Mr. William Roth
The Braun Corporation
P.O. Box 310
Winamac, IN 46996

Re: **131-10831**
First Significant Permit Modification to
Part 70 No.: T 131-7058-00017

Dear Mr. Roth:

The Braun Corporation was issued a permit on April 20, 1999 for motor vehicle conversions for enhanced access to the physically challenged. A letter requesting changes to this permit was received on April 6, 1999. Pursuant to the provisions of 326 IAC 2-7-12 a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of an increase production capacity, a change to low VOC coatings and the addition of an undercoating facility. In addition, the Seat Shop (Plant 3) and ParaTransit Van Line No. 1 were removed from service, and the Chrysler and Ford EnterVan lines will now be known as EnterVan Lines No. 1 and 2, with no reference to chassis manufacturer. To facilitate rule compliance, all production lines are now classified as separate emission units for assembly and surface coating.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

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 Patrick T. Brennan, c/o OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, at 516-691-3395 or in Indiana at 1-800-451-6027 (ext 516-691-3395).

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments
PTB/MES
cc: File - Pulaski County
U.S. EPA, Region V
Pulaski County Health Department
Air Compliance Section Inspector - Eric Courtright
Compliance Data Section - Mindy Jones
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

Mr. William Roth
The Braun Corporation
P.O. Box 310
Winamac, IN 46996

Re: 113-11117
First Administrative Amendment to
Part 70 131-7058-00017

Dear Mr. Roth:

The Braun Corporation was issued a permit on April 20, 1999 for motor vehicle conversion for enhanced access to the physically challenged. A letter requesting that the significant source modification 131-10831 be incorporated into the Part 70 permit was received on April 6, 1999. Pursuant to the provisions of 2-7-11 the permit is hereby administratively amended as follows (with new language bolded and old language stricken):

A.1 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

~~(a) One (1) general assembly area in Plant 3, described as follows:~~

~~(1) Plant 3 Seat Shop, identified as Seat Shop, with a maximum rating of 8 units per hour. This facility operates independently of all other surface coating facilities~~.

(~~b~~)~~Seven (7)~~ Thirteen (13) surface coating booths in Plant 4, described as follows:

(1) EnterVan Line No. 1 assembly area, identified as Enter/Assem. No. 1, with a maximum rating of 8.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.

(~~1~~) **(2)** ~~Chrysler~~ EnterVan **Line No. 1** refinishing surface coating booth, ~~identified as~~ **Enter/Ref. No. 1** ~~Chrysler~~, with a maximum rating of ~~0.083~~ **8.0** vans per ~~hour~~ **day**. Particulate emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID **Enter 1** ~~Chrysler~~. This facility operates independently of all other **refinishing** surface coating facilities.

(3) EnterVan Line No. 2 assembly area, identified as Enter/Assem. No. 2 with a maximum rating of 8.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.

(~~2~~)**(4)** ~~Ford~~ EnterVan Line No. 2 refinishing surface coating booth, ~~identified as~~ **Enter/Ref. No. 2** ~~Ford~~, with a maximum rating of ~~0.083~~ **8.0** vans per ~~hour~~ **day**. Particulate emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID **Enter 2.** ~~Ford~~. This facility operates independently of all other **refinishing** surface coating facilities.

~~(4) ParaTransit Van Line 1 Refinishing surface coating booth, identified as Para 1, with a maximum rating of 0.083 vans per hour. Particulate emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID Para 1. This facility operates independently of all other surface coating facilities.~~

(5) ParaTransit Van Line No. 2 assembly area, identified as Para/Assem. No. 2, with a maximum rating of 7.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.

~~(5)~~ **(6)** ParaTransit Van Line **No. 2** refinishing surface coating booth, identified as Para/**Ref**. 2, with a maximum rating of ~~0.083~~ **7.0** vans per **day** ~~hour~~. Particulate emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID Para 2. This facility operates independently of all other **refinishing** surface coating facilities.

(7) ParaTransit Van Line No. 3 assembly area, identified as Para/Assem. No. 3, with a maximum rating of 7.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.

~~(6)~~ (8) ParaTransit Van Line **No. 3** refinishing surface coating booth, identified as Para/**Ref** 3, with a maximum rating of ~~0.083~~ **7.0** vans per **day** ~~hour~~. Particulate emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID Para 3. This facility operates independently of all other **refinishing** surface coating facilities.

(9) ParaTransit Van Line No. 4 assembly area, identified as Para/Assem. No. 4, with a maximum rating of 7.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.

~~(7)~~ (10) ParaTransit Van Line **No. 4** refinishing surface coating booth, identified as Para/**Ref** 4, with a maximum rating of ~~0.083~~ **7.0** vans per **day** ~~hour~~. Particulate emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID Para 4. This facility operates independently of all other **refinishing** surface coating facilities.

(11) Bus/ParaTransit Van Line assembly area, identified as Bus/Assem., with a maximum rating of 7.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.

~~(3)~~ **(12)** ~~New~~ Bus/ParaTransit Van Line refinishing surface coating booth, identified as ~~New~~ Bus/**Ref** ~~Para~~, with a maximum rating of ~~0.83~~ **7.0** vans per **day** ~~hour~~. Particulate emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID #~~New~~ Bus/Pa**ra**. This facility operates independently of all other **refinishing** surface coating facilities.

(13) Undercoating operation, identified as UN1, with a maximum rating of 48.0 chassis per day. Emissions are fugitive. This facility operates independently of all other surface coating facilities

D.1 FACILITY OPERATION CONDITIONS - Surface Coating Booths

Facility Description [326 IAC 2-7-5(15)]
~~One (1) general assembly area in Plant 3, described as follows:~~

~~(1) Plant 3 Seat Shop, identified as Seat Shop, with a maximum rating of 8 units per hour. This facility operates independently of all other surface coating facilities~~.

~~Seven (7)~~ Thirteen (13) surface coating booths in Plant 4, described as follows:

(1) EnterVan Line No. 1 assembly area, identified as Enter/Assem. No. 1, with a maximum rating of 8.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.

(~~1~~) **(2)** ~~Chrysler~~ EnterVan **Line No. 1** refinishing surface coating booth, ~~identified as~~ **Enter/Ref. No. 1** ~~Chrysler~~, with a maximum rating of ~~0.083~~ **8.0** vans per ~~hour~~ **day**. Particulate emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID **Enter 1** ~~Chrysler~~. This facility operates independently of all other **refinishing** surface coating facilities.

(3) EnterVan Line No. 2 assembly area, identified as Enter/Assem. No. 2 with a maximum rating of 8.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.

(~~2~~)**(4)** ~~Ford~~ EnterVan Line No. 2 refinishing surface coating booth, ~~identified as~~ **Enter/Ref. No. 2** ~~Ford~~, with a maximum rating of ~~0.083~~ **8.0** vans per ~~hour~~ **day**. Particulate emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID **Enter 2.** ~~Ford~~. This facility operates independently of all other **refinishing** surface coating facilities.

~~(4) ParaTransit Van Line 1 Refinishing surface coating booth, identified as Para 1, with a maximum rating of 0.083 vans per hour. Particulate emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID Para 1. This facility operates independently of all other surface coating facilities.~~

(5) ParaTransit Van Line No. 2 assembly area, identified as Para/Assem. No. 2, with a maximum rating of 7.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.

~~(5)~~ **(6)** ParaTransit Van Line **No. 2** refinishing surface coating booth, identified as Para/**Ref**. 2, with a maximum rating of ~~0.083~~ **7.0** vans per **day** ~~hour~~. Particulate emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID Para 2. This facility operates independently of all other **refinishing** surface coating facilities.

(7) ParaTransit Van Line No. 3 assembly area, identified as Para/Assem. No. 3, with a maximum rating of 7.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.

~~(6)~~ (8) ParaTransit Van Line **No. 3** refinishing surface coating booth, identified as Para/**Ref** 3, with a maximum rating of ~~0.083~~ **7.0** vans per **day** ~~hour~~. Particulate emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID Para 3. This facility operates independently of all other **refinishing** surface coating facilities.

(9) ParaTransit Van Line No. 4 assembly area, identified as Para/Assem. No. 4, with a maximum rating of 7.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.

~~(7)~~ (10) ParaTransit Van Line **No. 4** refinishing surface coating booth, identified as Para/**Ref** 4, with a maximum rating of ~~0.083~~ **7.0** vans per **day** ~~hour~~. Particulate emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID Para 4. This facility operates independently of all other **refinishing** surface coating facilities.

(11) Bus/ParaTransit Van Line assembly area, identified as Bus/Assem., with a maximum rating of 7.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.

~~(3)~~ **(12)** ~~New~~ Bus/ParaTransit Van Line refinishing surface coating booth, identified as ~~New~~ Bus/**Ref** ~~Para~~, with a maximum rating of ~~0.83~~ **7.0** vans per **day** ~~hour~~. Particulate emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID #~~New~~ Bus/Pa**ra**. This facility operates independently of all other **refinishing** surface coating facilities.

(13) Undercoating operation, identified as UN1, with a maximum rating of 48.0 chassis per day. Emissions are fugitive. This facility operates independently of all other surface coating facilities

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

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

The PM emissions from the **Enter/Assem. No. 1, Enter/Ref. No. 1, Enter/Assem. No. 2, Enter/Ref. No. 2, Para/Assem. No 2, Para/Ref. No. 2, Para/Assem. No 3, Para/Ref. No. 3, Para/Assem. No. 4, Para/Ref. No. 4, Bus/Assem, Bus/Ref., and UN1** ~~Ford, Chrysler, New Bus/Para, Para 1, Para 2, Para 3, and Para 4~~ surface coating booths 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:

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

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8]

~~(a) Any change or modification that would cause VOC emissions from the application of adhesives from the Seat Shop, Ford, Chrysler, New Bus/Para, Para 1, Para 2, Para 3, and Para 4 surface coating booths to be greater than or equal to fifteen (15) pounds per day will require prior approval by IDEM, OAM.~~

~~(b) Pursuant to CP 131-6363, issued on May 14, 1997, any change or modification to any facility that may cause potential emissions of VOC to increase to 25 tons per year, shall require prior approval by OAM and use of Best Available Control Technology.~~

(a) **Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the average volatile organic compound (VOC) content of coatings applied to metal substrates in the EnterVan Line assembly areas (Enter/Assem. No. 1 and Enter/Assem. No. 2) and the Undercoating facility (UN1) shall be limited to 3.5 pounds of VOCs per gallon of coating less water for extreme performance coatings, as delivered to the applicator for any calender day.**

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

(b) **The application of adhesives to metal substrates in the ParaTransit Van and Bus/ParaTransit Van assembly areas (Para/Assem. No. 2, Para/Assem. No. 3, Para/Assem. No. 4 and Bus/Assem.) is exempt from 326 IAC 8-2-9 because potential emissions as delivered to the applicator are less than 15 lbs per day per facility. Any change or modification that would cause VOC emissions from these operations to be greater than or equal to fifteen (15) pounds per day per facility will require prior approval by IDEM, OAM.**

(c) **Contact adhesives in the ParaTransit Van and Bus/ParaTransit Van assembly areas (Para/Assem. No. 2, Para/Assem. No. 3, Para/Assem. No. 4 and Bus/Assem.) are applied to wood substrates and could be subject to 326 IAC 8-1-6, but are exempt because potential VOC emissions from each production facility are below 25.0 TPY. Any change or modification to any production facility that may cause potential emissions of VOC to increase to 25 tons per year, shall require prior approval by OAM and use of Best Available Control Technology.**

(d) **The refinishing surface coating booths (Enter/Ref. No. 1, Enter/Ref. No. 2, Para/Ref. No. 2, Para/Ref. No. 3, Para/Ref. No. 4 and Bus/Ref.) are exempt from the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) by 326 IAC 8-2-9(b)(3), because they are auto refinishing operations. These operations could be subject to 326 IAC 8-1-6 (BACT), but are exempt because each production facility has potential VOC emissions less than 25 tons per year. Any change or modification to any production facility that may cause potential emissions of VOC to increase to 25 tons per year, shall require prior approval by OAM and use of Best Available Control Technology.**

(e) **For the purposes of enforcing Conditions D.1.2(c) and D.1.2(d), a production facility is defined as one ParaTransit Van, EnterVan or Bus/ParaTransit Van production line, consisting of one assembly area and one refinishing surface coating booth. Each production line at the source operates independently of all other lines and is treated as a separate facility.**

(f) **The application of adhesives to wood substrates in the EnterVan, ParaTransit Van and Bus/ParaTransit Van assembly areas (Enter/Assem. No. 1, Enter/Assem. No. 2, Para/Assem. No. 2, Para/Assem. No. 3, Para/Assem. No. 4 and Bus/Assem.) is exempt from 326 IAC 8-2-12 because these coatings are applied to rough structural plywood on the bus and van floors, which are not considered furniture.**

D.1.5 Particulate Matter (PM)

The dry filters for PM control shall be in place at all times when the **Enter/Ref. No. 1, Enter/Ref. No. 2, Para/Ref. No. 2, Para/Ref. No. 3, Para/Ref. No. 4 and Bus/Ref**. ~~Ford, Chrysler, New Bus/Para, Para 1, Para 2, Para 3, and Para 4~~ surface coating booths are in operation.

