

Mr. John Bawcum
The Braun Corporation
PO Box 310
Winamac, IN 46996

Re: **131-12887-00017**
Significant Permit Modification to:
Part 70 permit No.: **T 131-7058-00017**

Dear Mr. Bawcum:

The Braun Corporation was issued Part 70 operating permit **T 131-7058-00017** on April 20, 1999 for a stationary motor vehicle conversion plant. A letter requesting changes to this permit was received on October 24, 2000. Pursuant to 326 IAC 2-7-12 a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The Office of Air Quality has determined that the following changes shall be made to the permit to allow operation of the surface coating booths without their respective dry filters as a means of PM emission control:

- (a) that (2), (5), (8), (11), and (13) of Condition A.2 shall be changed to remove all references of the dry filters as emission control devices.
- (b) that (2), (5), (8), (11), and (13) of the unit description of Section D.1 shall be changed to remove all references of the dry filters as emission control devices.
- (c) that item (m) of Condition A.3 and the insignificant activities list of Section D.4 shall be changed to describe one burn-off oven instead of two.
- (d) that Condition D.1.3, the requirement of a preventive maintenance plan, shall be removed because the required stack testing is being used to demonstrate that the dry filters are not necessary to achieve compliance with 326 IAC 6-3-2, no ongoing demonstration of compliance is required, and thus, no preventive maintenance plan is required.
- (e) that the testing requirements (Condition D.1.4) shall be changed to require testing for PM emissions from one Entervan line and one Bus/ParaTransit Van Line while a bus and para-transit van is being painted, with the test being conducted within 90 days of permit issuance. The required tests will demonstrate that use of the dry filters as PM control is not needed.
- (f) that Condition D.1.5 shall be removed to eliminate the requirement of the use of dry filters at all times when the applicable surface coating booths are in operation and Condition D.1.6 shall be removed to eliminate the compliance monitoring requirements associated with use of the filters. Provided the stack tests demonstrate that the dry filters are not necessary, Conditions D.1.5 and D.1.6 become not applicable.

- (g) that the record keeping requirements of Condition D.1.7 be changed to require record keeping of the VOC content only.
- (h) that a new Condition D.1.4 be added to limit the solids content of the coatings and require that records of the coating solids be kept to demonstrate compliance with the limits established.
- (i) that the testing requirements (Condition D.1.4) be re-numbered to Condition D.1.3 and that Condition D.1.7 be re-numbered to Condition D.1.5, with the permit Table of Contents being adjusted accordingly.

All other conditions of the permit shall remain unchanged and in effect. The permit has been redrafted to include all changes made to the source to date.

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 contact Scott Fulton, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, at 317-233-5691 or in Indiana at 1-800-451-6027 (ext 3-5691).

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
SDF

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

PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**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 Quality	Issuance Date: April 20, 1999
First Significant Permit Modification 131-10831	Issuance Date: August 2, 1999
First Administrative Amendment 131-11117	Issuance Date: September 14, 1999
Second Administrative Amendment AAT 131-12100	Issuance Date: April 20, 2000
Second Significant Permit Modification 131-11788	Issuance Date: June 7, 2000
Third Significant Permit Modification 131-12887	Pages Affected: Permit redrafted to incorporate all changes to date. Specific affected pages for this permit: 3, 5, 6, 7, 30, 31, 32, 33, and 38
Issued by: Original signed by Paul Dubentzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: May 7, 2001

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A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 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 facilities and assembly areas in Plant 4, described as follows:

- (1) EnterVan Line No. 1 assembly area, identified as Enter/Assem. No. 1, with a maximum rating of 15.0 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 15.0 vans per day. Particulate emissions shall be exhausted at Stack/Vent ID Enter 1. This facility operates independently of all other refinishing surface coating facilities.
- (3) EnterVan Line No. 1 undercoating area, identified as Enter/Un. No. 1, with a maximum rating of 15.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other undercoating areas.
- (4) EnterVan Line No. 2 assembly area, identified as Enter/Assem. No. 2 with a maximum rating of 15.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.
- (5) EnterVan Line No. 2 refinishing surface coating booth, identified as Enter/Ref. No. 2, with a maximum rating of 15.0 vans per day. Particulate emissions shall be exhausted at Stack/Vent ID Enter 2. This facility operates independently of all other refinishing surface coating facilities.

- (6) EnterVan Line No. 2 undercoating area, identified as Enter/Un. No. 2, with a maximum rating of 15.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other undercoating areas.
- (7) Bus/ParaTransit Van Line No. 1 assembly area, identified as Para/Assem. No. 1, with a maximum rating of 12.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.
- (8) Bus/ParaTransit Van Line No.1 refinishing surface coating booth, identified as Para/Ref. 1, with a maximum rating of 12.0 vans per day. Particulate emissions shall be exhausted at Stack/Vent ID Para 1. This facility operates independently of all other refinishing surface coating facilities.
- (9) Bus/ParaTransit Van Line No.1 undercoating area, identified as Para/Un. No. 1, with a maximum rating of 12.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other undercoating areas.
- (10) Bus/ParaTransit Van Line No. 2 assembly area, identified as Para/Assem. No. 2, with a maximum rating of 12.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.
- (11) Bus/ParaTransit Van Line No. 2 refinishing surface coating booth, identified as Para/Ref. 2, with a maximum rating of 12.0 vans per day. Particulate emissions shall be exhausted at Stack/Vent ID Para 2. This facility operates independently of all other refinishing surface coating facilities.
- (12) Bus/ParaTransit Van Line No. 2 undercoating area, identified as Para/Un. No. 2, with a maximum rating of 12.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other undercoating areas.
- (13) Flare Paint Shop equipped with one (1) surface coating booth, identified as FP No. 1, with a maximum rating of 54.0 flare sets per day. Particulate emissions shall be exhausted at Stack/Vent ID FP 1. This facility operates independently of all other surface coating facilities.

