

**FEDERALLY ENFORCEABLE STATE  
OPERATING PERMIT (FESOP)  
and ENHANCED NEW SOURCE REVIEW  
OFFICE OF AIR MANAGEMENT**

**Transwheel Corporation  
3000 Yeoman Way  
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 2-8 and 326 IAC 2-1-3.2, as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F069-9002-00056	
Issued by: Paul Dubenetzky, Branch Chief 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 2-8-3(b)]

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The Permittee owns and operates a stationary aluminum wheel reprocessing plant.

Responsible Official: Mr. Jon. R. Knecht - President  
Source Address: 3000 Yeoman Way, Huntington, Indiana, 46750  
Mailing Address: 3000 Yeoman Way, Huntington, Indiana, 46750  
SIC Code: 3714  
County Location: Huntington  
County Status: Attainment for all criteria pollutants  
Source Status: Federally Enforceable State Operating Permit (FESOP)  
Minor Source, under PSD Rules;  
Minor Source, Section 112 of the Clean Air Act

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

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

- (1) one (1) wheelabrator shot blast system, identified as WH1, with a maximum capacity of finishing 400 wheels per hour, utilizing a baghouse (DT3) for particulate control, and exhausting inside the plant;
- (2) three (3) shotblasting cabinets, identified as SB1, SB2, and SB3, each with a maximum capacity of finishing 120 wheels per hour, each equipped with a cyclone, all utilizing a baghouse (DT2) for particulate control, and exhausting inside the plant;
- (3) one (1) chemical dip tank, identified as PS1, with a maximum capacity of cleaning 350 wheels per hour, equipped with a hinged cover for vapor control, and exhausting inside the plant;
- (4) one (1) chemical dip tank, identified as PS2, with a maximum capacity of cleaning 350 wheels per hour, equipped with a hinged cover for vapor control, and exhausting inside the plant;
- (5) two (2) spray paint booths, identified as LB1 and LB2, each with a maximum capacity of coating 240 wheels per hour, each utilizing one (1) air atomization spray gun and one (1) HVLP spray gun, each equipped with dry filters for particulate control, and each exhausted through one (1) stack (S/V ID: S23 and S24) respectively;

- (6) five (5) powder coating booths, identified as PB1 through PB5, each with a maximum capacity of coating 240 wheels per hour, each utilizing one (1) electrostatic air atomized application gun, all utilizing a baghouse (DT1) for particulate control, and exhausting generally inside the plant;
- (7) one (1) caustic paint removal system, identified as HS1, cleaning 200 wheels per hour, consisting of the following equipment:
  - (a) one (1) molten sodium hydroxide bath;
  - (b) one (1) warm water rinse tank;
  - (c) one (1) cold water rinse tank; and
  - (d) one (1) acid rinse tank.The entire unit is hooded and particulate emissions are controlled by a dilute acid scrubber (SC1) and exhausted through one (1) stack (S/V ID: S29)

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

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

- (1) one (1) surface pretreatment system, identified as PT1, with a maximum capacity of treating 350 wheels per hour, consisting of an alkaline wash, a hydrofluoric acid etch, a chromic acid treatment, and rinsing operations.
- (2) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
  - (a) two (2) furnaces each rated at 0.137 mmBtu/hr;
  - (b) one (1) furnace rated at 0.075 mmBtu/hr;
  - (c) one (1) furnace rated at 0.165 mmBtu/hr;
  - (d) nine (9) space heaters, each rated at 0.150 mmBtu/hr;
  - (e) six (6) space heaters, each rated at 0.140 mmBtu/hr;
  - (f) four (4) tank heaters, each rated at 0.250 mmBtu/hr;
  - (g) one (1) tank heater rated at 0.100 mmBtu/hr; and
  - (h) two (2) 0.4 mmBtu/hr natural gas fired duct furnaces;
- (3) One (1) steam booth and steam cleaner with wastewater controlled by wastewater treatment;
- (4) Two (2) TIG welding units used for production welding equipped with a "smog hog" electrostatic precipitator for emissions control..
- (5) Eight (8) electric curing ovens.
- (6) Machining where an aqueous cutting coolant continuously floods the machining surface;
- (7) Paint stripping water wash to wastewater treatment.
- (8) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (9) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (10) Paved and unpaved roads with public access.
- (11) one (1) enclosed Herkules paint gun washer using a maximum of 130 gallons of lacquer thinner per year.

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

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

**A.5 Prior Permit Conditions**

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- (a) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.
  
- (b) 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

**SECTION B GENERAL CONDITIONS**

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

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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 FESOP under 326 IAC 2-8.

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

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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 2-8-4(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 2-8-6]**

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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 2-8-9] [326 IAC 2-8-3(h)]**

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

**B.6 Severability [326 IAC 2-8-4(4)]**

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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 2-8-4(5)(D)]**

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

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

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- (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, 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 Order Issuance [326 IAC 2-8-5(b)]

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

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

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

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(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.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (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

- (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 the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
  - (5) Such other facts as specified in Sections D of this permit, IDEM, OAM, may require to determine the compliance status of the source.

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).

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

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

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM , within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Management, Compliance Section) or,  
Telephone No.: 317-233-5674 (ask for Compliance Section)  
Facsimile No.: 317-233-5967

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

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

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

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

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

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

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(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 2-8-3(c)(6) 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 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
  - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

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

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

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

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any 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.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination  
[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)]

- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM determines any of the following:
  - (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, 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 2-8-8(c)]

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

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(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, IN 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
  - (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 until the renewal permit has been issued or denied.

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

**B.18 Permit Amendment or Modification** [326 IAC 2-8-10] [326 IAC 2-8-11]

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- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11 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 the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request.  
[326 IAC 2-8-10(b)(3)]

**B.19 Permit Revision Under Economic Incentives and Other Programs** [326 IAC 2-8-11(b)(2)]

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

**B.20 Changes Under Section 502(b)(10) of the Clean Air Act** [326 IAC 2-8-15(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 2-8-15(a) and the following additional condition:

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

**B.21 Operational Flexibility** [326 IAC 2-8-15]

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

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-1 has been obtained;

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

(4) The Permittee notifies the:

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

and

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

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

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

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

(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 2-8-15(c)]  
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).

- (d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, 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.22 Construction Permit Requirement [326 IAC 2]

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

B.23 Inspection and Entry [326 IAC 2-8-5(a)(2)]

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

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.  
[326 IAC 2-8-5(a)(4)]
  - (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.24 Transfer of Ownership or Operation [326 IAC 2-1-6][326 IAC 2-8-10]**

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

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-8-10. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) IDEM, OAM shall reserve the right to issue a new permit.

**B.25 Annual Fee Payment [326 IAC 2-8-4(6)][326 IAC 2-8-16]**

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

**B.26 Enhanced New Source Review [326 IAC 2]**

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

## **SECTION C SOURCE OPERATION CONDITIONS**

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

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

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

- (a) Pursuant to 326 IAC 2-8:
  - (1) The potential to emit any regulated pollutant from the entire source shall be limited to less than one-hundred (100) tons per three hundred sixty-five (365) consecutive day period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable;

- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per three hundred sixty-five (365) consecutive day period; and
  - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per three hundred sixty-five (365) consecutive day period.
- (b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.
  - (c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

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 unit(s) vented to the control equipment is are in operation.

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

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).
- All required notifications shall be submitted to:
- Indiana Department of Environmental Management  
Asbestos Section, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015
- The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

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

### C.8 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 the 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 2-8-4] [326 IAC 2-8-5(a)(1)]

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

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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 notify:

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

in writing, prior to the end of the initial ninety (90) day compliance schedule with full justification of the reasons for 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.10 Maintenance of Monitoring Equipment [326 IAC 2-8-4(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.11 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.

**Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

**C.12 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]**

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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.13 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-8-4][326 IAC 2-8-5] [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.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]  
[326 IAC 2-8-5]

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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 2-8-4(3)]**

C.15 Monitoring Data Availability

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- (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 in (a) above.

