



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels Jr.*  
Governor

*Thomas W. Easterly*  
Commissioner

100 North Senate Avenue  
Indianapolis, Indiana 46204  
(317) 232-8603  
Toll Free (800) 451-6027  
[www.idem.IN.gov](http://www.idem.IN.gov)

TO: Interested Parties / Applicant

DATE: June 18, 2009

RE: Dexter Axle Company Plant 39 / 039-27954-00070

FROM: Matthew Stuckey, Branch Chief  
Permits Branch  
Office of Air Quality

## Notice of Decision – Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

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

Enclosures  
FNPER-AM.dot12/3/07



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Mr. Michael A. Furfaro  
Dexter Axle Company Plant 39  
PO Box 250  
Elkhart, IN 46515

June 18, 2009

Re: Registration Notice-Only Change  
No. R039-27954-00070

Dear Mr. Furfaro:

Philips Products Ventline Division was issued a Registration No. R039-12332-00070 on December 6, 2000 for a stationary venting equipment manufacturing plant located at 902 South Division Street, Bristol, Indiana 46507. On May 19, 2009, the Office of Air Quality (OAQ) received a letter from the source requesting that the registration be updated to indicate a change in ownership and company name change to Dexter Axle Company Plant 39. This change to the registration is considered a notice-only change pursuant to 326 IAC 2-5.5-6(d)(3).

In addition, the source has requested to construct and operate two (2) door lines processes (RV Door Production Line and Access Door). The two door line processes will add a total of nine (9) saws to cut aluminum parts. PTE calculations are shown at table 1. The addition of these units to the registration is considered a notice-only change, since the potential emissions of regulated criteria pollutants and hazardous air pollutants are less than the ranges specified in 326 IAC 2-5.5-6(d)(10) and 326 IAC 2-5.5-6(d)(12), respectively. The uncontrolled/unlimited potential to emit of the entire source will continue to be within the threshold levels specified in 326 IAC 2-5.5-1(b)(1). State rule 326 IAC6-3-2 is applicable to this source. There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) or National Emission standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 20 and 40 CFR Part 61, 63) included in this notice-only change.

Pursuant to 326 IAC 2-5.5-6, the registration is hereby revised. The rule applicability for this modification is explained in the attached Technical Support Document (TSD).

- (i) **One (1) RV doors production line, approved for construction in 2009, with a maximum production rate of 70 units per hour. PM/PM10/PM2.5 emissions from the RV steel, aluminum, foam cutting, routing and woodworking operations are controlled by dust collector DC1. This line includes the following operations:**
- (1) **Inner frame steel cutting with a maximum cutting rate of 240 pounds per hour;**
  - (2) **Skin foam cutting with a maximum cutting rate of 120 pounds per hour;**
  - (3) **Outer frame aluminum cutting with a maximum cutting rate of 890 pounds per hour;**
  - (4) **Surface coating of metal parts using aerosol and plews cans at a maximum rate of 42 units per hour; and**
  - (5) **Screen surface coating of metal parts using aerosol and plew cans at a maximum rate of 30 units per hour.**

- (j) **One (1) access door production line, approved for construction in 2009, with a maximum production rate of 7 units per hour, application of sealant, application of surface coating of metal parts using aerosol and plew cans.**

**D.1.2 Particulate Emissions (PM) [326 IAC 6-3-2]**

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**Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the powder paint process shall be limited to 0.4 lbs/hr. The particulate matter (PM) from, the welding processes shall be limited to 6.2 lbs/hr., the RV doors woodworking, material cutting and routing operations shall be limited by the following the allowable particulate emission rate for the emission units listed in the table below:**

Emissions Unit	Process Weight Rate (ton/hr)	PM Allowable (lb/hr)
Powder Paint		0.4
Welding Operations		6.2
<b>RV Doors Woodworking</b>	<b>0.01</b>	<b>0.551</b>
<b>Material Cutting and Routing</b>	<b>0.985</b>	<b>4.05</b>

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

Interpolation 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:

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

**Compliance Determination Requirements [326 IAC 2-5.1-2(g)] [326 IAC 2-5.5-4(b)]**

**D.1.3 Volatile Organic Compounds**

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

**D.1.4 Particulate Control**

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To comply with condition D.1.2, the collection system shall be in operation at all times the powder paint process and the router are in operation, and the smoke extractors shall be in operation at all times the welding processes are in operation.

