

Mr. Ronald Collins
Delphi Energy & Engine Management Systems
2900 S. Scatterfield Road
Anderson, Indiana 46013

Re: 095-14041
Fourth Minor Permit Modification to
Part 70 No.: T 095-6388-00016

Dear Mr. Collins:

Delphi Energy & Engine Management Systems was issued a Part 70 permit on August 31, 1999 for automotive parts manufacturing operation. A letter requesting changes to this permit was received on February 16, 2001. Pursuant to the provisions of 326 IAC 2-7-12 a minor permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of incorporating the operation conditions for the following facilities permitted under the Minor Source Modification 095-14015:

- (a) One (1) trickle varnish line for stators, identified as S15m, consisting of the following three (3) processes:
 - 1. pre-heating, which is done by electric induction pre-heating oven;
 - 2. trickle varnish coating; and
 - 3. curing, which is done by electric infrared heating oven.

- (b) One (1) trickle varnish line for rotors, identified as R15, consisting of the following three (3) processes:
 - 1. preheating, which is done by electric induction heating oven;
 - 2. trickle varnish coating; and
 - 3. curing, which is done by electric infrared heating oven.

The Part 70 permit is modified to include the two (2) new trickle varnish lines (changes are bolded and deletions are struck-through for emphasis):

- 1. Section A.2 page 5 of 37 of the Part 70 is revised to include the new varnish lines and be numbered as follows:
 - (9) One (1) trickle varnish line for stators, identified as S15, consisting of the following three (3) processes:**
 - 1. pre-heating, which is done by electric induction pre-heating oven;**
 - 2. trickle varnish coating; and**
 - 3. curing, which is done by electric infrared heating oven.**

 - (10) One (1) trickle varnish line for rotors, identified as R15, consisting of the following three (3) processes:**

1. preheating, which is done by electric induction heating oven;
 2. trickle varnish coating; and
 3. curing, which is done by electric infrared heating oven.
2. Section D.4 will be added in the Permit to address the proposed two (2) new trickle varnish lines. Revision is as follows:

SECTION D.4 FACILITY OPERATION CONDITIONS

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

- (9) One (1) trickle varnish line for stators, identified as S15, consisting of the following three (3) processes:
1. pre-heating, which is done by electric induction pre-heating oven;
 2. trickle varnish coating; and
 3. curing, which is done by electric infrared heating oven.
- (10) One (1) trickle varnish line for rotors, identified as R15, consisting of the following three (3) processes:
1. preheating, which is done by electric induction heating oven;
 2. trickle varnish coating; and
 3. curing, which is done by electric infrared heating oven.

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

D.4.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating applied by the proposed two (2) trickle varnish lines to stators and rotors shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.

Compliance Determination Requirements

D.4.2 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 limit specified in Condition D.4.1 shall be determined using the modified EPA Method 24 (40 CFR 60 Appendix A). Testing shall be 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.4.3 Record Keeping Requirements

- (a) To document compliance with Condition D.4.1, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to

establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.4.1.

- (1) The amount and VOC content of each material and solvent used. Records shall include purchase orders, invoices, material safety data sheets (MSDS) and alternative manufacturer information necessary to verify the type and amount used.**
 - (2) A log of the dates of use; and**
 - (3) The total VOC usages for each month;**
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.**

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

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Aida De Guzman, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0 and ask for Aida De Guzman or extension (3-4972), or dial (317) 233-4972.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
APD

cc: File - Madison County
U.S. EPA, Region V
Madison County Health Department
Anderson Office of Air Management
Air Compliance Section Inspector -Jim Thorpe
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT and Anderson Office of Air Management

**Delphi Automotive Systems, L.L.C.
2900 South Scatterfield Rd.
Anderson, IN 46013**

(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.: T095-6388-00016	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: August 31, 1999
1 st Minor Permit modification: 095-11377	Issuance Date: November 18, 1999
2 nd Minor Permit Modification: 095-11994	Issuance Date: April 25, 2000
1 st Administrative Amendment: 095-12368	Issuance Date: July 18, 2000
3 rd Minor Permit Modification: 095-12242	Issuance Date: July 28, 2000
1 st Significant Permit Modification: 095-12800	Issuance Date: January 16, 2001
Fourth Minor Permit Modification: 095-14041	Pages Affected: 5, 6, 7, 32 Pages Added: 32a
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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- A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
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- D.3.4 Record Keeping Requirements

Certification

- Emergency/Deviation Occurrence Report**
- Natural Gas Fired Boiler Certification**
- Semi-annual Compliance Monitoring Report**

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) and the Anderson Office of Air Management (AOAM). 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 automobile parts manufacturing source.