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

D.1.6 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks **(Enter 1, Enter 2, Para 2, Para 3, Para 4 and Bus/Para)** ~~(Chrysler, Ford, #New Bus/Pa, Para 1, Para 2, Para 3 and Para 4)~~ while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

D.1.7 Record Keeping Requirements

(**a)** **To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly, and shall be complete and sufficient to establish compliance with the VOC content limits established in Condition D.1.2.**

(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 cleanup solvent usage for each month;

(4) The total VOC usage for each month; and

(5) The weight of VOCs emitted for each compliance period.

~~(a)~~ **(b)** To document compliance with Condition D.1.6, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Compliance Response Plan.

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

Operation of the new equipment incorporated into the Part 70 operating permit by this amendment may commence operation upon issuance of this approval. 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 Patrick T. Brennan, c/o OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, at 516-691-3395 or in Indiana at 1-800-451-6027 (ext 516-691-3395).

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments
PTB/MES
cc: File - Pulaski County
U.S. EPA, Region V
Pulaski County Health Department
Air Compliance Section Inspector - Eric Courtright
Compliance Data Section - Mindy Jones
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT
OFFICE OF AIR MANAGEMENT

The Braun Corporation
623 West 11th Street
Winamac, Indiana 46996

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 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.: **T131-7058-00017**	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: April 20, 1999

First Significant Permit Modification 131-10831	Pages Affected: 5, 6, 28, 28a, 29, 29a, 30
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

First Administrative Amendment 131-11117	Pages Affected: 5, 6, 28, 28a, 29, 29a, 30
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

PART 70 OPERATING PERMIT
OFFICE OF AIR MANAGEMENT

The Braun Corporation
623 West 11th Street
Winamac, Indiana 46996

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 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.: **T131-7058-00017**	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: April 20, 1999

First Significant Permit Modification 131-10831	Pages Affected: 5, 6, 28, 28a, 29, 29a, 30
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

TABLE OF CONTENTS

CERTIFICATION FORM

EMERGENCY/DEVIATION OCCURRENCE REPORTING FORM.

QUARTERLY COMPLIANCE MONITORING REPORT FORM

A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary motor vehicle conversion plant.

Responsible Official:	William R. Roth
Source Address:	623 West 11th Street, Winamac, IN 46996
Mailing Address:	P. O. Box 310, Winamac, IN 46996
Phone Number:	219-946-6153
SIC Code:	3711
County Location:	Pulaski
County Status:	Attainment for all criteria pollutants
Source Status:	Minor Source, under PSD Rules Major Source, Part 70 Permit Program

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

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

Thirteen (13) surface coating booths in Plant 4, described as follows:

(1) EnterVan Line No. 1 assembly area, identified as Enter/Assem. No. 1, with a maximum rating of 8.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.

(2) EnterVan Line No. 1 refinishing surface coating booth, identified as Enter/Ref. No. 1, with a maximum rating of 8.0 vans per day. Particulate emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID Enter 1. This facility operates independently of all other refinishing surface coating facilities.

(3) EnterVan Line No. 2 assembly area, identified as Enter/Assem. No. 2 with a maximum rating of 8.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.

(4) EnterVan Line No. 2 refinishing surface coating booth, identified as Enter/Ref. No. 2, with a maximum rating of 8.0 vans per day. Particulate emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID Enter 2. This facility operates independently of all other refinishing surface coating facilities.

(5) ParaTransit Van Line No. 2 assembly area, identified as Para/Assem. No. 2, with a maximum rating of 7.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.

(6) ParaTransit Van Line No. 2 refinishing surface coating booth, identified as Para/Ref. 2, with a maximum rating of 7.0 vans per day. Particulate emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID Para 2. This facility operates independently of all other refinishing surface coating facilities.

(7) ParaTransit Van Line No. 3 assembly area, identified as Para/Assem. No. 3, with a maximum rating of 7.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.

(8) ParaTransit Van Line No. 3 refinishing surface coating booth, identified as Para/Ref 3, with a maximum rating of 7.0 vans per day. Particulate emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID Para 3. This facility operates independently of all other refinishing surface coating facilities.

(9) ParaTransit Van Line No. 4 assembly area, identified as Para/Assem. No. 4, with a maximum rating of 7.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.

(10) ParaTransit Van Line No. 4 refinishing surface coating booth, identified as Para/Ref 4, with a maximum rating of 7.0 vans per day. Particulate emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID Para 4. This facility operates independently of all other refinishing surface coating facilities.

(11) Bus/ParaTransit Van Line assembly area, identified as Bus/Assem., with a maximum rating of 7.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.

(12) Bus/ParaTransit Van Line refinishing surface coating booth, identified as Bus/Ref, with a maximum rating of 7.0 vans per day. Particulate emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID Bus/Para. This facility operates independently of all other refinishing surface coating facilities.

(13) Undercoating operation, identified as UN1, with a maximum rating of 48.0 chassis per day. Emissions are fugitive. This facility operates independently of all other surface coating facilities.

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

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

(a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

(b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

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

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

(a) It is a major source, as defined in 326 IAC 2-7-1(22).

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

D.1 FACILITY OPERATION CONDITIONS - Surface Coating Booths

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

Thirteen (13) surface coating booths in Plant 4, described as follows:

(1) EnterVan Line No. 1 assembly area, identified as Enter/Assem. No. 1, with a maximum rating of 8.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.

(2) EnterVan Line No. 1 refinishing surface coating booth, identified as Enter/Ref. No. 1, with a maximum rating of 8.0 vans per day. Particulate emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID Enter 1. This facility operates independently of all other refinishing surface coating facilities.

(3) EnterVan Line No. 2 assembly area, identified as Enter/Assem. No. 2 with a maximum rating of 8.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.

(4) EnterVan Line No. 2 refinishing surface coating booth, identified as Enter/Ref. No. 2, with a maximum rating of 8.0 vans per day. Particulate emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID Enter 2. This facility operates independently of all other refinishing surface coating facilities.

(5) ParaTransit Van Line No. 2 assembly area, identified as Para/Assem. No. 2, with a maximum rating of 7.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.

(6) ParaTransit Van Line No. 2 refinishing surface coating booth, identified as Para/Ref. 2, with a maximum rating of 7.0 vans per day. Particulate emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID Para 2. This facility operates independently of all other refinishing surface coating facilities.

(7) ParaTransit Van Line No. 3 assembly surface area, identified as Para/Assem. No. 3, with a maximum rating of 7.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.

(8) ParaTransit Van Line No. 3 refinishing surface coating booth, identified as Para/Ref 3, with a maximum rating of 7.0 vans per day. Particulate emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID Para 3. This facility operates independently of all other refinishing surface coating facilities.

(9) ParaTransit Van Line No. 4 assembly area, identified as Para/Assem. No. 4, with a maximum rating of 7.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.

(10) ParaTransit Van Line No. 4 refinishing surface coating booth, identified as Para/Ref 4, with a maximum rating of 7.0 vans per day. Particulate emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID Para 4. This facility operates independently of all other refinishing surface coating facilities.

(11) Bus/ParaTransit Van Line assembly area, identified as Bus/Assem., with a maximum rating of 7.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.

(12) Bus/ParaTransit Van Line refinishing surface coating booth, identified as Bus/Ref, with a maximum rating of 7.0 vans per day. Particulate emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID Bus/Para. This facility operates independently of all other refinishing surface coating facilities.

(13) Undercoating operation, identified as UN1, with a maximum rating of 48.0 chassis per day. Emissions are fugitive. This facility operates independently of all other surface coating facilities.

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

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

The PM emissions from the Enter/Assem. No. 1, Enter/Ref. No. 1, Enter/Assem. No. 2, Enter/Ref. No. 2, Para/Assem. No. 2, Para/Ref. No. 2, Para/Assem. No. 3, Para/Ref. No. 3, Para/Assem. No. 4, Para/Ref. No. 4, Bus/Assem, Bus/Ref. and UN1 surface coating booths 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:

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

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8]

(a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the average volatile organic compound (VOC) content of coatings applied to metal substrates in the EnterVan Line assembly areas (Enter/Assem. No. 1 and Enter/Assem. No. 2) and the Undercoating facility (UN1) shall be limited to 3.5 pounds of VOCs per gallon of coating less water for extreme performance coatings, as delivered to the applicator for any calender day.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

(b) The application of adhesives to metal substrates in the ParaTransit Van and Bus/ParaTransit Van assembly areas (Para/Assem. No. 2, Para/Assem. No. 3, Para/Assem. No. 4 and Bus/Assem.) is exempt from 326 IAC 8-2-9 because potential emissions as delivered to the applicator are less than 15 pounds per day per facility. Any change or modification that would cause VOC emissions from these operations to be greater than or equal to fifteen (15) pounds per day per facility will require prior approval by IDEM, OAM.

(c) Contact adhesives in the ParaTransit Van and Bus/ParaTransit Van assembly areas (Para/Assem. No. 2, Para/Assem. No. 3, Para/Assem. No. 4 and Bus/Assem.) are applied to wood substrates and could be subject to 326 IAC 8-1-6, but are exempt because potential VOC emissions from each production facility are below 25.0 TPY. Any change or modification to any production facility that may cause potential emissions of VOC to increase to 25 tons per year, shall require prior approval by OAM and use of Best Available Control Technology.

(d) The refinishing surface coating booths (Enter/Ref. No. 1, Enter/Ref. No. 2, Para/Ref. No. 2, Para/Ref. No. 3, Para/Ref. No. 4 and Bus/Ref.) are exempt from the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) by 326 IAC 8-2-9(b)(3), because they are auto refinishing operations. These operations could be subject to 326 IAC 8-1-6 (BACT), but are exempt because each production facility has potential VOC emissions less than 25 tons per year. Any change or modification to any production facility that may cause potential emissions of VOC to increase to 25 tons per year, shall require prior approval by OAM and use of Best Available Control Technology.

(e) For the purposes of enforcing Conditions D.1.2(c) and D.1.2(d), a production facility is defined as one ParaTransit Van, EnterVan or Bus/ParaTransit Van production line, consisting of one assembly area and one refinishing surface coating booth. Each production line at the source operates independently of all other lines and is treated as a separate facility.

(f) The application of adhesives to wood substrates in the EnterVan, ParaTransit Van and Bus/ParaTransit Van assembly areas (Enter/Assem. No. 1, Enter/Assem. No. 2, Para/Assem. No. 2, Para/Assem. No. 3, Para/Assem. No. 4 and Bus/Assem.) is exempt from 326 IAC 8-2-12 because these coatings are applied to rough structural plywood on the bus and van floors, which are not considered furniture.

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.1.4 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limits specified in Condition D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.5 Particulate Matter (PM)

The dry filters for PM control shall be in place at all times when the Enter/Ref. No. 1, Enter/Ref. No. 2, Para/Ref. No. 2, Para/Ref. No. 3, Para/Ref. No. 4 and Bus/Ref. surface coating booths are in operation.

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

D.1.6 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (Enter 1, Enter 2, Para 2, Para 3, Para 4 and Bus/Para) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Compliance Response Plan.

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

D.1.7 Record Keeping Requirements

(a) To document compliance with Condition D.1.2 (b), the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken daily, and shall be complete and sufficient to establish compliance with the less than 15 pounds per day per assembly area VOC emission limits established for coating of metal substrates in Condition D.1.2 (b).

(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 total VOC usage per assembly area for each day; and

(4) The weight of VOCs emitted per assembly area for each day.

(b) To document compliance with Condition D.1.6, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Compliance Response Plan.

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

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for the First Significant Permit Modification to a Part 70 Operating Permit

Source Background and Description

Source Name:	**The Braun Corporation**
Source Location:	**623 West 11th Street, Winamac, Indiana 46996**
County:	**Pulaski**
SIC Code:	**3711**
Operation Permit No.:	**T 131-7058-00017**
Operation Permit Issuance Date:	**April 20, 1999**
Permit Modification No.:	**131-10831-00017**
Permit Reviewer:	**Patrick T. Brennan/MES**

The Office of Air Management (OAM) has reviewed a modification application from The Braun Corporation relating to the operation of a stationary motor vehicle conversion plant.

History

On April 6, 1999, The Braun Corporation submitted an application to the OAM requesting to increase production capacity of motor vehicle conversions for enhanced access to the physically challenged. The source was issued a Part 70 permit on April 20, 1999. In addition to a capacity increase, the source is also switching to low VOC coatings, adding an undercoating facility, and removing the seat shop (Plant 3) and ParaTransit Van Line No. 1 from service. The Chrysler and Ford EnterVan lines will now be known as EnterVan Lines No. 1 and 2, with no reference to chassis manufacturer. To facilitate rule compliance, all production lines are now classified as separate emission units for assembly and surface coating. This involved no physical change to the facilities.

