

Mr. Joseph Ruggier  
Hahn Equipment Company  
1625 North Garvin Street  
Evansville, Indiana 47711

Re: **163-12149**  
First Administrative Amendment to Incorporate  
Significant Source Modification 163-11982 to  
**Part 70 Permit No. 163-7624-00007**

Dear Mr. Ruggier:

Hahn Equipment Company was issued a Part 70 Permit on July 13, 1999 for the operation of their multi-purpose golf course grounds-keeping equipment and consumer products plant which includes product surface coating, assembly, and shipment. A letter requesting that the Significant Source Modification 163-11982 be incorporated into their Part 70 permit was received on April 12, 2000. Pursuant to the provisions of 326 IAC 2-7-11 the permit is hereby administratively amended as follows (with new language bolded and old language stricken):

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

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The Permittee owns and operates stationary source for the surface coating, assembly, and shipment of multi-purpose golf course grounds-keeping equipment and consumer products.

Responsible Official: Mr. Jon Grimmer  
Source Address: 1625 N. Garvin St., Evansville, Indiana 47711  
Mailing Address: 1625 N. Garvin St., Evansville, Indiana 47711  
SIC Code: 3523  
County Location: Vanderburgh  
~~County~~ **Source Location** Status: Attainment for all criteria pollutants;  
Source Status: Part 70 Permit Program  
Minor Source, under PSD;  
Major Source, Section 112 of the Clean Air Act

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

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

- (a) one (1) spray paint booth, identified as SB-1, ~~equipped with an overhead conveyor and closing doors at both ends, with~~ **using** a maximum capacity of coating one (1) metal frame per hour of **0.24 gallons of applied primer or 0.40 gallons of applied top coat per hour**, utilizing **either** airless electrostatic **or high volume low pressure (HVLN)** application with dry filters for particulate control, and exhausted through one (1) stack (S/V ID P-01);

***(Note: This facility replaces existing spray paint booth SB-1, which has one (1) spray paint booth, identified as SB-1, equipped with an overhead conveyor and closing doors at both ends, with a maximum capacity of coating one (1) metal frame per hour, utilizing airless electrostatic application with dry filters for particulate control, and exhausted through one (1) stack (S/V ID P-01). As listed, the new booth will retain the same facility identification (i.e., SB-1) as the booth removed from service.)***

- (b) one (1) **top coat spray painting booth facility**, identified as ~~SB-2~~, with a maximum capacity of applying 2.4 gallons of paint per hour, utilizing electrostatic with air assist application with dry filters for particulate control, and exhausted through one (1) stack (~~SAV-ID-P-02~~); coating a maximum of 3,000 pounds of metal parts per hour using a maximum of 5.04 gallons of applied coating per hour, consisting of:
- (1) one (1) spray paint booth, identified as SB-2, utilizing electrostatic with air assist spray application with dry filters for particulate control, and exhausted through one (1) stack identified as P-02; and
  - (2) one (1) spray paint booth, identified as SB-3, utilizing electrostatic with air assist spray application with waterwash for particulate control, and exhausted through one (1) stack identified as P-03.
- (c) one (1) **prime coat spray painting booth facility**, identified as ~~SB-3~~, with a maximum capacity of coating 10 feet per minute of products, utilizing electrostatic with air assist application with waterwash for particulate control, and exhausted through one (1) stack (~~SAV-ID-P-03~~); coating a maximum of 3,000 pounds of metal parts per hour using a maximum of 9.38 gallons of applied coating per hour, consisting of:
- (1) one (1) spray paint booth, identified as SB-4, utilizing high volume low pressure (HVLP) spray application with dry filters for particulate control, and exhausted through one (1) stack identified as P-04; and
  - (2) one (1) spray paint booth, identified as SB-5, utilizing high volume low pressure (HVLP) spray application with dry filters for particulate control, and exhausted through one (1) stack identified as P-05.

