

January 24, 2002

Mark Griffin  
Nishikawa Standard Company  
324 Morrow Street  
Topeka, Indiana 46571

Re: 087-15216-00031  
First Administrative Amendment to  
Part 70 No.: T 087-7181-00031

Dear Mr. Griffin:

Nishikawa Standard Company was issued a Part 70 permit on April 12, 2001 for a source that manufactures automotive rubber weatherstripping products. A letter requesting changes to this permit was received on January 14, 2002. Pursuant to the provisions of 326 IAC 2-7-11(a)(8), an administrative amendment to this permit is hereby drafted to incorporate the new surface coating line.

The following changes to the permit are hereby made to incorporate the proposed coating line into the existing source Title V permit. Changes to the permit are in bold type and deletions are struck-through for emphasis):

**1. Condition A.2, Source Description:**

The source description of Condition A.2 shall be amended as follows to include the proposed surface coating line:

... (ff) One (1) spray line identified as X-034, equipped with six (6) High Volume Low Pressure (HVLP) spray guns, using dry filters to control PM overspray emissions, exhausting to stack PEF-E3, and two (2) natural gas-fired coating cure ovens, each has a heat input capacity of 0.340 mmBtu/hr exhausting to stacks PEF-E4 and PEF-E5.

**(gg) One (1) surface coating line, identified as X-033, including:**

- (1) one (1) surface coating booth, equipped with one (1) high volume low pressure (HVLP) spray gun, applying surface coatings to rubber parts at a maximum design rate of 0.15 gallons per hour, with particulate emissions controlled by a dry filter system, with emissions exhausted through Stack PEF-D2, and**
- (2) one (1) electric curing oven.**

**2. Section D.1, Unit Description:**

The unit description of Section D.1 shall be amended as follows to reflect the new surface coating line.

## SECTION D.1 FACILITY OPERATION CONDITIONS

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

(a) ....

(q) **One (1) surface coating line, identified as X-033, including:**

**(1) one (1) surface coating booth, equipped with one (1) high volume low pressure (HVLP) spray gun, applying surface coatings to rubber parts at a maximum design rate of 0.15 gallons per hour, with particulate emissions controlled by a dry filter system, with emissions exhausted through Stack PEF-D2, and**

**(2) one (1) electric curing oven.**

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

### 3. Condition D.1.3, 326 IAC 6-3-2 PM limitations:

Condition D.1.3 shall be amended as follows to include the proposed surface coating line.

#### D.1.3 Particulate Matter (PM) [326 IAC 6-3-2]

The PM from the one (1) spray coating line (X025), **one (1) surface coating line (X-033)**, four (4) spray booths (Lines 2, 3, 5 and 6), two (2) silicone application lines (X001 and X019), nine (9) CV finishing touchup stations (X003 and X004), three (3) urethane application lines (X020, X021, X023), one (1) portable spray booth and three (3) waterborne urethane coating booths (Lines 4 and 7 and Small Robot) shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

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

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 Scott Fulton, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0 and ask for Scott Fulton or extension (3-5691), or dial (317) 233-5691.

Sincerely,

Original Signed by Paul Dubenetzky  
Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

Attachments

SDF

cc: File - LaGrange County  
U.S. EPA, Region V  
LaGrange County Health Department  
Northern Regional Office  
Air Compliance Section Inspector - Doyle Houser  
Compliance Data Section - Karen Nowak  
Administrative and Development - Janet Mobley  
Technical Support and Modeling - Michele Boner

# PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Nishikawa Standard Company  
324 Morrow Street  
Topeka, Indiana 46571**

(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.: T 087-7182-00031	Date Issued: April 12, 2001
First Minor Source Modification No.: 087-11820-00031	Date Issued: March 15, 2000
First Significant Source Modification No.: 087-12244-00031	Date Issued: July 19, 2000
Second Minor Source Modification No.: 087-14331-00031	Date Issued: July 24, 2001
First Minor Permit Modification No.: 087-14376-00031	Date Issued: July 20, 2001
First Administrative Amendment No.: 087-15216-00031	Affected Pages: 9, 31, and 32, with 32a added.
Issued by: Original Signed by Paul Dubenetzky Paul Dubenetzky, Chief Permit Branch Office of Air Quality	Issuance Date: January 24, 2002

hour and 4.8 pounds of talc per hour.