Proposed Changes

The following changes have been made to the Part 70 operating permit. Deleted language appears as ~~strikeouts~~, new language is **bolded**.

1. The following changes have been made to the equipment list. The Seat Shop in Plant 3 and ParaTransit Van Line No. 1 in Plant 4 have been deleted. An undercoating facility has been added to Plant 4. The EnterVan lines are now named generically, and the assembly booths and refinishing booths are now treated as individual emission units. All production lines have increased capacity increase.

A.1 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

~~(a) One (1) general assembly area in Plant 3, described as follows:~~

~~(1) Plant 3 Seat Shop, identified as Seat Shop, with a maximum rating of 8 units per hour. This facility operates independently of all other surface coating facilities~~.

(~~b)Seven (7)~~ Thirteen (13) surface coating booths in Plant 4, described as follows:

(1) EnterVan Line No. 1 assembly area, identified as Enter/Assem. No. 1, with a maximum rating of 8.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.

(~~1~~) **(2)** ~~Chrysler~~ EnterVan **Line No. 1** refinishing surface coating booth, ~~identified as~~ **Enter/Ref. No. 1** ~~Chrysler~~, with a maximum rating of ~~0.083~~ **8.0** vans per ~~hour~~ **day**. Particulate emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID **Enter 1** ~~Chrysler~~. This facility operates independently of all other **refinishing** surface coating facilities.

(3) EnterVan Line No. 2 assembly area, identified as Enter/Assem. No. 2 with a maximum rating of 8.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.

(~~2~~)**(4)** ~~Ford~~ EnterVan Line No. 2 refinishing surface coating booth, identified as **Enter/Ref. No. 2** ~~Ford~~, with a maximum rating of ~~0.083~~ **8.0** vans per ~~hour~~ **day**. Particulate emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID **Enter 2.** ~~Ford~~. This facility operates independently of all other **refinishing** surface coating facilities.

~~(4) ParaTransit Van Line 1 Refinishing surface coating booth, identified as Para 1, with a maximum rating of 0.083 vans per hour. Particulate emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID Para 1. This facility operates independently of all other surface coating facilities.~~

(5) ParaTransit Van Line No. 2 assembly area, identified as Para/Assem. No. 2, with a maximum rating of 7.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.

~~(5)~~ **(6)** ParaTransit Van Line **No. 2** refinishing surface coating booth, identified as Para/**Ref**. 2, with a maximum rating of ~~0.083~~ **7.0** vans per **day** ~~hour~~. Particulate emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID Para 2. This facility operates independently of all other **refinishing** surface coating facilities.

(7) ParaTransit Van Line No. 3 assembly area, identified as Para/Assem. No. 3, with a maximum rating of 7.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.

~~(6)~~ (8) ParaTransit Van Line **No. 3** refinishing surface coating booth, identified as Para/**Ref** 3, with a maximum rating of ~~0.083~~ **7.0** vans per **day** ~~hour~~. Particulate emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID Para 3. This facility operates independently of all other **refinishing** surface coating facilities.

(9) ParaTransit Van Line No. 4 assembly area, identified as Para/Assem. No. 4, with a maximum rating of 7.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.

~~(7)~~ (10) ParaTransit Van Line **No. 4** refinishing surface coating booth, identified as Para/**Ref** 4, with a maximum rating of ~~0.083~~ **7.0** vans per **day** ~~hour~~. Particulate emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID Para 4. This facility operates independently of all other **refinishing** surface coating facilities.

(11) Bus/ParaTransit Van Line assembly area, identified as Bus/Assem., with a maximum rating of 7.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.

~~(3)~~ **(12)** ~~New~~ Bus/ParaTransit Van Line refinishing surface coating booth, identified as ~~New~~ Bus/**Ref** ~~Para~~, with a maximum rating of ~~0.83~~ **7.0** vans per **day** ~~hour~~. Particulate emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID #~~New~~ Bus/Pa**ra**. This facility operates independently of all other **refinishing** surface coating facilities.

(13) Undercoating operation, identified as UN1, with a maximum rating of 48.0 chassis per day. Emissions are fugitive. This facility operates independently of all other surface coating facilities

2. The equipment list in Section D.1 has been revised as follows:

D.1 FACILITY OPERATION CONDITIONS - Surface Coating Booths

Facility Description [326 IAC 2-7-5(15)]
~~One (1) general assembly area in Plant 3, described as follows:~~

~~(1) Plant 3 Seat Shop, identified as Seat Shop, with a maximum rating of 8 units per hour. This facility operates independently of all other surface coating facilities~~.

~~Seven (7)~~ Thirteen (13) surface coating booths in Plant 4, described as follows:

(1) EnterVan Line No. 1 assembly area, identified as Enter/Assem. No. 1, with a maximum rating of 8.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.

(~~1~~) **(2)** ~~Chrysler~~ EnterVan **Line No. 1** refinishing surface coating booth, ~~identified as~~ **Enter/Ref. No. 1** ~~Chrysler~~, with a maximum rating of ~~0.083~~ **8.0** vans per ~~hour~~ **day**. Particulate emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID **Enter 1** ~~Chrysler~~. This facility operates independently of all other **refinishing** surface coating facilities.

(3) EnterVan Line No. 2 assembly area, identified as Enter/Assem. No. 2 with a maximum rating of 8.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.

(~~2~~)**(4)** ~~Ford~~ EnterVan Line No. 2 refinishing surface coating booth, ~~identified as~~ **Enter/Ref. No. 2** ~~Ford~~, with a maximum rating of ~~0.083~~ **8.0** vans per ~~hour~~ **day**. Particulate emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID **Enter 2.** ~~Ford~~. This facility operates independently of all other **refinishing** surface coating facilities.

~~(4) ParaTransit Van Line 1 Refinishing surface coating booth, identified as Para 1, with a maximum rating of 0.083 vans per hour. Particulate emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID Para 1. This facility operates independently of all other surface coating facilities.~~

(5) ParaTransit Van Line No. 2 assembly area, identified as Para/Assem. No. 2, with a maximum rating of 7.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.

(~~5~~) **(6)** ParaTransit Van Line **No. 2** refinishing surface coating booth, identified as Para/**Ref**. 2, with a maximum rating of ~~0.083~~ **7.0** vans per **day** ~~hour~~. Particulate emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID Para 2. This facility operates independently of all other **refinishing** surface coating facilities.

(7) ParaTransit Van Line No. 3 assembly area, identified as Para/Assem. No. 3, with a maximum rating of 7.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.

(~~6~~) (8) ParaTransit Van Line **No. 3** refinishing surface coating booth, identified as Para/**Ref** 3, with a maximum rating of ~~0.083~~ **7.0** vans per **day** ~~hour~~. Particulate emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID Para 3. This facility operates independently of all other **refinishing** surface coating facilities.

(9) ParaTransit Van Line No. 4 assembly area, identified as Para/Assem. No. 4, with a maximum rating of 7.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.

~~(7)~~ (10) ParaTransit Van Line **No. 4** refinishing surface coating booth, identified as Para/**Ref** 4, with a maximum rating of ~~0.083~~ **7.0** vans per **day** ~~hour~~. Particulate emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID Para 4. This facility operates independently of all other **refinishing** surface coating facilities.

(11) Bus/ParaTransit Van Line assembly area, identified as Bus/Assem., with a maximum rating of 7.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.

~~(3)~~ **(12)** ~~New~~ Bus/ParaTransit Van Line refinishing surface coating booth, identified as ~~New~~ Bus/**Ref** ~~Para~~, with a maximum rating of ~~0.83~~ **7.0** vans per **day** ~~hour~~. Particulate emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID #~~New~~ Bus/Par**a**. This facility operates independently of all other **refinishing** surface coating facilities.

(13) Undercoating operation, identified as UN1, with a maximum rating of 48.0 chassis per day. Emissions are fugitive. This facility operates independently of all other surface coating facilities

3. Section D.1.1 has been revised to reflect the new surface coating booth identification.

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

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

The PM emissions from the **Enter/Assem. No. 1, Enter/Ref. No. 1, Enter/Assem. No. 2, Enter/Ref. No. 2, Para/Assem. No 2, Para/Ref. No. 2, Para/Assem. No 3, Para/Ref. No. 3, Para/Assem. No. 4, Para/Ref. No. 4, Bus/Assem, Bus/Ref., and UN1** ~~Ford, Chrysler, New Bus/Para, Para 1, Para 2, Para 3, and Para 4~~ surface coating booths 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:

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

4. Operations applying coatings to metal substrates in the EnterVan assembly areas (Enter/Assem. No. 1and Enter/Assem. No. 2) have switched to adhesive coatings which are compliant with 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations). Coatings applied in the new undercoating operation are compliant with 326 IAC 8-2-9. Operations applying coatings to metal substrates in the ParaTransit Van and Bus/ParaTransit Van assembly areas (Para/Assem. No. 2, Para/Assem. No. 3, Para/Assem. No. 4 and Bus/Assem.) have potential VOC emissions less than 15 lbs per day, and are exempt from 326 IAC 8-2-9 and the associated reporting requirements. In addition, the Seat Shop and Paratransit Van Line No. 1 have been eliminated.

Accordingly, Section D.1.2 (a) has been revised as follows:

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8]

~~(a) Any change or modification that would cause VOC emissions from the application of adhesives from the Seat Shop, Ford, Chrysler, New Bus/Para, Para 1, Para 2, Para 3, and Para 4 surface coating booths to be greater than or equal to fifteen (15) pounds per day will require prior approval by IDEM, OAM.~~

~~(b) Pursuant to CP 131-6363, issued on May 14, 1997, any change or modification to any facility that may cause potential emissions of VOC to increase to 25 tons per year, shall require prior approval by OAM and use of Best Available Control Technology.~~

(a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the average volatile organic compound (VOC) content of coatings applied to metal substrates in the EnterVan Line assembly areas (Enter/Assem. No. 1 and Enter/Assem. No. 2) and the Undercoating facility (UN1) shall be limited to 3.5 pounds of VOCs per gallon of coating less water for extreme performance coatings, as delivered to the applicator for any calender day.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

(b) The application of adhesives to metal substrates in the ParaTransit Van and Bus/ParaTransit Van assembly areas (Para/Assem. No. 2, Para/Assem. No. 3, Para/Assem. No. 4 and Bus/Assem.) is exempt from 326 IAC 8-2-9 because potential emissions as delivered to the applicator are less than 15 lbs per day per facility. Any change or modification that would cause VOC emissions from these operations to be greater than or equal to fifteen (15) pounds per day per facility will require prior approval by IDEM, OAM.

(c) Contact adhesives in the ParaTransit Van and Bus/ParaTransit Van assembly areas (Para/Assem. No. 2, Para/Assem. No. 3, Para/Assem. No. 4 and Bus/Assem.) are applied to wood substrates and could be subject to 326 IAC 8-1-6, but are exempt because potential VOC emissions from each production facility are below 25.0 TPY. Any change or modification to any production facility that may cause potential emissions of VOC to increase to 25 tons per year, shall require prior approval by OAM and use of Best Available Control Technology.

(d) The refinishing surface coating booths (Enter/Ref. No. 1, Enter/Ref. No. 2, Para/Ref. No. 2, Para/Ref. No. 3, Para/Ref. No. 4 and Bus/Ref.) are exempt from the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) by 326 IAC 8-2-9(b)(3), because they are auto refinishing operations. These operations could be subject to 326 IAC 8-1-6 (BACT), but are exempt because each production facility has potential VOC emissions less than 25 tons per year. Any change or modification to any production facility that may cause potential emissions of VOC to increase to 25 tons per year, shall require prior approval by OAM and use of Best Available Control Technology.

(e) For the purposes of enforcing Conditions D.1.2(c) and D.1.2(d), a production facility is defined as one ParaTransit Van, EnterVan or Bus/ParaTransit Van production line, consisting of one assembly area and one refinishing surface coating booth. Each production line at the source operates independently of all other lines and is treated as a separate facility.

(f) The application of adhesives to wood substrates in the EnterVan, ParaTransit Van and Bus/ParaTransit Van assembly areas (Enter/Assem. No. 1, Enter/Assem. No. 2, Para/Assem. No. 2, Para/Assem. No. 3, Para/Assem. No. 4 and Bus/Assem.) is exempt from 326 IAC 8-2-12 because these coatings are applied to rough structural plywood on the bus and van floors, which are not considered furniture.

5. Sections D.1.5 and D.1.6 (a) have been revised to reflect the new surface coating booth and stack identification.

D.1.5 Particulate Matter (PM)

The dry filters for PM control shall be in place at all times when the **Enter/Ref. No. 1, Enter/Ref. No. 2, Para/Ref. No. 2, Para/Ref. No. 3, Para/Ref. No. 4 and Bus/Ref**. ~~Ford, Chrysler, New Bus/Para, Para 1, Para 2, Para 3, and Para 4~~ surface coating booths are in operation.