Responsible Official: John Jaffers
Source Address: 2911 State Road 9, Anderson, IN 46016;
2900 South Scatterfield Road, Anderson, IN 46013
2902 State Road 9, Anderson, IN 46016;
2900 State Road 9, Anderson, IN 46016;
1820 E. 32nd Street, Anderson, IN 46016;
2620 E. 38th Street, Anderson, IN 46016.
Mailing Address: 5725 Delphi Drive, Troy, MI 48098-2815
SIC Code: 3714
County Location: Madison
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Minor Source, under PSD Rules;
Major Source, Section 112 of the Clean Air Act

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

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

- (1) One (1) natural gas-fired boiler, with a maximum heat input capacity of 25.1 mmBtu/hr and exhausts to one (1) stack designated as DD10EA24.
- (2) One (1) natural gas-fired boiler, with a maximum heat input capacity of 25.1 mmBtu/hr and exhausts to one (1) stack designated as DD10SA24.
- (3) Varnish operations consisting of the following:
 - (a) One (1) varnish dip tank, EU 11-18, identified as Dip Tank A (North), with a drying oven and cooling area, with maximum capacity of 600 parts per hour, and exhausting to stacks N16EA19, N16NA9 and N18NA19 respectively.
 - (b) One (1) varnish dip tank, EU 11-19, identified as Dip Tank B (South), with a drying oven and cooling area, with maximum capacity of 600 parts per hour, and exhausting to stacks N18EA19, N20EA9 and N18EA19 respectively.
 - (c) One (1) varnish dip tank, EU 11-100, identified as Dip Tank C (East), with a drying oven and cooling area, with maximum capacity of 600 parts per hour, and exhausting to stacks G18EA25, G20EA7 and G24NA17 respectively.
 - (d) One (1) varnish dip tank, EU 11-101, identified as Dip Tank D (West), with a drying oven and cooling area, with maximum capacity of 600 parts per hour, and exhausting to stacks G18SA25, G20SA8 and G20WA17 respectively.

- (4) One (1) double drum parts washer, identified as EU11-117, with a maximum capacity of 2000 pounds per hour, with no controls and exhausting to stack L36EA21.
- (5) Two (2) engine dynamometers used for research and development.
- (6) Two (2) natural gas-fired boilers, identified as boiler A and boiler B, each boiler has a heat input capacity of 33.5 million Btu per hour (mmBtu/hr). These boilers are currently installed at Plant #17, and proposed to be moved to Plant #11.
- (7) One (1) trickle varnish line for stators, which exhausts to one (1) stack designated as L10SA15 and consists of the following three (3) processes:
 1. preheating;
 2. trickle varnish coating; and
 3. curing.
- (8) One (1) trickle varnish line for rotors, which exhausts to one (1) stack designated as J12WA15 and consists of the following three (3) processes:
 1. preheating;
 2. trickle varnish coating; and
 3. curing.
- (9) One (1) trickle varnish line for stators, identified as S15, consisting of the following three (3) processes:
 1. pre-heating, which is done by electric induction pre-heating oven;
 2. trickle varnish coating; and
 3. curing, which is done by electric infrared heating oven.
- (10) One (1) trickle varnish line for rotors, identified as R15, consisting of the following three (3) processes:
 1. preheating, which is done by electric induction heating oven;
 2. trickle varnish coating; and
 3. curing, which is done by electric infrared heating oven.

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

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

- (1) Natural gas-fired combustion sources with heat input less than ten million (10,000,000) Btu per hour.
- (2) Equipment powered by internal combustion engines of less than 500,000 Btu per hour capacity, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu per hour.
- (3) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage tank of less than 10,500 gallon capacity.
- (4) A petroleum fuel, other than gasoline, dispensing facility, having a storage tank of less than 10,500 gallon capacity, and dispensing less than 230,000 gallons per month.
- (5) Storage tanks less than one thousand (1,000) gallons in capacity with annual throughputs less than twelve thousand (12,000) gallons.
- (6) Vessels storing lubricating oils, hydraulic oils, machining oils and machining fluids.