**Record Keeping and Reporting Requirements [326 IAC 2-5.1-2(g)] [326 IAC 2-5.5-4(b)]**

**D.1.5 Record Keeping Requirements**

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- (a) **To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.**
  - (1) **The VOC content of each coating material and solvent used.**
  - (2) **The amount of coating material and solvent less water used on a monthly basis.**
    - (A) **Records shall include purchase orders, invoices, and material**

**safety data sheets (MSDS) necessary to verify the type and amount used.**

- (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.**
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.**

The source shall continue to operate according to 326 IAC 2-5.5. Please find enclosed the revised registration.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Bruce Farrar, at (800) 451-6027, press 0 and ask for Bruce Farrar or extension 4-5401, or dial (317) 234-5401.

Sincerely,



Iryn Calilung, Section Chief  
Permits Branch  
Office of Air Quality

IC/bf

Attachment: Revised Registration  
Emission Calculations

cc: File - Elkhart County  
Elkhart County Health Department  
Compliance and Enforcement Branch  
Billing, Licensing and Training Section



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## REGISTRATION OFFICE OF AIR QUALITY

**Dexter Axle Company Plant 39  
902 South Division Street  
Bristol, Indiana 46507**

Pursuant to 326 IAC 2-5.1 (Construction of New Sources: Registrations) and 326 IAC 2-5.5 (Registrations), (herein known as the Registrant) is hereby authorized to construct and operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this registration.

Registration No. R039-12332-00070	
Original signed by:  Paul Dubenetzky Permits Branch Office of Air Quality	Issuance Date: December 6, 2000

First Registration Notice-Only Change No. 039-19061-00070, issued on July 23, 2004

Second Registration Notice-Only Change No. 039-27954-00070	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date:  June 18, 2009

## SECTION A

## SOURCE SUMMARY

This registration is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Registrant 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 Registrant to obtain additional permits pursuant to 326 IAC 2.

### A.1 General Information

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The Registrant owns and operates a stationary venting equipment manufacturing plant.

Source Address:	902 South Division Street, Bristol, IN 46507
Mailing Address:	902 South Division Street, Bristol, IN 46507
General Source Phone Number:	(574) 848-4491
SIC Code:	3444
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Registration

### A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) Three (3) natural-gas-fired ovens rated at 2.5 million British thermal units (MMBtu) per hour combined (previously permitted).
- (b) One (1) natural-gas-fired washer rated at 5.3 MMBtu per hour (previously permitted).
- (c) Sixteen (16) natural-gas-fired space heaters rated at 240,000 Btu per hour each (previously permitted) .
- (d) One (1) powder paint system using a maximum of 62 pounds of powder paint per hour and controlled with a collection system (previously considered an exempted facility).
- (e) One (1) adhesive application system identified as Process B (previously considered an exempted facility).
- (f) One (1) acrylic seam sealer system identified as Process C (previously considered an exempted facility).
- (g) Welding processes controlled by smoke extractors (previously considered an exempted facility).
- (h) One (1) caulk application system identified as Process A (previously unpermitted).
- (i) One (1) RV doors production line, approved for construction in 2009, with a maximum production rate of 70 units per hour. PM/PM10/PM2.5 emissions from the MH/RV fiberglass, steel, aluminum, foam cutting, routing and woodworking operations are controlled by dust collectors DC1. This line includes the following operations:
  - (1) Inner frame steel cutting with a maximum cutting rate of 240 pounds per hour;
  - (2) Skin foam cutting with a maximum cutting rate of 120 pounds per hour;

- (3) Outer frame aluminum cutting with a maximum cutting rate of 890 pounds per hour;
  - (4) Surface coating of metal parts using aerosol and plews cans at a maximum rate of 42 units per hour; and
  - (5) Screen surface coating of metal parts using aerosol and plew cans at a maximum rate of 30 units per hour.
- (j) One (1) access door production line, approved for construction in 2009, with a maximum production rate of 7 units per hour, application of sealant, application of surface coating of metal parts using aerosol and plew cans.

## **SECTION B GENERAL CONDITIONS**

### **B.1 Definitions [326 IAC 2-1.1-1]**

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Terms in this registration shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-1.1-1) shall prevail.

### **B.2 Effective Date of Registration [IC 13-15-5-3]**

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Pursuant to IC 13-15-5-3, this registration is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

### **B.3 Registration Revocation [326 IAC 2-1.1-9]**

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Pursuant to 326 IAC 2-1.1-9 (Revocation), this registration to operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this registration.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this registration.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this registration shall not require revocation of this registration.
- (d) For any cause which establishes in the judgment of the fact that continuance of this registration is not consistent with purposes of this article.

### **B.4 Prior Permits Superseded [326 IAC 2-1.1-9.5]**

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- (a) All terms and conditions of permits established prior to Registration No. R039-12332-00070 and issued pursuant to permitting programs approved into the state implementation plan have been either:
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deleted.
- (b) All previous registrations and permits are superseded by this registration.