A.3 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) EnterVan Line No. 1 welding operations at Plant 4, emitting less than 25 pounds per day of PM and less than 1 pound per day of any combination of HAPs.
- (c) EnterVan Line No. 2 welding operations at Plant 4, emitting less than 25 pounds per day of PM and less than 1 pound per day of any combination of HAPs.
- (d) Bus/ParaTransit Van Line No. 1 welding operations at Plant 4, emitting less than 25 pounds per day of PM and less than 1 pound per day of any combination of HAPs.

- (e) Bus/ParaTransit Van Line No. 2 welding operations at Plant 4, emitting less than 25 pounds per day of PM and less than 1 pound per day of any combination of HAPs.
- (f) Axle/Door welding operations at Plant 4, emitting less than 25 pounds per day of PM and less than 1 pound per day of any combination of HAPs.
- (g) Welding operations at Plant 3, emitting less than 25 pounds per day of PM and less than 1 pound per day of any combination of HAPs.
- (h) Touch-Up Booth/Oven No. 1 at Plant 4 emitting less than 15 pounds per day of VOC, less than 25 pounds per day of PM and less than 1 ton per year of any combination of HAPs.
- (i) Touch-Up Booth/Oven No. 2 at Plant 4 emitting less than 15 pounds per day of VOC, less than 25 pounds per day of PM and less than 1 ton per year of any combination of HAPs.
- (j) APD Door Shop at Plant 3 emitting less than 15 pounds per day of VOC, less than 25 pounds per day of PM and less than 1 ton per year of any combination of HAPs.
- (k) Powder Coating and Oven at Plant 3 emitting less than 15 pounds per day of VOC, less than 25 pounds per day of PM and less than 1 ton per year of any combination of HAPs.
- (l) Powder Coating Oven at Plant 3 with natural gas-fired combustion of less than ten million (10,000,000) Btu per hour.
- (m) One (1) Burn Off Oven at Plant 3 equipped with two burners, with natural gas-fired combustion of less than ten million (10,000,000) Btu per hour.
- (n) Space heaters with natural gas-fired combustion of less than ten million (10,000,000) Btu per hour.

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).

B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

- (a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."

B.2 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

B.3 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-7-7(a)]

- (a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.
- (b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.6 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

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

B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

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

- (b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAQ along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAQ, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

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

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source' compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was based on continuous or intermittent data;
 - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);
 - (5) Any insignificant activity that has been added without a permit revision;
 - (6) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

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

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ.

B.13 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,
Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

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

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(10) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

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

B.14 Permit Shield [326 IAC 2-7-15]

-
- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.

- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
 - (1) The applicable requirements are included and specifically identified in this permit;
or
 - (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAQ shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ has issued the modification. [326 IAC 2-7-12(b)(7)]

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

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

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) An emergency as defined in 326 IAC 2-7-1(12); or
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
 - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.18 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

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

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
 - (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

- (a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.
- (b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

B.22 Operational Flexibility [326 IAC 2-7-20]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

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

and

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

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

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

(b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) **Emission Trades [326 IAC 2-7-20(c)]**
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) **Alternative Operating Scenarios [326 IAC 2-7-20(d)]**
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) **Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.**

B.23 Construction Permit Requirement [326 IAC 2]

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

B.24 Inspection and Entry [326 IAC 2-7-6(2)]

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

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-7-6(6)]
 - (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAQ or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAQ nor an authorized representative, may disclose the information unless and until IDEM, OAQ makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination

becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]

- (2) The Permittee, and IDEM, OAQ acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

B.25 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

The application which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

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

C SOURCE OPERATION CONDITIONS

Entire Source

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

- C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]
Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- C.2 Opacity [326 IAC 5-1]
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%) in any one (1) six minute averaging period, as determined in 326 IAC 5-1-4.
 - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]
The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.
- C.4 Incineration [326 IAC 4-2][326 IAC 9-1-2]
The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.
- C.5 Fugitive Dust Emissions [326 IAC 6-4]
The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.
- C.6 Operation of Equipment [326 IAC 2-7-6(6)]
All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

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

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.8 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

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

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAQ within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAQ, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.9 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements; and
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (a) Will continue to comply with such requirements that become effective during the term of this permit.

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend the compliance schedule an additional ninety (90) days provided the Permittee notifies:

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

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.11 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- (a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.12 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.13 Pressure Gauge Specifications

Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.

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

C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

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

within ninety (90) days after the date of issuance of this permit.

The ERP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) If the ERP is disapproved by IDEM, OAQ the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) Submit:
 - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
 - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
 - (3) A verification to IDEM, OAQ that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAQ that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.16 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] [326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
 - (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (1) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

- (2) The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
 - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAQ shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAQ within thirty (30) days of receipt of the notice of deficiency. IDEM, OAQ reserves the authority to use enforcement activities to resolve noncompliant stack tests.

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

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

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

C.18 Emission Statement [326 IAC 2-7-5(3)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19][326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
- (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate actual emissions of other regulated pollutants from the source, for purpose of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. This emission statement must be submitted to:
- Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.19 Monitoring Data Availability

- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.

- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.20 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAQ representative, for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or local agency within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (3) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;

(4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

(d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

(a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

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

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

(g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

Stratospheric Ozone Protection

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

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

D.1 FACILITY OPERATION CONDITIONS - Surface Coating Areas

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

Thirteen (13) surface coating facilities and assembly areas in Plant 4, described as follows:

- (1) EnterVan Line No. 1 assembly area, identified as Enter/Assem. No. 1, with a maximum rating of 15.0 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 15.0 vans per day. Particulate emissions shall be exhausted at Stack/Vent ID Enter 1. This facility operates independently of all other refinishing surface coating facilities.
- (3) EnterVan Line No. 1 undercoating area, identified as Enter/Un. No. 1, with a maximum rating of 15.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other undercoating areas.
- (4) EnterVan Line No. 2 assembly area, identified as Enter/Assem. No. 2 with a maximum rating of 15.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.
- (5) EnterVan Line No. 2 refinishing surface coating booth, identified as Enter/Ref. No. 2, with a maximum rating of 15.0 vans per day. Particulate emissions shall be exhausted at Stack/Vent ID Enter 2. This facility operates independently of all other refinishing surface coating facilities.
- (6) EnterVan Line No. 2 undercoating area, identified as Enter/Un. No. 2, with a maximum rating of 15.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other undercoating areas.
- (7) Bus/ParaTransit Van Line No. 1 assembly area, identified as Para/Assem. No. 1, with a maximum rating of 12.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.
- (8) Bus/ParaTransit Van Line No.1 refinishing surface coating booth, identified as Para/Ref. 1, with a maximum rating of 12.0 vans per day. Particulate emissions shall be exhausted at Stack/Vent ID Para 1. This facility operates independently of all other refinishing surface coating facilities.
- (9) Bus/ParaTransit Van Line No.1 undercoating area, identified as Para/Un. No. 1, with a maximum rating of 12.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other undercoating areas.
- (10) Bus/ParaTransit Van Line No. 2 assembly area, identified as Para/Assem. No. 2, with a maximum rating of 12.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.