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

D.1.6 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks **(Enter 1, Enter 2, Para 2, Para 3, Para 4 and Bus/Para)** ~~(Chrysler, Ford, #New Bus/Pa, Para 1, Para 2, Para 3 and Para 4)~~ while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

6. Condition D.1.7 has been modified to include VOC recordkeeping to establish compliance with the revised Condition D.1.2.

D.1.7 Record Keeping Requirements

(**a**) **To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly, and shall be complete and sufficient to establish compliance with the VOC content limits established in Condition D.1.2.**

(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 cleanup solvent usage for each month;

(4) The total VOC usage for each month; and

(5) The weight of VOCs emitted for each compliance period.

~~(a)~~ **(b)** To document compliance with Condition D.1.6, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Compliance Response Plan.

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

Existing Approvals

The source was issued a Part 70 Operating Permit T 131-7058-00017 on April 20, 1999.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

The stack ID's have been changed to reflect the new source configuration. There are no new stacks.

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (EF)
Enter 1	Surface Coating	30.5	2.50	11,700	68
Enter 2	Surface Coating	30.5	2.50	11,700	68
Para 2	Surface Coating	31.5	4.51	29,300	68
Para 3	Surface Coating	31.5	4.51	29,300	68
Para 4	Surface Coating	31.5	4.51	29,300	68
Bus/Pa	Surface Coating	31.5	4.51	29,300	68

Recommendation

The staff recommends to the Commissioner that the Significant Permit Modification 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 application for the purposes of this review was received on April 6, 1999.

Emission Calculations

See Appendix A, pages 1 through 6, of this document for detailed emissions calculations.

Potential To Emit

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

The proposed modification includes use of reformulated coatings for all processes, as well as a capacity increase. The potential to emit for the entire source, after the source modification, is as follows:

Pollutant	Potential To Emit (tons/year)
PM	46.0
PM_{10}	46.0
SO_2	0.0
VOC	156
CO	0.0
NO_X	0.0

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

HAPs	Potential To Emit (tons/year)
Toluene	greater than 10, less than 25
Hexane	less than 10
Xylene	less than 10
MEK	less than 10
MIBK	less than 10
Glycol Ethers	less than 10
Ethyl Benzene	less than 10
TOTAL	greater than 25

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC and particulate matter are equal to or greater than 25 tons per year. Therefore, the source requires a significant source modification to the existing Part 70 permit under the provisions of 326 IAC 2-7.

(b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source requires a significant source modification to the existing Part 70 permit under the provisions of 326 IAC 2-7.

(c) Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

No previous emissions data has been received from the source.

Source Status

Modified Source PSD, Part 70 or FESOP Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited) are as follows:

Pollutant	**Emissions** (ton/yr)
PM	46.0
PM_{10}	46.0
SO_2	0.0
VOC	156
CO	0.0
NO_X	0.0
Single HAP	20.3
Combination HAPS	38.6

(a) This modified source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories.

Proposed Modification

PTE from the proposed modification (based on 8,760 hours of operation per year at rated capacity including enforceable emission control and production limit, where applicable):

Pollutant	**PM** (tons/yr)	**PM_{10}** (tons/yr)	**SO_2** (tons/yr)	**VOC** (tons/yr)	**CO** (tons/yr)	**NO_X** (tons/yr)
Proposed Modification	46.0	46.0	0.00	156	0.00	0.00
PSD Threshold Level	250	250	250	250	250	250

This modification to an existing minor stationary source is not major because the emission increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

County Attainment Status

The source is located in Pulaski County.

Pollutant	Status
PM_{10}	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_X) are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Pulaski County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

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

This source located in Pulaski County is a minor source under PSD Rules since none of the criteria pollutants have a potential to be emitted at a rate of two hundred and fifty (250) tons per year or greater and it is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2.

326 IAC 2-6 (Emission Reporting)

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

326 IAC 5-1 (Opacity)

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

(a) Opacity shall not exceed an average of forty percent (40%) 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.

State Rule Applicability - Individual Facilities

The applicability of the OAM rules governing surface coating operations is summarized in the following table for the various assembly areas and spray booths.

Facility	Applicable Rule(s)
EnterVan Line No. 1 Assembly (Enter/Assem. No. 1)	326 IAC 6-3-2 applies for overspray 326 IAC 8-2-9 applies for metal substrates (compliant coatings) 326 IAC 8-1-6 does not apply for wood and rubber substrates, (VOC PTE less than 25 TPY) 326 IAC 8-2-12 does not apply (wood substrates are not furniture)
EnterVan Line No. 1 Refinishing (Enter/Ref. No. 1)	326 IAC 6-3-2 applies for overspray 326 IAC 8-2-2 does not apply (not automobile assembly) 326 IAC 8-2-9 does not apply (automobile refinishing) 326 IAC 8-1-6 does not apply (VOC PTE less than 25 TPY)
EnterVan Line No. 2 Assembly (Enter/Assem. No. 2)	326 IAC 6-3-2 applies for overspray 326 IAC 8-2-9 applies for metal substrates (compliant coatings) 326 IAC 8-1-6 does not apply for wood and rubber substrates, (VOC PTE less than 25 TPY) 326 IAC 8-2-12 does not apply (wood substrates are not furniture)
EnterVan Line No. 2 Refinishing (Enter/Ref. No. 2)	326 IAC 6-3-2 applies for overspray 326 IAC 8-2-2 does not apply (not automobile assembly) 326 IAC 8-2-9 does not apply (automobile refinishing) 326 IAC 8-1-6 does not apply (VOC PTE less than 25 TPY)
ParaTransit Van Line No. 2 Assembly (Para/Assem. No. 2)	326 IAC 6-3-2 applies for overspray 326 IAC 8-2-9 does not apply for metal substrates (VOC PTE less than 15 lbs per day) 326 IAC 8-1-6 does not apply for wood and rubber substrates, (VOC PTE less than 25 TPY) 326 IAC 8-2-12 does not apply (wood substrates are not furniture)
ParaTransit Van Line No. 2 Refinishing (Para/Ref. No. 2)	326 IAC 6-3-2 applies for overspray 326 IAC 8-2-2 does not apply (not automobile assembly) 326 IAC 8-2-9 does not apply (automobile refinishing) 326 IAC 8-1-6 does not apply (VOC PTE less than 25 TPY)
ParaTransit Van Line No. 3 Assembly (Para/Assem. No. 3)	326 IAC 6-3-2 applies for overspray 326 IAC 8-2-9 does not apply for metal substrates (VOC PTE less than 15 lbs per day) 326 IAC 8-1-6 does not apply for wood and rubber substrates, (VOC PTE less than 25 TPY) 326 IAC 8-2-12 does not apply (wood substrates are not furniture)

Facility	Applicable Rule(s)
ParaTransit Van Line No. 3 Refinishing (Para/Ref. No. 3)	326 IAC 6-3-2 applies for overspray 326 IAC 8-2-2 does not apply (not automobile assembly) 326 IAC 8-2-9 does not apply (automobile refinishing) 326 IAC 8-1-6 does not apply (VOC PTE less than 25 TPY)
ParaTransit Van Line No. 2 Assembly (Para/Assem. No. 4)	326 IAC 6-3-2 applies for overspray 326 IAC 8-2-9 does not apply for metal substrates (VOC PTE less than 15 lbs per day) 326 IAC 8-1-6 does not apply for wood and rubber substrates, (VOC PTE less than 25 TPY) 326 IAC 8-2-12 does not apply (wood substrates are not furniture)
ParaTransit Van Line No. 4 Refinishing (Para/Ref. No. 4)	326 IAC 6-3-2 applies for overspray 326 IAC 8-2-2 does not apply (not automobile assembly) 326 IAC 8-2-9 does not apply (automobile refinishing) 326 IAC 8-1-6 does not apply (VOC PTE less than 25 TPY)
Bus/ParaTransit Van Line Assembly (Bus/Assem.)	326 IAC 6-3-2 applies for overspray 326 IAC 8-2-9 does not apply for metal substrates (VOC PTE less than 15 lbs per day) 326 IAC 8-1-6 does not apply for wood and rubber substrates, (VOC PTE less than 25 TPY) 326 IAC 8-2-12 does not apply (wood substrates are not furniture)
Bus/ParaTransit Van Line Refinishing (Bus/Ref.)	326 IAC 6-3-2 applies for overspray 326 IAC 8-2-2 does not apply (not automobile assembly) 326 IAC 8-2-9 does not apply (automobile refinishing) 326 IAC 8-1-6 does not apply (VOC PTE less than 25 TPY)
Undercoating Facility (UN1)	326 IAC 6-3-2 applies for overspray 326 IAC 8-2-9 applies for metal substrates (compliant coatings)

326 IAC 6-3-2 (Process Operations)

The particulate matter (PM) overspray from the Enter/Assem. No. 1, Enter/Ref. No. 1, Enter/Assem. No. 2, Enter/Ref. No. 2, Para/Assem. No. 2, Para/Ref. No. 2, Para/Assem. No. 3, Para/Ref. No. 3, Para/Assem. No. 4, Para/Ref. No. 4, Bus/Assem., Bus/Ref. and UN1 surface coating facilities shall be limited by the following:

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

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

Compliance with this rule is shown by use of dry filters for overspray control.

326 IAC 8-1-6 (BACT) and 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating)

Because the surface coating operations in the bus and van assembly areas (Enter/Assem. No. 1, Enter/Assem. No. 2, Para/Assem. No. 2, Para/Assem. No. 3, Para/Assem. No. 4 and Bus/Assem.) apply coatings to wood and rubber substrates, 326 IAC 8-1-6 could be applicable. However, because potential VOC emissions from each production facility are below 25.0 TPY, this rule does not apply. For the purposes of this rule, a production facility is defined as one ParaTransit Van,

EnterVan or Bus/ParaTransit line, consisting of one assembly area and one refinishing surface coating booth. Each production line at the source operates independently of all other lines and is treated as a separate facility.

The wood substrates coated are CDX rough structural plywood on the bus and van floors, not furniture. Therefore, 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating) is not applicable.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

(a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coatings delivered to the applicators when coating metal substrates in the EnterVan Line assembly areas (Enter/Assem. No. 1 and Enter/Assem. No. 2) and the Undercoating facility (UN1) shall be limited to 3.5 pounds of VOCs per gallon of coating less water for extreme performance coatings.

Based on the MSDS submitted by the source and calculations made, these facilities are in compliance with this requirement.

(b) The only coating applied to metal in the ParaTransit Van and Bus/ParaTransit Van assembly areas (Para/Assem. No. 2, Para/Assem. No. 3, Para/Assem. No. 4 and Bus/Assem.) is the RTV sealant. Each facility has actual and potential VOC emissions from RTV sealant application of less than 15.0 lbs per day, and is therefore exempt from the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations). Because potential emissions are less than 15 lbs per day, these facilities are also exempt from reporting requirements.

Contact adhesives in the ParaTransit Van and Bus/ParaTransit Van assembly areas (Para/Assem. No. 2, Para/Assem. No. 3, Para/Assem. No. 4 and Bus/Assem.) are applied to wood substrates and could be subject to 326 IAC 8-1-6, but are exempt because potential VOC emissions from each production facility are below 25.0 TPY. The wood substrates coated are CDX rough structural plywood on the bus and van floors, and are not considered furniture. Therefore, 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating) is not applicable.

(c) The use of coatings for automobile refinishing in the refinishing surface coating booths (Enter/Ref. No. 1, Enter/Ref. No. 2, Para/Ref. No. 2, Para/Ref. No. 3, Para/Ref. No. 4 and Bus/Ref.) are exempt from the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) by 326 IAC 8-2-9(b)(3). These operations could be subject to 326 IAC 8-1-6 (BACT), but are exempt because each production facility has potential VOC emissions less than 25 tons per year. These operations are not subject to 326 IAC 8-2-2 because they are not automobile assembly.

Compliance Requirements

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

Compliance Determination Requirements in permit Section D 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 in permit Section D. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

(1) The Enter/Ref. No. 1, Enter/Ref. No. 2, Para/Ref. No. 2, Para/Ref. No. 3, Para/Ref. No. 4 and Bus/Ref. surface coating booths have applicable compliance monitoring conditions as specified below:

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray while one or more of the booths are in operation.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the dry filters for the surface coating operations must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations).

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

(a) This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the 1990 Clean Air Act Amendments.

(b) See Appendix A, pages 3 through 6, of this document for detailed air toxic calculations.

Conclusion

The operation of this stationary motor vehicle conversion plant shall be subject to the conditions of the attached proposed Part 70 Significant Permit Modification No. 131-10831-00017.