### **B.5 Annual Notification [326 IAC 2-5.1-2(f)(3)] [326 IAC 2-5.5-4(a)(3)]**

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Pursuant to 326 IAC 2-5.1-2(f)(3) and 326 IAC 2-5.5-4(a)(3):

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this registration.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:



Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, IN 46204-2251

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

**B.6 Source Modification Requirement [326 IAC 2-5.5-6(a)]**

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Pursuant to 326 IAC 2-5.5-6(a), an application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

**B.7 Registrations [326 IAC 2-5.1-2(i)]**

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Pursuant to 326 IAC 2-5.1-2(i), this registration does not limit the source's potential to emit.

## SECTION C

## SOURCE OPERATION CONDITIONS

Entire Source

### Emission Limitations and Standards [326 IAC 2-5.1-2(g)] [326 IAC 2-5.5-4(b)]

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

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

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

#### C.2 Fugitive Dust Emissions [326 IAC 6-4]

The Registrant 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).

## SECTION D.1

## OPERATION CONDITIONS

Facility Description [326 IAC 2-5.1-2(f)(2)] [326 IAC 2-5.5-4(a)(2)]:

- (a) Three (3) natural-gas-fired ovens rated at 2.5 million British thermal units (MMBtu) per hour combined (previously permitted).
- (b) One (1) natural-gas-fired washer rated at 5.3 MMBtu per hour (previously permitted).
- (c) Sixteen (16) natural-gas-fired space heaters rated at 240,000 Btu per hour each (previously permitted) .
- (d) One (1) powder paint system using a maximum of 62 pounds of powder paint per hour and controlled with a collection system (previously considered an exempted facility).
- (e) One (1) adhesive application system identified as Process B (previously considered an exempted facility).
- (f) One (1) acrylic seam sealer system identified as Process C (previously considered an exempted facility).
- (g) Welding processes controlled by smoke extractors (previously considered an exempted facility).
- (h) One (1) caulk application system identified as Process A (previously unpermitted).
- (i) One (1) RV doors production line, approved for construction in 2009, with a maximum production rate of 70 units per hour. PM/PM10/PM2.5 emissions from the MH/RV fiberglass, steel, aluminum, foam cutting, routing and woodworking operations are controlled by dust collectors DC2 (located outdoors) and DC3. This line includes the following operations:
  - (1) Inner frame steel cutting with a maximum cutting rate of 240 pounds per hour;
  - (2) Skin foam cutting with a maximum cutting rate of 120 pounds per hour;
  - (3) Outer frame aluminum cutting with a maximum cutting rate of 890 pounds per hour;
  - (4) Surface coating of metal parts using aerosol and plews cans at a maximum rate of 42 units per hour; and
  - (5) Screen surface coating of metal parts using aerosol and plew cans at a maximum rate of 30 units per hour.
- (j) One (1) access door production line, approved for construction in 2009, with a maximum production rate of 7 units per hour, application of sealant, application of surface coating of metal parts using aerosol and plew cans.

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

### **Emission Limitations and Standards [326 IAC 2-5.1-2(f)(1)] [326 IAC 2-5.5-4(a)(1)]**

#### **D.1.1 Volatile Organic Compound (VOC) [326 IAC 8-2-9]**

- (a) Pursuant to 326 IAC 8-2-9, the Permittee shall not allow the discharge into the atmosphere VOC in excess of three and five-tenths (3.5), pounds of VOC per gallon of coating, excluding water, as delivered to the applicator for processes A, B, C. The coatings used for processes A, B and C are sealants and an adhesive. These coatings will be exposed to outdoor weather at all times and therefore, are considered extreme performance coatings.
- (b) Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment of processes A, B, C during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

#### **D.1.2 Particulate Emissions (PM) [326 IAC 6-3-2]**

Pursuant to 326 IAC 6-3-2, the particulate from the welding, cutting and routing facilities shall be limited by the following:

Emissions Unit	Process Weight Rate (ton/hr)	PM Allowable (lb/hr)
Powder Paint		0.4
Welding Operations		6.2
Saws		0.551
RV Doors Woodworking	0.01	0.551
Material Cutting and Routing	0.985	4.05

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

Interpolation 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:

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

### **Compliance Determination Requirements [326 IAC 2-5.1-2(g)] [326 IAC 2-5.5-4(b)]**

#### **D.1.3 Volatile Organic Compounds**

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

#### **D.1.4 Particulate Control**

To comply with condition D.1.2, the collection system shall be in operation at all times the powder paint process and the router are in operation, and the smoke extractors shall be in operation at all times the welding processes are in operation.