- (11) Bus/ParaTransit Van Line No. 2 refinishing surface coating booth, identified as Para/Ref. 2, with a maximum rating of 12.0 vans per day. Particulate emissions shall be exhausted at Stack/Vent ID Para 2. This facility operates independently of all other refinishing surface coating facilities.
- (12) Bus/ParaTransit Van Line No. 2 undercoating area, identified as Para/Un. No. 2, with a maximum rating of 12.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other undercoating areas.
- (13) Flare Paint Shop equipped with one (1) surface coating booth, identified as FP No. 1, with a maximum rating of 54.0 flare sets per day. Particulate emissions shall be exhausted at Stack/Vent ID FP 1. This facility operates independently of all other surface coating facilities.

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

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/Un. No. 1, Enter/Assem. No. 2, Enter/Ref. No. 2, Enter/Un. No. 2, Para/Assem. No. 1, Para/Ref. No. 1, Para/Un. No. 1 Para/Assem. No. 2, Para/Ref. No. 2, Para/Un. No. 2 and FP No. 1 surface coating areas 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.1.2 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 and Bus/ParaTransit assembly and undercoating areas (Enter/Assem. No. 1, Enter/Un. No. 1, Enter/Assem. No. 2, Enter/Un. No. 2, Para/Assem. No. 1, Para/Un. No. 1, Para/Assem. No. 2 and Para/Un. No. 2) shall be limited to 3.5 pounds of VOCs per gallon of coating less water for extreme performance coatings, as delivered to the applicator.

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) Contact adhesives in the Bus/ParaTransit Van assembly areas (Para/Assem. No. 1 and Para/Assem. No. 2) 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 OAQ and use of Best Available Control Technology.
- (c) The refinishing surface coating booths (Enter/Ref. No. 1, Enter/Ref. No. 2, Para/Ref. No. 1 and Para/Ref. No. 2) 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 OAQ and use of Best Available Control Technology.
- (d) For the purposes of enforcing Conditions D.1.2(b) and D.1.2(c), a production facility is defined as one EnterVan or Bus/ParaTransit Van production line, consisting of one (1) assembly area, one (1) refinishing surface coating area and one (1) undercoating area. Each production line at the source operates independently of all other lines and is treated as a separate facility.
- (e) The application of adhesives to wood substrates in the EnterVan and Bus/ParaTransit Van assembly areas (Enter/Assem. No. 1, Enter/Assem. No. 2, Para/Assem. No. 1 and Para/Assem. No. 2) 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.

Compliance Determination Requirements

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.

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

During the period within 90 days after the issuance of this permit, in order to demonstrate compliance with Condition D.1.1, the Permittee shall perform PM testing of one (1) EnterVan line and One (1) Bus/ParaTransit Van line utilizing methods as approved by the Commissioner. This PM test needs to be performed on the Bus/ParaTransit Van line while a bus is being painted and also while a paratransit van is being painted. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

D.1.5 Coating Solids Content

Pursuant to 326 IAC 2-1.1-11, the solids content of the coatings applied at EnterVan Lines 1 and 2 and Bus/ParaTransit Van Lines 1 and 2 shall be limited as follows:

- (a) the solids content at each assembly area (Enter/Assem. No. 1, Enter/Assem. No. 2, Para/Assem. No. 1, and Para/Assem. No. 2) shall be limited to 3.10 pounds solids per gallon coating as applied,

- (b) the solids content at each refinishing area (Enter/Ref. No. 1, Enter/Ref. No. 2, Para/Ref. No. 1, and Para/Ref. No. 2) shall be limited to 7.60 pounds solids per gallon coating as applied, and
- (c) the solids content at each undercoating area (Enter/Un. No. 1, Enter/Un. No.2, Para/Un. No. 1, and Para/Un. No. 2) shall be limited 4.46 pounds solids per gallon coating as applied.

The records required in this Condition shall be maintained in accordance with Section C - General Record Keeping Requirements of this permit. Any changes to the coatings applied at the EnterVan Lines and Bus/ParaTransit Van Lines specified in this condition that exceed the specified solids content limits shall obtain approval from the Office of Air Quality before such changes are made.

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

D.1.6 Record Keeping Requirements

- (a) To document compliance with Condition D.1.2(a), the Permittee shall maintain records of the VOC content of each coating material, as applied. The records shall include the coatings applied during each month, the VOC content of each coating as applied, and purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the coating type. Said records shall be maintained on a monthly basis and shall be complete and sufficient to establish compliance with the VOC emission limits established for coating of metal substrates in Condition D.1.2(a).
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2 FACILITY OPERATION CONDITIONS

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

Insignificant Activities:

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

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

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

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

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

Compliance Determination Requirements

D.2.2 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 Conditions D.2.1 and D.2.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

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

D.2.3 Monitoring

Monitoring of this facility is not specifically required by this permit. However, any change or modification to this facility, as specified in 326 IAC 2-1 may require this facility to have monitoring requirements.

