



ARVIN EXHAUST
ORIGINAL EQUIPMENT MANUFACTURERS

081-12617-00020

August 8, 2000

RECEIVED

AUG 14 2000

State Of Indiana
Department Of Environmental Management
Office Of Air Management

Mr. Paul Dubenetzky
Office of Air Management
Indiana Department of Environmental Management
100 North Senate Avenue
PO Box 6015
Indianapolis, IN 46206-6015

Dear Mr. Dubenetzky:

I am writing to notify the agency of changes in Part 70 operating permits at two Arvin Exhaust facilities. The changes are summarized below. For the changes discussed, I have referenced the permit section listing the emission unit or activity **in bold type** prior to the description of the change.

Arvin Exhaust Franklin OP No.T081-7483-00020

Emission Units Removed

A.2 (1) As of February 2000 the Cadillac paint line ceased production and was removed from service. All components were disassembled, removed from the facility and either sold, scrapped, or discarded.

A. 2 (2) As of June 2000 the Mazda paint line ceased production and was removed from service. All components were disassembled, removed from the facility and either sold, scrapped or discarded.

Insignificant Activities Removed

As of January 2000, the following boilers or units were removed from service and dismantled:

A.3 (1)(c) One 3.6 MMBtu per hour Kewanee boiler

A.3 (1)(d) One 3.6 MMBtu per hour Cliff boiler (one still remains in service)

A.3 (1)(e) One 2.7 MMBtu per hour Johnston boiler

A.3 (2) One 58,753 gallon capacity No. 2 fuel oil storage tank with a fixed roof emitting less than 15 pounds per day of VOC.

A.3 (1)(a), A.3 (1)(b), A.3 (1)(f), A.3 (1)(g) All natural gas-fired dry-off ovens, bake ovens and parts washer combustion units associated with the above-mentioned paint lines were removed on the dates indicated above.

Administrative Changes

A change in personnel necessitates that we request a change of responsible officials. Our records indicate the last responsible official is Robert Elliot, Facility Manager. Arvin requests that this be changed to Tom Jones, Quality Manager.

Arvin Exhaust Gladstone OP No. T005-7481-00058

Emission Units Removed

A.2 (1)(a), A.2 (1)(b) As of November 1999, the GM Paint Line ceased production and was removed from service. All components were disassembled, removed from the facility and either sold, scrapped, or discarded.

Administrative Changes

A change in personnel necessitates that we request a change of responsible officials. Our records indicate the last responsible official is Ron Chitwood, Vice President, Ford Business unit. Arvin requests that this be changed to Joseba Perez Trillos, Director, North American Operations, Ford Business Group.

Based on our analysis of the information presented above, Arvin no longer meets the definition of a Part 70 "major source." Arvin therefore requests that the Franklin and Gladstone facilities be considered by IDEM for re-classification as minor sources and be granted minor source operating permits if applicable.

If you have questions, or require additional information, please telephone me at 812-379-3545. Thank you.

Sincerely,



Debra Chelf
Division Environmental Manager
ArvinMeritor, Exhaust Division

Cc: Jerry Kean, Franklin
Ric Deardorff, Gladstone

BILLING AND REFUND WORKSHEET

Permit Reviewer: Allen R. Davidson

Date: December 15, 2000

Filing Fee Bill

Permit Fee Bill

Refund

Tracking and Plant Id Number: 081-12617-00020

Date Application Received: August 14, 2000

Company Name: Arvin Exhaust, OEM, a division of Arvin Industries, Inc.

Responsible Official: Debra Chelf

Mailing Address: 1001 Hurricane Street
Franklin, IN 46131

Facility Description: an automobile component manufacturing plant

Credit for filing fee: Date rec'd: ___/___/___ receipt # _____ \$ _____

Credit for add'l fees: Date rec'd: ___/___/___ receipt # _____ \$ _____

Credit for add'l fees: Date rec'd: ___/___/___ receipt # _____ \$ _____

Total Credit: \$ 0

Permit Reviewer: Please check off applicable fees and total to the right.