### **Record Keeping and Reporting Requirements [326 IAC 2-5.1-2(g)] [326 IAC 2-5.5-4(b)]**

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

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1. Records

necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

- (1) The VOC content of each coating material and solvent used.
- (2) The amount of coating material and solvent less water used on a monthly basis.
  - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
  - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE AND ENFORCEMENT BRANCH**

**REGISTRATION  
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-5.1-2(f)(3) and 326 IAC 2-5.5-4(a)(3).

<b>Company Name:</b>	Dexter Axle Company Plant 29
<b>Address:</b>	902 South Division Street
<b>City:</b>	Bristol, IN 46507
<b>Phone Number:</b>	574-848-4491
<b>Registration No.:</b>	039-12332-00070

- I hereby certify that Dexter Axle Company Plant 29 is :  still in operation.  
 no longer in operation.
- I hereby certify that Dexter Axle Company Plant 29 is :  in compliance with the requirements of Registration No. 039-12332-00070.  
 not in compliance with the requirements of Registration No. 039-12332-00070.

<b>Authorized Individual (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Phone Number:</b>
<b>Date:</b>

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

<b>Noncompliance:</b>

## Indiana Department of Environmental Management Office of Air Quality

### Technical Support Document (TSD) for a Registration Revision

#### Source Description and Location

<b>Source Name:</b>	<b>Dexter Axle Company Plant 39</b>
<b>Source Location:</b>	<b>902 South Division Street, Bristol, IN 46507</b>
<b>County:</b>	<b>Elkhart</b>
<b>SIC Code:</b>	<b>3444</b>
<b>Registration No.:</b>	<b>R039-12332-00070</b>
<b>Registration Issuance Date:</b>	<b>December 6, 2000</b>
<b>Registration Revision No.:</b>	<b>039-27954-00070</b>
<b>Permit Reviewer:</b>	<b>Bruce Farrar</b>

On May 19, 2009, the Office of Air Quality (OAQ) received an application from Dexter Axle Company Plant 39 related to a modification to an existing plant.

#### Existing Approvals

The source was issued Registration No.039-12332-00070 on December 6, 2000. The source has since received Notice-Only Change No. 039-19061-00070, issued on July 23, 2004.

#### County Attainment Status

The source is located in Elkhart County.

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Attainment effective July 19, 2007, for the 8-hour ozone standard. <sup>1</sup>
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Not designated.
<sup>1</sup> Attainment effective October 18, 2000, for the 1-hour ozone standard for the South Bend-Elkhart area, including Elkhart County, and is a maintenance area for the 1-hour National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour standard was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for PM2.5.	

(a) Ozone Standards

Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) PM2.5

Elkhart County has been classified as attainment for PM2.5. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM2.5 emissions, and the effective date of these rules was July 15<sup>th</sup>, 2008. Indiana has three years from

the publication of these rules to revise its PSD rules, 326 IAC 2-2, to include those requirements. The May 8, 2008 rule revisions require IDEM to regulate PM10 emissions as a surrogate for PM2.5 emissions until 326 IAC 2-2 is revised.

- (c) Other Criteria Pollutants  
 Elkhart County has been classified as attainment or unclassifiable in Indiana for all other pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

**Fugitive Emissions**

The fugitive emissions of criteria pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-5.1-2 (Registrations) applicability.

**Status of the Existing Source**

The table below summarizes the potential to emit of the entire source, prior to the proposed revision, after consideration of all enforceable limits established in the effective permits:

Process/ Emission Unit	Potential To Emit of the Entire Source Prior to Revision (tons/year)								
	PM	PM10	PM2.5	SO <sub>2</sub>	NOx	VOC	CO	Total HAPs	Worst Single HAP
Combustion	0.4	0.4	-	-	4.8	0.3	4.0	0.091	0.081 Hexane
Sealant & Adhesive	-	-	-	-	-	20.51	-	6.32	3.98 MEK
Powder Paint*	0.07	0.07	-	-	-	-	-	-	-
Welding	0.07	0.07	-	-	-	-	-	0.05	-
<b>Total PTE of the Entire Source</b>	<b>0.54</b>	<b>0.54</b>	-	-	<b>4.8</b>	<b>20.81</b>	<b>4.0</b>	<b>6.46</b>	<b>3.98</b>
Exemptions Levels	5	5	5	10	10	5 or 10	25	25	10
Registration Levels	25	25	25	25	25	25	100	25	10

negl. = negligible  
 These emissions are based upon Registration No.: 039-12332-00070, dated December 6, 2000.  
 \* The filter house used with the powder paint operations is considered integral to the process.