- (7) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary coatings.
- (8) Machining where an aqueous cutting coolant continuously floods the machine interface.
- (9) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (10) Cleaners and solvents characterized as having a vapor pressure of less than 0.7kPa; 5 mmHg or 1 psi measured at 20 degrees C (88 degrees F).
- (11) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment and welding equipment.
- (12) Closed loop heating and cooling systems.
- (13) Rolling oil recovery systems.
- (14) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1%.
- (15) Any operation using aqueous solutions containing less than 1% by weight of VOC's excluding HAPs.
- (16) Forced and induced draft cooling tower system not regulated under a NESHAP.
- (17) Quenching operations used with heat treating processes.
- (18) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (19) Heat exchanger cleaning and repair.
- (20) Trimmers that do not produce fugitive emissions and are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.
- (21) Paved and unpaved roads and parking lots with public access.
- (22) Enclosed systems for conveying plastic raw materials and plastic finished goods.
- (23) Asbestos abatement projects regulated by 326 IAC 14-10.
- (24) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures or vehicles at the source where air emissions for those activities would not be associated with any production processes.
- (25) Equipment used to collect any material that might be released during a malfunction, process upset or spill clean up, including catch tanks, temporary liquid separators, tanks and fluid handling equipment.
- (26) Blowdown for any of the following: sight glass; boiler, compressors; pumps and cooling towers.
- (27) Furnaces used for melting metals other than beryllium with a brim full capacity of less than 460 cubic inches by volume.
- (28) On-site fire and emergency response training approved by the department.

- (29) Diesel generators not exceeding 1800 horsepower.
- (30) Stationary fire pumps.
- (31) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying and woodworking operations.
- (32) Filter or coalescer media changeout.
- (33) Mold release agents using low volatile products (vapor pressure less than 2 kilopascals measured at 38 degrees C).
- (34) A laboratory as defined in 326 IAC 2-7-1 (21)(C).
- (35) Rust prevention (Acrylic acid, methyl ethyl ketone).
- (36) Other activities listed below:

Adhesive application	Enamel touch up	Re-op operation
Adhesive, hot melt	Epoxy dispenser	Repair hood
Assembly, black shell	Feeders	Rust inhibitors
Atomized aluminum powder	Filter cooling system	Sanders
Banders	Flux application	Saws, cut-off and band
Battery formation	Foaming station	Sharpeners, drill & hob
Battery test cabinets	Furnaces	Silicone coating
Blander	Glue and ink operations	Spray booth
Blasting, band, sand & steel	Glue degassing	Straightener
Broach machines, gear cutters	Glue dispensers	Sylgard dials
Buffing wheel	Lubricate seals	Test station
Chuckers	Machine aluminum molds	Thermotron units
Cleaning, ink stamp	Machining operations	Trimmer
Cleanup; general	Magnaflux	Urethane mixing station
Coil removal	Magnet assembly	Vacuum furnace
Cold boxes	Mixing station	Varnish dip
Conductive ink	Mixing tanks	Varnish strip
Cure handlers	Molding material silos	Vibration chambers
Cut-out dials, final	Molding presses	Vulcan machine
Date code stamp	Molding, plastic injection	Washer, parts
Dielectric test	Oil/water separator	Washer, rust inhibitor
Dip booth	Ovens, gas and electric	Weigh station
Dip tanks	Oven, hydrogen	Winding machines, wire
Dryer, gas-fired	Oven, thermal shock	Wire brush
Deburring	Oven, vapor-phase	Wire stripping
Electrical discharge machines	Ovens, potting	Wood shop
	Presses, punch	

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).

Delphi Energy & Engine Management Systems
Anderson, Indiana
Reviewer: RJP/FLL

4th Minor Permit Modification 095-14041
Modified by: Aida De Guzman

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Part 70 No.: T 095-6388-00016

SECTION 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 and AOAM.
- (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.
- (c) All terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by the AOAM.

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 Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and
Anderson Office of Air Management
P.O. Box 2100
120 East 8th Street
Anderson, IN 46011

- (b) The Permittee shall furnish to IDEM, OAM, and the AOAM within a reasonable time, any information that IDEM, OAM, and the AOAM 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, OAM, and the AOAM 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, OAM, and the AOAM along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, 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's 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 Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and
Anderson Office of Air Management
P.O. Box 2100
120 East 8th Street
Anderson, IN 46011

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, OAM, and the AOAM 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, OAM, and the AOAM 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 Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management
P.O. Box 2100
120 East 8th Street
Anderson, IN 46011

- (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, OAM, and the AOAM upon request and shall be subject to review and approval by IDEM, OAM, and the AOAM.