Indiana Department of Environmental Management
Office of Air Management

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

Source Name:	**The Braun Corporation**
Source Location:	**623 West 11th Street, Winamac, Indiana 46996**
County:	**Pulaski**
SIC Code:	**3711**
Operation Permit No.:	**T 131-7058-00017**
Operation Permit Issuance Date:	**April 20, 1999**
Permit Modification No.:	**131-10831-00017**
Permit Reviewer:	**Patrick T. Brennan/MES**

On June 30, 1999, the Office of Air Management (OAM) had a notice published in the Pulaski County Journal, Winamac, Indiana, stating that The Braun Corporation had applied for a Significant Modification to the existing Part 70 Operating Permit to operate a stationary motor vehicle conversion plant. The notice also stated that OAM proposed to issue a Part 70 Operating Permit Significant Permit Modification for this operation, and provided information on how the public could review the proposed Part 70 Operating Permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this Part 70 Operating Permit Significant Permit Modification should be issued as proposed.

On July 7, 1999, Ken DeRolf of DECA submitted comments on the proposed Part 70 Operating Permit Significant Permit Modification. The comments and OAM responses are as follows: The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded)**:

Note: Comments 1 through 12 all deal with the same issue and are addressed in one combined response.

Comment 1:

Condition A.2 (2), Page 5 of 37. Please revise the second sentence to read *"All emissions shall be exhausted at Stack ID Enter 1."* Reason - The application conclusively showed that the process complies with all applicable requirements without benefit of add-on emission controls. Therefore, any reference to *"Particulate emissions shall be controlled by dry filters..."* is invalid and misleading.

Comment 2:

Condition A.2 (4), Page 5 of 37. Please revise the second sentence to read "All emissions shall be exhausted at Stack ID Enter 2." Reason - The application conclusively showed that the process complies with all applicable requirements without benefit of add-on emission controls. Therefore, any reference to *"Particulate emissions shall be controlled by dry filters..."* is invalid and misleading.

Comment 3:

Condition A.2 (6), Page 5 of 37. Please revise the second sentence to read *"All emissions shall be exhausted at Stack ID Para 2."* Reason - The application conclusively showed that the process complies with all applicable requirements without benefit of add-on emission controls. Therefore, any reference to *"Particulate emissions shall be controlled by dry filters..."* is invalid and misleading.

Comment 4:

Condition A.2 (8), Page 6 of 37. Please revise the second sentence to read *"All emissions shall be exhausted at Stack ID Para 3."* Reason - The application conclusively showed that the process complies with all applicable requirements without benefit of add-on emission controls. Therefore, any reference to *"Particulate emissions shall be controlled by dry filters..."* is invalid and misleading.

Comment 5:

Condition A.2 (10), Page 6 of 37. Please revise the second sentence to read *"All emissions shall be exhausted at Stack ID Para 4."* Reason - The application conclusively showed that the process complies with all applicable requirements without benefit of add-on emission controls. Therefore, any reference to *"Particulate emissions shall be controlled by dry filters..."* is invalid and misleading.

Comment 6:

Condition A.2 (12), Page 5 of 37. Please revise the second sentence to read *"All emissions shall be exhausted at Stack ID Bus/Para."* Reason - The application conclusively showed that the process complies with all applicable requirements without benefit of add-on emission controls. Therefore, any reference to *"Particulate emissions shall be controlled by dry filters..."* is invalid and misleading.

Comment 7:

Description D.1 (2), Page 28 of 37. Please revise the second sentence to read *"All emissions shall be exhausted at Stack ID Enter 1."* Reason - The application conclusively showed that the process complies with all applicable requirements without benefit of add-on emission controls. Therefore, any reference to *"Particulate emissions shall be controlled by dry filters..."* is invalid and misleading.

Comment 8:

Description D.1 (4), Page 28 of 37. Please revise the second sentence to read *"All emissions shall be exhausted at Stack ID Enter 2."* Reason - The application conclusively showed that the process complies with all applicable requirements without benefit of add-on emission controls. Therefore, any reference to *"Particulate emissions shall be controlled by dry filters..."* is invalid and misleading.

Comment 9:

Description D.1 (6), Page 28 of 37. Please revise the second sentence to read *"All emissions shall be exhausted at Stack ID Para 2."* Reason - The application conclusively showed that the process complies with all applicable requirements without benefit of add-on emission controls. Therefore, any reference to *"Particulate emissions shall be controlled by dry filters..."* is invalid and misleading.

Comment 10:

Description D.1 (8), Page 28 of 37. Please revise the second sentence to read "All emissions shall be exhausted at Stack ID Para 3." Reason - The application conclusively showed that the process complies with all applicable requirements without benefit of add-on emission controls. Therefore, any reference to *"Particulate emissions shall be controlled by dry filters..."* is invalid and misleading.

Comment 11:

Description D.1 (10), Page 28 of 37. Please revise the second sentence to read *"All emissions shall be exhausted at Stack ID Para 4."* Reason - The application conclusively showed that the process complies with all applicable requirements without benefit of add-on emission controls. Therefore, any reference to *"Particulate emissions shall be controlled by dry filters..."* is invalid and misleading.

Comment 12:

Description D.1 (12), Page 28 of 37. Please revise the second sentence to read *"All emissions shall be exhausted at Stack ID Bus/Para."* Reason - The application conclusively showed that the process complies with all applicable requirements without benefit of add-on emission controls. Therefore, any reference to *"Particulate emissions shall be controlled by dry filters..."* is invalid and misleading.

Response to Comments 1 through 12:

Complying with the requirements of 326 IAC 6-3-2 can be especially variable for paint booths. The actual substrate being painted and the solids content of the paint being used can affect the process weight rate, the gallons or pounds of solids used, transfer efficiency, or other factors that directly affect actual, allowable, or potential emissions. While permit applications contain representative information regarding these factors, relying on this information as an ongoing demonstration of compliance is difficult if the factors are not themselves enforceable. The OAM does not believe that it would be generally advisable to include these factors as permit conditions, to make them enforceable or to presume that they are so fixed they define a source's potential emissions because either could severely limit a source's operational flexibility.

The OAM has determined that properly operating the air pollution controls that are already in place is generally adequate to demonstrate compliance with 326 IAC 6-3 in lieu of a stack test and also assures compliance with applicable rules limiting fugitive dust, opacity, and (when necessary) Potential to Emit. Accordingly, no changes have been made to the permit.

Comment 13:

Condition D.1.3 (Preventive Maintenance Plan), Page 29a of 37. Please delete this condition in its entirety. Reason - In the application the refinishing booths for EnterVan Line #1, EnterVan Line #2, ParaTransit Van Line #2, ParaTransit Van Line #3, ParaTransit Van #4, and the Bus/ParaTransit Van Line were rigorously shown to be in compliance with the particulate rule without benefit of emission control equipment. Since no emission control equipment is required, the dry filters in these booths may not be considered as emission control equipment. Since there is no emission control equipment present, there cannot be any valid requirement for a preventive maintenance plan for non-existent equipment.

Response 13:

Pursuant to 326 IAC 2-7-4(c)(9) (Permit Application), confirmation that the source maintains on-site a preventive maintenance plan as described in 326 IAC 1-6-3, must be included in the permit application. Pursuant to 326 IAC 2-7-5(13) (Permit Content), a provision that requires the source to do all of the following must be included in each Part 70 permit:

1) Maintain on-site the preventive maintenance plan as required under 326 IAC 2-7-4(c)(9);
2) Implement the preventive maintenance plan; and,
3) Forward to the department upon request the preventive maintenance plan.

IDEM's preventive maintenance plan guidance states that a preventive maintenance plan is required only if:

(a) the unit emits particulate matter, sulfur dioxide, or volatile organic compounds; and
(b) the unit has existing applicable requirements; and
(c) the unit is subject to a NSPS or NESHAP (for these units current requirements will satisfy as a compliance monitoring plan); or
(d) the unit has a control device and the allowable emissions exceed 10 pounds per hour; or
(e) the unit does not have a control device and has actual emissions exceeding 25 tons per year.

The guidance does not state that if a facility does not meet the above requirements, preventive maintenance will never be necessary, it does state that a preventive maintenance plan is not required to be submitted with the application. In most cases, the requirement to maintain a preventive maintenance plan and perform preventive maintenance has followed the same guidelines as specified above. However, there are some types of operations (i.e. woodworking) that the OAM has determined that compliance monitoring and preventive maintenance plans are necessary to ensure continuous compliance.

Because it is difficult to determine the process weight rate for surface coating operations, OAM has determined that dry filters are required for the surface coating booths (see response to Comments 1 - 12). Accordingly, compliance monitoring and preventive maintenance plans are required for these operations, and there will be no changes to this condition in the permit.

Comments 14 and 15 are also addressed in a combined response.

Comment 14:

Condition D.1.5 (Compliance Determination - Particulate Matter), Page 29a of 37. Please delete this condition in its entirety. Reason - As previously mentioned, the application included information showing conclusively that the specified booths comply with 326 IAC 6-3-2 (the most stringent applicable particulate requirement) without dry filters. This compliance was shown at the worst case process weight rate which is at maximum throughput. Since the derivative of the equation in that rule with respect to process weight rate is less than unity, the equation becomes more stringent as process weight rate increases, so at maximum process weight rate, the particulate emission rate is most stringent. Since the dry filters are irrelevant to compliance with the applicable requirement, this condition does nothing to protect the environment.

Comment 15:

Condition D.1.6 (a) (Monitoring - Daily Filter Inspections), Page 29a of 37. Please delete this condition in its entirety. Reason - As previously mentioned, the application conclusively showed that the dry filters are not required for the booths in question to comply with the most stringent applicable requirement. Since these filters are not necessary for compliance with the applicable requirement, daily inspections of these filters is equally unnecessary.

Response to Comments 14 and 15:

As stated in the response to Comments 1 through 12, the OAM believes that dry filters are necessary to ensure compliance with the requirements of 326 IAC 6-3-2 for surface coating booths. Therefore, the requirement to operate these booths has not been removed from the permit. Proper operation of the air pollution controls that are already in place is generally adequate to demonstrate compliance with 326 IAC 6-3 in lieu of a stack test and also assures compliance with applicable rules limiting fugitive dust, opacity, and (when necessary) Potential to Emit.

The OAM believes that checking the placement and integrity of the filters once a day is a very effective means of ensuring proper operation and ongoing compliance. Note that prior to issuing the final Part 70 permit for this source, OAM re-evaluated the other compliance monitoring provisions related to evidence of actual emissions from the spray booths because it was determined that less resource intensive provisions were appropriate. The frequency of visible emissions evaluations was changed from daily to weekly. The frequency of inspections of rooftops or other surfaces for a noticeable change in solids deposition was changed from weekly to monthly.

Comment 16:

Condition D.1.6 (b), Page 29a of 37. Please delete this condition in its entirety. Reason - Presumably, this condition was included to assure compliance with 326 IAC 6-3-2. That rule limits emission of particulate matter. 326 IAC 1-2-52 defines "particulate matter" as *"Any airborne finely divided solid or liquid material, excluding uncombined water, with an aerodynamic diameter smaller than one hundred (100) micrometers (µm)."* Any accumulations on the rooftop or on the ground obviously are not airborne. Further, since this material quickly fell out of the air, one can safely conclude that the particles never were of less than 100 µm aerodynamic diameter, as the larger, more massive particles cannot be held in suspension in the air by either buoyant or viscous forces, so accumulations of such material cannot be considered as evidence of the presence of particulate matter. As such this condition exceeds the authority granted the agency by the rules.

Response 16:

While there are definitions of particulate matter that include diameter, the reference method for determining compliance with the limitations that apply to particulate matter emissions from these facilities is a "method 5 stack test". This method does not exclude any normal sized particle in the measurement of emission rate. In addition, evidence of deposition strongly implies increased particulate matter emissions into the air. The OAM does not believe that such a test is necessary to demonstrate compliance at this time, but discussions of particulate matter emission rates should be made in terms of these methods.

Accordingly, OAM believes that the presence of overspray on rooftops and the nearby ground is evidence of airborne particulate matter and a possible dry filter malfunction. Because the requirements for the usage of dry filters for surface coating booth emissions have not been removed from the permit, Condition D.1.6 (b) also remains applicable, and no changes have been made to the permit.

Comment 17:

Condition D.1.7 (a), Page 30 of 37. Please revise this condition to read as follows: *"To document compliance with condition D.1.2 (a), the Permittee shall maintain records of the VOC content of the coatings applied to metal substrates in the two EnterVan Assembly areas, and of the undercoating material applied in the Undercoating facility."* Reason - These facilities comply with 326 IAC 8-2-9 by using coatings which cannot be diluted and which are compliant with that rule as supplied. These facilities do not use daily volume-weighted averaging to comply with the applicable requirement, and to require detailed records is onerous and does nothing to protect the environment.