**Description of Proposed Revision**

The Office of Air Quality (OAQ) has reviewed an application, submitted by Dexter Axle Company Plant 39 on May 19, 2009, relating to the construction of two (2) door lines processes (RV Door Production Line and Access Door). These two (2) door line processes were previously permitted at Philips Products (MSOP No.: 039-27463-00128).

The following is a list of the new emission units and pollution control devices:

- (a) One (1) RV doors production line, approved for construction in 2009, with a maximum production rate of 70 units per hour. PM, PM10, and PM2.5 emissions from the MH/RV fiberglass, steel, aluminum, foam cutting, routing and woodworking operations are controlled by dust collectors DC1. This line includes the following operations:



- (1) Inner frame steel cutting with a maximum cutting rate of 240 pounds per hour;
  - (2) Skin foam cutting with a maximum cutting rate of 120 pounds per hour;
  - (3) Outer frame aluminum cutting with a maximum cutting rate of 890 pounds per hour;
  - (4) Surface coating using aerosol and plews cans at a maximum rate of 70 42 units per hour; and
  - (5) Screen surface coating using aerosol and plew cans at a maximum rate of 30 units per hour.
- (b) One (1) access door production line, approved for construction in 2009, with a maximum production rate of 7 units per hour, application of sealant, application of surface coating using aerosol and plew cans.

**Enforcement Issues**

There are no pending enforcement actions related to this revision.

**Emission Calculations**

See Appendix A of this TSD for detailed emission calculations.

**Permit Level Determination – Registration Revision**

The following table is used to determine the appropriate permit level under 326 IAC 2-5.5-6. This table reflects the PTE before controls of the proposed revision.

Emission Units	Table 1 - PTE of the Modification (tons/year)							
	PM	PM10*	SO2	NOx	VOC	CO	Single HAP	Combined HAP
Surface Coating Operations	0.53	0.53	-	-	2.83		2.34	2.38
Saws and Routers	3.34	3.34	-	-	-	-	-	-
<b>Total PTE of this Modification</b>	<b>3.87</b>	<b>3.87</b>	<b>-</b>	<b>-</b>	<b>2.83</b>	<b>-</b>		<b>2.38</b>

\* Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".

This registration is being revised through a notice-only change, since the potential emissions of regulated criteria pollutants and hazardous air pollutants are less than the ranges specified in 326 IAC 2-5.5-6(d)(10) and 326 IAC 2-5.5-6(d)(12), respectively. The uncontrolled/unlimited potential to emit of the entire source will continue to be within the threshold levels specified in 326 IAC 2-5.5-1(b)(1). State rule 326 IAC6-3-2 is applicable to this source. There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) or National Emission standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 20 and 40 CFR Part 61, 63) included in this notice-only change.

**PTE of the Entire Source After Issuance of the Registration Revision**

The table below summarizes the potential to emit of the entire source after issuance of this revision, reflecting all limits, of the emission units.

Emission Units	PTE of the Entire Source After Issuance (tons/year)							
	PM	PM10*	SO2	NOx	VOC	CO	Single HAP	Combined HAP
Powder Paint <sup>1</sup>	0.07	0.07	-	-	-	-	-	-
Processes A, B & C	-	-	-	-	20.5	-	-	6.32
Combustion	0.4	0.4	-	4.8	0.3	4.0	-	0.09
Welding Processes <sup>2</sup>	0.07	0.07	-	-	-	-	-	0.05
Surface Coating Operations	0.53	0.53	-	-	2.83	-	2.34	2.38
Saws and Routers	3.34	3.34	-	-	-	-	-	-
<b>Total</b>	<b>4.41</b>	<b>4.41</b>	<b>-</b>	<b>-</b>	<b>23.63</b>	<b>4.0</b>		<b>8.84</b>
Exemptions Levels	5	5	10	10	5 or 10	25	10	25
Registration Levels	25	25	25	25	25	100	10	25

\* Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".  
<sup>1</sup> The filterhouse used with the powder paint process has an efficiency of 99.9%  
<sup>2</sup> The smoke extractors used with the welding process has an efficiency of 95%.  
 These emissions are based upon Registration No.: R039-12332-00070, dated December 6, 2000.

- (a) This revision will not change the registration status of the source, because the uncontrolled/unlimited potential to emit of (*pollutant(s)*) from the entire source will still be within the ranges listed in 326 IAC 2-5.5-1(b)(1) and the PTE of all other regulated criteria pollutants will still be less than the ranges listed in 326 IAC 2-5.5-1(b)(1). Therefore, the source will still be subject to the provisions of 326 IAC 2-5.5 (Registrations).
- (b) This revision will not change the minor status of the source, because the uncontrolled/unlimited potential to emit of any single HAP will still be less than ten (10) tons per year and the PTE of a combination of HAPs will still be less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.