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, OAM, and the AOAM 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 Management,
Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967
Telephone Number: 317-646-9835 (AOAM)
Facsimile Number: 317-646-9657 (AOAM)

- (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 Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
and

Anderson Office of Air Management
P.O. Box 2100
120 East 8th Street
Anderson, IN 46011

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, OAM, and the AOAM may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.
 - (f) Failure to notify IDEM, OAM, and the AOAM 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, OAM, and the AOAM 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, OAM, and the AOAM 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, OAM, and the AOAM has issued the modification. [326 IAC 2-7-12(b)(8)]

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 Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management
P.O. Box 2100
120 East 8th Street
Anderson, IN 46011

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, OAM, and the AOAM 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, OAM, and the AOAM 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, OAM, and the AOAM at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, and the AOAM 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, OAM, and the AOAM 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 Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management
P.O. Box 2100
120 East 8th Street
Anderson, IN 46011

- (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, OAM, and the AOAM on or before the date it is due.
- (2) If IDEM, OAM, and the AOAM, 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, OAM, and the AOAM, 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, OAM, and the AOAM, 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, OAM, and the AOAM, 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 Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management
P.O. Box 2100
120 East 8th Street
Anderson, IN 46011

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 Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management
P.O. Box 2100
120 East 8th Street
Anderson, IN 46011

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, OAM, and the AOAM 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, OAM, 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, OAM, and the AOAM 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, OAM, and the AOAM 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, OAM, and the AOAM nor an authorized representative, may disclose the information unless and until IDEM, OAM, and the AOAM 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, OAM, and the AOAM 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 Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management
P.O. Box 2100

120 East 8th Street
Anderson, IN 46011

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, OAM, and the AOAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM or AOAM 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 OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

B.27 Advanced Source Modification Approval [326 IAC 2-7-5(16)]

The requirements to obtain a source modification approval under 326 IAC 2-7-10.5 or a permit modification under 326 IAC 2-7-12 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3 and such modifications occur only during the term of this permit.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Major Source

- (a) The total source potential to emit of VOC is less than 250 tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.
- (b) Any change or modification which may increase potential to emit to 250 tons per year from this source, shall cause this source to be considered a major source under PSD, 326 IAC 2-2 and 40 CFR 52.21, and shall require approval from IDEM, OAM prior to making the change.

C.2 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.3 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.4 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.5 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.6 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.7 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.8 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 Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management
P.O. Box 2100
120 East 8th Street
Anderson, IN 46011

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.9 Performance Testing [326 IAC 3-6]

- (a) If required, 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, OAM.

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 Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management
P.O. Box 2100
120 East 8th Street
Anderson, IN 46011

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) If IDEM, OAM requires modification to the test methods, analytical methods, operational parameters or other matters included in the test protocol the source operator and the testing firm shall be notified by letter or telephone at least twenty-one (21) days prior to the proposed test date. If the source operator or test firm desires to change any previously submitted procedures or conditions, IDEM, OAM shall be notified of such change as soon as practicable prior to the test. Reasonable changes in the test protocol that result from emergency conditions during the test shall be approved by IDEM, OAM before the test may proceed if a department staff person is available at the test site. Otherwise, post-test approval may be granted based on reasonable changes resulting from emergency or reasonably unforeseeable conditions during the test.
- (c) All test reports must be received by IDEM, OAM 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, OAM, 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.10 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
- (c) Will comply with such applicable requirements that become effective during the term of this permit.

C.11 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 Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management
P.O. Box 2100
120 East 8th Street
Anderson, IN 46011

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.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.

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

C.13 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 prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on July 10, 1998.
- (b) If the ERP is disapproved by IDEM, OAM, and the AOAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (c) 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.

- (d) 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.
- (e) Upon direct notification by IDEM, OAM, and the AOAM, 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.14 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, OAM, and the AOAM that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM, and the AOAM 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.15 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, OAM, 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, OAM 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, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM 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, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM 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.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][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 purposes 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. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management
P.O. Box 2100
120 East 8th Street
Anderson, IN 46011

(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, OAM, and the AOAM on or before the date it is due.

C.17 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- (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 and the AOAM 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.18 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, OAM, and the AOAM 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 (or local agency) 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
 - (6) 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.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 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 Semi-annual 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 Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management
P.O. Box 2100
120 East 8th Street
Anderson, IN 46011

- (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, OAM, and the AOAM on or before the date it is due.
- (d) Unless otherwise specified in this permit, any semi-annual report shall be submitted within thirty (30) days of the end of the reporting period. The report does 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.

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).

Stratospheric Ozone Protection

C.20 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.