2. Section D.1 is revised to read as follows:

## SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] - The following surface coating operations

- (a) one (1) spray paint booth, identified as SB-1, ~~equipped with an overhead conveyor and closing doors at both ends, with~~ using a maximum capacity of coating one (1) metal frame per hour of **0.24 gallons of applied primer or 0.40 gallons of applied top coat per hour**, utilizing either airless electrostatic or **high volume low pressure (HVLP)** application with dry filters for particulate control, and exhausted through one (1) stack (~~SAV ID P-01~~);
- (b) one (1) **top coat spray painting booth facility**, identified as SB-2, with a maximum capacity of applying 2.4 gallons of paint per hour, utilizing electrostatic with air assist application with dry filters for particulate control, and exhausted through one (1) stack (~~SAV ID P-02~~); **coating a maximum of 3,000 pounds of miscellaneous metal parts per hour using a maximum of 5.04 gallons of applied coating per hour, and consisting of:**
  - (1) **one (1) spray paint booth, identified as SB-2, utilizing electrostatic with air assist spray application with dry filters for particulate control, and exhausted through one (1) stack identified as P-02; and**
  - (2) **one (1) spray paint booth, identified as SB-3, utilizing electrostatic with air assist spray application with waterwash for particulate control, and exhausted through one (1) stack identified as P-03.**
- (c) one (1) **prime coat spray painting booth facility**, identified as SB-3, with a maximum capacity of coating 10 feet per minute of products, utilizing electrostatic with air assist application with waterwash for particulate control, and exhausted through one (1) stack (~~SAV ID P-03~~); **coating a maximum of 3,000 pounds of miscellaneous metal parts per hour using a maximum of 9.38 gallons of applied coating per hour, and consisting of:**
  - (1) **one (1) spray paint booth, identified as SB-4, utilizing high volume low pressure (HVLP) spray application with dry filters for particulate control, and exhausted through one (1) stack identified as P-04; and**
  - (2) **one (1) spray paint booth, identified as SB-5, utilizing high volume low pressure (HVLP) spray application with dry filters for particulate control, and exhausted through one (1) stack identified as P-05.**

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

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

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coatings delivered to the applicators at ~~the spray paint booth identified as SB-2~~ **SB-1, the top coat spray painting facility, which includes spray paint booths SB-2 and SB-3, and the prime coat spray painting facility, which includes spray paint booths SB-4 and SB-5**, shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for **air dried and forced warm air dried coatings**.

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.

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

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Pursuant to 326 IAC 6-3-2 (c) the PM **overspray** from the three (3) ~~paint booths (SB-1, SB-2, SB-3)~~ **surface coating facilities (spray paint booth SB-1, the top coat spray painting facility, which includes spray paint booths SB-2 and SB-3, and the prime coat spray painting facility, which includes spray paint booths SB-4 and SB-5)**, shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

**D.1.3 New Source Toxics Control [326 IAC 2-4.1-1]**

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The hazardous air pollutant (HAP) usage at the prime coat spray painting facility, which includes spray paint booths SB-4 and SB-5, shall be limited such that single HAP usage is limited to less than 10 tons per twelve (12) consecutive month period, and total combined HAP usage is limited to less than 25 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-4.1-1 (New Source Toxics Control) will not apply to the facility.

**D.1.4 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]**

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The potential emissions of volatile organic compounds (VOC) attributable to the modification are less than 250 tons per twelve (12) consecutive month period. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply. Any change or modification which may increase VOC usage to 250 tons per twelve (12) consecutive month, or greater, shall require OAM's prior approval before such change can take place.

**D.1.35 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

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

**Compliance Determination Requirements**

**D.1.46 Testing Requirements [326 IAC 2-7-6(1),(6)]**

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The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit in D.1.1, ~~or the PM~~ limits in D.1.2, **or the HAP limits in D.1.3** shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

**D.1.57 Volatile Organic Compounds (VOC)**

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Compliance with the VOC usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

#### D.1.68 Particulate Matter (PM)

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The waterwash and dry filters for PM control shall be in operation at all times when the three (3) surface coating ~~booths (SB-1, SB-2, and SB-3)~~ **facilities (spray paint booth SB-1, the top coat spray painting facility, which includes spray paint booths SB-2 and SB-3, and the prime coat spray painting facility, which includes spray paint booths SB-4 and SB-5)**, are in operation.

#### D.1.79 Monitoring

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- (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 (P-01,P-02,P-03, **P-04, P-05**) 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 Preventive Maintenance Plan.