SECTION D.3 FACILITY OPERATION CONDITIONS

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

Insignificant Activities:

Insignificant Activities:

- (b) EnterVan Line No. 1 welding operations at Plant 4, emitting less than 25 pounds per day of PM and less than 1 pound per day of any combination of HAPs.
- (c) EnterVan Line No. 2 welding operations at Plant 4, emitting less than 25 pounds per day of PM and less than 1 pound per day of any combination of HAPs.
- (d) Bus/ParaTransit Van Line No. 1 welding operations at Plant 4, emitting less than 25 pounds per day of PM and less than 1 pound per day of any combination of HAPs.
- (e) Bus/ParaTransit Van Line No. 2 welding operations at Plant 4, emitting less than 25 pounds per day of PM and less than 1 pound per day of any combination of HAPs.
- (f) Axle/Door welding operations at Plant 4, emitting less than 25 pounds per day of PM and less than 1 pound per day of any combination of HAPs.
- (g) Welding operations at Plant 3, emitting less than 25 pounds per day of PM and less than 1 pound per day of any combination of HAPs.
- (h) Touch-Up Booth/Oven No. 1 at Plant 4 emitting less than 15 pounds per day of VOC, less than 25 pounds per day of PM and less than 1 ton per year of any combination of HAPs.
- (i) Touch-Up Booth/Oven No. 2 at Plant 4 emitting less than 15 pounds per day of VOC, less than 25 pounds per day of PM and less than 1 ton per year of any combination of HAPs.
- (j) APD Door Shop at Plant 3 emitting less than 15 pounds per day of VOC, less than 25 pounds per day of PM and less than 1 ton per year of any combination of HAPs.
- (k) Powder Coating and Oven at Plant 3 emitting less than 15 pounds per day of VOC, less than 25 pounds per day of PM and less than 1 ton per year of any combination of HAPs.

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

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

D.3.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the welding and surface coating operations shall not exceed allowable PM emission rate based on the following equation:

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

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

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

Compliance Determination Requirement

D.3.2 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, compliance with the PM limit specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

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

D.3.3 Record Keeping and Reporting Requirements

There are no record keeping or reporting requirements for this facility.

SECTION D.4

FACILITY OPERATION CONDITIONS

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

Insignificant Activities:

Insignificant Activities with not covered by specific rules, included at the request of the source.

- (l) Powder Coating Oven at Plant 3 with natural gas-fired combustion of less than ten million (10,000,000) Btu per hour.
- (m) One (1) Burn Off Oven at Plant 3 equipped with two burners, with natural gas-fired combustion of less than ten million (10,000,000) Btu per hour.
- (n) Space heaters with natural gas-fired combustion of less than ten million (10,000,000) Btu per hour.

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

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

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: **The Braun Corporation**
Source Address: **623 West 11th Street, Winamac, Indiana 46996**
Mailing Address: **P. O. Box 310, Winamac, Indiana 46996**
Part 70 Permit No.: **T131-7058-00017**

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: **The Braun Corporation**
Source Address: **623 West 11th Street, Winamac, Indiana 46996**
Mailing Address: **P. O. Box 310, Winamac, Indiana 46996**
Part 70 Permit No.: **T131-7058-00017**

This form consists of 2 pages

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Check either No. 1 or No.2	
9 1.	This is an emergency as defined in 326 IAC 2-7-1(12)
C	The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
C	The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9 2.	This is a deviation, reportable per 326 IAC 2-7-5(3)(c)
C	The Permittee must submit notice in writing within ten (10) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency/Deviation:
Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

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

**PART 70 OPERATING PERMIT
QUARTERLY COMPLIANCE REPORT**

Source Name: **The Braun Corporation**
Source Address: **623 West 11th Street, Winamac, Indiana 46996**
Mailing Address: **P. O. Box 310, Winamac, Indiana 46996**
Part 70 Permit No.: **T131-7058-00017**

Months: _____ to _____ Year: _____

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

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of each Deviation

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for a Significant Permit Modification to an Existing Title V Permit

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
Significant Permit Modification No.:	131-12887-00017
Permit Reviewer:	Scott D. Fulton

On February 8, 2001, the Office of Air Quality (OAQ) had a notice published in the Pulaski Journal in Winamac, Indiana, stating that Braun Corporation had applied for a Significant Permit Modification to an existing Part 70 Operating Permit. The notice also stated that the OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed 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 permit should be issued as proposed.

Upon further review, the OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table Of Contents has been modified to reflect these changes.

On March 16, 2001, DECA Environmental & Associates, Inc. submitted the following comments in regards to the proposed modification.

1. **Comment 1:**

Condition A.2(2), (5), (8), (11), and (13), and the unit summary of Section D.1 (D.1(2), (5), (8), (11), and (13)), should be changed to read "are" controlled by dry filters as opposed to "shall be" controlled by dry filters.

Response 1:

Although the dry filters will be in place, the filters are not considered control devices for this source, which eliminates the requirement to monitor the fugitive particulate matter (PM) emissions from the applicable units. Therefore the "control" references of Condition A.2(2), (5), (8), (11), and (13), and (2), (5), (8), (11), and (13) of the unit summary of Section D.1 shall be removed.

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 facilities and assembly areas in Plant 4, described as follows:

- (1) EnterVan Line No. 1 assembly area, identified as Enter/Assem. No. 1, with a maximum rating of 15.0 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 15.0 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. 1 undercoating area, identified as Enter/Un. No. 1, with a maximum rating of 15.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other undercoating areas.
- (4) EnterVan Line No. 2 assembly area, identified as Enter/Assem. No. 2 with a maximum rating of 15.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.
- (5) EnterVan Line No. 2 refinishing surface coating booth, identified as Enter/Ref. No. 2, with a maximum rating of 15.0 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.
- (6) EnterVan Line No. 2 undercoating area, identified as Enter/Un. No. 2, with a maximum rating of 15.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other undercoating areas.
- (7) Bus/ParaTransit Van Line No. 1 assembly area, identified as Para/Assem. No. 1, with a maximum rating of 12.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.
- (8) Bus/ParaTransit Van Line No.1 refinishing surface coating booth, identified as Para/Ref. 1, with a maximum rating of 12.0 vans per day. Particulate emissions shall be ~~controlled by dry filters,~~ then exhausted at Stack/Vent ID Para 1. This facility operates independently of all other refinishing surface coating facilities.
- (9) Bus/ParaTransit Van Line No.1 undercoating area, identified as Para/Un. No. 1, with a maximum rating of 12.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other undercoating areas.
- (10) Bus/ParaTransit Van Line No. 2 assembly area, identified as Para/Assem. No. 2, with a maximum rating of 12.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.
- (11) Bus/ParaTransit Van Line No. 2 refinishing surface coating booth, identified as Para/Ref. 2, with a maximum rating of 12.0 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.
- (12) Bus/ParaTransit Van Line No. 2 undercoating area, identified as Para/Un. No. 2, with a maximum rating of 12.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other undercoating areas.