Response 17:

The requirement for recordkeeping to document compliance with Condition D.1.2 (a) has been removed from the permit. Condition D.1.7 (a) has been revised to require recordkeeping only for the 15 pounds per day per assembly area VOC emission limits in Condition D.1.2 (b). The revised condition is as follows:

D.1.7 Record Keeping Requirements

(a) To document compliance with Condition D.1.2 **(b)**, the Permittee shall maintain records in accordance with (1) through **(4)**~~(5)~~ below. Records maintained for (1) through **(4)**~~(5)~~ shall be taken **daily** ~~monthly~~, and shall be complete and sufficient to establish compliance with the **less than 15 pounds per day per assembly area** VOC **emission** ~~content~~ limits **established for coating of metal substrates** in Condition D.1.2 **(b)**.

(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 cleanup solvent usage for each month~~;

(3) ~~(4)~~ The total VOC usage **per assembly area** for each day ~~mont~~h; and

(4) ~~(5)~~ The weight of VOCs emitted **per assembly area** for each **day.** ~~compliance period~~.

(b) To document compliance with Condition D.1.6, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Compliance Response Plan.

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

Comment 18:

Condition D.1.7 (b) (Reporting Requirements - Overspray), Page 30 of 37. Please delete this condition in its entirety. Reason - Since Condition D.1.6 was discredited in Comments 14 and 15, record keeping requirements supporting that condition, which is the purpose of Condition D.1.7 (b), is equally invalid.

Response 18:

Because OAM has determined that Condition D.1.6 will remain in the permit, Condition D.1.7 (b) remains applicable.

Appendix A: Federal Potential Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: The Braun Corporation
Address City IN Zip: 623 West 11th Street, Winamac, IN 46996
Permit Modification: 131-10831
Plt ID: 131-00017
Reviewer: MES/Patrick T. Brennan
Date: April 6, 1999

Material **PLANT #4**	Density (lb/gal)	Weight % Volatile (H20 & 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 tons per year	lb VOC /gal solids	Transfer Efficiency
EnterVan Line No. 1, Assembly																
Contact Adhesive	6.59	53.00%	0.0%	53.0%	0.0%	47.00%	2.0000	0.333	3.49	3.49	2.33	55.83	10.19	2.26	7.43	75%
RTV Sealant	8.76	5.00%	0.0%	5.0%	0.0%	95.00%	0.3130	0.333	0.44	0.44	0.05	1.10	0.20	0.00	0.46	100%
Subtotal:											***2.37***	***56.92***	***10.39***	***2.26***		
EnterVan Line No. 1, Refinishing																
DP48LF Resin	11.90	36.15%	0.0%	36.15%	0.0%	38.81%	0.2810	0.333	4.30	4.30	0.40	9.66	1.76	1.56	11.08	50%
DP402 Catalyst	7.75	67.10%	0.0%	67.10%	0.0%	27.51%	0.1410	0.333	5.20	5.20	0.24	5.86	1.07	0.26	18.90	50%
DAU82 Urethane	7.99	51.19%	0.0%	51.19%	0.0%	41.85%	0.0550	0.333	4.09	4.09	0.07	1.80	0.33	0.16	9.77	50%
DAU2 Catalyst	7.83	77.14%	0.0%	77.14%	0.0%	19.42%	0.0550	0.333	6.04	6.04	0.11	2.65	0.48	0.07	31.10	50%
DRR1170 Reducer	7.13	76.04%	0.0%	76.04%	0.0%	2.75%	0.1410	0.333	5.42	5.42	0.25	6.11	1.11	0.18	197.15	50%
DBU Base	8.18	59.16%	0.0%	59.16%	0.0%	31.51%	0.1410	0.333	4.84	4.84	0.23	5.45	1.00	0.34	15.36	50%
DTL-1 Thinner	6.69	80.40%	0.0%	80.40%	0.0%	0.00%	0.1560	0.333	5.38	5.38	0.28	6.71	1.22	0.15	ERR	50%
DX330 Wax Remover	6.36	100.00%	0.0%	100.00%	0.0%	0.00%	0.0160	0.333	6.36	6.36	0.03	0.81	0.15	0.00	ERR	50%
DT870 Reducer	6.91	100.00%	0.0%	100.00%	0.0%	0.00%	0.0550	0.333	6.91	6.91	0.13	3.04	0.55	0.00	ERR	50%
Subtotal:											***1.75***	***42.09***	***7.68***	***2.72***		
EnterVan Line No. 2, Assembly																
Contact Adhesive	6.59	53.00%	0.0%	53.0%	0.0%	47.00%	2.0000	0.333	3.49	3.49	2.33	55.83	10.19	2.26	7.43	75%
RTV Sealant	8.76	5.00%	0.0%	5.0%	0.0%	95.00%	0.3130	0.333	0.44	0.44	0.05	1.10	0.20	0.00	0.46	100%
Subtotal:											***2.37***	***56.92***	***10.39***	***2.26***		
EnterVan Line No. 2, Refinishing																
DP48LF Resin	11.90	36.15%	0.0%	36.15%	0.0%	38.81%	0.2810	0.333	4.30	4.30	0.40	9.66	1.76	1.56	11.08	50%
DP402 Catalyst	7.75	67.10%	0.0%	67.10%	0.0%	27.51%	0.1410	0.333	5.20	5.20	0.24	5.86	1.07	0.26	18.90	50%
DAU82 Urethane	7.99	51.19%	0.0%	51.19%	0.0%	41.85%	0.0550	0.333	4.09	4.09	0.07	1.80	0.33	0.16	9.77	50%
DAU2 Catalyst	7.83	77.14%	0.0%	77.14%	0.0%	19.42%	0.0550	0.333	6.04	6.04	0.11	2.65	0.48	0.07	31.10	50%
DRR1170 Reducer	7.13	76.04%	0.0%	76.04%	0.0%	2.75%	0.1410	0.333	5.42	5.42	0.25	6.11	1.11	0.18	197.15	50%
DBU Base	8.18	59.16%	0.0%	59.16%	0.0%	31.51%	0.1410	0.333	4.84	4.84	0.23	5.45	1.00	0.34	15.36	50%
DTL-1 Thinner	6.69	80.40%	0.0%	80.40%	0.0%	0.00%	0.1560	0.333	5.38	5.38	0.28	6.71	1.22	0.15	ERR	50%
DX330 Wax Remover	6.36	100.00%	0.0%	100.00%	0.0%	0.00%	0.0160	0.333	6.36	6.36	0.03	0.81	0.15	0.00	ERR	50%
DT870 Reducer	6.91	100.00%	0.0%	100.00%	0.0%	0.00%	0.0550	0.333	6.91	6.91	0.13	3.04	0.55	0.00	ERR	50%
Subtotal:											***1.75***	***42.09***	***7.68***	***2.72***		
ParaTransit Van Line No. 2, Assembly																
Contact Adhesive	6.59	53.00%	0.0%	53.0%	0.0%	47.00%	1.5000	0.292	3.49	3.49	1.53	36.72	6.70	1.49	7.43	75%
RTV Sealant	8.76	5.00%	0.0%	5.0%	0.0%	95.00%	0.3130	0.292	0.44	0.44	0.04	0.96	0.18	0.00	0.46	100%
Subtotal:											***1.57***	***37.68***	***6.88***	***1.49***		
ParaTransit Van Line No. 2, Refinishing																
DP48LF Sealer	11.90	36.15%	0.0%	36.15%	0.0%	38.81%	0.1670	0.292	4.30	4.30	0.21	5.03	0.92	0.81	11.08	50%
DP402 Catalyst	7.75	67.10%	0.0%	67.10%	0.0%	27.51%	0.0830	0.292	5.20	5.20	0.13	3.02	0.55	0.14	18.90	50%
NCT Catalyst	7.69	44.01%	0.0%	44.01%	0.0%	24.24%	0.0230	0.292	3.38	3.38	0.02	0.55	0.10	0.06	13.96	50%
NCT Primer	10.93	41.36%	0.0%	41.36%	0.0%	36.00%	0.1250	0.292	4.52	4.52	0.17	3.96	0.72	0.51	12.56	50%
DTL Thinner	6.69	80.40%	0.0%	80.40%	0.0%	0.00%	0.2500	0.292	5.38	5.38	0.39	9.42	1.72	0.21	ERR	50%
DBU Base	8.18	59.16%	0.0%	59.16%	0.0%	0.00%	0.3130	0.292	4.84	4.84	0.44	10.61	1.94	0.67	ERR	50%
DRR1170 Reducer	7.13	76.04%	0.0%	76.04%	0.0%	0.00%	0.3750	0.292	5.42	5.42	0.59	14.25	2.60	0.41	ERR	50%
DX394 Cleaner	8.07	99.74%	83.2%	16.57%	80.6%	0.21%	0.1250	0.292	6.90	1.34	0.05	1.17	0.21	0.00	636.76	50%
DAU82 Clear	7.99	51.19%	0.0%	51.19%	0.0%	41.85%	0.2500	0.292	4.09	4.09	0.30	7.17	1.31	0.62	9.77	50%
DAU Catalyst	7.83	77.14%	0.0%	77.14%	0.0%	19.42%	0.2500	0.292	6.04	6.04	0.44	10.58	1.93	0.29	31.10	50%
DT870 Reducer	6.91	100.00%	0.0%	100.00%	0.0%	0.00%	0.1250	0.292	6.91	6.91	0.25	6.05	1.10	0.00	ERR	50%
Subtotal:											***2.99***	***71.82***	***13.11***	***3.72***		

Appendix A: Federal Potential Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: The Braun Corporation
Address City IN Zip: 623 West 11th Street, Winamac, IN 46996
Permit Modification: 131-10831
Plt ID: 131-00017
Reviewer: MES/Patrick T. Brennan
Date: April 6, 1999

Material **PLANT #4 (cont.)**	Density (lb/gal)	Weight % Volatile (H20 & 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 tons per year	lb VOC /gal solids	Transfer Efficiency
ParaTransit Van Line No. 3, Assembly																
Contact Adhesive	6.59	53.00%	0.0%	53.0%	0.0%	47.00%	1.5000	0.292	3.49	3.49	1.53	36.72	6.70	1.49	7.43	75%
RTV Sealant	8.76	5.00%	0.0%	5.0%	0.0%	95.00%	0.3130	0.292	0.44	0.44	0.04	0.96	0.18	0.00	0.46	100%
Subtotal:											***1.57***	***37.68***	***6.88***	***1.49***		
ParaTransit Van Line No. 3, Refinishing																
DP48LF Sealer	11.90	36.15%	0.0%	36.15%	0.0%	38.81%	0.1670	0.292	4.30	4.30	0.21	5.03	0.92	0.81	11.08	50%
DP402 Catalyst	7.75	67.10%	0.0%	67.10%	0.0%	27.51%	0.0830	0.292	5.20	5.20	0.13	3.02	0.55	0.14	18.90	50%
NCT Catalyst	7.69	44.01%	0.0%	44.01%	0.0%	24.24%	0.0230	0.292	3.38	3.38	0.02	0.55	0.10	0.06	13.96	50%
NCT Primer	10.93	41.36%	0.0%	41.36%	0.0%	36.00%	0.1250	0.292	4.52	4.52	0.17	3.96	0.72	0.51	12.56	50%
DTL Thinner	6.69	80.40%	0.0%	80.40%	0.0%	0.00%	0.2500	0.292	5.38	5.38	0.39	9.42	1.72	0.21	ERR	50%
DBU Base	8.18	59.16%	0.0%	59.16%	0.0%	0.00%	0.3130	0.292	4.84	4.84	0.44	10.61	1.94	0.67	ERR	50%
DRR1170 Reducer	7.13	76.04%	0.0%	76.04%	0.0%	0.00%	0.3750	0.292	5.42	5.42	0.59	14.25	2.60	0.41	ERR	50%
DX394 Cleaner	8.07	99.74%	83.2%	16.57%	80.6%	0.21%	0.1250	0.292	6.90	1.34	0.05	1.17	0.21	0.00	636.76	50%
DAU82 Clear	7.99	51.19%	0.0%	51.19%	0.0%	41.85%	0.2500	0.292	4.09	4.09	0.30	7.17	1.31	0.62	9.77	50%
DAU Catalyst	7.83	77.14%	0.0%	77.14%	0.0%	19.42%	0.2500	0.292	6.04	6.04	0.44	10.58	1.93	0.29	31.10	50%
DT870 Reducer	6.91	100.00%	0.0%	100.00%	0.0%	0.00%	0.1250	0.292	6.91	6.91	0.25	6.05	1.10	0.00	ERR	50%
Subtotal:											***2.99***	***71.82***	***13.11***	***3.72***		
ParaTransit Van Line No. 4, Assembly																
Contact Adhesive	6.59	53.00%	0.0%	53.0%	0.0%	47.00%	1.5000	0.292	3.49	3.49	1.53	36.72	6.70	1.49	7.43	75%
RTV Sealant	8.76	5.00%	0.0%	5.0%	0.0%	95.00%	0.3130	0.292	0.44	0.44	0.04	0.96	0.18	0.00	0.46	100%
Subtotal:											***1.57***	***37.68***	***6.88***	***1.49***		
ParaTransit Van Line No. 4, Refinishing																
DP48LF Sealer	11.90	36.15%	0.0%	36.15%	0.0%	38.81%	0.1670	0.292	4.30	4.30	0.21	5.03	0.92	0.81	11.08	50%
DP402 Catalyst	7.75	67.10%	0.0%	67.10%	0.0%	27.51%	0.0830	0.292	5.20	5.20	0.13	3.02	0.55	0.14	18.90	50%
NCT Catalyst	7.69	44.01%	0.0%	44.01%	0.0%	24.24%	0.0230	0.292	3.38	3.38	0.02	0.55	0.10	0.06	13.96	50%
NCT Primer	10.93	41.36%	0.0%	41.36%	0.0%	36.00%	0.1250	0.292	4.52	4.52	0.17	3.96	0.72	0.51	12.56	50%
DTL Thinner	6.69	80.40%	0.0%	80.40%	0.0%	0.00%	0.2500	0.292	5.38	5.38	0.39	9.42	1.72	0.21	ERR	50%
DBU Base	8.18	59.16%	0.0%	59.16%	0.0%	0.00%	0.3130	0.292	4.84	4.84	0.44	10.61	1.94	0.67	ERR	50%
DRR1170 Reducer	7.13	76.04%	0.0%	76.04%	0.0%	0.00%	0.3750	0.292	5.42	5.42	0.59	14.25	2.60	0.41	ERR	50%
DX394 Cleaner	8.07	99.74%	83.2%	16.57%	80.6%	0.21%	0.1250	0.292	6.90	1.34	0.05	1.17	0.21	0.00	636.76	50%
DAU82 Clear	7.99	51.19%	0.0%	51.19%	0.0%	41.85%	0.2500	0.292	4.09	4.09	0.30	7.17	1.31	0.62	9.77	50%
DAU Catalyst	7.83	77.14%	0.0%	77.14%	0.0%	19.42%	0.2500	0.292	6.04	6.04	0.44	10.58	1.93	0.29	31.10	50%
DT870 Reducer	6.91	100.00%	0.0%	100.00%	0.0%	0.00%	0.1250	0.292	6.91	6.91	0.25	6.05	1.10	0.00	ERR	50%
Subtotal:											***2.99***	***71.82***	***13.11***	***3.72***		

