lab (Unit ID #7)

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

$$P = 0.05 \text{ tons per hour} \\ E = 4.10 * (0.05)^{0.67} = 0.55 \text{ pounds per hour} = 2.41 \text{ tons per year}$$

The baghouse (ID #7) shall be in operation at all times the Research and Development Lab is in operation, in order to comply with this limit.

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

Sulfur dioxide emissions from Boiler Unit #1, with maximum heat capacity of 16.72 MMBtu/hour and SO<sub>2</sub> emission over 25 tons per year or 10 pounds per hour, shall be limited to five-tenths (0.5) pound per million Btu heat input when burning No. 2 fuel oil. This equates to a fuel oil sulfur content limit of 0.5% (see Appendix A, page 3 of 4 for detailed calculations). Therefore, the sulfur content of the fuel must be less than or equal to 0.5% in order to comply with this rule.

Boilers Unit # 2 & 3, each with a maximum heat capacity of 10 MMBtu/hour, are not subject to 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations) because each boiler emits less than 25 tons per year and 10 pounds per hour of SO<sub>2</sub> emissions.

326 IAC 7-2-1 (Sulfur Dioxide Reporting Requirements)

Boiler, Unit #1, with maximum heating capacity of 16.72 MMBtu/hour is subject to 326 IAC 7-2-1 (Reporting Requirements). This rule requires the source to submit to the Office of Air Management upon request reports of calendar month or annual average sulfur content, heat content, fuel consumption, and sulfur dioxide emission rate in pounds per million Btu.

## Compliance Requirements

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

Compliance Determination Requirements in 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:

- (a) Boiler # 1 has applicable compliance monitoring conditions as specified below:
  - (1) Daily visible emissions notations from Boiler #1 stack, when burning No. 2 fuel oil shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.
  
- (b) The Brake Linings Manufacturing Process (Unit ID #4), the Brake Blocks Manufacturing Process (Unit ID #5), the Clutch Facing Manufacturing Process (Unit ID #6), and Research and Development Lab (Unit ID #7) have applicable compliance monitoring conditions as specified below:
  - (1) Daily visible emissions notations from the Brake Linings Manufacturing Process (Unit ID #4), the Brake Blocks Manufacturing Process (Unit ID #5), the Clutch Facing Manufacturing Process (Unit ID #6), and Research and Development Lab (Unit ID #7) stacks shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

- (2) The Permittee shall record the total static pressure drop across the baghouses controlling the Brake Linings Manufacturing Process (Unit ID #4), the Brake Blocks Manufacturing Process (Unit ID #5), the Clutch Facing Manufacturing Process (Unit ID #6), and Research and Development Lab (Unit ID #7) stacks, at least once daily when the Brake Linings Manufacturing Process (Unit ID #4), the Brake Blocks Manufacturing Process (Unit ID #5), the Clutch Facing Manufacturing Process (Unit ID #6), and Research and Development Lab (Unit ID #7) are in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the each of the baghouses shall be maintained within the range of 1.0 to 4.0 inches of water or a range established during the latest stack test. The Compliance Report Plan for this unit shall contain troubleshooting contingency and respond steps for when the pressure reading is outside of the above mentioned range for any one reading.
- (3) An inspection shall be performed monthly of excess visible emissions, leaks in the duct work, and baghouses. Defective bags and parts shall be replaced. A record shall be kept of the results of the inspection and the number of parts replaced.

These monitoring conditions are necessary because the baghouses for the Brake Linings Manufacturing Process (Unit ID #4), the Brake Blocks Manufacturing Process (Unit ID #5), the Clutch Facing Manufacturing Process (Unit ID #6), and Research and Development Lab (Unit ID #7) must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

### **Air Toxic Emissions**

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

- (a) This source will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Clean Air Act Amendments.
- (b) See attached calculations for detailed air toxic calculations.

### **Conclusion**

The operation of this brake linings, brake blocks, automotive clutch facings, industrial clutches, and friction products manufacturing operation shall be subject to the conditions of the attached proposed **Part 70 Permit No. T069-7677-00020**.