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

#### D.1.810 Record Keeping Requirements

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- (a) To document compliance with Condition D.1.1 **and D.1.3**, 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 **and HAP** usage limits and/or the VOC **and HAP** emission limits established in Condition D.1.1 **and Condition D.1.3**.
  - (1) The amount, and **the VOC and individual HAP** 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 month(s) of use;
  - (3) The volume weighted VOC content of the coatings used for each month;
  - (4) The cleanup solvent usage for each month;
  - (5) The total VOC, **individual HAP, and combined HAPs** usage for each month;

and

- (6) The weight of VOCs, **individual HAP, and combined HAPs** emitted for each compliance period.
- (b) To document compliance with Condition D.1.68 and D.1.79, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### **D.1.11 Reporting Requirements**

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**A quarterly summary of the information to document compliance with Condition D.1.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

The permit cover page and table of contents will also be updated to include the above referenced information. All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original 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 Michael Hirtler at (973) 575-2555, extension 3229.

Sincerely,

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Management

#### Attachments

MH/EVP

- c: File - Vanderburgh County  
Evansville Environmental Protection Agency  
U.S. EPA, Region V  
Vanderburgh County Health Department  
Air Compliance Section Inspector - Dave Holder  
Compliance Data Section - Jerri Curless  
Administrative and Development - Janet Mobley  
Technical Support and Modeling - Nancy Landau

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
 OFFICE OF AIR MANAGEMENT  
 COMPLIANCE DATA SECTION  
 and the  
 EVANSVILLE ENVIRONMENTAL PROTECTION AGENCY**

**Part 70 Quarterly Report**

**Source Name:** Hahn Equipment Company  
**Source Address:** 1625 N. Garvin Street, Evansville, Indiana 47711  
**Mailing Address:** 1625 N. Garvin Street, Evansville, Indiana 47711  
**Part 70 Permit No.:** T163-7624-00007  
**Facility:** Prime coat spray painting facility, which includes spray paint booths SB-4 and SB-5  
**Parameter:** Single and Combined Hazardous Air Pollutants (HAPs)  
**Limit:** The hazardous air pollutant (HAP) usage shall be limited such that single HAP usage is limited to less than 10 tons per twelve (12) consecutive month period, and total combined HAP usage is limited to less than 25 tons per twelve (12) consecutive month period.

YEAR: \_\_\_\_\_

Month	HAP Usage This Month (tons)		HAP Usage Previous 11 Months (tons)		HAP Usage 12 Month Total (tons)	
	Single HAP	Combined HAPs	Single HAP	Combined HAPs	Single HAP	Combined HAPs
Month 1						
Month 2						
Month 3						

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.  
 Deviation has been reported on: \_\_\_\_\_

**Submitted by:** \_\_\_\_\_  
**Title / Position:** \_\_\_\_\_  
**Signature:** \_\_\_\_\_  
**Date:** \_\_\_\_\_  
**Phone:** \_\_\_\_\_

A certification is not required for this report.

**PART 70 OPERATING PERMIT  
OFFICE OF AIR MANAGEMENT  
and the  
Evansville Environmental Protection Agency**

**Hahn Equipment Company  
1625 N. Garvin Street  
Evansville, IN 47711**

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

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

Operation Permit No.: T163-7624-00007	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: July 13, 1999

First Significant Source Modification 163-11982, issued on

First Administrative Amendment 163-12149	Pages Affected: 3, 4, 4a, 30, 30a, 31, 32, 36a
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

C.12 Monitoring Methods [326 IAC 3]

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

- C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]
- C.14 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5]
- C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]

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

- C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-6] [326 IAC 2-7-19]
- C.17 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]
- C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)]
- C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

**Stratospheric Ozone Protection**

- C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

**D.1 FACILITY OPERATION CONDITIONS - Three (3) Coating Facilities (SB-1, Top Coating Facility, Prime Coating Facility) . . . . . 30**

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

- D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]
- D.1.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]
- D.1.3 New Source Toxics Control [326 IAC 2-4.1-1]
- D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

**Compliance Determination Requirements**

- D.1.5 Testing Requirements [326 IAC 2-7-6(1)]
- D.1.6 Volatile Organic Compounds (VOC)

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

- D.1.7 Particulate Matter (PM)
- D.1.8 Monitoring

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

- D.1.9 Record Keeping Requirements
- D.1.10 Reporting Requirements

**D.2 FACILITY OPERATION CONDITIONS - Insignificant Activities . . . . . 33**

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

- D.1.1 Particulate Matter (PM) [326 IAC 4-2]

**Certification Form . . . . . 34**  
**Emergency/Deviation Occurrence Report . . . . . 35**  
**Quarterly Report - Prime Coating Facility . . . . . 36a**  
**Compliance Report Form . . . . . 37**

## SECTION A SOURCE SUMMARY

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

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

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The Permittee owns and operates stationary source for the surface coating, assembly, and shipment of multi-purpose golf course grounds-keeping equipment and consumer products.