C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]

- (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.17 General Reporting Requirements [326 IAC 2-8-4(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 semi-annual report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports.
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

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

### **Stratospheric Ozone Protection**

#### **C.18 Compliance with 40 CFR 82 and 326 IAC 22-1**

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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 2-8-4(10) - Shotblasting Operations

- (a) one (1) wheelabrator blast system, identified as WH1, with a maximum capacity of finishing 400 wheels per hour, utilizing a baghouse (DT3) for particulate control, and exhausting inside the plant; and
- (b) three (3) shotblasting cabinets, identified as SB1, SB2, and SB3, each with a maximum capacity of finishing 120 wheels per hour, each equipped with a cyclone, all utilizing a baghouse (DT2) for particulate control, and exhausting inside the plant;

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

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

- (a) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the shotblasting booths SB1, SB2, and SB3, shall each not exceed 4.31 pounds per hour based on a process weight rate of 2,160 pounds of aluminum wheels per hour.
- (b) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the shotblasting booth WH1 shall not exceed 9.67 pounds per hour based on a process weight rate of 7,200 pounds of aluminum wheels per hour.

The pounds per hour limitations were 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:

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

### Compliance Determination Requirements

#### D.1.2 Testing Requirements [326 IAC 2-8-5(a)(1), (4)]

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

#### D.1.3 Particulate Matter (PM)

The baghouse (DT3) on the wheelabrator WH1 and the baghouse (DT2) on the shotblasting booths SB1, SB2, SB3 for PM control shall be in operation at all times when the facilities are in operation and exhausting to the outside atmosphere.

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

### **D.1.4 Broken Bag or Failure Detection**

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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.
- (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

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

### **D.1.5 Record Keeping Requirements**

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- (a) To document compliance with Condition D.1.4, the Permittee shall maintain the following:
  - (1) Documentation of all response steps implemented, per event .
  - (2) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.
  - (3) Quality Assurance/Quality Control (QA/QC) procedures.
  - (4) Operator standard operating procedures (SOP).
  - (5) Manufacturer's specifications or its equivalent.
  - (6) Equipment "troubleshooting" contingency plan.
  - (7) Documentation of the dates vents are redirected.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.2 FACILITY CONDITIONS

[Facility Description [326 IAC 2-8-4(10)] - Hot Caustic Paint Removal

one (1) caustic paint removal system, identified as HS1, cleaning 200 wheels per hour, consisting of the following equipment:

- (a) one (1) molten sodium hydroxide bath;
- (b) one (1) warm water rinse tank;
- (c) one (1) cold water rinse tank; and
- (d) one (1) acid rinse tank.

The entire unit is hooded and particulate emissions are controlled by a dilute acid scrubber (SC1) and exhausted through one (1) stack (S/V ID: S29)

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

### Construction Conditions [326 IAC 2-1-3.2]

#### General Construction Conditions

D.2.1 This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

#### Effective Date of the Permit

D.2.2 Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.

D.2.3 Pursuant to 326 IAC 2-1-9(b) (Revocation of Permits), IDEM, OAM may revoke this section of the approved permit if construction is not commenced within eighteen (18) months after receipt of this permit or if construction is suspended for a continuous period of one (1) year or more.

D.2.4 All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

#### First Time Operation Permit

D.2.5 This document shall also become the first-time operation permit for the facilities under this section of this permit, pursuant to 326 IAC 2-1-4 (Operating Permits) when, prior to start of operation, the following requirements are met:

- (a) The attached affidavit of construction shall be submitted to:

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

verifying that the facilities were constructed as proposed in the application. The facilities covered in this section of this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM .

- (b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
- (c) The Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section and attach it to this permit.

### **Operation Conditions**

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

##### **D.2.6 Particulate Matter (PM) [326 IAC 6-3]**

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Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM/PM10 emission rate from the caustic paint removal system HS1 shall not exceed 6.95 pounds per hour based on a process weight rate of 4400 pounds of aluminum wheels per hour.

The pounds per hour limitations were 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:

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

#### **Compliance Determination Requirements**

##### **D.2.7 Testing Requirements [326 IAC 2-8-5(a)(1), (4)]**

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Within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, the Permittee shall perform compliance tests for PM and PM-10 testing utilizing Methods 5 or 17 (40 CFR 60, Appendix A) for PM and Methods 201 or 201A and 202 (40 CFR 51, Appendix M) for PM-10, or other methods as approved by the Commissioner to determine the pounds per hour emission rate from the entire unit HS-1 and the overall control efficiency of the scrubber SC-1. This test shall also determine the proper operating parameters, including the pressure drop and flow rate necessary to achieve a minimum 45% overall control efficiency. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM-10 includes filterable and condensable PM-10. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

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

##### **D.2.8 Particulate Matter (PM)**

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The scrubber (SC1) for PM control shall be in operation at all times when the caustic paint removal system is in operation and exhausting to the outside atmosphere.

#### D.2.9 Scrubber Operating Condition

- (a) The Permittee shall monitor and record the pressure drop and flow rate of the scrubber, at least once per week. The Preventive Maintenance Plan for the scrubber shall contain troubleshooting contingency and corrective actions for when the pressure drop and flow rate readings are outside of the normal range for any one reading.
- (b) The instrument used for determining the flow rate shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.
- (c) 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) An inspection shall be performed each calendar quarter of the scrubber. Defective scrubber part(s) shall be replaced. A record shall be kept of the results of the inspection and the number of scrubber part(s) replaced.
- (e) In the event that a scrubber's failure has been observed:
  - (i) The affected process will be shut down immediately until the failed unit has been replaced.
  - (ii) Based upon the findings of the inspection, any additional corrective actions will be devised within eight (8) hours of discovery and will include a timetable for completion.

#### D.2.10 Visible Emissions Notations

- (a) Daily visible emission notations of the caustic paint removal system (HS1) 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.

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

#### D.2.11 Record Keeping Requirements

- (a) To document compliance with Condition D.2.10, the Permittee shall maintain records of daily visible emission notations of the caustic paint removal system (HS1) stack exhaust.
- (b) To document compliance with Condition D.2.9, the Permittee shall maintain the following:

- (1) Weekly records of the following operational parameters during normal operation of the scrubber (SC-1) when venting to the atmosphere:
    - (A) pressure drop; and
    - (B) flow rate
  - (2) Documentation of all response steps implemented, per event .
  - (3) Operation and preventive maintenance logs, including work and/or purchase orders, shall be maintained.
  - (4) Quality Assurance/Quality Control (QA/QC) procedures.
  - (5) Operator standard operating procedures (SOP).
  - (6) Manufacturer's specifications or its equivalent.
  - (7) Equipment "troubleshooting" contingency plan.
- (c) To document compliance with Condition D.2.9, the Permittee shall maintain records of the quarterly inspections for the scrubber SC-1.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

### **SECTION D.3 FACILITY OPERATION CONDITIONS**

Facility Description [326 IAC 2-8-4(10)] - Surface Coating and Dip Tanks

- (a) two (2) spray paint booths, identified as LB1 and LB2, each with a maximum capacity of coating 240 wheels per hour, each utilizing one (1) air atomization spray gun and one (1) HVLP spray gun, each equipped with dry filters for particulate control, and each exhausted through one (1) stack (S/V ID: S23 and S24) respectively;
- (b) five (5) powder coating booths, identified as PB1 through PB5, each with a maximum capacity of coating 240 wheels per hour, each utilizing one (1) electrostatic air atomized application gun, all utilizing a baghouse (DT1) for particulate control, and exhausting generally inside the plant;
- (c) one (1) chemical dip tank, identified as PS1, with a maximum capacity of cleaning 350 wheels per hour, equipped with a hinged cover for vapor control, and exhausting inside the plant; and
- (d) one (1) chemical dip tank, identified as PS2, with a maximum capacity of cleaning 350 wheels per hour, equipped with a hinged cover for vapor control, and exhausting inside the plant.

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

##### **D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]**

The two (2) spray paint booths (LB1 and LB2) shall use less than 15 pounds of VOC per day, including coatings, dilution solvents, and cleaning solvents. This usage limit is required to limit the potential to emit of VOC to less than 15 pounds per day. Compliance with this limit makes 326 IAC 8-2-9 (Miscellaneous Metal Coatings) not applicable.

**D.3.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]**

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The PM from the two (2) paint booths (LB1 and LB2), and the powder coating booths (PB1 - PB5) shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

**D.3.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]**

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A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the spray paint booths LB1 and LB2, and the powder paint booths PB1 through PB5 and any control devices.

**Compliance Determination Requirements**

**D.3.4 Testing Requirements [326 IAC 2-8-5(a)(1), (4)]**

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

**D.3.5 Volatile Organic Compounds (VOC)**

Compliance with the VOC content and usage limitations contained in Conditions D.3.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

**D.3.6 VOC Emissions**

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Compliance with Condition D.3.1 shall be demonstrated at the end of each day based on the total volatile organic compound usage for the most recent day.