## Indiana Department of Environmental Management Office of Air Management

### Addendum to the Technical Support Document (TSD) for a Part 70 Operating Permit

#### Source Background and Description

<b>Source Name:</b>	Friction Material Company, Inc.
<b>Source Location:</b>	1849 East Sabine Street, Huntington, IN 46750
<b>County:</b>	Huntington
<b>SIC Code:</b>	3292
<b>Operation Permit No.:</b>	T069-7677-00020
<b>Permit Reviewer:</b>	Yvette de los Angeles/EVP

On August 17, 1998, the Office of Air Management (OAM) had a notice published in the Herald Press, Huntington, Indiana, stating that Friction Material Company, Inc. had applied for a Part 70 Operating Permit for the operation of a brake linings, brake blocks, automotive clutch facings, industrial clutches, and friction products manufacturing operation. The notice also stated that OAM proposed to issue a permit for this installation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review, the OAM has decided to make the following changes to the Part 70 Operating Permit and Technical Support Document (changes in bold or ~~strikeout~~ for emphasis):

#### Comment 1

On page 4 of 10 in the Technical Support Document, the VOC Actual Emissions are more than 300 tons per year, yet nothing is listed in the "Limited Potential to Emit" Table and on page 3 of 10, the Potential Emissions state that VOC is greater than 100 but less than 250.

#### Response 1

The "Limited Potential to Emit" table on page 4 of 10 and "Potential Emissions" table on page 3 of 10 have been revised accordingly:

#### Limited Potential to Emit

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

Process/facility	Limited Potential to Emit (tons/year)						
	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Brake Linings Manufacturing Process (Unit #4)	3.42	3.42	—	—	—	—	—

Process/facility	Limited Potential to Emit (tons/year)						
	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Brake Blocks Manufacturing Process (Unit #5)	18.35	18.35	—	—	—	—	—
Clutch Facing Manufacturing Process (Unit #6)	20.83	20.83	—	470.50**	—	—	—
Research and Development Lab (Unit #7)	0.54	0.54	—	—	—	—	—
<b>Total Emissions</b>	<b>43.15</b>	<b>43.15</b>	<b>—</b>	<b>470.50</b>	<b>—</b>	<b>—</b>	<b>—</b>

\*Note: Controlled PM and PM-10 emissions comply with 326 IAC 6-3-2. Controlled emissions are lower than allowable emissions.

\*\* VOC emission from Clutch Facing Manufacturing Process were submitted by the source.

**Potential Emissions**

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

Pollutant	Potential Emissions (tons/year)
PM	greater than 250
PM-10	greater than 250
SO <sub>2</sub>	less than 100
VOC	greater than 250
CO	less than 100
NO <sub>x</sub>	less than 100

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

**Comment 2**

On page 5 of 10 of the Technical Support Document, under “Federal Rule Applicability” subparts (a) (b) and (c), construction dates need to be added.

**Response 2**

The “Federal Rule Applicability” has been revised as follows:

### Federal Rule Applicability

- (a) The three (3) boilers, Unit #1, 2, and 3, **constructed in 1975 (Unit #1) and 1969 (Units # 2 and 3), with a combined maximum heat capacity of 36.72 million British thermal units (MMBtu) per hour**, are not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.4, Subpart Dc) because the installation date of the three (3) boilers are before June 9, 1989.
- (b) The one (1) underground storage tank, Unit ID #8, **constructed in 1982**, is not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.4, Subpart Ka) because the storage capacity is less than 40,000 gallons.
- (c) The one (1) above ground storage tank, Unit ID #9, **constructed in 1975**, is not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.4, Subpart K) because the storage capacity is less than 40,000 gallons.

### Comment 3

On page 6 of 10 of the Technical Support Document, under "State Rule Applicability - Individual Facilities", section (b) should be more specific and indicate that Units 2 and 3 are part of the combined maximum heat input capacity.

### Response 3

The "State Rule Applicability - Individual Facilities" has been revised accordingly:

### State Rule Applicability - Individual Facilities

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

The particulate matter (PM) emissions from each of the three (3) boilers, Unit ID #1, 2, and 3, shall be limited by the following:

- (b) The one (1) boiler, Unit #1, with a combined maximum heat input capacity (**with boilers Units # 2 and 3**) of 36.72 MMBtu per hour, constructed after June 8, 1972 and before September 21, 1983, is subject to 326 IAC 6-2-3. Pursuant to this rule, particulate emissions from indirect heating facilities existing and in operation after June 8, 1972 and before September 21, 1983, shall be limited by the following equation:

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

### Comment 4

On page 29 of 40 of the Part 70 Operating Permit, under D.1.1 Particulate Matter (PM) [326 IAC 6-2-3], the limits are not based on the equation. The limits for boilers 2 and 3 are based on 326 IAC 6-2-3 (d) and boiler 1 is based on 326 IAC 6-2-3 (e).