- (dd) One (1) mixing department, identified as X018, constructed in 1987, equipped with one (1) carbon black weigh station, two (2) mixing mills, and one (1) Barwell pelletizer line, all exhausting to a small baghouse identified as CE-02 and exhausting at stack PEF-A10, capacity: 416.7 pounds of rubber per hour, 3.2 pounds of talc per hour, and 83.3 pounds of carbon black per hour.
- (ee) One (1) SDM ED extrusion line, identified as emission unit X-033, with a maximum capacity of 1,289 pounds of rubber per hour, equipped with two (2) natural gas-fired microwave curing ovens, each has a heat input capacity of 0.143 million British Thermal Units per hour (mmBtu/hr), exhausting to vents PEV-E1 and PEV-E2; two (2) natural gas-fired hot air rubber curing ovens, each has a heat input capacity of 0.850 mmBtu/hr exhausting to stacks PEF-E1 and PEF-E2; and one wire metal system consisting of two (2) natural gas-fired burners, each has a heat input capacity of 0.375 mmBtu/hr and exhausting to stack PEF-E6.
- (ff) One (1) spray line identified as X-034, equipped with six (6) High Volume Low Pressure (HVLP) spray guns, using dry filters to control PM overspray emissions, exhausting to stack PEF-E3, and two (2) natural gas-fired coating cure ovens, each has a heat input capacity of 0.340 mmBtu/hr exhausting to stacks PEF-E4 and PEF-E5.
- (gg) One (1) surface coating line, identified as X-033, including:
  - (1) one (1) surface coating booth, equipped with one (1) high volume low pressure (HVLP) spray gun, applying surface coatings to rubber parts at a maximum design rate of 0.15 gallons per hour, with particulate emissions controlled by a dry filter system, with emissions exhausted through Stack PEF-D2, and
  - (2) one (1) electric curing 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)]

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

- (a) Pellet Lines Mixing Mills A, C, D and E [326 IAC 6-3]
- (b) Pelletizers and Tumblers [326 IAC 6-3]
- (c) Dango Mixing Mills B and F [326 IAC 6-3]
- (d) Color Mixing Mill [326 IAC 6-3]
- (e) SDM Finishing Drill and Fastener Inserter Units [326 IAC 6-3]
- (f) Mold Tech Repair Sandblast Unit [326 IAC 6-3]
- (g) Mold Tech Repair Weld and Metalworking Equipment [326 IAC 6-3]
- (h) Dango Barwell Extruders [326 IAC 6-3]
- (i) Polymer Block Cutting Station [326 IAC 6-3]
- (j) Scrap Cardboard Bailing Unit [326 IAC 6-3]
- (k) Weld Shop Equipment [326 IAC 6-3]
- (l) CV Annealing Oven [326 IAC 6-3]
- (m) Silicone Coating Mixing Station [326 IAC 6-3]
- (n) Die Room Metalworking Equipment [326 IAC 6-3]
- (o) SDM Mezzanine Units [326 IAC 6-3]

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

- (l) One (1) urethane application line, identified as emission unit X023, constructed in 1997, equipped with six (6) spray guns and one (1) blown air dryer, and exhausting at stack PEV-A25, capacity: 10 grams of coating per minute per gun.
- (m) One (1) portable spray booth for urethane coating, identified as emission unit X024, constructed in 1996, equipped with one (1) high volume-low pressure (HVLP) spray applicators and exhausting to a dry filter, capacity: 10 grams of coating per minute per gun.
- (n) One (1) waterborne urethane coating booth, identified as Line 4, equipped with dry filters and exhausting to stack PEV-A24, capacity: 0.45 gallons per hour.
- (o) One (1) waterborne urethane coating booth, identified as Line 7, equipped with dry filters and exhausting to stack PEV-A25, capacity: 1.36 gallons per hour.
- (p) One (1) waterborne urethane coating booth, identified as Small Robot, equipped with dry filters and exhausting to stack PEV-A26, capacity: 0.15 gallons per hour.
- (q) One (1) surface coating line, identified as X-033, including:
  - (1) one (1) surface coating booth, equipped with one (1) high volume low pressure (HVLP) spray gun, applying surface coatings to rubber parts at a maximum design rate of 0.15 gallons per hour, with particulate emissions controlled by a dry filter system, with emissions exhausted through Stack PEF-D2, and
  - (2) one (1) electric curing oven.