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

**D.3.7 Particulate Matter (PM)**

---

The dry filters for PM control on the paint spray booths LB1 and LB2, and the baghouse controlling the powder booths PB1-PB5, shall be in operation at all times when the surface coating operations are in operation.

**D.3.8 Volatile Organic Compounds (VOC)**

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The chemical dip tanks identified as PS1 and PS2 are subject to the following requirements:

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:
  - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

- (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
  - (B) The solvent is agitated; or
  - (C) The solvent is heated.
- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
- (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
- (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
- (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
  - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
  - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
  - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
  - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

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

### D.3.9 Record Keeping Requirements

- (a) To document compliance with Conditions D.3.1 the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.3.1.
- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) The volume weighted VOC content of the coatings used for each day;
  - (4) The cleanup solvent usage for each day; and
  - (5) The total VOC usage (in pounds VOC) for each day.
- (b) The Permittee shall record the total usage rate of paint remover from the two (2) paint stripping operations (PS1 and PS2). Records shall include the amount and VOC content of each paint stripper used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS).
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.4

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)] - Insignificant Activities

- (a) Two (2) TIG welding units equipped with a "smog hog" electrostatic precipitator for emissions control..
- (b) Steam cleaning operation
- (c) one (1) enclosed Herkules paint gun washer using a maximum of 130 gallons of lacquer thinner per year.

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

### D.4.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the TIG welding units and the steam cleaning operation shall not exceed allowable PM emission rate based on the following equation:

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

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

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

#### D.4.2 Volatile Organic Compounds (VOC)

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The Herkules paint gun washer is subject to the requirements specified below:

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:
  - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
    - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
    - (B) The solvent is agitated; or
    - (C) The solvent is heated.
  - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
  - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
  - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
  - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
    - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
    - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
    - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
  - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
  - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

### Compliance Determination Requirement

#### D.4.3 Testing Requirements [326 IAC 2-8-5(a)(1), (4)]

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

#### D.4.4 Particulate Matter (PM)

The smog hog electrostatic precipitator for PM control shall be in operation at all times when the two (2) TIG welding units are in operation.

### SECTION D.5 FACILITY CONDITIONS

[Facility Description [326 IAC 2-8-4(10)] - New Construction including the following;

one (1) chemical dip tank, identified as PS2, with a maximum capacity of cleaning 350 wheels per hour, equipped with a hinged cover for vapor control, and exhausting inside the plant;

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

#### Construction Conditions [326 IAC 2-1-3.2]

##### General Construction Conditions

- D.5.1 This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

##### Effective Date of the Permit

- D.5.2 Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.
- D.5.3 Pursuant to 326 IAC 2-1-9(b) (Revocation of Permits), IDEM, OAM may revoke this section of the approved permit if construction is not commenced within eighteen (18) months after receipt of this permit or if construction is suspended for a continuous period of one (1) year or more.

- D.5.4 All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

#### **First Time Operation Permit**

- D.5.5 This document shall also become the first-time operation permit for the facilities under this section of this permit, pursuant to 326 IAC 2-1-4 (Operating Permits) when, prior to start of operation, the following requirements are met:

- (d) The attached affidavit of construction shall be submitted to:

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

verifying that the facilities were constructed as proposed in the application. The facilities covered in this section of this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM .

- (e) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
- (f) The Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section and attach it to this permit.

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

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

Source Name: Transwheel Corporation  
Source Address: 3000 Yeoman Way, huntington, Indiana 46750  
Mailing Address: 3000 Yeoman Way, huntington, Indiana 46750  
FESOP No.: F/ENSR 069-9002-00056

**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**

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

Source Name: Transwheel Corporation  
Source Address: 3000 Yeoman Way, Huntington, Indiana 46750  
Mailing Address: 3000 Yeoman Way, Huntington, Indiana 46750  
FESOP No.: F/ENSR 069-9002-00056

**This form consists of 2 pages**

**Page 1 of 2**

Check either No. 1 or No.2
<b>9</b> 1. This is an emergency as defined in 326 IAC 2-7-1(12) CThe 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 CThe 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
<b>9</b> 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c) CThe 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**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
 SEMI-ANNUAL COMPLIANCE MONITORING REPORT**

Source Name: Transwheel Corporation  
 Source Address: 3000 Yeoman Way, Huntington, Indiana 46750  
 Mailing Address: 3000 Yeoman Way, Huntington, Indiana 46750  
 FESOP No.: F/ENSR 069-9002-00056

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

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

**9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD**

**9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.**

Compliance Monitoring Requirement (eg. 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.

## Technical Support Document (TSD) for a Federally Enforceable State Operating Permit (FESOP) and Enhanced New Source Review (ENSR)

### Source Background and Description

Source Name: Transwheel Corporation  
Source Location: 3000 Yeoman Way, Huntington, Indiana 46750  
County: Huntington  
SIC Code: 3714  
Operation Permit No.: F/ENSR 069-9002-00056  
Permit Reviewer: Jeremy Magliaro/EVP

The Office of Air Management (OAM) has reviewed a Federally Enforceable State Operating Permit (FESOP) application from Transwheel Corporation relating to the operation of an aluminum wheel reprocessing plant.

### Permitted Emission Units and Pollution Control Equipment

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

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

The source consists of the following unpermitted facilities/units:

- (1) one (1) wheelabrator shot blast system, identified as WH1, with a maximum capacity of finishing 240 wheels per hour, utilizing a baghouse (DT3) for particulate control, and exhausting generally inside the plant;
- (2) three (3) shotblasting cabinets, identified as SB1, SB2, and SB3, each with a maximum capacity of finishing 120 wheels per hour, each equipped with a cyclone, all utilizing a baghouse (DT2) for particulate control, and exhausting generally inside the plant;
- (3) two (2) open top chemical dip tanks, identified as PS1 and PS2, each with a maximum capacity of cleaning 180 wheels per hour, and exhausting generally inside the plant;
- (4) two (2) spray paint booths, identified as LB1 and LB2, each with a maximum capacity of coating 240 wheels per hour, each utilizing one (1) air atomization spray gun and one (1) HVLP spray gun, each equipped with dry filters for particulate control, and each exhausted through one (1) stack (S/V ID: S23 and S24) respectively;
- (5) five (5) powder coating booths, identified as PB1 through PB5, each with a maximum capacity of coating 240 wheels per hour, each utilizing one (1) electrostatic air atomized application gun, all utilizing a baghouse (DT1) for particulate control, and exhausting generally inside the plant;

## New Emission Units and Pollution Control Equipment Requiring ENSR

The application also includes information relating to the construction and operation of the following equipment:

- (1) one (1) caustic paint removal system, identified as HS1, cleaning 200 wheels per hour, consisting of the following equipment:
  - (a) one (1) molten sodium hydroxide bath;
  - (b) one (1) warm water rinse tank;
  - (c) one (1) cold water rinse tank; and
  - (d) one (1) acid rinse tank.

The entire unit is hooded and particulate emissions are controlled by a dilute acid scrubber (SC1) and exhausted through one (1) stack (S/V ID: S29)

## Insignificant Activities

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

- (1) one (1) surface pretreatment system, identified as PT1, with a maximum capacity of treating 240 wheels per hour, consisting of an alkaline wash, a hydrofluoric acid etch, a chromic acid treatment, and rinsing operations.
- (2) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
  - (a) two (2) furnaces each rated at 0.137 mmBtu/hr;
  - (b) one (1) furnace rated at 0.075 mmBtu/hr;
  - (c) one (1) furnace rated at 0.165 mmBtu/hr;
  - (d) nine (9) space heaters, each rated at 0.150 mmBtu/hr;
  - (e) six (6) space heaters, each rated at 0.140 mmBtu/hr;
  - (f) four (4) tank heaters, each rated at 0.250 mmBtu/hr; and
  - (g) one (1) tank heater rated at 0.100 mmBtu/hr.
- (3) One (1) steam booth and steam cleaner with wastewater controlled by wastewater treatment;
- (4) Two (2) TIG welding units used for maintenance welding.
- (5) Eight (8) electric curing ovens.
- (6) Machining where an aqueous cutting coolant continuously floods the machining surface;
- (7) Paint stripping water wash to wastewater treatment.
- (8) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (9) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (10) Paved and unpaved roads with public access.