- (13) Flare Paint Shop equipped with one (1) surface coating booth, identified as FP No. 1, with a maximum rating of 54.0 flare sets per day. Particulate emissions shall be ~~controlled by dry filters, then~~ exhausted at Stack/Vent ID FP 1. This facility operates independently of all other surface coating facilities.

D.1 FACILITY OPERATION CONDITIONS - Surface Coating Areas

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

Thirteen (13) surface coating facilities and assembly areas in Plant 4, described as follows:

- (1) EnterVan Line No. 1 assembly area, identified as Enter/Assem. No. 1, with a maximum rating of 15.0 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 15.0 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. 1 undercoating area, identified as Enter/Un. No. 1, with a maximum rating of 15.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other undercoating areas.
- (4) EnterVan Line No. 2 assembly area, identified as Enter/Assem. No. 2 with a maximum rating of 15.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.
- (5) EnterVan Line No. 2 refinishing surface coating booth, identified as Enter/Ref. No. 2, with a maximum rating of 15.0 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.
- (6) EnterVan Line No. 2 undercoating area, identified as Enter/Un. No. 2, with a maximum rating of 15.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other undercoating areas.
- (7) Bus/ParaTransit Van Line No. 1 assembly area, identified as Para/Assem. No. 1, with a maximum rating of 12.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.
- (8) Bus/ParaTransit Van Line No.1 refinishing surface coating booth, identified as Para/Ref. 1, with a maximum rating of 12.0 vans per day. Particulate emissions shall be ~~controlled by dry filters, then~~ exhausted at Stack/Vent ID Para 1. This facility operates independently of all other refinishing surface coating facilities.
- (9) Bus/ParaTransit Van Line No.1 undercoating area, identified as Para/Un. No. 1, with a maximum rating of 12.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other undercoating areas.
- (10) Bus/ParaTransit Van Line No. 2 assembly area, identified as Para/Assem. No. 2, with a maximum rating of 12.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other assembly areas.

- (11) Bus/ParaTransit Van Line No. 2 refinishing surface coating booth, identified as Para/Ref. 2, with a maximum rating of 12.0 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.
- (12) Bus/ParaTransit Van Line No. 2 undercoating area, identified as Para/Un. No. 2, with a maximum rating of 12.0 vans per day. Particulate emissions are fugitive. This facility operates independently of all other undercoating areas.
- (13) Flare Paint Shop equipped with one (1) surface coating booth, identified as FP No. 1, with a maximum rating of 54.0 flare sets per day. Particulate emissions shall be ~~controlled by dry filters, then~~ exhausted at Stack/Vent ID FP 1. This facility operates independently of all other surface coating facilities.

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

2. Comment 2:

Item (m) of the insignificant activities list of Condition A.3 and the insignificant activities list of Section D.4 incorrectly lists two burn-off ovens when there is only one. This needs to be corrected.

Response 2:

The most recent submittal to the Office of Air Quality (OAQ) (Administrative Amendment 131-12100-00017, issued on April 20, 2000) incorrectly lists two burn-off ovens which was transposed to the current proposed modification. However, the modification submitted prior to Administrative Amendment 131-12100-00017 (Second Significant Source Modification 131-11788-00017, issued on June 7, 2000), does correctly list one burn-off oven. Thus, Condition A.3 and the insignificant activities list of Section D.4 shall be amended as requested.

A.1 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....
- (m) ~~Two~~ **One (21)** Burn Off Ovens at Plant 3 **equipped with two burners**, with natural gas-fired combustion of less than ten million (10,000,000) Btu per hour....

SECTION D.4 FACILITY OPERATION CONDITIONS

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

Insignificant Activities:

Insignificant Activities with not covered by specific rules, included at the request of the source.

- (l) Powder Coating Oven at Plant 3 with natural gas-fired combustion of less than ten million (10,000,000) Btu per hour.
- (m) ~~Two~~ **One (21)** Burn Off Ovens at Plant 3 **equipped with two burners**, with natural gas-fired combustion of less than ten million (10,000,000) Btu per hour....

3. Comment 3:

The preventive maintenance plan of Condition D.1.3 should be removed because the dry filters are not required as controls.

Response 3:

The source is going to conduct stack testing without the dry filters to demonstrate compliance with 326 IAC 6-3-2. Should the source demonstrate through the required stack testing that the dry filters are not necessary to achieve compliance with 326 IAC 6-3-2, no ongoing demonstration of compliance will be required, and thus, no preventive maintenance plan will be required. The preventive maintenance plan can then be removed.

However, until such time the stack tests demonstrate compliance with the limit, the preventive maintenance plan (Condition D.1.3) must remain in the permit. Thus, no changes to Condition D.1.3 shall be made.

4. Comment 4:

The solids content limits of Condition D.1.5 should be removed because the limit promotes the use of high VOC coatings.

Response 4:

DECA's claim that the solids content limit promotes the use of higher VOC coatings is incorrect. Their claim is based on the premise that the lower solid contents required by the limits will force the source into the use of higher VOC content coatings.

While it is true that the source may voluntarily increase the VOC content of the coatings to meet the solids limits of Condition D.1.4, the limits themselves do not require the source to find different coatings or change the formulation of the existing coatings to meet the limits established.

The solids content limits established in Condition D.1.4 are based on the worst case solids coating applied at the source. This means the source can apply any coatings currently used at the source. No new coatings are required and no new formulations need to be created. Thus, there is no forced increase in VOC content as proposed by DECA.

Further, the purpose of the solids content limit is to minimize the particulate matter emissions generated by the coating processes of the source. Since compliance with the 326 IAC 6-3 hourly limit is demonstrated through stack testing, no compliance monitoring in the form of daily filter checks, weekly observations of the overspray, and monthly observations of the exhaust stacks are necessary.