**Federal Rule Applicability Determination**

The federal rule applicability for this revision is as follows:

New Source Performance Standards (NSPS)

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included for this proposed revision.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (a) The requirements of the National Perchloroethylene Air Emission Standards for Dry Cleaning Facilities , 40 CFR 63.320, Subpart M (326 IAC 20-7), are not included for this proposed revision, since the source does not operate dry cleaning facility.
- (b) The requirements of the National Emission Standards for Chromium Emissions From Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks , 40 CFR 63.340, Subpart N (326 IAC 20-8), are not included for this proposed revision, since the source is not a facility that operates a chromium electroplating or chromium anodizing tank.
- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Ethylene Oxide Emissions Standards for Sterilization Facilities, 40 CFR 63.360, Subpart O

(326 IAC 20-5), are not included for this proposed revision, since the source does not operate a sterilization or fumigation facility.

- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Wet-Formed Fiberglass Mat Production, 40 CFR 63.2980, Subpart HHHH (326 IAC 20-52), are not included for this proposed revision, since the source does not operate a drying and curing oven at a wet-formed fiberglass mat production facility.
- (e) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included for this proposed revision.

#### Compliance Assurance Monitoring (CAM)

- (f) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the potential to emit of the source is limited to less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

<b>State Rule Applicability Determination</b>
---

The state rules applicable to the existing emission units at this source will not change as a result of this revision.

The following state rules are applicable to the proposed revision:

- (a) 326 IAC 2-5.5 (Registrations)  
Registration applicability is discussed under the Permit Level Determination – Registration section above.
- (b) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))  
The proposed revision is not subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs from the new units is less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.
- (c) 326 IAC 2-6 (Emission Reporting)  
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (d) 326 IAC 5-1 (Opacity Limitations)  
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
  - (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
  - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

- (e) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)  
 Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the powder paint process, the welding processes, the RV doors woodworking, and material cutting and routing operations shall be limited by the following the allowable particulate emission rate for the emission units listed in the table below:

Emissions Unit	Process Weight Rate (ton/hr)	PM Allowable (lb/hr)
Powder Paint		0.4
Welding Operations		6.2
RV Doors Woodworking	0.01	0.551
Material Cutting and Routing	0.985	4.05

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

Interpolation 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 filterhouse shall be in operation at all times the powder paint operation is in operation, in order to comply with this limit.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)

- (f) The proposed revision is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from each new unit is less than fifteen (15) pounds per day.

326 IAC 8-2 (Surface Coating Emission Limitations)

- (g) The proposed revision is not subject to the requirements of 326 IAC 8-2, although the units were constructed after 1990, the potential emissions from each new unit is less than fifteen (15) pounds per day.

**Proposed Changes**

The following changes listed below are due to the proposed revision. Deleted language appears as ~~strikethrough~~ text and new language appears as **bold** text:

- (i) **One (1) RV doors production line, approved for construction in 2009, with a maximum production rate of 70 units per hour. PM/PM10/PM2.5 emissions from the RV steel, aluminum, foam cutting, routing and woodworking operations are controlled by dust collector DC1. This line includes the following operations:**

- (1) **Inner frame steel cutting with a maximum cutting rate of 240 pounds per hour;**
- (2) **Skin foam cutting with a maximum cutting rate of 120 pounds per hour;**
- (3) **Outer frame aluminum cutting with a maximum cutting rate of 890 pounds per hour;**

- (4) Surface coating of metal parts using aerosol and plews cans at a maximum rate of 42 units per hour; and
- (5) Screen surface coating of metal parts using aerosol and plew cans at a maximum rate of 30 units per hour.
- (j) One (1) access door production line, approved for construction in 2009, with a maximum production rate of 7 units per hour, application of sealant, application of surface coating of metal parts using aerosol and plew cans.

**D.1.2 Particulate Emissions (PM) [326 IAC 6-3-2]**

Pursuant to 326 IAC 6-3-2, ~~the particulate matter (PM) from the powder paint process shall be limited to 0.4 lbs/hr. The particulate matter (PM) from, the welding processes shall be limited to 6.2 lbs/hr.,~~ the RV doors woodworking, material cutting and routing operations shall be limited by the following the allowable particulate emission rate for the emission units listed in the table below:

Emissions Unit	Process Weight Rate (ton/hr)	PM Allowable (lb/hr)
Powder Paint		0.4
Welding Operations		6.2
<b>RV Doors Woodworking</b>	<b>0.01</b>	<b>0.551</b>
<b>Material Cutting and Routing</b>	<b>0.985</b>	<b>4.05</b>

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

Interpolation 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:

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

**Compliance Determination Requirements [326 IAC 2-5.1-2(g)] [326 IAC 2-5.5-4(b)]**

**D.1.3 Volatile Organic Compounds**

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

**D.1.4 Particulate Control**

To comply with condition D.1.2, the collection system shall be in operation at all times the powder paint process and the router are in operation, and the smoke extractors shall be in operation at all times the welding processes are in operation.