## Enforcement Issue

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

**Recommendation**

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

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

An administratively incomplete FESOP application for the purposes of this review was received on February 26, 1998. Additional information received on May 8, 1998, June 3, 1998, and July 8, 1998 makes the FESOP application administratively complete.

**Emission Calculations**

See Appendix A of this document for detailed emissions calculations (nine (9) 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	1508.6
PM-10	1305.9
SO <sub>2</sub>	0.0
VOC	16.0
CO	1.1
NO <sub>x</sub>	2.6

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

HAP's	Potential Emissions (tons/year)
xylene	0.29
toluene	0.57
formaldehyde	0.00
ethylbenzene	0.07
aluminum flake	0.05
methanol	0.38
TOTAL	1.29

- (a) The potential emissions (as defined in 326 IAC 1-2-55) of PM10 are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) This source, otherwise required to obtain a Title V permit, has agreed to accept a permit with federally enforceable limits that restrict its PTE to below the Title V emission levels. Therefore, this source will be issued a Federally Enforceable State Operating Permit (FESOP), pursuant to 326 IAC 2-8.

**Limited Potential to Emit**

- (a) The source has accepted a federally enforceable limit on potential to emit PM10 of 99 tons per year, (by using a wet scrubber to control PM10 emissions from the Hot caustic salt bath (HS1), and three (3) baghouses to control PM10 emissions from the shotblasting (SB1-3 and WH1) and powder coat operations (PB1-5)), consisting of:
  - (i) 99 tons per year for the significant activities.
- (b) The table below summarizes the total limited potential to emit of the significant and insignificant emission units.

Process/facility	Limited Potential to Emit (tons/year)						
	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Shotblasters SB1,SB2,SB3, WH1	15.36	13.24	--	--	--	--	--
Caustic Paint Removal HS1	30.46	30.46	--	--	--	--	--
Paint Stripping PS1 and PS2	--	--	--	--	--	--	--
Spray Paint LB1 and LB2	--	--	--	2.74	--	--	0.79
Powder coat PB1-PB5	--	--	--	--	--	--	--
Insignificant Activities	0.30	0.30	0.02	0.30	1.09	2.56	negl.
<b>Total Emissions</b>	--	--	--	--	--	--	--

The limited potential to emit PM/PM10 from the shotblasters (SB1-3, WH1), and the caustic paint removal (HS1) were calculated pursuant to compliance with 326 IAC 6-3-2 (Process Operations).

**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.

### Federal Rule Applicability

- (a) There are no New Source Performance Standards (326 IAC 12), 40 CFR Part 60, applicable to this source.
- (b) 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 2-6 (Emission Reporting)

This source is located in Huntington County and the potential to emit PM<sub>10</sub> and VOC is less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

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

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

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

#### 326 IAC 6-4 (Fugitive Dust Emissions)

The Permittee shall not allow fugitive dust to escape beyond the property line on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). The Permittee shall comply with the fugitive dust regulations under 326 IAC 6-4.

### State Rule Applicability - Individual Facilities

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

- (a) The particulate matter (PM/PM<sub>10</sub>) from the spray coating booths (LB1 and LB2), and the powder coating booths (PB1 through PB5), shall each be limited by the following:

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

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

The dry filters on the spray booths LB1 and LB2, and the baghouse controlling the powder coating booths PB1 through PB5 shall be in operation at all times the units are in operation, in order to comply with this limit.

- (b) The particulate matter (PM) from the shotblasting booths SB1, SB2, SB3, and WH1 shall each not exceed 0.82 pounds per hour based on a process weight rate of 180 pounds of aluminum wheels per hour.

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:

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

$$E = 4.10 (0.09)^{0.67} = 0.88 \text{ lb PM/hr; which is equivalent to 3.84 tons PM/yr; and} \\ (0.88 \text{ lb PM/hr}) * (0.86 \text{ lbPM10/lb PM}) = 0.76 \text{ lb PM10/hr or 3.31 tons PM10/yr;}$$

The cyclones and the baghouse (DT2) shall be in operation at all times the shotblasting units SB1, SB2, and SB3 are in operation, in order to comply with this limit. The baghouse (DT3) shall be in operation at all times the wheelabrator unit WH1 is in operation in order to comply with this limit.

- (c) The particulate matter (PM/PM10) from the caustic paint removal system shall not exceed 6.95 pounds per hour based on a process weight rate of 4400 pounds of aluminum wheels per hour.

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:

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

$$E = 4.10 (2.2)^{0.67} = 6.95 \text{ lb PM/hr; which is equivalent to 30.46 tons/yr.}$$

The scrubber (SC1) shall be in operation at all times the units are in operation, in order to comply with this limit.

- (d) The particulate matter (PM/PM10) from the insignificant TIG welding units, and the insignificant steam cleaning operation shall not exceed the allowable emission rate established by the following equation:

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

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

### 326 IAC 8-2-9 (Miscellaneous Metal Coatings)

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coatings), no source constructed after July 1, 1990 and emitting greater than fifteen (15) pounds of VOC per day and engaged in the coating of miscellaneous metal parts may discharge into the atmosphere any VOC in excess of 3.5 pounds per gallon, excluding water in a system that is air dried or forced warm air dried at temperatures up to 194EF.

- (a) The surface coating booths LB1 and LB2 which surface coat aluminum wheels are subject to the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coatings) because they have the potential to emit VOC greater than 15 pounds per day. The source will limit the input VOC usage to LB1 and LB2 to less than 15 pounds per day, including dilution and cleanup solvents. Therefore, 326 IAC 8-2-9 (Miscellaneous Metal Coatings) is not applicable.
- (b) The powder coating booths identified as PB1 through PB5 which surface coat aluminum wheels are not subject to the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coatings) because they have the potential to emit VOC less than 15 pounds per day.

## Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in 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.

This source has the following compliance monitoring requirements:

1. The Permittee shall conduct a performance test on the caustic paint removal system (HS1) to determine the overall capture efficiency of the scrubber (SC1) and to determine the hourly PM/PM10 emission rate generated by the entire unit HS1.

This testing requirement is necessary to determine the optimal operating parameters of the system, including the acid content, pressure drop, and flow rate to operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-8 (FESOP).

2. That the scrubber (SC1) shall be operated at all times when the caustic paint removal system (HS1) is in operation.
  - (a) The Permittee shall monitor and record the acid content, pressure drop and flow rate of the scrubber, at least once per week. The Preventive Maintenance Plan for the scrubber shall contain troubleshooting contingency and corrective actions for when the acid content, pressure drop and flow rate readings are outside of the normal range for any one reading.
  - (b) An inspection shall be performed each calendar quarter of the scrubber. Defective scrubber part(s) shall be replaced. A record shall be kept of the results of the inspection and the number of scrubber part(s) replaced.

This scrubber operating requirement is necessary to verify that the scrubber (SC-1) operates properly to comply with 326 IAC 6-3 (Process Operations) and 326 IAC 2-8 (FESOP).

3. The input VOC usage to the paint spray booths LB1 and LB2 shall not exceed 15 pounds per day, including dilution and cleanup solvents. The permittee shall record the VOC usage rate daily and submit a monthly reporting form to the OAM.

This record keeping and reporting requirement is necessary to determine compliance with 326 IAC 8-2-9 (Miscellaneous Metal Coatings).

### **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) FESOP 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. (page 3 of 9, Appendix A)

### **Conclusion**

The operation of this aluminum wheel reprocessing plant shall be subject to the conditions of the attached proposed **FESOP No. F/ENSR 069-9002-00056**.

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

Addendum to the  
Technical Support Document for Federally Enforceable State Operating  
Permit (FESOP) and Enhanced New Source Review (ENSR)

<b>Source Name:</b>	<b>Transwheel Corporation</b>
<b>Source Location:</b>	<b>3000 Yeoman Way, Huntington, Indiana 46750</b>
<b>County:</b>	<b>Huntington</b>
<b>SIC Code:</b>	<b>3714</b>
<b>Operation Permit No.:</b>	<b>F/ENSR 069-9002-00056</b>
<b>Permit Reviewer:</b>	<b>Jeremy Magliaro/EVP</b>

On July 30, 1998, the Office of Air Management (OAM) had a notice published in the Herald Press, Huntington, Indiana, stating that Transwheel Corporation had applied for a Federally Enforceable State Operating Permit (FESOP) and Enhanced New Source Review (ENSR) to operate an aluminum wheel reprocessing plant. The notice also stated that OAM proposed to issue a FESOP for this operation and provided information on how the public could review the proposed FESOP 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 FESOP should be issued as proposed.