Appendix A: Federal Potential Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: The Braun Corporation
Address City IN Zip: 623 West 11th Street, Winamac, IN 46996
Permit Modification: 131-10831
Plt ID: 131-00017
Reviewer: MES/Patrick T. Brennan
Date: April 6, 1999

Material **PLANT #4 (cont.)**	Density (lb/gal)	Weight % Volatile (H20 & 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 tons per year	lb VOC /gal solids	Transfer Efficiency
Bus/ParaTransit Van Line, Assembly																
Contact Adhesive	6.59	53.00%	0.0%	53.0%	0.0%	47.00%	1.5000	0.292	3.49	3.49	1.53	36.72	6.70	1.49	7.43	75%
RTV Sealant	8.76	5.00%	0.0%	5.0%	0.0%	95.00%	0.3130	0.292	0.44	0.44	0.04	0.96	0.18	0.00	0.46	100%
Subtotal:											***1.57***	***37.68***	***6.88***	***1.49***		
Bus/ParaTransit Van Line, Refinishing																
DP48LF Sealer	11.90	36.15%	0.0%	36.15%	0.0%	38.81%	0.1670	0.292	4.30	4.30	0.21	5.03	0.92	0.81	11.08	50%
DP402 Catalyst	7.75	67.10%	0.0%	67.10%	0.0%	27.51%	0.0830	0.292	5.20	5.20	0.13	3.02	0.55	0.14	18.90	50%
NCT Catalyst	7.69	44.01%	0.0%	44.01%	0.0%	24.24%	0.0230	0.292	3.38	3.38	0.02	0.55	0.10	0.06	13.96	50%
NCT Primer	10.93	41.36%	0.0%	41.36%	0.0%	36.00%	0.1250	0.292	4.52	4.52	0.17	3.96	0.72	0.51	12.56	50%
DTL Thinner	6.69	80.40%	0.0%	80.40%	0.0%	0.00%	0.2500	0.292	5.38	5.38	0.39	9.42	1.72	0.21	ERR	50%
DBU Base	8.18	59.16%	0.0%	59.16%	0.0%	0.00%	0.3130	0.292	4.84	4.84	0.44	10.61	1.94	0.67	ERR	50%
DRR1170 Reducer	7.13	76.04%	0.0%	76.04%	0.0%	0.00%	0.3750	0.292	5.42	5.42	0.59	14.25	2.60	0.41	ERR	50%
DX394 Cleaner	8.07	99.74%	83.2%	16.57%	80.6%	0.21%	0.1250	0.292	6.90	1.34	0.05	1.17	0.21	0.00	636.76	50%
DAU82 Clear	7.99	51.19%	0.0%	51.19%	0.0%	41.85%	0.2500	0.292	4.09	4.09	0.30	7.17	1.31	0.62	9.77	50%
DAU Catalyst	7.83	77.14%	0.0%	77.14%	0.0%	19.42%	0.2500	0.292	6.04	6.04	0.44	10.58	1.93	0.29	31.10	50%
DT870 Reducer	6.91	100.00%	0.0%	100.00%	0.0%	0.00%	0.1250	0.292	6.91	6.91	0.25	6.05	1.10	0.00	ERR	50%
Subtotal:											***2.99***	***71.82***	***13.11***	***3.72***		
Undercoating Operation																
Black Rust Protection - Entervan	7.43	40.00%	0.0%	40.0%	0.0%	53.00%	1.0000	0.667	2.97	2.97	1.98	47.58	8.68	3.26	5.61	75%
Black Rust Prot. - ParaTran Van	7.43	40.00%	0.0%	40.0%	0.0%	53.00%	2.0000	1.167	2.97	2.97	6.94	166.48	30.38	11.39	5.61	75%
AA Water Base Rust Prot - Entervar	8.17	55.00%	45.0%	10.0%	45.0%	45.00%	0.0630	0.667	1.49	0.82	0.03	0.82	0.15	0.07	1.82	90%
AA Water Base Rust Prot. - ParaTra	8.17	55.00%	45.0%	10.0%	45.0%	45.00%	0.2500	1.167	1.49	0.82	0.24	5.72	1.04	0.47	1.82	90%
Subtotal:											***9.19***	***220.60***	***40.26***	***15.19***		
										GRAND TOTAL:	**35.69**	**856.63**	**156.34**	**45.96**		

Control Technology Emissions (Combustion)															
						Emission Factors						Emissions			
Type	Number	Capacity	Gas usage	PM	PM10	SO2	NOx	VOC	CO	PM	PM10	SO2	NOx	VOC	CO
		MMBtu/hr	MMCF/yr	lb/MMCF	lb/MMCF	lb/MMCF	lb/MMCF	lb/MMCF	lb/MMCF	tons/yr	tons/yr	tons/yr	tons/yr	tons/yr	tons/yr
Catalytic			0.0	3.0	3.0	0.6	100.0	5.3	35.0	0.0	0.0	0.0	0.0	0.0	0.0
Thermal			0.0	3.0	3.0	0.6	140.0	2.8	20.0	0.0	0.0	0.0	0.0	0.0	0.0
Total			0.0							0.0	0.0	0.0	0.0	0.0	0.0
									Control Efficiency		Controlled	Controlled	Controlled	Controlled	
									VOC	PM	VOC pounds	VOC pounds	VOC	Particulate	
										0	per hour	per day	tons/yr	tons/yr	

Controlled Emissions due to Surface Coating Operations and Controls

Controlled Total: **35.69** **856.63** **156.34** **45.96**

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

HAP Emission Calculations

CP#: 131-10891
Plt ID#: 131-00017

Company Name: The Braun Corporation
Plant Location: 623 West 11th Street, Winamac, IN 46996
County: Pulaski
Permit Reviewer: Patrick T. Brennan
Date: April 6, 1999

Material **PLANT #4**	Density (lb/gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % Toluene	Weight % Hexane	Weight % Xylene	Weight % MEK	Weight % MIBK	Weight % Glycol Ethers	Weight % Ethyl Benzene	Toluene Emissions (tons/yr)	Hexane Emissions (tons/yr)	Xylene Emissions (tons/yr)	MEK Emissions (tons/yr)	MIBK Emissions (tons/yr)	Glycol Ethers Emissions (tons/yr)	Ethyl Benzene Emissions (tons/yr)
EnterVan Line No. 1, Assembly																	
Contact Adhesive	6.59	2.0000	0.333	8.00%	10.00%	0.00%	0.00%	0.00%	0.00%	0.00%	1.54	1.92	0.00	0.00	0.00	0.00	0.00
RTV Sealant	8.76	0.3130	0.333	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Subtotal:											***1.538***	***1.922***	***0.000***	***0.000***	***0.000***	***0.000***	***0.000***
EnterVan Line No. 1, Refinishing																	
DP48LF Resin	11.90	0.2810	0.333	4.10%	0.00%	3.70%	0.00%	5.30%	4.40%	0.50%	0.20	0.00	0.18	0.00	0.26	0.21	0.02
DP402 Catalyst	7.75	0.1410	0.333	2.30%	0.00%	0.00%	13.40%	0.00%	0.00%	0.00%	0.04	0.00	0.00	0.21	0.00	0.00	0.00
DAU82 Urethane	7.99	0.0550	0.333	6.30%	0.00%	1.20%	7.20%	0.00%	0.00%	0.00%	0.04	0.00	0.01	0.05	0.00	0.00	0.00
DAU2 Catalyst	7.83	0.0550	0.333	12.80%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.08	0.00	0.00	0.00	0.00	0.00	0.00
DRR1170 Reducer	7.13	0.1410	0.333	11.10%	0.00%	5.30%	0.00%	0.00%	0.00%	0.00%	0.16	0.00	0.08	0.00	0.00	0.00	0.00
DBU Base	8.18	0.1410	0.333	7.10%	0.00%	3.10%	2.70%	0.00%	0.00%	0.00%	0.12	0.00	0.05	0.05	0.00	0.00	0.00
DTL-1 Thinner	6.69	0.1560	0.333	45.30%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.69	0.00	0.00	0.00	0.00	0.00	0.00
DX330 Wax Remover	6.36	0.0160	0.333	1.40%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
DT870 Reducer	6.91	0.0550	0.333	19.00%	0.00%	0.00%	32.50%	0.00%	0.00%	0.00%	0.11	0.00	0.00	0.18	0.00	0.00	0.00
Subtotal:											***1.437***	***0.000***	***0.318***	***0.485***	***0.258***	***0.215***	***0.024***
EnterVan Line No. 2, Assembly																	
Contact Adhesive	6.59	2.0000	0.333	8.00%	10.00%	0.00%	0.00%	0.00%	0.00%	0.00%	1.54	1.92	0.00	0.00	0.00	0.00	0.00
RTV Sealant	8.76	0.3130	0.333	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Subtotal:											***1.538***	***1.922***	***0.000***	***0.000***	***0.000***	***0.000***	***0.000***
EnterVan Line No. 2, Refinishing																	
DP48LF Resin	11.90	0.2810	0.333	4.10%	0.00%	3.70%	0.00%	5.30%	4.40%	0.50%	0.20	0.00	0.18	0.00	0.26	0.21	0.02
DP402 Catalyst	7.75	0.1410	0.333	2.30%	0.00%	0.00%	13.40%	0.00%	0.00%	0.00%	0.04	0.00	0.00	0.21	0.00	0.00	0.00
DAU82 Urethane	7.99	0.0550	0.333	6.30%	0.00%	1.20%	7.20%	0.00%	0.00%	0.00%	0.04	0.00	0.01	0.05	0.00	0.00	0.00
DAU2 Catalyst	7.83	0.0550	0.333	12.80%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.08	0.00	0.00	0.00	0.00	0.00	0.00
DRR1170 Reducer	7.13	0.1410	0.333	11.10%	0.00%	5.30%	0.00%	0.00%	0.00%	0.00%	0.16	0.00	0.08	0.00	0.00	0.00	0.00
DBU Base	8.18	0.1410	0.333	7.10%	0.00%	3.10%	2.70%	0.00%	0.00%	0.00%	0.12	0.00	0.05	0.05	0.00	0.00	0.00
DTL-1 Thinner	6.69	0.1560	0.333	45.30%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.69	0.00	0.00	0.00	0.00	0.00	0.00
DX330 Wax Remover	6.36	0.0160	0.333	1.40%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
DT870 Reducer	6.91	0.0550	0.333	19.00%	0.00%	0.00%	32.50%	0.00%	0.00%	0.00%	0.11	0.00	0.00	0.18	0.00	0.00	0.00
Subtotal:											***1.437***	***0.000***	***0.318***	***0.485***	***0.258***	***0.215***	***0.024***
ParaTransit Van Line No. 2, Assembly																	
Contact Adhesive	6.59	1.5000	0.292	8.00%	10.00%	0.00%	0.00%	0.00%	0.00%	0.00%	1.01	1.26	0.00	0.00	0.00	0.00	0.00
RTV Sealant	8.76	0.3130	0.292	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Subtotal:											***1.011***	***1.264***	***0.000***	***0.000***	***0.000***	***0.000***	***0.000***
ParaTransit Van Line No. 2, Refinishing																	
DP48LF Sealer	11.90	0.1670	0.292	4.10%	0.00%	3.70%	0.00%	5.30%	4.40%	0.50%	0.10	0.00	0.09	0.00	0.13	0.11	0.01
DP402 Catalyst	7.75	0.0830	0.292	2.30%	0.00%	0.00%	13.40%	0.00%	0.00%	0.00%	0.02	0.00	0.00	0.11	0.00	0.00	0.00
NCT Catalyst	7.69	0.0230	0.292	24.60%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.06	0.00	0.00	0.00	0.00	0.00	0.00
NCT Primer	10.93	0.1250	0.292	6.40%	0.00%	7.00%	0.00%	0.00%	0.00%	1.40%	0.11	0.00	0.12	0.00	0.00	0.00	0.02
DTL Thinner	6.69	0.2500	0.292	45.30%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.97	0.00	0.00	0.00	0.00	0.00	0.00
DBU Base	8.18	0.3130	0.292	7.10%	0.00%	3.10%	2.70%	0.00%	0.00%	0.60%	0.23	0.00	0.10	0.09	0.00	0.00	0.02
DRR1170 Reducer	7.13	0.3750	0.292	11.10%	0.00%	5.30%	0.00%	0.00%	0.00%	1.20%	0.38	0.00	0.18	0.00	0.00	0.00	0.04
DX394 Cleaner	8.07	0.1250	0.292	0.00%	0.00%	0.00%	0.00%	0.00%	8.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.10	0.00
DAU82 Clear	7.99	0.2500	0.292	6.30%	0.00%	1.20%	7.20%	0.00%	0.00%	0.00%	0.16	0.00	0.03	0.18	0.00	0.00	0.00
DAU Catalyst	7.83	0.2500	0.292	12.80%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.32	0.00	0.00	0.00	0.00	0.00	0.00
DT870 Reducer	6.91	0.1250	0.292	19.00%	0.00%	0.00%	32.50%	0.00%	0.00%	0.00%	0.21	0.00	0.00	0.36	0.00	0.00	0.00
Subtotal:											***2.563***	***0.000***	***0.530***	***0.742***	***0.135***	***0.215***	***0.098***