Responsible Official: Mr. Jon Grimmer  
Source Address: 1625 N. Garvin St., Evansville, Indiana 47711  
Mailing Address: 1625 N. Garvin St., Evansville, Indiana 47711  
SIC Code: 3523  
Source Location: Vanderburgh  
Source Status: Attainment for all criteria pollutants;  
Source Status: Part 70 Permit Program  
Minor Source, under PSD;  
Major Source, Section 112 of the Clean Air Act

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

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

- (a) one (1) spray paint booth, identified as SB-1, using a maximum of 0.24 gallons of applied primer or 0.40 gallons of applied top coat per hour, utilizing either airless electrostatic or high volume low pressure (HVLP) application with dry filters for particulate control, and exhausted through one (1) stack P-01;

*(Note: This facility replaces existing spray paint booth SB-1, which has one (1) spray paint booth, identified as SB-1, equipped with an overhead conveyor and closing doors at both ends, with a maximum capacity of coating one (1) metal frame per hour, utilizing airless electrostatic application with dry filters for particulate control, and exhausted through one (1) stack (S/V ID P-01). As listed, the new booth will retain the same facility identification (i.e., SB-1) as the booth removed from service).*

- (b) one (1) top coat spray painting facility, coating a maximum of 3,000 pounds of metal parts per hour using a maximum of 5.04 gallons of applied coating per hour, consisting of:
- (1) one (1) spray paint booth, identified as SB-2, utilizing electrostatic with air assist spray application with dry filters for particulate control, and exhausted through one (1) stack identified as P-02; and
- (2) one (1) spray paint booth, identified as SB-3, utilizing electrostatic with air assist spray application with waterwash for particulate control, and exhausted through one (1) stack identified as P-03.

- (c) one (1) prime coat spray painting facility, coating a maximum of 3,000 pounds of metal parts per hour using a maximum of 9.38 gallons of applied coating per hour, consisting of:
  - (1) one (1) spray paint booth, identified as SB-4, utilizing high volume low pressure (HVLP) spray application with dry filters for particulate control, and exhausted through one (1) stack identified as P-04; and
  - (2) one (1) spray paint booth, identified as SB-5, utilizing high volume low pressure (HVLP) spray application with dry filters for particulate control, and exhausted through one (1) stack identified as P-05.

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

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

- (a) one (1) natural gas fired heat cleaning oven rated at 515,000 Btu per hour, equipped with an afterburner and exhausted through one (1) stack.
- (b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

## SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] - The following surface coating operations

- (a) one (1) spray paint booth, identified as SB-1, using a maximum of 0.24 gallons of applied primer or 0.40 gallons of applied top coat per hour, utilizing either airless electrostatic or high volume low pressure (HVLV) application with dry filters for particulate control, and exhausted through one (1) stack P-01;
- (b) one (1) top coat spray painting facility, coating a maximum of 3,000 pounds of metal parts per hour using a maximum of 5.04 gallons of applied coating per hour, consisting of:
  - (1) one (1) spray paint booth, identified as SB-2, utilizing electrostatic with air assist spray application with dry filters for particulate control, and exhausted through one (1) stack identified as P-02; and
  - (2) one (1) spray paint booth, identified as SB-3, utilizing electrostatic with air assist spray application with waterwash for particulate control, and exhausted through one (1) stack identified as P-03.
- (c) one (1) prime coat spray painting facility, coating a maximum of 3,000 pounds of metal parts per hour using a maximum of 9.38 gallons of applied coating per hour, consisting of:
  - (1) one (1) spray paint booth, identified as SB-4, utilizing high volume low pressure (HVLV) spray application with dry filters for particulate control, and exhausted through one (1) stack identified as P-04; and
  - (2) one (1) spray paint booth, identified as SB-5, utilizing high volume low pressure (HVLV) spray application with dry filters for particulate control, and exhausted through one (1) stack identified as P-05.