approval fees

___ \$ 100 for exemption review or relocation \$ _____

___ \$ 600 for registration review \$ _____

___ \$ 500 for Part 70 minor source modification or FESOP minor permit revision \$ _____

___ \$ 600 for MSOP minor permit revision \$ _____

___ \$ 3,500 for construction permit review \$ _____

___ \$ 3,500 for significant source modification or significant permit revision \$ _____

___ \$ 6,000 for PSD or emissions offset permit review \$ _____

___ \$ 500 for interim construction permit \$ _____

___ \$ 3,000 for FESOP Permit Fee \$ _____

☒ ~~\$ 500~~ for SSOA Permit Fee or General Permit *no charge for 2-9-13 SSOA when "Option 1" selected* \$ 0

air quality impact study review

___ \$ 3,500 if applicant does analysis, or \$ _____

___ times \$6,000 per pollutant if OAM does analysis equals \$ _____

PSD BACT or LAER review

___ \$ 3,000 for 2 to 5 review analyses, or \$ _____

___ \$ 6,000 for 6 to 10 review analyses, or \$ _____

___ \$ 10,000 for 11 or more review analyses \$ _____

additional fees

___ times \$500 for each NSPS review equals \$ _____

___ times \$500 for each NESHAP review equals \$ _____

___ times \$600 for each 326 IAC 8-1-6 BACT review equals \$ _____

___ \$ 500 for a public hearing \$ _____

Total Permitting and Filing Fees Applicable \$ 0

Total Permitting and Filing Fees Applicable \$ _____

Total Credit \$ _____

Total Due \$ 0

Total Refund Due: \$ 0

Reason for Refund: _____

Refund to person, company, address: _____

Permit Reviewer _____ Date ___/___/___ Supervisor _____ Date ___/___/___



ARVIN EXHAUST
ORIGINAL EQUIPMENT MANUFACTURERS

12617 Draft TV ARD

November 20, 2000

Mr. Allen Davidson, P.E.
Permit Reviewer
Office of Air Management
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015

Dear Mr. Davidson:

Please find enclosed a Source Specific Operating Agreement (SSOA) application for Arvin Exhaust, OEM, a Division of Arvin Industries, Inc., Franklin, Indiana plant (Arvin). This application is in response to the NOD #1 sent to Arvin by the Indiana Department of Environmental Management (IDEM) on 6 September 2000.

Arvin has removed several emission sources from its Franklin Plant as outlined its letter of 8 August 2000. As a result of the removal of this equipment the Part 70 permit requirements are no longer applicable to the Franklin Plant. Arvin now only operates the equipment listed below at this plant.

Unit	Capacity	Fuel
Cleaver Brooks Boiler (B-4)	11.7 mmBtu/hr	Natural Gas or Fuel Oil #2
8 Air Make-up Units	2.225 mmBtu/hr each	Natural Gas
5 Air Make-up Units	165,000 Btu/hr each	Natural Gas
3 Air Make-up Units	750,000 Btu/hr each	Natural Gas

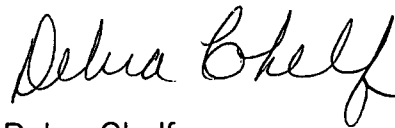
The combined capacity of these units is 32.6 million Btu per hour. If these units were to be run 8,760 hours per year it would result in a fuel consumption of 275.7 million cubic feet of natural gas. If the Cleaver Brooks boiler were to be run on fuel oil for the entire year, the total fuel

Mr. Allen Davidson
Office of Air Management
9 November 2000
Page 2

requirements for the plant would be 182.2 million cubic feet of natural gas and 732,100 gallons of fuel oil. Because fuel oil is rarely used and there is no onsite storage for fuel oil, Arvin is willing to accept a 12 month limit of 117,000 gallons of fuel oil in order to qualify for the SSOA External Combustion Option #1.

If you require any additional information regarding this response, please contact me at (812) 379-3545.

Sincerely,

A handwritten signature in cursive script, appearing to read "Debra Chelf".

Debra Chelf
Corporate Environmental
Manager
ArvinMeritor, Exhaust Division

cc: David Jordan, ERM
Dan Boucher, Franklin

attachments

SOURCE SPECIFIC OPERATING AGREEMENT
General Information

For Agency Use Only:

Application Tracking #:

Application Receipt Date:

A. General Source

1. Company Name: Arvin Exhaust, OEM, Division of Arvin Industries, Inc.

2. Mailing Address: 1001 Hurricane Street
Franklin, Indiana 46131

3. Street Address (if different):

4. Contact Person: Debra Chelf

5. Telephone No.: (812) 379-3545

6. Fax No. (optional): (812) 379-3861

7. County: Johnson

8. Standard Industrial Classification Code(s) (SIC): 3714

B. Responsible Official

1. Name: Tom Jones

2. Title: Quality Manager

3. Address: 1001 Hurricane Street
Franklin, Indiana 46131

4. Telephone No.: (317) 736-7111 X2770

5. Fax No. (optional):

C. Proposed SSOAs

- | | |
|---------------------------------------------------------------------------|------------------------------------------------------------------------------------|
| <input type="checkbox"/> Surface Coating or Graphic Arts, 326 IAC 2-9-2.5 | <input type="checkbox"/> Concrete Batch Operations, 326 IAC 2-9-9 |
| <input type="checkbox"/> Surface Coating or Graphic Arts, 326 IAC 2-9-3 | <input type="checkbox"/> Coal Mines and Coal Prep. Operations, 326 IAC 2-9-10 |
| <input type="checkbox"/> Woodworking Operations, 326 IAC 2-9-4 | <input type="checkbox"/> Automobile Refinishing Operations, 326 IAC 2-9-11 |
| <input type="checkbox"/> Abrasive Cleaning Operations, 326 IAC 2-9-5 | <input type="checkbox"/> Degreasing Operations, 326 IAC 2-9-12 |
| <input type="checkbox"/> Grain Elevator Operations, 326 IAC 2-9-6 | <input checked="" type="checkbox"/> External Combustion Operations, 326 IAC 2-9-13 |
| <input type="checkbox"/> Sand and Gravel Operations, 326 IAC 2-9-7 | <input type="checkbox"/> Internal Combustion Operations, 326 IAC 2-9-14 |
| <input type="checkbox"/> Crushed Stone Operations, 326 IAC 2-9-8 | |

D. Existing SSOA information


- | | |
|----------------------------------------------------------------|----|
| 1. Does the source currently have any existing SSOAs? (yes/no) | NO |
| 2. If you answered yes to 1, how many SSOAs are there? | |

Existing SSOA Type	Permit Number

E. Certification of Truth, Accuracy, and Completeness

Note: This certification must be signed by a responsible official (see instructions). Applications without a signed certification will be returned as complete.

I certify under penalty of law that, based on the information and belief formed after reasonable inquiry, the statements and information contained in this application are true, accurate and complete and the source covered by this application shall not emit any criteria pollutants or hazardous air pollutants (HAPs) in amounts greater than allowed by the specific requirements under 326 IAC 2-9.

Name (typed):	Tom Jones
Title:	Quality Manager
Signature:	
Date:	11/16/00

External Combustion Operation Under 326 IAC 2-9-13

Company Name: Arvin Exhaust

Plant ID#: 081-00020

Compliance

I have reviewed the requirements under 326 IAC 2-9-13 and have determined that the proposed operation qualifies for a Source Specific Operating Agreement (SSOA) under this rule. I will comply with the following the SSOA requirements under 326 IAC 2-9-13 by carrying out one set of the following requirements:

Option 1: External Combustion Operation that Does Not Require a SSOA Application

If the combined fuel use of all external combustion units to be approved under this SSOA type can be limited to any "one" of the categories listed in the table below, the applicant does not need to submit a SSOA application for this SSOA type, but must comply with the requirements of 326 IAC 2-9-13(b) and (c). (See instructions)

Operation Description			Limit
Single fuel	Maximum capacity: 0.3 to <10 MMBtu/hr	Natural gas-fired	1000 MMcf/yr
Single fuel	Maximum capacity: 10 to 100 MMBtu/hr	Natural gas-fired	714 MMcf/yr
Single fuel	Maximum capacity: >100 MMBtu/hr	Natural gas-fired	181 MMcf/yr
Single fuel		Fuel oil, #1 or #2	1408 kgal/yr
Single fuel		Fuel oil, #5 or #6	181 kgal/yr
Single fuel		Liquefied petroleum gas (LPG)	5263 MMcf/yr
Single fuel		Coal (bituminous and subbituminous)	786 tons/yr
Single fuel		Bark only	5882 tons/yr
Single fuel		Wood only	7352 tons/yr
Single fuel		Wood and Bark	7352 tons/yr
Dual fuel	Maximum capacity: 0.3 to <10 MMBtu/hr	Natural gas	976 MMcf/yr
		Fuel oil, #1 or #2	117 kgal/yr
Dual fuel	Maximum capacity: 10 to 100 MMBtu/hr	Natural gas	697 MMcf/yr
		Fuel oil, #1 or #2	117 kgal/yr
Dual fuel	Maximum capacity: >100 MMBtu/hr	Natural gas-fired	177 MMcf/yr
		Fuel oil, #1 or #2	117 kgal/yr
Dual fuel		Fuel oil, #1 or #2	1407 kgal/yr
	Maximum capacity: 0.3 to <10 MMBtu/hr	Natural gas	83 MMcf/yr
Dual fuel		Fuel oil, #1 or #2	1407 kgal/yr
	Maximum capacity: 10 to 100 MMBtu/hr	Natural gas	59 MMcf/yr
Dual fuel		Fuel oil, #1 or #2	1407 kgals/yr
	Maximum capacity: >100 MMBtu/hr	Natural gas	15 MMcf/yr
Dual fuel		Fuel oil, #1 and #2	1291 kgals/yr
		Fuel oil, #5 and #6	15 kgals/yr
Dual fuel		Coal (bituminous and subbituminous)	786 tons/yr
		Bark, wood, or wood and bark	490 tons/yr
Dual fuel		Bark, wood, or wood and bark	5858 tons/yr
		Coal (bituminous and subbituminous)	65 tons/yr

over...