However, while the compliance stack tests demonstrate initial compliance with the 326 IAC 6-3 hourly limit, the stack tests do not demonstrate "continuous" compliance. It is the solids content limits of Condition D.1.5 that demonstrate compliance with the 326 IAC 6-3 limit on a continuous basis.

Limiting the solids content of the coatings to the worst case coating ensures that the source will not utilize coatings that exceed the solids content of the coatings currently applied, which ensures that, on a continuous basis, there will be no increases in particulate matter emissions. Thus, no changes to Condition D.1.4 shall be made.

5. Comment 5:

The record keeping requirements of Condition D.1.6 should be replaced with the following: "To document compliance with Condition D.1.2 the Permittee shall maintain records of the VOC content of the undercoating material and adhesives that are applied in the assembly areas. Records shall include either the Material Safety Data Sheets or VOC Data Sheets that verify the VOC content of the coatings used as applied".

Response 5:

Second Significant Source Modification 131-11788-00017, issued on June 7, 2000, removed the requirement to keep records of the amount of adhesives and clean-up solvents utilized at the source and only required that records of the VOC content be kept through maintaining MSDS sheets "or" VOC data sheets.

During review of the current proposed modification (131-12887-00017), prior to public notice, it was determined that the replacement record keeping requirements were not sufficient to demonstrate compliance with the limitations established in Condition D.1.2 and that records of the amount of VOCs generated by the clean-up solvents and adhesives were needed in addition to the VOC content of the coatings to ensure that the adhesive and clean-up solvent emissions did not exceed 25 tons/year and trigger the 326 IAC 8-1-6 best available control technology requirements. Thus, the original record keeping condition which required records of both the amount of solvent and adhesive, and VOC content of the coatings applied to metal, was re-introduced into the permit and sent to public notice.

The comment submitted by DECA after the public comment period stated that records of the amount of VOC generated by the adhesives and clean-up solvents are not necessary and that the record keeping should be for the VOC content of the coatings subject to 326 IAC 8-2-9 with records consisting of MSDS sheet "or" the VOC data sheets, as previously required.

DECA is correct in stating that records of the VOC generated by the adhesives and clean-up solvents are not necessary. The VOC emissions from the clean-up solvents and adhesives applied are not limited. Thus, the source does not need to keep records of these materials to demonstrate compliance over a more continuous basis as long as the source does not exceed the maximum adhesive and clean-up solvent usage rates specified in the permit application and utilizes adhesives and clean-up solvents that have VOC contents that are equal to or less than the worst case materials specified in the application.

However, the proposed record keeping requirement is not correct. The record keeping requirement proposed by DECA does require record keeping of the VOC content of the coatings subject to 326 IAC 8-2-9, but the records to be kept include VOC data sheets "or" the MSDS sheets. If the source keeps records via the VOC data sheets, compliance may be demonstrated.

However, the MSDS sheets alone do not establish the VOC content on an as applied basis because the MSDS sheets are for the individual coatings and solvents, not the coatings as applied (coating + solvent added). Thus, by requiring either the VOC data sheets "or" the MSDS sheets, compliance is not demonstrated.

Further, use of the MSDS sheets and VOC data sheets does not provide an effective means for inspector to determine if compliance with the established limits has been achieved. Therefore, Condition D.1.5 shall be changed as follows:

D.1.5 Record Keeping Requirements

- (a) To document compliance with Condition D.1.2(a), the Permittee shall maintain records of the VOC content of each coating material, as applied. **The records shall include the coatings applied during each month, the VOC content of each coating as applied, and purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the coating type in accordance with (1) through (5) below, Said records shall be maintained for (1) through (5) on a monthly basis shall be taken monthly, and shall be and shall be complete and sufficient to establish compliance with the VOC emission limits established for coating of metal substrates in Condition D.1.2(a).**
- ~~(1) The amount 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 per assembly area for each month; and~~
 - ~~(5) The weight of VOCs emitted per assembly area for each month.~~
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Since the removal of the requirement to keep records of the amount of VOC generated by the adhesives and clean-up solvents is not necessary to demonstrate compliance with the limits of Condition D.1.2, the removal is determined to **not** be a relaxation of a limit or requirements and therefore is not required to go through public notice again.

In addition, Condition D.1.4, as currently permitted, references "all" the record keeping requirements of Condition D.1.6 (now Condition D.1.5) which in turn references the general record keeping requirements found in Section C of the permit. The reference to Condition D.1.6 should not have been included because the only aspect of the record keeping requirements of Condition D.1.6 (now Condition D.1.5) that applies to Condition D.1.4 is the reference to the general record keeping requirements found in Section C. Therefore, Condition D.1.4 shall be amended to stand on its own with the reference to the record keeping requirements of Condition D.1.5 being removed and language being added that references the general record keeping requirements of Section C.

D.1.4 Coating Solids Content

Pursuant to 326 IAC 2-1.1-11, the solids content of the coatings applied at EnterVan Lines 1 and 2 and Bus/ParaTransit Van Lines 1 and 2 shall be limited as follows:

- (a) the solids content at each assembly area (Enter/Assem. No. 1, Enter/Assem. No. 2, Para/Assem. No. 1, and Para/Assem. No. 2) shall be limited to 3.10 pounds solids per gallon coating as applied,
- (b) the solids content at each refinishing area (Enter/Ref. No. 1, Enter/Ref. No. 2, Para/Ref. No. 1, and Para/Ref. No. 2) shall be limited to 7.60 pounds solids per gallon coating as applied, and
- (c) the solids content at each undercoating area (Enter/Un. No. 1, Enter/Un. No.2, Para/Un. No. 1, and Para/Un. No. 2) shall be limited 4.46 pounds solids per gallon coating as applied.

The records required in this Condition Records shall be **maintained in accordance with Section C - General Record Keeping Requirements of this permit** kept as required in Condition D.1.6 and shall be made available upon request of the Commissioner. Any changes to the coatings applied at the EnterVan Lines and Bus/ParaTransit Van Lines specified in this condition that exceed the specified solids content limits shall obtain approval from the **Commissioner Office of Air Quality** before such changes are made.