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

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

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coatings delivered to the applicators at spray paint booth SB-1, the top coat spray painting facility, which includes spray paint booths SB-2 and SB-3, and the prime coat spray painting facility, which includes spray paint booths SB-4 and SB-5, shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for air dried and forced warm air dried coatings.

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.

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

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Pursuant to 326 IAC 6-3-2 (c) the PM overspray from the three (3) surface coating facilities (spray paint booth SB-1, the top coat spray painting facility, which includes spray paint booths SB-2 and SB-3, and the prime coat spray painting facility, which includes spray paint booths SB-4 and SB-5), shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

**D.1.3 New Source Toxics Control [326 IAC 2-4.1-1]**

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The hazardous air pollutant (HAP) usage at the prime coat spray painting facility, which includes spray paint booths SB-4 and SB-5, shall be limited such that single HAP usage is limited to less than 10 tons per twelve (12) consecutive month period, and total combined HAP usage is limited to less than 25 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-4.1-1 (New Source Toxics Control) will not apply to the facility.

**D.1.4 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]**

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The potential emissions of volatile organic compounds (VOC) attributable to the modification are less than 250 tons per twelve (12) consecutive month period. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply. Any change or modification which may increase VOC usage to 250 tons per twelve (12) consecutive month, or greater, shall require OAM's prior approval before such change can take place.

**D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

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

**Compliance Determination Requirements**

**D.1.6 Testing Requirements [326 IAC 2-7-6(1),(6)]**

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The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit in D.1.1, the PM limits in D.1.2, or the HAP limits in D.1.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

#### D.1.7 Volatile Organic Compounds (VOC)

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Compliance with the VOC usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

#### D.1.8 Particulate Matter (PM)

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The waterwash and dry filters for PM control shall be in operation at all times when the three (3) surface coating facilities (spray paint booth SB-1, the top coat spray painting facility, which includes spray paint booths SB-2 and SB-3, and the prime coat spray painting facility, which includes spray paint booths SB-4 and SB-5), are in operation.

#### D.1.9 Monitoring

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- (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 (P-01, P-02, P-03, P-04, P-05) 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 Preventive Maintenance Plan.

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

#### D.1.10 Record Keeping Requirements

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- (a) To document compliance with Condition D.1.1 and D.1.3, 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 and HAP usage limits and/or the VOC and HAP emission limits established in Condition D.1.1 and Condition D.1.3.
  - (1) The amount, and the VOC and individual HAP 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 month(s) of use;
  - (3) The volume weighted VOC content of the coatings used for each month;
  - (4) The cleanup solvent usage for each month;

- (5) The total VOC, individual HAP, and combined HAPs usage for each month; and
  - (6) The weight of VOCs, individual HAP, and combined HAPs emitted for each compliance period.
- (b) To document compliance with Condition D.1.8 and D.1.9, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.11 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
 OFFICE OF AIR MANAGEMENT  
 COMPLIANCE DATA SECTION  
 and the  
 EVANSVILLE ENVIRONMENTAL PROTECTION AGENCY**

**Part 70 Quarterly Report**

Source Name: Hahn Equipment Company  
 Source Address: 1625 N. Garvin Street, Evansville, Indiana 47711  
 Mailing Address: 1625 N. Garvin Street, Evansville, Indiana 47711  
 Part 70 Permit No.: T163-7624-00007  
 Facility: Prime coat spray painting facility, which includes spray paint booths SB-4 and SB-5  
 Parameter: Single and Combined Hazardous Air Pollutants (HAPs)  
 Limit: The hazardous air pollutant (HAP) usage shall be limited such that single HAP usage is limited to less than 10 tons per twelve (12) consecutive month period, and total combined HAP usage is limited to less than 25 tons per twelve (12) consecutive month period.

YEAR: \_\_\_\_\_

Month	HAP Usage This Month (tons)		HAP Usage Previous 11 Months (tons)		HAP Usage 12 Month Total (tons)	
	Single HAP	Combined HAPs	Single HAP	Combined HAPs	Single HAP	Combined HAPs
Month 1						
Month 2						
Month 3						

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.  
 Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
 Title / Position: \_\_\_\_\_  
 Signature: \_\_\_\_\_  
 Date: \_\_\_\_\_  
 Phone: \_\_\_\_\_

A certification is not required for this report.