Option 2: External Combustion Operation that Does Require a SSOA Application

If the combined fuel use of all external combustion units to be approved under this SSOA type cannot be limited to any "one" of the categories listed in Option 1 above, but can be limited to "one" of the categories listed in Table 1 of Option 2 below, the applicant can still qualify and obtain a SSOA under 326 IAC 2-9-13 by selecting the limit category of Table 1 the source will comply with, and checking the boxes of Table 2, demonstrating that the source can and will comply with the remaining requirements of 326 IAC 2-9-13.

Table 1			
Operation Description			Limit
Single fuel	Maximum capacity: 0.3 to <10 MMBtu/hr	Natural gas-fired	1600 MMcf/yr
Single fuel	Maximum capacity: 10 to 100 MMBtu/hr	Natural gas-fired	1142 MMcf/yr
Single fuel	Maximum capacity: >100 MMBtu/hr	Natural gas-fired	290 MMcf/yr
Single fuel		Fuel oil, #1 or #2	2253 kgal/yr
Single fuel		Fuel oil, #5 or #6	291 kgal/yr
Single fuel		Liquefied petroleum gas	8421 MMcf/yr
Single fuel		Coal (bituminous and subbituminous)	1258 tons/yr
Single fuel		Bark only	9411 tons/yr
Single fuel		Wood only	11764 tons/yr
Single fuel		Wood and Bark	11764 tons/yr
Dual fuel	Maximum capacity: 0.3 to <10 MMBtu/hr	Natural gas	1562 MMcf/yr
		Fuel oil, #1 or #2	187 kgal/yr
Dual fuel	Maximum capacity: 10 to 100 MMBtu/hr	Natural gas	1115 MMcf/yr
		Fuel oil, #1 or #2	187 kgal/yr
Dual fuel	Maximum capacity: >100 MMBtu/hr	Natural gas-fired	284 MMcf/yr
		Fuel oil, #1 or #2	187 kgal/yr
Dual fuel		Fuel oil, #1 or #2	2252 kgal/yr
	Maximum capacity: 0.3 to <10 MMBtu/hr	Natural gas	133 MMcf/yr
Dual fuel		Fuel oil, #1 or #2	2252 kgal/yr
	Maximum capacity: 10 to 100 MMBtu/hr	Natural gas	95 MMcf/yr
Dual fuel		Fuel oil, #1 or #2	2252 kgal/yr
	Maximum capacity: >100 MMBtu/hr	Natural gas	24 MMcf/yr
Dual fuel		Fuel oil, #1 and #2	2065 kgal/yr
		Fuel oil, #5 and #6	24 kgal/yr
Dual fuel		Coal (bituminous and subbituminous)	1258 tons/yr
		Bark, wood, or wood and bark	784 tons/yr
Dual fuel		Bark, wood, or wood and bark	9373 tons/yr
		Coal (bituminous and subbituminous)	104 tons/yr

Table 2	
	Comply with the limitation specified in Table 1 above.
	Limit the visible emissions from the units of the external combustion operation to less than or equal to twenty percent (20%) opacity in twenty-four consecutive readings in a six (6) minute period with the opacity being determined using 40 CFR 60, Appendix A, Method 9.
	Submit an annual certification that the source is in compliance with the requirements of the approved SSOA.
	Keep records of the hours operated for each combustion unit, records of the annual fuel usage for each combustion unit under the SSOA, and routine maintenance records.
	Report exceedance of any requirements of the SSOA within one (1) week of its occurrence, with the report containing any action taken to correct the exceedance and measures taken to reduce the emissions in order to comply with the established limits.



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live

Frank O'Bannon
Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.state.in.us/idem

September 6, 2000

Debra Chelf
Arvin Industries, Inc.
1531 13th Street, Box 3002
Columbus, IN 47202

Re: Minor Source Operating Permit Application
081-12617-00020
Notice of Deficiency #1

Dear Ms. Chelf:

Your request for a Minor Source Operating Permit (MSOP), for an automobile components manufacturing plant located at 1001 Hurricane Street, Franklin, IN 46131, was received on August 14, 2000. The application contains insufficient data for a complete review.