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

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

**D.1.1 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6][326 IAC 2-2]**

- (a) Pursuant to CP 087-9388-00031, issued on January 28, 1999, the VOC delivered to the applicators of the one (1) spray coating line, identified as emission unit X025, minus the VOC recovered, shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply to that emission unit.
- (b) Any change or modification at the spray booths (Lines 2, 3, 5 and 6), two (2) CV finishing touchup stations (X004), urethane application lines (X020, X021, X023), the portable spray booth or the three (3) waterborne urethane coating booths (Lines 4 and 7 and Small Robot) that increases the potential to emit VOC at the facility to twenty-five (25) tons per year or more may cause the source to become subject to 326 IAC 8-1-6 and prior approval is required.
- (c) Pursuant to 326 IAC 8-1-6, New facilities; General reduction requirements, the best available control technology (BACT) for the seven (7) CV finishing touchup stations (X003) and two (2) silicone application lines (X001 and X019) shall be as follows:

- (1) The total VOC usage at the one (1) spray coating line (X025), four (4) spray booths (Lines 2, 3, 5 and 6), two (2) silicone application lines (X001 and X019), nine (9) CV finishing touchup stations (X003 and X004), three (3) urethane application lines (X020, X021, X023), one (1) portable spray booth and three (3) waterborne urethane coating booths (Lines 4 and 7 and Small Robot) shall be limited to less than 183 tons per consecutive twelve (12) month period. This is a BACT limit for the seven (7) CV finishing touchup stations (X003) and two (2) silicone application lines (X001 and X019). All coating and application emission units are included in this limit to limit VOC from the entire source to less than 250 tons per year and make 326 IAC 2-2 (PSD) not applicable.
- (2) All coating, urethane and silicone application devices at these facilities or shall be drip; high volume, low pressure (HVLP) spray guns; or a coating application device at least as efficient. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.
- (3) All VOC containing containers shall be kept covered when not in use.
- (d) The VOC limitation in this BACT, in combination with VOC emissions of 63.5 tons per year from extruding, curing, mixing and milling, 2.0 tons per year from insignificant activities and 0.911 tons per year from combustion, will limit the total VOC emitted at this source to less than 250 tons per year and this source will remain a minor source pursuant to 326 IAC 2-2, Prevention of Significant Deterioration.

D.1.2 Hazardous Air Pollutants (HAPs) [326 IAC 2-4.1-1]

- (a) Pursuant to CP 087-9388-00031, issued on January 28, 1999, each individual hazardous air pollutant (HAP) delivered to the applicators of the one (1) spray coating line, identified as emission unit X025, minus the amount of that HAP recovered, shall be limited to less than ten (10) tons per consecutive twelve (12) month period.
- (b) Pursuant to CP 087-9388-00031, issued on January 28, 1999, any combination of HAPs delivered to the applicators of the one (1) spray coating line, identified as emission unit X025, minus the total HAPs recovered, shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

Therefore, the requirements of 326 IAC 2-4.1-1, New Source Toxics Control, are not applicable.

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2]

The PM from the one (1) spray coating line (X025), one (1) surface coating line (X-033), four (4) spray booths (Lines 2, 3, 5 and 6), two (2) silicone application lines (X001 and X019), nine (9) CV finishing touchup stations (X003 and X004), three (3) urethane application lines (X020, X021, X023), one (1) portable spray booth and three (3) waterborne urethane coating booths (Lines 4 and 7 and Small Robot) shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

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

or

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

$$E = 55.0 P^{0.11} - 40$$

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

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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



## Indiana Department of Environmental Management Office of Air Quality

### Technical Support Document (TSD) for an Administrative Amendment to a Part 70 (Title V) Permit

#### Source Background and Description

Source Name: Nishikawa Standard Company  
Source Location: 324 Morrow Street, Topeka, Indiana 46571  
County: LaGrange  
SIC Code: 3061  
Registration No.: 087-15216-00031  
Permit Reviewer: SDF

The Office of Air Quality (OAQ) has reviewed an application from Nishikawa Standard Company relating to the addition of one new rubber parts surface coating line at their existing automotive weather stripping manufacturing operation.

#### Request

On January 14, 2002, Nishikawa Standard Company submitted an application to add one new surface coating line at their existing stationary automotive components manufacturing operation. The surface coating booth is described as follows:

One (1) surface coating line, identified as X-033, including:

- (a) one (1) surface coating booth, equipped with one (1) high volume low pressure (HVLP) spray gun, applying surface coatings to rubber parts at a maximum design rate of 0.15 gallons per hour, with particulate emissions controlled by a dry filter system, with emissions exhausted through Stack PEF-D2, and
- (b) one (1) electric curing oven.