Bruce L. Johns, of Innovative Environmental Technologies, has submitted the following comments on behalf of the Transwheel Corporation (added language indicated by **boldface**, deleted language indicated by a ~~strikeout~~, accordingly):

**Comment #1**

*Please change the statement "generally vented inside the plant." everywhere it appears to read "exhausting inside the plant", specifically the following pages:*

- (a) *Page 5 of 37 of the FESOP, Section A.2, paragraphs (1), (2), (3), and (5); and*
- (b) *Page 25 of 37 of the FESOP, Section D.1 (a) and (b).*

**Response #1**

The aforementioned changes shall be incorporated into the FESOP. These sections will now read as follows:

- (1) one (1) wheelabrator shot blast system, identified as WH1, with a maximum capacity of finishing 240 wheels per hour, utilizing a baghouse (DT3) for particulate control, and exhausting ~~generally~~ inside the plant;
- (2) three (3) shotblasting cabinets, identified as SB1, SB2, and SB3, each with a maximum capacity of finishing 120 wheels per hour, each equipped with a cyclone, all utilizing a baghouse (DT2) for particulate control, and exhausting ~~generally~~ inside the plant;

**Comment #2**

*On page 5, and 25 of 37 of the FESOP, please change the rated capacity of WH1 from 240 wheels per hour to 400 wheels per hour.*

**Response #2**

The unit is now listed as having a capacity of 400 wheels per hour. This change has been made to Section A.2, page 5 of 37, and Section D.1, page 25 of 37 of the FESOP as follows:

one (1) wheelabrator blast system, identified as WH1, with a maximum capacity of finishing **400** ~~240~~ wheels per hour, utilizing a baghouse (DT3) for particulate control, and exhausting inside the plant; and

**Comment #3**

*On page 5 and 31 of 37 of the FESOP, please change the rated capacity of the two (2) chemical dip tanks from 180 wheels per hour to 350 wheels per hour. Please note that both of the tanks do have hinged covers that are opened to insert and remove parts. Also, the second chemical treatment tank, PS2 and the associated new fan S28, were mistakenly indicated as being installed as of 4/97. This is not correct. The second unit has not been installed, nor has the fan.*

**Response #3**

The OAM prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

On page 1 of 8 of the Technical Support Document, under "Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR" should have read:

~~(3) — two (2) open top chemical dip tanks, identified as PS1 and PS2, each with a maximum capacity of cleaning 180 wheels per hour, and exhausting uncontrolled through two (2) stacks (S/V ID S27 and S28) respectively;~~

**(3) one (1) chemical dip tank, identified as PS1, with a maximum capacity of cleaning 350 wheels per hour, equipped with a hinged cover for vapor control, and exhausting inside the plant;**

On page 1 of 8 of the Technical Support Document, under "New Emission Units and Pollution Control Equipment Requiring ENSR" should have read:

**(2) one (1) chemical dip tank, identified as PS2, with a maximum capacity of cleaning 350 wheels per hour, equipped with a hinged cover for vapor control, and exhausting inside the plant.**

The increase in VOC emissions from 11.38 to 12.42 tons per year due to the increased throughput to the chemical dip tanks does not trigger any regulatory requirements. This increase in emissions is reflected in the revised emissions calculation on page 1 of 9, Appendix A of the Technical Support Document. However, this comment required the following changes to the final FESOP permit:

On page 5 of 37, Section A.2 of the FESOP now read as follows (the remaining emission units have been renumbered accordingly):

- ~~(3) two (2) open top chemical dip tanks, identified as PS1 and PS2, each with a maximum capacity of cleaning 180 wheels per hour, and exhausting generally inside the plant;~~
- (3) one (1) chemical dip tank, identified as PS1, with a maximum capacity of cleaning 350 wheels per hour, equipped with a hinged cover for vapor control, and exhausting inside the plant;**
- (4) one (1) chemical dip tank, identified as PS2, with a maximum capacity of cleaning 350 wheels per hour, equipped with a hinged cover for vapor control, and exhausting inside the plant;**

Page 31 of 37 of the FESOP, Section D.3, Facility Description, now reads as follows:

- ~~(c) two (2) open top chemical dip tanks, identified as PS1 and PS2, each with a maximum capacity of cleaning 180 wheels per hour, and exhausting uncontrolled through two (2) stacks (S/N ID S27 and S28) respectively;~~
- (c) one (1) chemical dip tank, identified as PS1, with a maximum capacity of cleaning 350 wheels per hour, equipped with a hinged cover for vapor control, and exhausting inside the plant;**
- (d) one (1) chemical dip tank, identified as PS2, with a maximum capacity of cleaning 350 wheels per hour, equipped with a hinged cover for vapor control, and exhausting inside the plant;**

A new FESOP permit section, numbered Section D.5 has been added to the permit to include the appropriate construction conditions for the new chemical dip tank PS2.

#### **SECTION D.5 FACILITY CONDITIONS**

**[Facility Description [326 IAC 2-8-4(10)] - New Construction including the following;**

**one (1) chemical dip tank, identified as PS2, with a maximum capacity of cleaning 350 wheels per hour, equipped with a hinged cover for vapor control, and exhausting inside the plant;**

**THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.**

## Construction Conditions [326 IAC 2-1-3.2]

### General Construction Conditions

**D.5.1** This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

### Effective Date of the Permit

**D.5.2** Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.

**D.5.3** Pursuant to 326 IAC 2-1-9(b) (Revocation of Permits), IDEM, OAM may revoke this section of the approved permit if construction is not commenced within eighteen (18) months after receipt of this permit or if construction is suspended for a continuous period of one (1) year or more.

**D.5.4** All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

### First Time Operation Permit

**D.5.5** This document shall also become the first-time operation permit for the facilities under this section of this permit, pursuant to 326 IAC 2-1-4 (Operating Permits) when, prior to start of operation, the following requirements are met:

(a) The attached affidavit of construction shall be submitted to:

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

verifying that the facilities were constructed as proposed in the application. The facilities covered in this section of this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM .

(b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.

- (c) **The Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section and attach it to this permit.**

**Comment #4**

*On page 6 of 37 of the FESOP, please note that the two (2) TIG welders are used for production welding. Also, on page 6 of 37 of the FESOP, please add the following insignificant activities to the present list:*

- (a) *two (2) 0.4 mmBtu/hr natural gas fired duct furnaces;*
- (b) *one (1) smog hog for the two (2) TIG welders, it is an electrostatic precipitator; and*
- (c) *one (1) Herkules paint gun washer using a maximum of 130 gallons of lacquer thinner per year. There is no atomization of solvent in this unit. The unit is a closed cabinet with pumps that push thinner through the guns to clean; the solids settle in the conical bottom and are sent out for recycling.*

**Response #4**

Pursuant to the aforementioned comment, the following changes have been made on page 6 of 37, Insignificant Activities, of the FESOP:

- (2) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
  - (a) two (2) furnaces each rated at 0.137 mmBtu/hr;
  - (b) one (1) furnace rated at 0.075 mmBtu/hr;
  - (c) one (1) furnace rated at 0.165 mmBtu/hr;
  - (d) nine (9) space heaters, each rated at 0.150 mmBtu/hr;
  - (e) six (6) space heaters, each rated at 0.140 mmBtu/hr;
  - (f) four (4) tank heaters, each rated at 0.250 mmBtu/hr; and
  - (g) one (1) tank heater rated at 0.100 mmBtu/hr.
  - (h) two (2) 0.4 mmBtu/hr natural gas fired duct furnaces;**
- (4) Two (2) TIG welding units used for ~~maintenance~~ **production** welding **equipped with a “smog hog” electrostatic precipitator for emissions control.**
- (11) **one (1) enclosed Herkules paint gun washer using a maximum of 130 gallons of lacquer thinner per year.**

Pursuant to the aforementioned comment, the following changes have been made on page 33 of 37, Section D.4, Facility Description, of the FESOP:

**SECTION D.4 FACILITY OPERATION CONDITIONS**

Facility Description [326 IAC 2-8-4(10)] - Insignificant Activities

- (a) Two (2) TIG welding units **equipped with a “smog hog” electrostatic precipitator for emissions control..**
- (b) Steam cleaning operation
- (c) **one (1) enclosed Herkules paint gun washer using a maximum of 130 gallons of lacquer thinner per year.**