#### Response 4

The equation will be taken out and the following changes have been added:

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

Pursuant to 326 IAC 6-2-3 (Particulate Emission Limitation for Sources of Indirect Heating), the particulate matter emissions from the three (3) boilers, Unit #1,2 and 3, shall be determined utilizing the following:

- (a) **Pursuant to 326 IAC 6-2-3 (d)**, the PM from each of the two (2) boilers, Unit ID #2 and 3, shall not exceed 0.8 pounds per million Btu input.
- (b) **Pursuant to 326 IAC 6-2-3 (e)**, the PM from the one (1) boiler Unit ID # 1, shall not exceed 0.6 pound per MMBtu input.

~~This limitation is based on the following equation:~~

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

#### Comment 5

On page 29 of 40 of the Part 70 Operating Permit, under D.1.2 Sulfur Dioxide Limitation [326 IAC 7-1.1], add that if there are any changes or modifications to SO<sub>2</sub> emissions for boilers 2 and 3, the source will need prior approval.

#### Response 5

The following changes have been made:

##### D.1.2 Sulfur Dioxide Limitation [326 IAC 7-1.1]

- (a) Pursuant to 326 IAC 7-1.1 (Sulfur dioxide Emissions Limitation) the sulfur dioxide emissions from boiler, Unit #1, with heating capacity of 16.72 MMBtu/hour, shall not exceed five tenths (0.5) pounds per MMBtu heat input when burning No. 2 fuel oil.
- (b) **Any change or modification which may increase the potential to emit of SO<sub>2</sub> from Boiler 2 and 3 shall require prior approval before such change may occur.**

#### Comment 6

The following sections need to be revised:

- D.1.4 Sulfur Dioxide Emissions and Sulfur Content
- D.1.6 Record Keeping Requirements
- D.2.9 Record Keeping Requirements

#### Response 6

The following changes has been made to the Part 70 Operating Permit:

#### D.1.4 Sulfur Dioxide Emissions and Sulfur Content

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Compliance **with Condition D.1.2 (a)** shall be determined utilizing one of the following options.

#### D.1.6 Record Keeping Requirements

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- (a) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through ~~(6)~~ **(3)** below.

#### D.2.9 Record Keeping Requirements

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- (a) To document compliance with Condition ~~D.2.4~~ **D.2.5**, the Permittee shall maintain records of daily visible emission notations of the Brake Linings Manufacturing Process (Unit ID #4), the Brake Blocks Manufacturing Process (Unit ID #5), the Clutch Facing Manufacturing Process (Unit ID #6), and Research and Development Lab (Unit ID #7) baghouses stack exhaust.

#### Comment 7

Torn or otherwise failed bags can have a dramatic effect on bag house performance and few sources have reliable information that demonstrates that compliance can be achieved when compartments are "on line" with torn bags. The condition has been revised as follows to clarify that the emergency provisions of the Title V rule and the corresponding condition in this permit may take precedence if applicable.

#### D.2.8 Broken **or Failed Bag** ~~or Failure~~ Detection

---

In the event that bag failure has been observed.

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

### Comment 8

- (a) Condition C.3 has been revised to reflect current rule language. The condition has been changed to:

#### C.3 Opacity [326 IAC 5-1]

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

- (a) ~~Visible emissions~~ **Opacity** shall not exceed an average of forty percent (40%) ~~opacity~~ in ~~twenty-four (24) consecutive readings~~, **any one (1) six (6) minute averaging period** as determined in 326 IAC 5-1-4.
- (b) ~~Visible emissions~~ **Opacity** shall not exceed sixty percent (60%) ~~opacity~~ for more than a cumulative total of fifteen (15) minutes (sixty (60) readings **as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor**) in a six (6) hour period.

- (b) Page 7 of 9, of the Technical Support Document, should read as follows:

#### 326 IAC 5-1 (~~Visible Emissions~~ **Opacity** Limitations)

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

- (a) ~~Visible emissions~~ **Opacity** shall not exceed an average of forty percent (40%) ~~opacity~~ in ~~twenty-four (24) consecutive readings~~, **any one (1) six (6) minute averaging period** as determined in 326 IAC 5-1-4.
- (b) ~~Visible emissions~~ **Opacity** shall not exceed sixty percent (60%) ~~opacity~~ for more than a cumulative total of fifteen (15) minutes (sixty (60) readings **as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor**) in a six (6) hour period.