SECTION D.1

FACILITY OPERATION CONDITIONS

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

Varnish operations consisting of the following:

- (a) One (1) varnish dip tank, EU 11-18, identified as Dip Tank A (North), with a drying oven and cooling area, with maximum capacity of 600 parts per hour, and exhausting to stacks N16EA19, N16NA9 and N18NA19 respectively.
- (b) One (1) varnish dip tank, EU 11-19, identified as Dip Tank B (South), with a drying oven and cooling area, with maximum capacity of 600 parts per hour, and exhausting to stacks N18EA19, N20EA9 and N18EA19 respectively.
- (c) One (1) varnish dip tank, EU 11-100, identified as Dip Tank C (East), with a drying oven and cooling area, with maximum capacity of 600 parts per hour, and exhausting to stacks G18EA25, G20EA7 and G24NA17 respectively.
- (d) One (1) varnish dip tank, EU 11-101, identified as Dip Tank D (West), with a drying oven and cooling area, with maximum capacity of 600 parts per hour, and exhausting to stacks G18SA25, G20SA8 and G20WA17 respectively.

One (1) double drum parts washer, identified as EU11-117, with a maximum capacity of 2,000 pounds per hour, with no controls and exhausting to stack L36EA21.

Two (2) engine dynamometers used for research and development.

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

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8]

Based on the date of construction, pre 1973, there are no Article 8 rules that apply to the varnish operations or double drum parts washer.

D.1.2 Nitrogen Oxide Compounds (NO_x)

The input of gasoline to the two (2) dynamometers shall be limited to 7500 gallons per twelve (12) consecutive month period, rolled on a monthly basis.

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

D.1.3 Record Keeping Requirements

- (a) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Condition D.1.2.
 - (1) The total gasoline usage in gallons for each month;
 - (2) A log of the dates of use;
 - (3) Monthly emissions in tons of NO_x.
- (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)]

Two (2) natural gas-fired boilers, identified as boiler A and boiler B, each boiler has a heat input capacity of 33.5 million Btu per hour (mmBtu/hr). These boilers are currently installed at Plant #17, and proposed to be moved to Plant #11.

One (1) natural gas-fired boiler, with a maximum heat input capacity of 25.1 mmBtu/hr and exhausts to one (1) stack designated as DD10EA24.

One (1) natural gas-fired boiler, with a maximum heat input capacity of 25.1 mmBtu/hr and exhausts to one (1) stack designated as DD10SA24.

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

D.2.1 Oxides of Nitrogen (NOx) Emissions Limit

The total natural gas usage from the two (2) 33.5 mmBtu/hr boilers, A and B shall be limited to less than 247 million cubic feet (MMCF) per twelve-month period, rolled on a monthly basis. This natural gas usage limitation is equivalent to NOx emissions limit less than 25 tons per twelve-month period.

During the first twelve (12) months of operation, the natural gas usage shall be limited such that the total natural gas usage divided by accumulated months of operation shall be less than 20.58 MMCF average per month, rolled on a monthly basis. Compliance with this condition will make 326 IAC 2-7-10.5(f), Significant Source Modification not applicable.

D.2.2 Particulate Matter Limitation (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the particulate matter emissions from the four (4) natural gas-fired boilers with a total source maximum operating capacity of 117.2 mmBtu/hr, shall be limited to 0.3159 lb/mmBtu based on the following equation:

$$Pt = 1.09/Q^{0.26}; \text{ where } Pt = \text{pounds of particulate matter emitted per million Btu (lb/mmBtu) heat input; and}$$

$$Q = \text{Total source maximum operating capacity rating in million Btu per hour (mmBtu/hour) heat input.}$$

Compliance Determination Requirements

D.2.3 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 or Anderson Office of Air Management compliance with the Oxides of Nitrogen (NOx) limit specified in Condition D.2.1 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.2.4 Record Keeping Requirements

- (a) To document compliance with Condition D.2.1, the Permittee shall maintain meter readings of the natural gas fuel usages monthly. The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the recording/monitoring.

- (b) Pursuant to 40 CFR § 60.48c, the owner or operator shall maintain records of the amounts of fuel combusted during each month for the four (4) boilers.
- (c) Pursuant to 40 CFR § 60.48c, all records shall be maintained by the owner or operator for a period of two (2) years following the date of such record.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of the Part 70 permit.