The new enclosed paint gun washer qualifies as a cold cleaner degreasing facility. Therefore, the following operating condition is required. It shall be inserted on page 33 of 37 of the FESOP (the remainder of Section D.4 has been renumbered accordingly):

#### **D.4.2 Volatile Organic Compounds (VOC)**

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**The Herkules paint gun washer is subject to the requirements specified below:**

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:**
  - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:**
    - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));**
    - (B) The solvent is agitated; or**
    - (C) The solvent is heated.**
  - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.**
  - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).**
  - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.**
  - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):**
    - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.**

- (B) A water cover when solvent is used is insoluble in, and heavier than, water.**
  - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.**
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:**
- (1) Close the cover whenever articles are not being handled in the degreaser.**
  - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.**
  - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.**

The following Compliance Determination requirement has been added on page 33 of 37 of the FESOP as Condition D.4.4 as follows:

#### **D.4.4 Particulate Matter (PM)**

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**The smog hog electrostatic precipitator for PM control shall be in operation at all times when the two (2) TIG welding units are in operation.**

#### **Comment #5**

*Section C.1, on page 17 of 37; The use of potential to emit in this section is bothersome unless the use of potential here refers to one's "capability". The facility has the capability to exceed the potential to emit of VOCs with one (1) spray gun operating 8760 hours per year. I would feel better if the idea presented referred to the "actual emissions at 8760 hours" being limited to the stated limits. I sense that this is a futile request.*

#### **Response #5**

Pursuant to 326 IAC 2-7-1 (Definitions), the term "potential to emit" is defined as follows:

"...the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA..."

The proposed Federally Enforceable State Operating Permit (FESOP) limits the potential to emit any regulated air pollutant to less than 100 tons per year, any single HAP to less than 10 tons per year, and any combination of HAPs to less than 25 tons per year. Although the equipment listed in the proposed FESOP may have the capability of emitting greater than the limits specified above, the operational design of the source, as specified in the permit application by the production capacities of each facility, as well as by the use of control equipment, limits the potential to emit to below the FESOP levels specified above. These physical and operational designs are federally enforceable by the U.S. EPA.

Any change or modification which increases the potential to emit of any regulated pollutant to greater than 100 tons per year, any single HAP to greater than 10 tons per year, and any combination of HAPs to greater than 25 tons per year shall be a violation of this permit. There have been no changes to the final permit from this comment.

**Comment #6**

*On page 25 of 37, please change the process weight rates for the following shotblasting facilities and their corresponding allowable PM emission rates.*

- (a) *WH1 - process weight rate of 3.6 tons per hour which corresponds to an allowable emission rate of 9.76 pounds of PM per hour; and*
- (b) *SB1, SB2, and SB3 - process weight rates of 1.08 tons per hour each which corresponds to an allowable emission rate of 4.31 pounds PM per hour each.*

**Response #6**

The allowable PM emission rates based on the process weight rates listed above have been verified to be correct. Therefore, the following changes to Condition D.1.1 (Particulate Matter), on page 25 of 38 of the FESOP are as follows:

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

- (a) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the shotblasting booths SB1, SB2, **and SB3**, ~~and WH1~~ shall each not exceed ~~0.82~~ **4.31** pounds per hour based on a process weight rate of ~~400~~ **2,160** pounds of aluminum wheels per hour.
- (b) **Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the shotblasting booth WH1 shall not exceed 9.67 pounds per hour based on a process weight rate of 7,200 pounds of aluminum wheels per hour.**

The pounds per hour limitations were 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:

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

**Comment #7**

*On page 30 of 37, Section D.2.11 (b)(3) refers to "including work purchase orders". Should this be "work and/or purchase orders"?*

**Response #7**

The Permittee is required to maintain both work and purchase orders to document compliance with Condition D.2.9 (Scrubber Operating Condition). To avoid confusion, the following change has been made to Condition D.2.11 (b)(3):

D.2.11 Record Keeping Requirements

- (b) To document compliance with Condition D.2.9, the Permittee shall maintain the following:

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

**Comment #8**

*On page 7 of 8 of the Technical Support Document (TSD), the monthly VOC reporting requirement stated does not appear in the permit. Is this monthly reporting required?*

**Response #8**

The OAM prefers that the TSD reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

There is no monthly reporting requirement required for this permit. The Permittee is only required to do daily record keeping stated under Condition D.3.8 (Record Keeping Requirements) on page 32 of 38 of the FESOP. There have been no changes resulting from this comment.

Upon further review, the OAM has decided to make the following changes to the FESOP (added language indicated by **boldface**, deleted language indicated by a ~~strikeout~~, accordingly)::

- 1) The chemical dip tanks PS1 and PS2 qualify as “cold cleaner degreasers”. These facilities do not qualify as “conveyorized degreasers” because they are operated by a manual hoist. On page 32 of 37 of the FESOP, a new Compliance Monitoring Requirement has been added. It is listed as Condition D.3.8 (Volatile Organic Compounds) and it reads as follows (the remainder of Section D.3 has been renumbered accordingly):

**D.3.8 Volatile Organic Compounds (VOC)**

---

**The chemical dip tanks identified as PS1 and PS2 are subject to the following requirements:**

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:
  - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
    - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
    - (B) The solvent is agitated; or
    - (C) The solvent is heated.

- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.**
  - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).**
  - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.**
  - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):**

    - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.**
    - (B) A water cover when solvent is used is insoluble in, and heavier than, water.**
    - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.**
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:**
- (1) Close the cover whenever articles are not being handled in the degreaser.**
  - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.**
  - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.**

**Source Emissions Summary  
Appendix A: Emission Calculations**

**Company Name:** Transwheel Corporation  
**Address City IN Zip:** 3000 Yeoman Way, Huntington, Indiana 46750  
**FESOP No.:** F069-9002  
**Plant ID:** 069-00056  
**Reviewer:** Jeremy Magliaro/EVP  
**Date:** February 26, 1998

**Uncontrolled Potential Emissions (tons/year)**

Emissions Generating Activity							
Pollutant	Natural Gas Combustion	Spray Paint Coating (LB1 and LB2)	Powder Coating PB1-PB5	Paint Stripping + Pre-Treat * PS1, PS2, PT1	NaOH Paint Removal HS1	Shotblasting** SB1-SB3, WB1	TOTAL
PM	0.24	0.43	5.02	0.00	55.19	1,447.74	1,508.6
PM10	0.24	0.43	5.02	0.00	55.19	1,245.06	1,305.9
SO2	0.02	0.00	0.00	0.00	0.00	0.00	0.0
NOx	2.97	0.00	0.00	0.00	0.00	0.00	3.0
VOC	0.17	4.47	0.03	12.42	0.00	0.00	17.1
CO	1.26	0.00	0.00	0.00	0.00	0.00	1.3
total HAPs	0.00	1.29	0.00	negligible	0.00	0.00	1.3
worst case single HAP	0.00	0.57	0.00	negligible	0.00	0.00	0.6
Total emissions based on rated capacity at 8,760 hours/year.							

**Potential Emissions after Controls and Usage Limits (tons/year)**

Emissions Generating Activity							
Pollutant	Natural Gas Combustion	Spray Paint Coating (LB1 and LB2)	Powder Coating PB1-PB5	Paint Stripping + Pre-Treat * PS1, PS2, PT1	NaOH Paint Removal HS1	Shotblasting** SB1-SB3, WB1	TOTAL
PM	0.24	0.03	0.01	0.00	30.35	2.90	33.5
PM10	0.24	0.03	0.01	0.00	30.35	2.49	33.1
SO2	0.02	0.00	0.00	0.00	0.00	0.00	0.0
NOx	2.97	0.00	0.00	0.00	0.00	0.00	3.0
VOC	0.17	2.74	0.03	12.42	0.00	0.00	15.4
CO	1.26	0.00	0.00	0.00	0.00	0.00	1.3
total HAPs	0.00	0.79	0.00	negligible	0.00	0.00	0.8
worst case single HAP	0.00	0.35	0.00	negligible	0.00	0.00	0.4

Total emissions based on rated capacity at 8,760 hours/year, after control and usage limits.

\*The applicant states a 11.38 tons VOC per year potential emission loss from the two (2) paint stripping baths (PS1 and PS2), and a negligible loss of HF and Chromic acid from the pretreat unit PT1.

\*\* The PM10 emissions from shotblasting were estimated using a 0.86 lb PM10/lb PM emission factor ratio..