HAP Emission Calculations

CP#: 131-10831
Plt ID#: 131-00017

Company Name: The Braun Corporation
Plant Location: 623 West 11th Street, Winamac, IN 46996
County: Pulaski
Permit Reviewer: Patrick T. Brennan
Date: April 6, 1999

Material **PLANT #4 (cont.)**	Density (lb/gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % Toluene	Weight % Hexane	Weight % Xylene	Weight % MEK	Weight % MIBK	Weight % Glycol Ethers	Weight % Ethyl Benzene	Toluene Emissions (tons/yr)	Hexane Emissions (tons/yr)	Xylene Emissions (tons/yr)	MEK Emissions (tons/yr)	MIBK Emissions (tons/yr)	Glycol Ethers Emissions (tons/yr)	Ethyl Benzene Emissions (tons/yr)
ParaTransit Van Line No. 3, Assembly																	
Contact Adhesive	6.59	1.5000	0.292	8.00%	10.00%	0.00%	0.00%	0.00%	0.00%	0.00%	1.01	1.26	0.00	0.00	0.00	0.00	0.00
RTV Sealant	8.76	0.3130	0.292	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Subtotal:											***1.011***	***1.264***	***0.000***	***0.000***	***0.000***	***0.000***	***0.000***
ParaTransit Van Line No. 3, Refinishing																	
DP48LF Sealer	11.90	0.1670	0.292	4.10%	0.00%	3.70%	0.00%	5.30%	4.40%	0.50%	0.10	0.00	0.09	0.00	0.13	0.11	0.01
DP402 Catalyst	7.75	0.0830	0.292	2.30%	0.00%	0.00%	13.40%	0.00%	0.00%	0.00%	0.02	0.00	0.00	0.11	0.00	0.00	0.00
NCT Catalyst	7.69	0.0230	0.292	24.60%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.06	0.00	0.00	0.00	0.00	0.00	0.00
NCT Primer	10.93	0.1250	0.292	6.40%	0.00%	7.00%	0.00%	0.00%	0.00%	1.40%	0.11	0.00	0.12	0.00	0.00	0.00	0.02
DTL Thinner	6.69	0.2500	0.292	45.30%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.97	0.00	0.00	0.00	0.00	0.00	0.00
DBU Base	8.18	0.3130	0.292	7.10%	0.00%	3.10%	2.70%	0.00%	0.00%	0.60%	0.23	0.00	0.10	0.09	0.00	0.00	0.02
DRR1170 Reducer	7.13	0.3750	0.292	11.10%	0.00%	5.30%	0.00%	0.00%	0.00%	1.20%	0.38	0.00	0.18	0.00	0.00	0.00	0.04
DX394 Cleaner	8.07	0.1250	0.292	0.00%	0.00%	0.00%	0.00%	0.00%	8.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.10	0.00
DAU82 Clear	7.99	0.2500	0.292	6.30%	0.00%	1.20%	7.20%	0.00%	0.00%	0.00%	0.16	0.00	0.03	0.18	0.00	0.00	0.00
DAU Catalyst	7.83	0.2500	0.292	12.80%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.32	0.00	0.00	0.00	0.00	0.00	0.00
DT870 Reducer	6.91	0.1250	0.292	19.00%	0.00%	0.00%	32.50%	0.00%	0.00%	0.00%	0.21	0.00	0.00	0.36	0.00	0.00	0.00
Subtotal:											***2.563***	***0.000***	***0.530***	***0.742***	***0.135***	***0.215***	***0.098***
ParaTransit Van Line No. 4, Assembly																	
Contact Adhesive	6.59	1.5000	0.292	8.00%	10.00%	0.00%	0.00%	0.00%	0.00%	0.00%	1.01	1.26	0.00	0.00	0.00	0.00	0.00
RTV Sealant	8.76	0.3130	0.292	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Subtotal:											***1.011***	***1.264***	***0.000***	***0.000***	***0.000***	***0.000***	***0.000***
ParaTransit Van Line No. 4, Refinishing																	
DP48LF Sealer	11.90	0.1670	0.292	4.10%	0.00%	3.70%	0.00%	5.30%	4.40%	0.50%	0.10	0.00	0.09	0.00	0.13	0.11	0.01
DP402 Catalyst	7.75	0.0830	0.292	2.30%	0.00%	0.00%	13.40%	0.00%	0.00%	0.00%	0.02	0.00	0.00	0.11	0.00	0.00	0.00
NCT Catalyst	7.69	0.0230	0.292	24.60%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.06	0.00	0.00	0.00	0.00	0.00	0.00
NCT Primer	10.93	0.1250	0.292	6.40%	0.00%	7.00%	0.00%	0.00%	0.00%	1.40%	0.11	0.00	0.12	0.00	0.00	0.00	0.02
DTL Thinner	6.69	0.2500	0.292	45.30%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.97	0.00	0.00	0.00	0.00	0.00	0.00
DBU Base	8.18	0.3130	0.292	7.10%	0.00%	3.10%	2.70%	0.00%	0.00%	0.60%	0.23	0.00	0.10	0.09	0.00	0.00	0.02
DRR1170 Reducer	7.13	0.3750	0.292	11.10%	0.00%	5.30%	0.00%	0.00%	0.00%	1.20%	0.38	0.00	0.18	0.00	0.00	0.00	0.04
DX394 Cleaner	8.07	0.1250	0.292	0.00%	0.00%	0.00%	0.00%	0.00%	8.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.10	0.00
DAU82 Clear	7.99	0.2500	0.292	6.30%	0.00%	1.20%	7.20%	0.00%	0.00%	0.00%	0.16	0.00	0.03	0.18	0.00	0.00	0.00
DAU Catalyst	7.83	0.2500	0.292	12.80%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.32	0.00	0.00	0.00	0.00	0.00	0.00
DT870 Reducer	6.91	0.1250	0.292	19.00%	0.00%	0.00%	32.50%	0.00%	0.00%	0.00%	0.21	0.00	0.00	0.36	0.00	0.00	0.00
Subtotal:											***2.563***	***0.000***	***0.530***	***0.742***	***0.135***	***0.215***	***0.098***

HAP Emission Calculations

CP#: 131-10831
Plt ID#: 131-00017

Company Name: The Braun Corporation
Plant Location: 623 West 11th Street, Winamac, IN 46996
County: Pulaski
Permit Reviewer: Patrick T. Brennan
Date: April 6, 1999

Material **PLANT #4 (cont.)**	Density (lb/gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % Toluene	Weight % Hexane	Weight % Xylene	Weight % MEK	Weight % MIBK	Weight % Glycol Ethers	Weight % Ethyl Benzene	Toluene Emissions (tons/yr)	Hexane Emissions (tons/yr)	Xylene Emissions (tons/yr)	MEK Emissions (tons/yr)	MIBK Emissions (tons/yr)	Glycol Ethers Emissions (tons/yr)	Ethyl Benzene Emissions (tons/yr)
Bus/ParaTransit Van Line, Assembly																	
Contact Adhesive	6.59	1.5000	0.292	8.00%	10.00%	0.00%	0.00%	0.00%	0.00%	0.00%	1.01	1.26	0.00	0.00	0.00	0.00	0.00
RTV Sealant	8.76	0.3130	0.292	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Subtotal:											***1.011***	***1.264***	***0.000***	***0.000***	***0.000***	***0.000***	***0.000***
Bus/ParaTransit Van Line, Refinishing																	
DP48LF Sealer	11.90	0.1670	0.292	4.10%	0.00%	3.70%	0.00%	5.30%	4.40%	0.50%	0.10	0.00	0.09	0.00	0.13	0.11	0.01
DP402 Catalyst	7.75	0.0830	0.292	2.30%	0.00%	0.00%	13.40%	0.00%	0.00%	0.00%	0.02	0.00	0.00	0.11	0.00	0.00	0.00
NCT Catalyst	7.69	0.0230	0.292	24.60%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.06	0.00	0.00	0.00	0.00	0.00	0.00
NCT Primer	10.93	0.1250	0.292	6.40%	0.00%	7.00%	0.00%	0.00%	0.00%	1.40%	0.11	0.00	0.12	0.00	0.00	0.00	0.02
DTL Thinner	6.69	0.2500	0.292	45.30%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.97	0.00	0.00	0.00	0.00	0.00	0.00
DBU Base	8.18	0.3130	0.292	7.10%	0.00%	3.10%	2.70%	0.00%	0.00%	0.60%	0.23	0.00	0.10	0.09	0.00	0.00	0.02
DRR1170 Reducer	7.13	0.3750	0.292	11.10%	0.00%	5.30%	0.00%	0.00%	0.00%	1.20%	0.38	0.00	0.18	0.00	0.00	0.00	0.04
DX394 Cleaner	8.07	0.1250	0.292	0.00%	0.00%	0.00%	0.00%	0.00%	8.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.10	0.00
DAU82 Clear	7.99	0.2500	0.292	6.30%	0.00%	1.20%	7.20%	0.00%	0.00%	0.00%	0.16	0.00	0.03	0.18	0.00	0.00	0.00
DAU Catalyst	7.83	0.2500	0.292	12.80%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.32	0.00	0.00	0.00	0.00	0.00	0.00
DT870 Reducer	6.91	0.1250	0.292	19.00%	0.00%	0.00%	32.50%	0.00%	0.00%	0.00%	0.21	0.00	0.00	0.36	0.00	0.00	0.00
Subtotal:											***2.563***	***0.000***	***0.530***	***0.742***	***0.135***	***0.215***	***0.098***
Undercoating Operation																	
Black Rust Protection - Entervan	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Black Rust Prot. - ParaTran Van	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
AA Water Base - 1 Entervan	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
AA Water Base. - ParaTran	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Subtotal:											***0.000***	***0.000***	***0.000***	***0.000***	***0.000***	***0.000***	***0.000***

Total State Potential Emissions

GRAND TOTAL:	**(tons/yr):**	**20.25**	**8.90**	**2.76**	**3.94**	**1.06**	**1.29**	**0.44**
	(lb/hr):	**4.627**	**2.034**	**0.630**	**0.900**	**0.241**	**0.295**	**0.101**
	(g/sec):	**0.583**	**0.256**	**0.079**	**0.113**	**0.030**	**0.037**	**0.013**

Total HAPs (tons/yr): ***38.626***

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