**Record Keeping and Reporting Requirements [326 IAC 2-5.1-2(g)] [326 IAC 2-5.5-4(b)]**

**D.1.5 Record Keeping Requirements**

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1. Records necessary to demonstrate compliance shall be available within 30

**days of the end of each compliance period.**

- (1) The VOC content of each coating material and solvent used.**
- (2) The amount of coating material and solvent less water used on a monthly basis.**
  - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.**
  - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.**
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.**

<b>Conclusion and Recommendation</b>
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Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on May 19, 2009.

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed Registration Notice-only change No. 039-27954-00070. The staff recommends to the Commissioner that this Registration Notice-only change be approved.

<b>IDEM Contact</b>
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- (a) Questions regarding this proposed permit can be directed to Bruce Farrar at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5401 or toll free at 1-800-451-6027 extension 4-5401.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: [www.idem.in.gov](http://www.idem.in.gov)

## Emission Calculations

### Summary of the Proposed Modifications

**Company Name:** Dexter Axle Company, Plant 39  
**Address City IN Zip:** 902 South Division Street, Bristol, IN 46205  
**Permit Number:** 039-27954-00070  
**Reviewer:** Bruce Farrar  
**Date:** May 19, 2009

Emission Unit	Limited PTE								
	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Single HAP	Combine HAPS
Surface Coating	0.53	0.53	0.53	-	-	2.83	-	Toluene 2.34	2.38
Saws and Routers	3.34	3.34	3.34	-	-	-	-	-	-
<b>Total</b>	<b>3.87</b>	<b>3.87</b>	<b>3.87</b>	<b>0.00</b>	<b>0.00</b>	<b>2.83</b>	<b>0.00</b>	<b>-</b>	<b>2.38</b>

**Emissions Calculations  
VOC and Particulate  
From Surface Coating Operations**

**Company Name: Dexter Axle Company, Plant 39  
Address City IN Zip: 902 South Division Street, Bristol, IN 46205  
Permit Number: 039-27954-00070  
Reviewer: Bruce Farrar  
Date: May 19, 2009**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (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>RV Door Production Line</b>																
SM5504	8.3	42.00%	0.0%	42.0%	0.0%	57.00%	0.00100	42.000	3.47	3.47	0.15	3.50	0.64	0.00	6.09	100%
3M Super 77	6.1	75.00%	10.0%	65.0%	0.0%	25.00%	0.00059	42.000	3.93	3.93	0.10	2.34	0.43	0.04	15.73	75%
Raabe Paint	6.5	83.00%	10.0%	73.0%	0.0%	8.00%	0.00030	42.000	4.72	4.72	0.06	1.43	0.26	0.02	58.95	75%
SM5504 (screen)	8.3	42.00%	0.0%	42.0%	0.0%	57.00%	0.00300	30.000	3.47	3.47	0.31	7.49	1.37	0.47	6.09	75%
										<b>Subtotal</b>	<b>0.61</b>	<b>14.76</b>	<b>2.69</b>	<b>0.53</b>		
<b>Access Doors</b>																
Glazing Sealant 1199	8.7	4.00%	0.0%	4.0%	0.0%	96.00%	0.01260	7.000	0.35	0.35	0.03	0.73	0.13	0.00	0.36	100%
Fasbond 30	9.2	2.00%	0.0%	2.0%	0.0%	98.00%	0.00014	7.000	0.18	0.18	0.00	0.00	0.00	0.00	0.19	100%
										<b>Subtotal</b>	<b>0.03</b>	<b>0.74</b>	<b>0.13</b>	<b>0.00</b>		

**TOTAL: 2.83 0.53**

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)  
 Total = Worst Coating + Sum of all solvents used

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)
<b>RV Door Production Line</b>							
SM5504	8.26	0.00100	42.000	0.00%	42.00%	0.00	0.64
3M Super 77	6.1	0.00059	42.000	0.00%	0.00%	0.00	0.00
Raabe Paint	6.50	0.00300	42.000	1.30%	9.23%	0.05	0.33
SM5504 (screen)	8.26	0.00300	30.000	0.00%	42.00%	0.00	1.37
<b>Access Doors</b>							
Glazing Sealant 1199	9.2	0.00014	7.000	0.00%	0.00%	0.00	0.00
Fasbond 30	8.7	0.01280	7.000	0.00%	0.00%	0.00	0.00