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

Company Name: Transwheel Corporation  
Address City IN Zip: 3000 Yeoman Way, Huntington, Indiana 46750  
FESOP No.: F069-9002  
Plant ID: 069-00056  
Reviewer: Jeremy Magliaro/EVP  
Date: February 26, 1998

Potential Uncontrolled Emissions:																	
Coating Material (as applied)	Product Being Coated	Density (Lb/Gal)	Weight % Volatile (H2O& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency
<b>Spray Paint Booth LB1:</b>		aluminum wheels															
LS1		8.65	80.50%	0.00%	80.50%	0.00%	18.00%	0.000078	240.0	6.96	6.96	0.13	3.13	0.57	0.07	38.68	50%
LS10A		8.65	80.50%	0.00%	80.50%	0.00%	18.00%	0.000065	240.0	6.96	6.96	0.11	2.62	0.48	0.06	38.68	50%
LS4		8.65	80.50%	0.00%	80.50%	0.00%	18.00%	0.000052	240.0	6.96	6.96	0.09	2.09	0.38	0.05	38.68	50%
LS25A		8.65	80.50%	0.00%	80.50%	0.00%	18.00%	0.000039	240.0	6.96	6.96	0.07	1.56	0.29	0.03	38.68	50%
LS17		8.65	80.50%	0.00%	80.50%	0.00%	18.00%	0.000026	240.0	6.96	6.96	0.04	1.04	0.19	0.02	38.68	50%
Balance of paint		8.65	80.50%	0.00%	80.50%	0.00%	18.00%	0.000240	240.0	6.96	6.96	0.40	9.63	1.76	0.21	38.68	50%
N-11 Wash Solvent		7.00	100.00%	0.00%	100.00%	0.00%	0.00%	0.000065	240.0	7.00	7.00	0.11	2.62	0.48	0.00	ERR	50%
<b>Spray Paint Booth LB2:</b>		aluminum wheels															
LS1		8.65	80.50%	0.00%	80.50%	0.00%	18.00%	0.000078	240.0	6.96	6.96	0.13	3.13	0.57	0.07	38.68	50%
LS10A		8.65	80.50%	0.00%	80.50%	0.00%	18.00%	0.000065	240.0	6.96	6.96	0.11	2.62	0.48	0.06	38.68	50%
LS4		8.65	80.50%	0.00%	80.50%	0.00%	18.00%	0.000052	240.0	6.96	6.96	0.09	2.09	0.38	0.05	38.68	50%
LS25A		8.65	80.50%	0.00%	80.50%	0.00%	18.00%	0.000039	240.0	6.96	6.96	0.07	1.56	0.29	0.03	38.68	50%
LS17		8.65	80.50%	0.00%	80.50%	0.00%	18.00%	0.000026	240.0	6.96	6.96	0.04	1.04	0.19	0.02	38.68	50%
Balance of paint		8.65	80.50%	0.00%	80.50%	0.00%	18.00%	0.000240	240.0	6.96	6.96	0.40	9.63	1.76	0.21	38.68	50%
N-11 Wash Solvent		7.00	100.00%	0.00%	100.00%	0.00%	0.00%	0.000065	240.0	7.00	7.00	0.11	2.62	0.48	0.00	ERR	50%

**Total Uncontrolled Potential Emissions:**

<b>1.02</b>	<b>24.49</b>	<b>4.47</b>	<b>0.43</b>
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**Controlled Potential Emissions:**

Total Controlled Potential Emissions:	VOC Input Usage Limitation	Control Efficiency	Limited VOC lbs per Hour	Limited VOC lbs per Day	Limited VOC tons per Year	Controlled PM tons/yr
	VOC	PM				
	38.75%	93.00%	0.63	15.00	2.74	0.03

The permittee will limit VOC usage to 15 pounds per day to avoid 326 IAC 8-2-9 (Miscellaneous Metal Coatings). This is equivalent to a 38.75 usage limit as shown above.

The balance of paint coating shown above represents the worst-case VOC content when the applicant mixes different coatings to obtain different colors.

Methodology:

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

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

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

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

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

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

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

Total Uncontrolled Potential Emissions = Worst Case Coating Applied + Sum of all Solvents Used (Note: All coatings are applied on a mutually exclusive basis).

Controlled VOC Emission Rate = Uncontrolled Emission Rate \* VOC Input Limitation

Controlled PM Emission Rate = Uncontrolled Emission Rate \* VOC Input Limitation \* (1 - Control Efficiency)

VOC input usage to the paint applicator will be limited to 11.92% of potential input usage based on 8,760 hours per year operation in order to limit VOC from the painting facility to 24.0 tons per year.

Therefore, the requirements pursuant to 326 IAC 8-1-6 will not apply to this facility.

HAP Emission Calculations

Company Name: Transwheel Corporation  
 Address City IN Zip: 3000 Yeoman Way, Huntington, Indiana 46750  
 FESOP No.: F069-9002  
 Plant ID: 069-00056  
 Reviewer: Jeremy Magliaro/EVP  
 Date: February 26, 1998

Material	Density (Lb/Gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Formaldehyde	Weight % Ethylbenzene	Weight % Aluminum Flake	Weight % Methanol	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Ethylbenzene (ton/yr)	Aluminum Flake (ton/yr)	Methanol Emissions (ton/yr)	Worst Case Coating (Total HAPs) (ton/yr)
<b>Spray Paint Booth LB1:</b>																
LS1	8.65	0.000078	240.000	5.95%	0.05%	0.05%	1.35%	3.30%	0.00%	0.04	0.00	0.00	0.01	0.02	0.00	0.08
LS10A	8.65	0.000065	240.000	5.95%	0.00%	0.05%	1.35%	3.30%	0.00%	0.04	0.00	0.00	0.01	0.02	0.00	0.06
LS4	8.65	0.000052	240.000	5.95%	0.05%	0.05%	1.35%	0.00%	0.00%	0.03	0.00	0.00	0.01	0.00	0.00	0.03
LS25A	8.65	0.000039	240.000	5.95%	0.05%	0.05%	1.35%	0.00%	0.00%	0.02	0.00	0.00	0.00	0.00	0.00	0.03
LS17	8.65	0.000026	240.000	5.95%	0.05%	0.05%	1.35%	3.30%	0.00%	0.01	0.00	0.00	0.00	0.01	0.00	0.03
Balance of paint	8.65	0.000240	240.000	5.95%	0.00%	0.00%	1.35%	0.00%	0.00%	0.13	0.00	0.00	0.03	0.00	0.00	0.16
N-11 Wash Solvent	7.00	0.000065	240.000	0.00%	60.00%	0.00%	1.35%	0.00%	40.00%	0.00	0.29	0.00	0.01	0.00	0.19	0.48
<b>Spray Paint Booth LB2:</b>																
LS1	8.65	0.000078	240.000	5.95%	0.05%	0.05%	1.35%	3.30%	0.00%	0.04	0.00	0.00	0.01	0.02	0.00	0.08
LS10A	8.65	0.000065	240.000	5.95%	0.00%	0.05%	1.35%	3.30%	0.00%	0.04	0.00	0.00	0.01	0.02	0.00	0.06
LS4	8.65	0.000052	240.000	5.95%	0.05%	0.05%	1.35%	0.00%	0.00%	0.03	0.00	0.00	0.01	0.00	0.00	0.03
LS25A	8.65	0.000039	240.000	5.95%	0.05%	0.05%	1.35%	0.00%	0.00%	0.02	0.00	0.00	0.00	0.00	0.00	0.03
LS17	8.65	0.000026	240.000	5.95%	0.05%	0.05%	1.35%	3.30%	0.00%	0.01	0.00	0.00	0.00	0.01	0.00	0.03
Balance of paint	8.65	0.000240	240.000	5.95%	0.00%	0.00%	1.35%	0.00%	0.00%	0.13	0.00	0.00	0.03	0.00	0.00	0.16
N-11 Wash Solvent	7.00	0.000065	240.000	0.00%	60.00%	0.00%	1.35%	0.00%	40.00%	0.00	0.29	0.00	0.01	0.00	0.19	0.48

Total State Potential Emissions 0.26      0.57      0.00      0.07      0.05      0.38      1.29

**METHODOLOGY**

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

**Appendix A: Emission Calculations  
VOC and Particulate  
From Molten Sodium Hydroxide Paint Removal**

**Company Name:** Transwheel Corporation  
**Address City IN Zip:** 3000 Yeoman Way, Huntington, Indiana 46750  
**FESOP No.:** F069-9002  
**Plant ID:** 069-00056  
**Reviewer:** Jeremy Magliaro/EVP  
**Date:** February 26, 1998

<b>Potential Emissions (uncontrolled):</b>								
Emission source	Units	Pounds Paint+Dirt (lb/unit)*	Maximum (unit/hour)	Flash-Off (%)	Potential PM pounds per hour	Potential PM pounds per day	Potential PM tons per year	PM Control Efficiency**
HS1	Aluminum Wheels	0.126	200.00	50.00%	12.60	302.40	55.19	45.00%
<b>Total Potential Emissions (uncontrolled):</b>					<b>12.60</b>	<b>302.40</b>	<b>55.19</b>	
<b>Potential Emissions (controlled):</b>								
					Controlled PM lbs per Hour	Controlled PM lbs per Day	Controlled PM tons per Year	
<b>Total Potential Emissions (controlled):</b>					<b>6.93</b>	<b>166.32</b>	<b>30.35</b>	

\* Based on actual tests performed at an identical piece of equipment at the manufacturers operation - the average pounds of paint and dirt removed from the operation was found to be 0.126 pounds/wheel.