6. Comment 6:

The most recent revisions to the IDEM model permit for should be incorporated into the permit.

Response 6:

Comments 1 and 3 apply directly to the proposed modification and have been addressed accordingly.

Comments 2 and 5 do not directly apply to the modification, but since the burn-off oven listed in Condition A.3 and the insignificant activities list of Section D.4 was incorrectly transposed into the proposed modification and the record keeping requirements of Condition D.1.5 were addressed in the proposed modification, these comments were also addressed.

Comment 4 has nothing to do with the proposed modification. However, while it is not the policy of the Office of Air Quality, after public notice, to start addressing issues the source may have in regards to the permit that do not have anything to do with the changes proposed by the source, it is determined that this comment can be addressed because no changes to the permit result from the comment and addressing the comment saves future time and effort.

Comment 6, however, has nothing to do with the proposed modification. Revising the permit to the most recent versions of the Title V model permit would require the source to go through a significant permit revision which requires re-public noticing the permit. Thus, no changes will be made at this time.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for the Second 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
Significant Permit Modification No.:	131-12887-00017
Permit Reviewer:	Scott D. Fulton

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

History

On October 24, 2000, the Braun Corporation submitted an application to the OAQ requesting that they be allowed to conduct stack testing of one (1) EnterVan Line and one (1) Bus/ParaTransit Van Line to demonstrate that the filter systems of the coating booths of these lines are not necessary to achieve compliance with the particulate matter (PM) emission limits of 326 IAC 6-3. The testing will be conducted once every five (5) years. By demonstrating compliance with the limits without use of the filter systems, the compliance, recordkeeping, and reporting requirements can and will be eliminated from Section D.1.

The source was issued a Part 70 permit on April 20, 1999 with modifications being made as follows:

1. The first Significant Permit Modification was issued on August 2, 1999.
2. The first Administrative Amendment was issued on September 14, 1999.
3. The second Significant Permit Modification was issued on June 7, 2000.
4. The second Administrative Amendment was issued on April 20, 2000.

NOTE: The permit has been revised to incorporate all changes that have been made to date.

Proposed Changes

The source is now planning a significant permit modification (131-12887-00017) consisting of the following proposed changes. All changes have been made to the Part 70 operating permit.

Deleted language appears as ~~strikeouts~~, new language is **bolded**.

1. The source requests that Condition D.1.7(a)(1) be modified to read as follows:

The amount and VOC content of each coating material, solvent, and adhesive used. Records shall be sufficient to verify that amount and type used, and may include purchase orders, invoices, material safety data sheets (MSDS), or VOC data sheets.

Upon review of the permit, the following was determined.

The requirements established in Condition D.1.7 (modified to Condition D.1.6) are intended to provide recordkeeping that allows the Office of Air Quality (OAQ) to determine compliance with 326 IAC 8-2-9 as well as provide a means of establishing that the VOC emissions from the areas not limited under 326 IAC 8-2-9 are generating VOC emissions that are below the applicable 326 IAC 8-1-6 BACT level of 25 tons per year.

The purchase orders, invoices, material safety data sheets (MSDS) are necessary to provide actual quantifiable information regarding the materials used. This information provides the tangible data that supplement the summarized VOC amount and content records that are required. Thus, no changes to this condition will be made.

2. Condition D.1.4 needs to be modified to require PM testing of one EnterVan line and one Bus/ParaTransit line (however, they need to test while a bus is being painted and while a para transit van is being painted), conducted within 90 days of permit issuance.

Braun Corporation has proposed that stack testing be conducted at their EnterVan and Bus/Para Transit Lines to demonstrate compliance with the requirements of 326 IAC 6-3 without the use of the filters as emissions control. This is determined to be acceptable. To allow this, Condition D.1.4 shall be changed as follows:

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.~~

During the period within 90 days after the issuance of this permit, in order to demonstrate compliance with Condition D.1.1, the Permittee shall perform PM testing of one (1) EnterVan line and One (1) Bus/ParaTransit Van line utilizing methods as approved by the Commissioner. This PM test needs to be performed on the Bus/ParaTransit Van line while a bus is being painted and also while a paratransit van is being painted. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

3. Conditions D.1.5 (requirement to use filters) and D.1.6 (compliance monitoring) need to be deleted.

Conditions D.1.5 and D.1.6 shall be deleted in anticipation that the compliance stack tests conducted by Braun Corporation will demonstrate compliance with the requirements of 326 IAC 6-3 will be achieved without the use of the filter systems of the respective booths.

By eliminating the dry filter systems as the means of complying with the limitation of 326 IAC 6-3, the dry filter compliance determination and monitoring requirements under Conditions D.1.5 and D.1.6 are not necessary. Thus, the following changes will be made:

~~D.1.5 Particulate Matter~~

~~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. 1, Para/Ref. No. 2 and FP1 surface coating booths are in operation. 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. 1, Para/Ref. No. 2 and FP1 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 surface coating booth stacks (Enter 1, Enter 2, Para 1, Para 2, and FP1) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which could 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 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.~~

Condition D.1.7 (Recordkeeping Requirements) shall become Condition D.1.6.

In addition, the recordkeeping requirements associated with the dry filter system (Condition D.1.6(b)) shall be removed because no records need to be kept. The following changes to Condition D.1.6 will be made as follows:

D.1.7.6 Record Keeping Requirements

- (a) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly, and shall be complete and sufficient to establish compliance with the 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 cleanup solvent usage for each month;
 - (4) The total VOC usage per assembly area for each month; and
 - (5) The weight of VOCs emitted per assembly area for each month.

- (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.
4. **A condition needs to be added limiting the substrates (e.g. EnterVans, Buses, and ParaTransit Vans). Also the amount of solids needs to be limited to the highest amount of solids used in the stack test.**

There are no specific state or federal rules that require limitations as proposed by the source. However, pursuant to 326 IAC 2-1.1-5(a), the Commissioner shall not issue a registration, permit, modification approval, or operating permit revision under this article if the commissioner determines the terms and conditions of the registration, permit, modification approval, or operating permit revision are not protective of the public health. Thus, the proposed limitations can be incorporated as requested.