Your emission source appears as if it may qualify for a Source Specific Operating Agreement (SSOA) under 326 IAC 2-9-13, since the only remaining emission unit is a dual-fuel boiler. If you wish to pursue this option, please review the enclosed instructions and fill out the enclosed application.

If you do not wish to pursue a SSOA, a formal MSOP application will be required. You may download the operating permit application forms at <http://www.state.in.us/idem/oam/permits/apps/>.

In order to expedite the processing of your application, please provide your written response to this notice of deficiency (NOD) letter within thirty (30) days of receipt of this letter.

If you are unable to provide the requested information within thirty (30) days or if you have questions regarding this requested information, please contact me at 317-233-5693 or at 1-800-451-6027 ext. (3-5693). If the Office of Air Management (OAM) does not receive the additional information requested after thirty (30) days or you have not requested an extension of time to respond to the request, OAM may be forced to make a decision on your permit application based on the information currently submitted.

Note that time period accountability is suspended pending receipt by OAM of your completed response to this NOD #1, pursuant to IC 13-15-4-10. If additional questions arise as the review proceeds, OAM will contact you.

Please attach a copy of this letter to your response.

Sincerely,

Allen R. Davidson, P.E.
Permits Section
Office of Air Management

ARD
Enclosures: SSOA application & instructions

cc: File - Johnson County
Air Compliance - Marc Goldman

Mail Code 61-50

Arvin Industries - NOD #1

IDEM Staff:

GLORIA Y ELEY

September 6, 2000

Name and Address of Sender



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

Type of Mail:

CERTIFICATE OF MAILING ONLY

AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING

Line	Article Number	Name Address, Street and Post Office Address	Postage	Handling Charge	Adt. Value (if registered)	Insured Value	Due Sender If COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Debra Chelf Arvin Industries, Inc. 1531 13th Street, Box 3002 Columbus IN 47202										

Total Number of pieces Listed by Sender	Total Number of Pieces Received at Post Office	Postmaster, Per(Name of Receiving Employee)	<p>The full declaration of value is required on all domestic and international registered mail. the maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on insured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.</p>
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CHECK LIST FOR THE
ADMINISTRATIVE ADJUDICATION ACT (AAA)

Company Arvin Industries, Inc. ID # 081-12617-00020
County JOHNSON City COLUMBUS

Draft Public Notice

☐ Permanent County & Company AAA List checked
☐ No list ☐ Date ☐
☒ List attached 12-28-2000

1265 Exemption Qualifications, Registrations, SSOA, Interim and Final Permits

☐ Permanent County & Company AAA List checked
☐ No list ☐ Date ☐
☐ List attached

**Relocations, Name Change & Transfers, and PART 70, FESOP, SSOA and NSR
Amendments**

☐ Permanent County & Company AAA List checked
☐ No list ☐ Date ☐
☐ List attached

The following are concerned citizens. All correspondence needs to be sent Via Federal Express/Certified Mail.

61-50 GYE

Dr. Craig Moorman
Johnson County Health Department
86 W. Court St, Courthouse Annex
Franklin, IN 46131-2345

61-50 GYE

Johnson County Commissioners
5 East Jefferson
Franklin, IN 46131

61-50 GYE

Mr. Debra Chelf
Arvin Industries, Inc.
1531 13th Street, Box 3002
Columbus, IN 47202

Mail Code 61-50

IDEM Staff:

Gloria Yvonne Eley

Name and Address of Sender



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

Type of Mail:

CERTIFICATE OF MAILING ONLY

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HERE IF
USED AS
CERTIFICATE
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Line	Article Number	Name Address, Street and Post Office Address	Postage	Handling Charge	Ad. Value (if registered)	Insured Value	Due Sender if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Craig Moorman Johnson County Health Department 86 W. Court St, Courthouse Annex Franklin IN 46131-2345										
2		Johnson County Commissioners 5 East Jefferson Franklin IN 46131										
3		Debra Cheif Arvin Industries, Inc. 1531 13th Street, Box 3002 Columbus IN 47202										

Total Number of pieces Listed by Sender

Total Number of Pieces Received at Post Office

Postmaster, Per(Name of Receiving Employee)

The full declaration of value is required on all domestic and international registered mail. the maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50,000 per occurrence. The maximum indemnity payable on Express mtl merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See *Domestic Mail Manual* R900, S913, and S921 for limitations of coverage on insured and COD mail. See *International Mail Manual* for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.