\*\* This operation will be controlled by a dilute acid scrubber with a minimum 45% control efficiency.

Methodology:

Potential PM Pounds per Hour = Pounds of PM per unit \* Maximum (units/hr)\*Flash-off%

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

**Appendix A: Emission Calculations  
Shotblaster SB1**

**Company Name:** Transwheel Corporation  
**Address City IN Zip:** 3000 Yeoman Way, Huntington, Indiana 46750  
**FESOP No.:** F069-9002  
**Plant ID:** 069-00056  
**Reviewer:** Jeremy Magliaro/EVP  
**Date:** February 26, 1998

**Table 1 - Emission Factors for Abrasives**

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

**Table 2 - Density of Abrasives (lb/ft3)**

Abrasive	Density (lb/ft3)
Aloxides	160
Sand	99
Steel	487
Ceramic	144

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

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

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

**Calculations**

*Adjusting Flow Rates for Different Abrasives and Nozzle Diameters*

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

138
144
99
0.25
0.25

**Flow Rate (FR) (lb/hr) = 200.727 per nozzle**

**Uncontrolled Emissions (E, lb/hr)**

EF = emission factor (lb PM/ lb abrasive) From Table 1 =  
 FR = Flow Rate (lb/hr) =  
 w = fraction of time of wet blasting =  
 N = number of nozzles =  
 C = Control Efficiency

0.010
200.727
0 %
1
99.80%

<b>Uncontrolled Emissions =</b>	<b>2.01 lb/hr</b>
	<b>8.79 ton/yr</b>

<b>Controlled Emissions =</b>	<b>0.00 lb/hr</b>
	<b>0.02 ton/yr</b>

**METHODOLOGY**

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

**Appendix A: Emission Calculations  
Shotblasters SB2 and SB3**

**Company Name:** Transwheel Corporation  
**Address City IN Zip:** 3000 Yeoman Way, Huntington, Indiana 46750  
**FESOP No.:** F069-9002  
**Plant ID:** 069-00056  
**Reviewer:** Jeremy Magliaro/EVP  
**Date:** February 26, 1998

**Table 1 - Emission Factors for Abrasives**

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

**Table 2 - Density of Abrasives (lb/ft3)**

Abrasive	Density (lb/ft3)
Aloxides	160
Sand	99
Steel	487
Plastic	78

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

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

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

**Calculations**

*Adjusting Flow Rates for Different Abrasives and Nozzle Diameters*

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

138
78
99
0.25
0.25

**Flow Rate (FR) (lb/hr) = 108.727 per nozzle**

**Uncontrolled Emissions (E, lb/hr)**

EF = emission factor (lb PM/ lb abrasive) From Table 1 =  
 FR = Flow Rate (lb/hr) =  
 w = fraction of time of wet blasting =  
 N = number of nozzles =  
 C = Control Efficiency

0.010
108.727
0 %
1
99.80%

<b>Uncontrolled Emissions =</b>	<b>1.09 lb/hr</b>
	<b>4.76 ton/yr</b>

<b>Controlled Emissions =</b>	<b>0.00 lb/hr</b>
	<b>0.01 ton/yr</b>

**METHODOLOGY**

Emission Factors from Stappa Alapco, Section 3 "Abrasive Blasting"

Ton/yr = lb/hr X 8760 hr/yr X ton/2000 lbs

Flow Rate (FR) (lb/hr) = FR1 x (ID/ID1)2 x (D/D1)

E = EF x FR x (1-w/200) x N

w should be entered in as a whole number (if w is 50%, enter 50)

These shotblasters are controlled by cyclones and a baghouse (DT2) with a 99.80% control efficiency.

**Appendix A: Process Particulate Emissions  
Wheelabrator Blast - WH1**

**Company Name: Transwheel Corporation**  
**Address City IN Zip: 3000 Yeoman Way, Huntington, Indiana 46750**  
**FESOP No.: F069-9002**  
**Plant ID: 069-00056**  
**Reviewer: Jeremy Magliaro/EVP**  
**Date: February 26, 1998**

<b>Potential Emissions (Uncontrolled) (tons/year)</b>						
<b>A. Baghouses</b>						
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 (tons/yr)
DT3 - for wheelabrator WH1	1	0.02180	1.9	1,854	99.80%	1433.92
Total Emissions Based on Rated Capacity at 8,760 Hours/Year						<b>1433.92</b>
<b>Potential Emissions (controlled) (tons/year)</b>						
<b>A. Baghouses</b>						
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 (tons/yr)
DT3 - for wheelabrator WH1	1	0.02180	1.9	1,854	99.80%	2.87
Total Emissions Based on Rated Capacity at 8,760 Hours/Year and source controls						<b>2.87</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 \* 1/(1-Control Efficiency)

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

**Company Name: Transwheel Corporation**  
**Address City IN Zip: 3000 Yeoman Way, Huntington, Indiana 46750**  
**FESOP No.: F069-9002**  
**Plant ID: 069-00056**  
**Reviewer: Jeremy Magliaro/EVP**  
**Date: February 26, 1998**

Combustion Unit Type	Total Capacity MMBtu/hr	Potential Thruput MMCF/yr	Emission Factor in lb/MMCF						Potential Emission Rate in tons/year					
			PM	PM10	SO2	NOx	VOC	CO	PM	PM10	SO2	NOx	VOC	CO
Six (6) space heaters - 140k Btu/hr each	0.84	7.36	7.60	7.60	0.6	94.0	5.5	40.0	0.03	0.03	0.00	0.35	0.02	0.15
Nine (9) space heaters - 150k Btu/hr each	1.35	11.83	7.60	7.60	0.6	94.0	5.5	40.0	0.04	0.04	0.00	0.56	0.03	0.24
One (1) furnace - 75k Btu/hr	0.75	6.57	7.60	7.60	0.6	94.0	5.5	40.0	0.02	0.02	0.00	0.31	0.02	0.13
Two (2) furnaces - 137k Btu/hr each	0.27	2.40	7.60	7.60	0.6	94.0	5.5	40.0	0.01	0.01	0.00	0.11	0.01	0.05
One (1) furnace - 165k Btu/hr	0.17	1.45	7.60	7.60	0.6	94.0	5.5	40.0	0.03	0.03	0.00	0.41	0.02	0.18
Four (4) bath heaters - 250k Btu/hr each	1.00	8.76	7.60	7.60	0.6	94.0	5.5	40.0	0.03	0.03	0.00	0.41	0.02	0.18
One (1) tank heater - 100k Btu/hr	0.10	0.88	7.60	7.60	0.6	94.0	5.5	40.0	0.03	0.03	0.00	0.41	0.02	0.18
Two (2) duct furnaces - 400k Btu/hr each	0.80	7.01	7.60	7.60	0.6	94.0	5.5	40.0	0.03	0.03	0.00	0.41	0.02	0.18
<b>Total Potential Emissions in tons/yr</b>	<b>4.379</b>	<b>38.36</b>							<b>0.24</b>	<b>0.24</b>	<b>0.02</b>	<b>2.97</b>	<b>0.17</b>	<b>1.26</b>

**Methodology**

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

Emission factors from AP 42, 5th Edition, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, for residential (< 0.3 MMBtu/hr) and commercial (>= 0.3 & < 10.0 MMBtu/hr) combustion units.