D.2.5 Reporting Requirements

- (a) A quarterly summary of the information to document compliance with Condition D.2.1, and the natural gas fired boiler certification shall be submitted to:

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

and

Anderson Office of Air Management
P.O. Box 2100
120 East 8th Street
Anderson, Indiana 460111

using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

- (b) Pursuant to 40 CFR § 60.48c, the owner or operator shall submit notification of the date of construction or reconstruction, anticipated startup and actual startup of the four (4) boilers as provided by 40 CFR § 60.7. The notification shall contain the information required under 40 CFR § 60.48c, including the following:
 - (1) The design heat input capacity of the four (4) boilers and identification of the fuel to be combusted; and
 - (2) The annual capacity factor at which the owner or operator anticipates operating the four (4) boilers, based on all fuels fired and based on each individual fuel fired.

SECTION D.3

FACILITY OPERATION CONDITIONS

One (1) trickle varnish line for stators, which exhausts to one (1) stack designated as L10SA15 and consists of the following three (3) processes:

1. preheating;
2. trickle varnish coating; and
3. curing.

One (1) trickle varnish line for rotors, which exhausts to one (1) stack designated as J12WA15 and consists of the following three (3) processes:

1. preheating;
2. trickle varnish coating; and
3. curing.

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

D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of applied coating of the two (2) trickle varnish lines shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.

Compliance Determination Requirements

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

D.3.3 Volatile Organic Compounds (VOC)

Compliance with the VOC content contained in Condition D.4.1, shall be determined using the ASTM Method D6053-96, which is an approved USEPA alternative to Method 24.

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

D.3.4 Record Keeping Requirements

- (a) To document compliance with Condition D.4.1, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.4.1.
 - (1) The amount and VOC content of each material and solvent used. Records shall include purchase orders, invoices, material safety data sheets (MSDS) and alternative manufacturer information necessary to verify the type and amount used.
 - (2) A log of the dates of use; and
 - (3) The total VOC usages for each month;
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.4

FACILITY OPERATION CONDITIONS

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

- (9) One (1) trickle varnish line for stators, identified as S15, consisting of the following three (3) processes:
1. pre-heating, which is done by electric induction pre-heating oven;
 2. trickle varnish coating; and
 3. curing, which is done by electric infrared heating oven.
- (10) One (1) trickle varnish line for rotors, identified as R15, consisting of the following three (3) processes:
1. preheating, which is done by electric induction heating oven;
 2. trickle varnish coating; and
 3. curing, which is done by electric infrared heating oven.

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

D.4.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating applied by the proposed two (2) trickle varnish lines to stators and rotors shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.

Compliance Determination Requirements

D.4.2 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 limit specified in Condition D.4.1 shall be determined using the modified EPA Method 24 (40 CFR 60 Appendix A). Testing shall be 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.4.3 Record Keeping Requirements

- (a) To document compliance with Condition D.4.1, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.4.1.
- (1) The amount and VOC content of each material and solvent used. Records shall include purchase orders, invoices, material safety data sheets (MSDS) and alternative manufacturer information necessary to verify the type and amount used.
 - (2) A log of the dates of use; and
 - (3) The total VOC usages for each month;
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
and Anderson Office of Air Management**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Delphi Automotive Systems, L.L.C., Energy and Engine Management Systems
Source Address: 2900 South Scatterfield Road, Anderson, IN 46013
Mailing Address: P.O. Box 2439, Anderson, IN 46018
Part 70 Permit No.: T095-6388-00016

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 MANAGEMENT
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967
and
Anderson Office of Air Management
PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: Delphi Automotive Systems, L.L.C., Energy and Engine Management Systems
Source Address: 2900 South Scatterfield Road, Anderson, IN 46013
Mailing Address: P.O. Box 2439, Anderson, IN 46018
Part 70 Permit No.: T095-6388-00016

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2
<input checked="" type="radio"/> 1. This is an emergency as defined in 326 IAC 2-7-1(12) <input type="checkbox"/> The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and <input type="checkbox"/> 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
<input checked="" type="radio"/> 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c) <input type="checkbox"/> 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 MANAGEMENT
COMPLIANCE DATA SECTION
and Anderson Office of Air Management**

**PART 70 OPERATING PERMIT
NATURAL GAS FIRED BOILER CERTIFICATION**

Source Name: Delphi Automotive Systems, L.L.C., Energy and Engine Management Systems
Source Address: 2900 South Scatterfield Road, Anderson, IN 46013
Mailing Address: P.O. Box 2439, Anderson, IN 46018
Part 70 Permit No.: T095-6388-00016

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

Report period

Beginning: _____

Ending: _____

Boiler Affected

Alternate Fuel

Days burning alternate fuel

From

To

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 MANAGEMENT
COMPLIANCE DATA SECTION
and Anderson Office of Air Management**