In order to determine the limitations that will be used, the solids content for the worst case coatings need to be determined. The results are as follows:

- (a) Entervan Line 1:

Area	Density	Fraction Solids	lb solid/gal coat applied
Assembly	6.59	0.47	3.10
Refinishing DP48LF	11.90	0.6385	7.60
DP402	7.75	0.3280	2.54
DAU82	7.99	0.4881	3.90
DAU2	7.83	0.2286	1.79
DBU	8.18	0.3934	3.22
DRR1170	7.13	0.0356	0.25
Undercoat Water	8.17	0.45	3.68
Black	7.43	0.60	4.46

(b) Entervan Line 2:

Area	Density	Fraction Solids	lb solid/gal coat applied
Assembly	6.59	0.47	3.10
Refinishing DP48LF	11.90	0.6385	7.60
DP402	7.75	0.3280	2.54
DAU82	7.99	0.4881	3.90
DAU2	7.83	0.2286	1.79
DBU	8.18	0.3934	3.22
DRR1170	7.13	0.0356	0.25
Undercoat Water	8.17	0.45	3.68
Black	7.43	0.60	4.46

(c) Bus/ParaTransit Van Line 1:

Area	Density	Fraction Solids	lb solid/gal coat applied
Assembly	6.59	0.47	3.10
Refinishing DP48LF	11.90	0.6385	7.60
DP402	7.75	0.3280	2.54
DAU82	7.99	0.4881	3.90
DAU2	7.83	0.2286	1.79
DBU	8.18	0.3934	3.22
DRR1170	7.13	0.0356	0.25
NCTprime	10.93	0.5753	6.29
NCTcoat	7.69	0.3099	2.38
Undercoat Water	8.17	0.45	3.68
Black	7.43	0.60	4.46

(d) Bus/ParaTransit Van Line 2:

Area	Density	Fraction Solids	lb solid/gal coat applied
Assembly	6.59	0.47	3.10
Refinishing DP48LF	11.90	0.6385	7.60
DP402	7.75	0.3280	2.54
DAU82	7.99	0.4881	3.90
DAU2	7.83	0.2286	1.79
DBU	8.18	0.3934	3.22
DRR1170	7.13	0.0356	0.25
NCTprime	10.93	0.5753	6.29
NCTcoat	7.69	0.3099	2.38
Undercoat Water	8.17	0.45	3.68
Black	7.43	0.60	4.46

Based on the above calculations, the worst case solids content for the coatings used at EnterVan Lines 1 and 2 and Bus/ParaTransit Van Lines 1 and 2 is as follows:

Area	lb solid/gal coat applied
EnterVan Assembly, Lines 1 and 2	3.10
EnterVan Refinishing, Lines 1 and 2	7.60
EnterVan Undercoat, Lines 1 and 2	4.46
Bus/ParaTransit Assembly, Lines 1 and 2	3.10
Bus/ParaTransit Refinishing, Lines 1 and 2	7.60
Bus/ParaTransit Undercoat, Lines 1 and 2	4.46

Based on the above worst case solids contents for the coatings used, the following limitations will be added as Condition D.1.5.

D.1.5 Particulate Matter Coating Solids Content

~~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. 1, Para/Ref. No. 2 and FP1 surface coating booths are in operation. 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. 1, Para/Ref. No. 2 and FP1 surface coating booths are in operation.~~

That pursuant to 326 IAC 2-1.1-11, the solids content of the coatings applied at EnterVan Lines 1 and 2 and Bus/ParaTransit Van Lines 1 and 2 shall be limited as follows:

- (a) the solids content at each assembly area (Enter/Assem. No. 1, Enter/Assem. No. 2, Para/Assem. No. 1, and Para/Assem. No. 2) shall be limited to 3.10 pounds solids per gallon coating as applied,
- (b) the solids content at each refinishing area (Enter/Ref. No. 1, Enter/Ref. No. 2, Para/Ref. No. 1, and Para/Ref. No. 2) shall be limited to 7.60 pounds solids per gallon coating as applied, and
- (c) the solids content at each undercoating area (Enter/Un. No. 1, Enter/Un. No.2, Para/Un. No. 1, and Para/Un. No. 2) shall be limited 4.46 pounds solids per gallon coating as applied.

Records shall be kept as required in Condition D.1.6 and shall be made available upon request of the Commissioner. Any changes to the coatings applied at the EnterVan Lines and Bus/ParaTransit Van Lines specified in this condition that exceed the specified solids content limits shall obtain approval from the Commissioner before such changes are made.

5. **The source has requested that language be incorporated in the technical support document (TSD) stating that a permit modification is required if they decide to change substrates or use a higher solid content coating and that they will be required to conduct another stack test using the new substrate and/or coating to demonstrate compliance with 326 IAC 6-3 without the use of filters.**

The language requested by the source has been incorporated in the permit instead of the TSD because this statement is enforceable in the permit and not the TSD. Pursuant to Condition D.1.5:

Any changes to the coatings applied at the EnterVan Lines and Bus/ParaTransit Van Lines specified in this condition that exceed the specified solids content limits shall obtain approval from the Commissioner before such changes are made.

Additional Proposed Changes

In addition to the conditions changed as per request of the source, the following change has been made to the Table of Contents to account for the adjusted condition changes:

D.1 FACILITY OPERATION CONDITIONS - Surface Coating Booths

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

- D.1.1 Particulate Matter [326 IAC 6-3-2(c)]
- D.1.2 Volatile Organic Compounds [326 IAC 8-2-9]
- D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

- D.1.4 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]
- D.1.5 ~~Particulate Matter (PM)~~ **Coating Solids Content**

Compliance Monitoring Requirements

- ~~D.1.6 Monitoring~~

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

- D.1.76 Record Keeping Requirements

Conclusion

The emissions of the source shall remain the same after implementation of the proposed changes, there will be no changes in the existing rule applicability, and no new rules will become applicable.

Therefore, this permit shall be subject to the conditions of the attached Part 70 Permit Modification No. 131-12887-00017.