### Comment 9

IDEM is removing this provision from the permit. IDEM now believes that it is not necessary to include this condition in the permit. The issues regarding credible evidence can be adequately addressed when a showing of compliance or noncompliance is made. Indiana's air pollution control laws allow the use of any credible evidence in determining compliance or noncompliance. An explicit statement is not required in the permit. Although the permit may set out specific methods to determine compliance, any other method or other credible evidence may be admissible to demonstrate compliance or noncompliance.

#### ~~B.27 Credible Evidence [326 IAC 2-7-5(3)][62 Federal Register 8313][326 IAC 2-7-6]~~

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

### Appendix A: Emission Calculations

**Company Name:** Friction Material Company  
**Address City IN Zip:** 1849 East Sabine Street, Huntington, IN 46750  
**CP:** T069-7677  
**Plt ID:** 069-00020  
**Reviewer:** Yvette de los Angeles  
**Date:** July 10, 1998

Uncontrolled Potential Emissions (tons/year)					
Emissions Generating Activity					
Pollutant	Natural Gas Combustion	No. 2 Fuel Oil Combustion	Process Particulate Emissions From Baghouses	Clutch Facing Manufacturing Process	TOTAL
PM	2.25	2.27	4,314.54	0.00	4319.06
PM10	2.25	2.27	4,314.54	0.00	4319.06
SO2	0.10	80.42	0.00	0.00	80.52
NOx	22.52	22.65	0.00	0.00	45.17
VOC	0.45	0.23	0.00	107.42	108.10
CO	5.63	5.66	0.00	0.00	11.29
total HAPs	0.00	0.00	0.00	0.00	0.00
worst case single HAP	0.00	0.00	0.00	0.00	0.00
Total emissions based on rated capacity at 8,760 hours/year.					
Controlled Potential Emissions (tons/year)					
Emissions Generating Activity					
Pollutant	Natural Gas Combustion	No. 2 Fuel Oil Combustion	Process Particulate Emissions From Baghouses	Clutch Facing Manufacturing Process	TOTAL
PM	2.25	2.27	43.15	0.00	47.67
PM10	2.25	2.27	43.15	0.00	47.67
SO2	0.10	80.42	0.00	0.00	80.52
NOx	22.52	22.65	0.00	0.00	45.17
VOC	0.45	0.23	0.00	107.42	108.10
CO	5.63	5.66	0.00	0.00	11.29
total HAPs	0.00	0.00	0.00	0.00	0.00
worst case single HAP	0.00	0.00	0.00	0.00	0.00
Total emissions based on rated capacity at 8,760 hours/year, after control.					

#### Compliance with 326 IAC 6-2-3

Boiler Unit ID #2 and 3

The following calculation demonstrates compliance with the allowable PM emission limit of 0.8 lb/MMBtu pursuant to 326 IAC 6-2-3:

maximum heat input capacity	20.00 MM Btu per hour	
<b>PM emissions</b>	<b>0.05 pound per MM Btu</b>	<b>WILL COMPLY</b>

Boiler Unit ID #1

The following calculation demonstrates compliance with the allowable PM emission limit of 0.6 lb/MMBtu pursuant to 326 IAC 6-2-3:

maximum heat input capacity	36.72 MM Btu per hour	
<b>PM emissions</b>	<b>0.03 pound per MM Btu</b>	<b>WILL COMPLY</b>

Methodology

PM emissions = [(PM emission from natural gas boiler + PM emission from No. 2 fuel oil) \* 2000 lb/ton] / [8760 hours \* maximum heat input capacity]

**Natural Gas Combustion Only**  
**10 < MM BTU/HR <100**  
**Small Industrial Boiler**

**Company Name: Friction Material Company, Inc.**  
**Address City IN Zip: 1849 East Sabine Street, Huntington, IN 46750**  
**CP: T069-7677**  
**Pit ID: 069-00020**  
**Reviewer: Yvette de los Angeles**  
**Date: July 10, 1998**

Type of Heating Unit	Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
Boiler #1	16.72	146.47
Boiler #2	10.00	87.60
Boiler #3	10.00	87.60

Emission Factor in lb/MMCF	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
	14.00	14.00	0.60	140.00	2.80	35.00

Potential Emission in tons/yr						
Boiler #1	1.03	1.03	0.04	10.25	0.21	2.56
Boiler #2	0.61	0.61	0.03	6.13	0.12	1.53
Boiler #3	0.61	0.61	0.03	6.13	0.12	1.53

<b>Total Potential Emissions in tons/yr</b>	<b>2.25</b>	<b>2.25</b>	<b>0.10</b>	<b>22.52</b>	<b>0.45</b>	<b>5.63</b>
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Methodology:

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: Uncontrolled = 140, Low NOx burner = 83, Flue gas recirculation = 30

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

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

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

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



## Process Particulate Emissions Calculations

Company Name: Friction Material Company, Inc.  
 Address City IN Zip: 1849 East Sabine Street, Huntington, IN 46750  
 CP: T069-7677  
 Pit ID: 069-00020  
 Reviewer: Yvette de los Angeles  
 Date: July 10, 1998

Uncontrolled Potential Emissions (tons/year)							
A. Baghouses							
Process	No. of Units	Grain Loading per Actual Cubic Foot of Outlet Air	Air to Cloth Ratio Air Flow (acfm/ft <sup>2</sup> )	Total Filter Area (ft <sup>2</sup> )	Control Efficiency	Total (lbs/hr)	Total (tons/yr)
Baghouse #1 - Unit ID #4	1	0.0012	11.0	4,640	99.00%	52.50	229.94
Baghouse #2 - Unit ID #4	1	0.0012	8.5	2,934	99.00%	25.65	112.35
Baghouse #3 - Unit ID #5	1	0.0278	6.0	2,930	99.00%	418.91	1834.81
Baghouse #5 - Unit ID #6	1	0.0117	7.5	3,060	99.00%	230.16	1008.08
Baghouse #6 - Unit ID #6	1	0.0117	8.0	3,060	99.00%	245.50	1075.29
Baghouse #7 - Unit ID #7	1	0.0012	8.0	1,500	99.00%	12.34	54.06
<b>Total Emissions Based on Rated Capacity at 8,760 Hours/Year</b>						<b>985.05</b>	<b>4314.54</b>
Controlled Potential Emissions (tons/year)							
A. Baghouses							
Process	No. of Units	Grain Loading per Actual Cubic Foot of Outlet Air	Air to Cloth Ratio Air Flow (acfm/ft <sup>2</sup> )	Total Filter Area (ft <sup>2</sup> )	Control Efficiency	Total (lbs/hr)	Total (tons/yr)
Baghouse #1 - Unit ID #4	1	0.0012	11.0	4,640	99.00%	0.52	2.30
Baghouse #2 - Unit ID #4	1	0.0012	8.5	2,934	99.00%	0.26	1.12
Baghouse #3 - Unit ID #5	1	0.0278	6.0	2,930	99.00%	4.19	18.35
Baghouse #5 - Unit ID #6	1	0.0117	7.5	3,060	99.00%	2.30	10.08
Baghouse #6 - Unit ID #6	1	0.0117	8.0	3,060	99.00%	2.45	10.75
Baghouse #7 - Unit ID #7	1	0.0012	8.0	1,500	99.00%	0.12	0.54
<b>Total Emissions Based on Rated Capacity at 8,760 Hours/Year and source controls</b>						<b>9.85</b>	<b>43.15</b>
Allowable Rate of Emission (From 326 IAC 6-3-2)							
A. Baghouses							
Process	No. of Units	Maximum Process Weight Rate (lbs/hr)	Maximum Process Weight Rate (tons/hr)			Allowable Rate of Emission (lbs/hr)	Total (tons/yr)
Unit ID #4	1	4,000	2.00			6.52	28.57
Unit ID #5	1	18,705	9.35			18.34	80.31
Unit ID #6	1	2,626	1.31			4.92	21.55
Unit ID #7	1	100	0.05			0.55	2.41
<b>Total Emissions Based on Rated Capacity at 8,760 Hours/Year and source controls</b>						<b>30.33</b>	<b>132.85</b>

Methodology:State Potential (uncontrolled):

Baghouse (tons/yr) = No. Units \* Loading (grains/acf) \* Air/Cloth Ratio (acfm/ft<sup>2</sup>) \* Filter Area (ft<sup>2</sup>) \* 1 lb/7,000 grains \* 60 min/hr \* 8760 hr/yr \* 1 ton/2,000 lbs \* 1/(1-Control Efficiency)

Federal Potential (controlled):

Baghouse (tons/yr) = No. Units \* Loading (grains/acf) \* Air/Cloth Ratio (acfm/ft<sup>2</sup>) \* Filter Area (ft<sup>2</sup>) \* 1 lb/7,000 grains \* 60 min/hr \* 8760 hr/yr \* 1 ton/2,000 lbs

Allowable Rate of Emission (from 326 IAC 6-3-2)

Since the allowable process weight rate (P) < 60,000 lbs/hr, the following equation must be used:

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