**PART 70 OPERATING PERMIT
SEMI-ANNUAL COMPLIANCE MONITORING REPORT**

Source Name: Delphi Automotive Systems, L.L.C., Energy and Engine Management Systems
Source Address: 2900 South Scatterfield Road, Anderson, IN 46013
Mailing Address: P.O. Box 2439, Anderson, IN 46018
Part 70 Permit No.: T095-6388-00016

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 semi-annually. 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	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 Air Quality
and Anderson Office Air Management**

**Technical Support Document (TSD) for the Fourth Part 70 Minor Permit
Modification**

Source Background and Description

Source Name:	Delphi Energy & Engine Management Systems
Source Location:	2900 South Scatterfield Road, Anderson, IN 46011
County:	Madison
SIC Code:	3714
Operation Permit No.:	T 095-6388-00016
Operation Permit Issuance Date:	August 31, 1999
Fourth Minor Permit Modification No.:	095-14041-00016
Permit Reviewer:	Aida De Guzman

The Office Air Quality (OAQ) has reviewed a permit modification application from Delphi Energy & Engine Management Systems relating to the operation of the following emission units:

- (a) One (1) trickle varnish line for stators, identified as S15m, consisting of the following three (3) processes:
1. pre-heating, which is done by electric induction pre-heating oven;
 2. trickle varnish coating; and
 3. curing, which is done by electric infrared heating oven.
- (b) One (1) trickle varnish line for rotors, identified as R15, consisting of the following three (3) processes:
1. preheating, which is done by electric induction heating oven;
 2. trickle varnish coating; and
 3. curing, which is done by electric infrared heating oven.

History

On February 16, 2001, Delphi Energy & Engine Management Systems submitted an application to the OAQ requesting to add two (2) new trickle varnish lines to their existing plant. Delphi Energy & Engine Management Systems was issued a Part 70 permit on August 31, 1999. Since then the following approvals were issued to the source:

- | | | |
|----|---|--------------------------------|
| 1. | First Minor Source Modification No.: 095-11322 | - issued on November 18, 1999; |
| 2. | First Minor Permit Modification No.: 095-11377 | - issued on November 18, 1999; |
| 3. | Second Minor Source Modification No.: 095-11938 | - issued on April 3, 2000; |
| 4. | Second Minor Permit Modification No.: 095-11994 | - issued on April 25, 2000; |
| 5. | Third Minor Source Modification No.: 095-12180 | - issued on May 20, 2000; |
| 6. | First Administrative Amendment No.: 095-12368 | - issued on July 18, 2000; |

- 7. Third Minor Permit Modification No.: 095-12242 - issued on July 28, 2000; and
- 8. First Significant Permit Modification No.: 095-12800 - issued on January 16, 2001.

Recommendation

The staff recommends to the Commissioner that the Part 70 Source Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on February 19, 2001, and additional information was received on March 7, 2001.

Emission Calculations

The emission factor (1.2 lb/gal) utilized in the calculation was established through a modified EPA test Method 24 done on this specific coating (Pedigree No. 9183 Star Wars Polyester Resin) by P.D. George, the resin manufacturer. The Compliance Data Section has reviewed the data from the tests and approved the tests done to verify the emission factor.

- (a) Preheating and Curing Operations: There are no emissions generated from these electric fired operations.
- (b) Trickle Varnish Emissions: Rotors and Stators are coated with Pedigree #9183.

Facility/Operation	Duration in Coating one Part (part/second)	Usage (gram/part)	Emission Factor, Ef (lb VOC/9.124 lb varnish)	VOC Emissions (tons/year)
Rotors Coating	1 part/18 sec	12.0	1.2	3.0
Stators Coating	2 parts/38 sec	32.0	1.2	7.7
TOTAL				10.7

Note: Emission Factor = 1.2 lb VOC/gal of varnish resin
 1 gallons of varnish resin = 9.124 pounds

Methodology:
 VOC Emissions, tons/yr = part/sec * usage, gr/part * 1lb/454 gr * 3600 sec/hr * 8760 hrs/yr * Ef, 1.2 lb/9.124 lb varnish * ton/2000 lbs

Potential To Emit of Modification

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

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	0.00
PM-10	0.00
SO ₂	0.00
VOC	10.7

CO	0.00
NO _x	0.00

Justification for Modification

This Minor Permit Modification pursuant to 326 IAC 2-7-12(b) is being issued to incorporate the requirements from a preconstruction permit (Minor Source Modification 095-14015) under 326 IAC 2-7-10.5 that have not satisfied the requirements of 326 IAC 2-7-17 and 2-7-18, and that cannot be implemented under an Administrative Amendment nor a Significant Permit Modification.