**TOTAL  
0.05 2.34 2.38**

**Total State Potential Emissions**

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



# Pounds of Shavings Report

## Emissions Calculations VOC and Particulate From Saws and Routers Operations\*

**Company Name:** Dexter Axle Company, Plant 39  
**Address City IN Zip:** 902 South Division Street, Bristol, IN 46205  
**039-27954-00070**  
**Bruce Farrar**  
**June 4, 2009**

DATE	SAW NAME or NUMBER	POUNDS OF DUST SHAVINGS	NUMBER OF PARTS CUT	lbs/pc	total potential per hr	PM Potential (5%) per hr	Tons/year
28-Apr	32	0.5	370	0.00	0.08	0.00	0.02
23-Apr	33	1.75	708	0.00	0.14	0.01	0.03
23-Apr	34	2.24	202	0.01	2.55	0.13	0.56
27-Apr	35	0.5	204	0.00	0.41	0.02	0.09
23-Apr	36	1	232	0.00	0.46	0.02	0.10
23-Apr	38	0.56	48	0.01	1.58	0.08	0.34
22-Apr	AD	0.5	62	0.01	1.17	0.06	0.26
23-Apr	CNC ROUTER	16	182	0.09	3.96	0.20	0.87
28-Apr	Door Bore	4	100	0.04	1.00	0.05	0.22
27-Apr	Manual Router	15	100	0.15	3.75	0.19	0.82
20-Apr	Multi-saw	3	458	0.01	0.16	0.01	0.04
<b>Totals</b>					<b>15.25</b>	<b>0.76</b>	<b>3.34</b>

### METHODOLOGY:

\* Source provide information from cuttings collected during a 5 day period.

Uncontrolled PTE of PM per hour = lbs PM per part \* parts per hour

Controlled PTE per hour = lbs PM per part \* parts per hour \*(1-.95) control efficiency

Controlled PTE per year = lbs PM per part \* parts per hour \*(1-.95) control efficiency \* 8760 hours \* 1/2000 pounds



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels Jr.*  
**Governor**

*Thomas W. Easterly*  
**Commissioner**

100 North Senate Avenue  
Indianapolis, Indiana 46204  
(317) 232-8603  
Toll Free (800) 451-6027  
[www.idem.IN.gov](http://www.idem.IN.gov)

## **SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED**

**TO:** Norm Michaels  
Dexter Axle Company Plant 39  
902 S. Division St.  
Bristol IN 46507

**DATE:** June 18, 2009

**FROM:** Matt Stuckey, Branch Chief  
Permits Branch  
Office of Air Quality

**SUBJECT:** Final Decision  
Registration-Notice Only Change  
039-27954-00070

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.

The final decision is being sent to you because our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person.

A copy of the final decision and supporting materials has also been sent via standard mail to:  
Pat Sapikowski Plant Mgr. Dexter Axle Company Plant 39  
OAQ Permits Branch Interested Parties List

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit. If you think you have received this document in error, please contact Joanne Smiddie-Brush of my staff at 1-800-451-6027 (ext 3-0185), or via e-mail at [jbrush@idem.IN.gov](mailto:jbrush@idem.IN.gov).

Final Applicant Cover letter.dot 11/30/07

# Mail Code 61-53

IDEM Staff	BLOCCHET 6/18/2009 Dexter Axle Company Plant 39 039-27954-00070 (final)		Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender	▶	Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handling Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee
											Remarks
1		Norm Michaels Dexter Axle Company Plant 39 902 S Division St Bristol IN 46507 (Source CAATS) <i>Via Confirmed Delivery</i>									
2		Pat Sapikowski Plant Mgr Dexter Axle Company Plant 39 902 S Division St Bristol IN 46507 (RO CAATS)									
3		Elkhart County Health Department 608 Oakland Avenue Elkhart IN 46516 (Health Department)									
4		Laurence A. McHugh Barnes & Thornburg 100 North Michigan South Bend IN 46601-1632 (Affected Party)									
5		Ms. Tonia Jones 13142 County Road 4 Middlebury IN 46540 (Affected Party)									
6		Bristol Town Council and Town Manager P.O. Box 122 Bristol IN 46507 (Local Official)									
7		Elkhart County Board of Commissioners 117 North Second St. Goshen IN 46526 (Local Official)									
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