County Attainment Status

The source is located in Madison County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Madison County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Madison County has been classified as attainment or unclassifiable for CO, SO₂ and PM₁₀. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity):

Pollutant	Emissions (tons/year)
PM	4.83
PM-10	7.16
SO ₂	0.569
VOC	288.6
CO	87.44
NO _x	86.93

- (a) This existing source is a major stationary source because an attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.
- (b) These emissions are based upon the Part 70 permit issued on August 31, 1999

the source's potential to emit summary from the annual inspection on February 18, 1999 and the First Minor Source Modification issued on November 18, 1999.

Potential to Emit of Modification After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.

Process/facility	Potential to Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Two (2) varnish lines	0.00	0.00	0.00	10.7	0.00	0.00	0.00

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

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this proposed modification.

State Rule Applicability - Two (2) Varnish Trickle Lines

- (a) 326 IAC 2-4.1 (New Source Toxics Rule) is not applicable to the two (2) trickle varnish lines because there are no HAPs emitted by these processes.
- (b) 326 IAC 5-1 (Opacity Limitations)
 Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
 - (1) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A. Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (c) 326 IAC 6-3-2 (Process Operations) does not apply to the trickle varnish lines because the application method has a 100 percent transfer efficiency, therefore there are no PM emissions from the trickle varnish lines.
- (d) 326 IAC 6-2 (Sources of Indirect Heating)
 The one (1) induction pre-heating oven, and one (1) infrared curing oven are not subject to 326 IAC 6-2 because they are electrically fired nor they are sources of indirect heating.
- (e) 326 IAC 8-2-9 (Miscellaneous Metal Coating):
 Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile

organic compound (VOC) content of coating delivered to the applicator at the two (2) trickle varnish lines shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.

Based on the information submitted by the source, the two (2) trickle varnish lines are in compliance with this requirement. The modified EPA test Method 24 done by P. D. George (manufacturer) shows that the varnish resin has less than 3.5 pounds of VOC per gallon of the coating, less water.

Compliance Requirements

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

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

Changes Proposed

The Part 70 permit is modified to include the two (2) new trickle varnish lines (changes are bolded and deletions are struck-through for emphasis):

1. Section A.2 page 5 of 37 of the Part 70 is revised to include the new varnish lines and be numbered as follows:
 - (9) **One (1) trickle varnish line for stators, identified as S15, consisting of the following three (3) processes:**
 1. **pre-heating, which is done by electric induction pre-heating oven;**
 2. **trickle varnish coating; and**
 3. **curing, which is done by electric infrared heating oven.**
 - (10) **One (1) trickle varnish line for rotors, identified as R15, consisting of the following three (3) processes:**
 1. **preheating, which is done by electric induction heating oven;**
 2. **trickle varnish coating; and**
 3. **curing, which is done by electric infrared heating oven.**

2. Section D.4 will be added in the Permit to address the proposed two (2) new trickle varnish lines. Revision is as follows:

SECTION D.4 FACILITY OPERATION CONDITIONS

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

- (9) One (1) trickle varnish line for stators, identified as S15, consisting of the following three (3) processes:
 1. pre-heating, which is done by electric induction pre-heating oven;
 2. trickle varnish coating; and
 3. curing, which is done by electric infrared heating oven.
- (10) One (1) trickle varnish line for rotors, identified as R15, consisting of the following three (3) processes:
 1. preheating, which is done by electric induction heating oven;
 2. trickle varnish coating; and
 3. curing, which is done by electric infrared heating oven.

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

D.4.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating applied by the proposed two (2) trickle varnish lines to stators and rotors shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.

Compliance Determination Requirements

D.4.2 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 limit specified in Condition D.4.1 shall be determined using the modified EPA Method 24 (40 CFR 60 Appendix A). Testing shall be 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.4.3 Record Keeping Requirements

- (a) To document compliance with Condition D.4.1, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.4.1.
 - (1) The amount and VOC content of each material and solvent used. Records shall include purchase orders, invoices, material safety data sheets (MSDS) and alternative manufacturer information necessary to verify the type and amount used.
 - (2) A log of the dates of use; and
 - (3) The total VOC usages for each month;

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

Conclusion

The construction of this proposed modification shall be subject to the conditions of the attached **Fourth Part 70 Minor Permit Modification No. 095-14041-00016.**