The proposed surface coating line will not allow an increase in production or emissions at any other equipment existing at the source. The parts to be coated are rubber parts.

The emissions generated by the proposed surface coating line are particulate matter (PM), PM10, volatile organic compounds (VOCs), and hazardous air pollutants (HAP). Based on the information submitted by Nishikawa Standard Company, the estimated PM/PM10, VOC, and combined HAP emissions are determined to be 1.19, 0.57, and 0.02 tons per year, respectively.

Therefore, the proposed surface coating line shall be exempted from the source modification requirements of 326 IAC 2-7-10.5 because pursuant to 326 IAC 2-1.1-3(d)(1)(A), (D), and (H), modifications with PM, PM10, VOC, single HAP, and combined HAP PTE less than 5, 5, 10, 1, and 2.5 tons per year, respectively, are not subject to the source modification requirements of 326 IAC 2-7-10.5.

Although the proposed surface coating line is not subject to the Part 70 source modification requirements of 326 IAC 2-7-10.5, the modification must be incorporated into the existing source permit.

The changes to the existing source permit consists solely of changes in descriptive information. No new applicable requirements will be triggered as a result of the proposed surface coating line.

The proposed surface coating line shall therefore be incorporated into the existing source Title V permit via an Administrative Amendment pursuant to 326 IAC 2-7-11(a)(8) which states that revisions consisting of descriptive information changes only that do not trigger any new applicable requirements, may be incorporated into the existing source permit via an administrative amendment.

### Existing Approvals

The source was issued a Part 70 permit (Title V), 087-7182-00031, on April 12, 2001. The following changes to the Title V after submittal of the application have been approved:

(1) 087-8661-00031	Registration	Date Issued:	10-02-97
(2) 087-9388-00031	State Construction Permit	Date Issued:	01-28-99
(3) 087-11820-00031	First Minor Source Modification	Date Issued:	03-15-00
(4) 087-12244-00031	First Significant Source Modification	Date Issued:	07-19-00
(5) 087-14331-00031	Second Minor Source Modification	Date Issued:	07-24-01
(6) 087-14376-00031	First Minor Permit Modification	Date Issued:	07-20-01

### Enforcement Issue

There are no enforcement actions pending.

### Recommendation

The staff recommends to the Commissioner that this Administrative Amendment 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.

### Emission Calculations

#### **UNRESTRICTED POTENTIAL TO EMIT DUE TO THE MODIFICATION:**

The emissions generated by the proposed surface coating line are VOC's, PM and PM10, and the single HAP methylbenzene.

The following calculations determine the unrestricted potential to emit (UPTE) from the proposed surface coating line.

#### **VOC:**

The proposed surface coating line generates VOC emissions. The following calculations determine the VOC UPTE based on the worst case coating/solvent combination, as applied, the chemical properties of the coating and solvents as obtained from the MSDS, emissions before controls, and 8760 hours of operation.

Coating	lb/gal	fraction VOC	maximum gal/hr	VOC (ton/yr)
SP-217	8.73	0.10	0.15	0.57

$$8.73 \text{ lb/gal} * 0.10 \text{ (fraction VOC)} * 0.15 \text{ gal/hr} * 8760 \text{ hr/yr} * 1/2000 \text{ ton/lb} = 0.57 \text{ tons VOC/yr}$$

**HAP:**

The proposed surface coating line generates the HAP methylbenzene. The following calculations determine the HAP UPTE based on the worst case coating/solvent combination, as applied, the chemical properties of the coating and solvents as obtained from the MSDS, emissions before controls, and 8760 hours of operation.

Coating	lb/gal	fraction HAP	maximum gal/hr	HAP (ton/yr)
SP-217	8.73	0.003	0.15	0.02

$$8.73 \text{ lb/gal} * 0.003 \text{ (fraction HAP)} * 0.15 \text{ gal/hr} * 8760 \text{ hr/yr} * 1/2000 \text{ ton/lb} = 0.02 \text{ tons HAP/yr}$$

**PM/PM10:**

The proposed surface coating line produces PM/PM10 emissions. The following calculations determine the PM/PM10 UPTE based on the worst case coating/solvent combination, as applied, the chemical properties of the coating and solvents as obtained from the MSDS, a transfer efficiency of 75%, emissions before controls, and 8760 hours of operation.

Coating	lb/gal	fraction solids	maximum gal/hr	Fraction Transferred	PM (ton/yr)
SP-217	8.73	0.83	0.15	0.75	1.19

$$8.73 \text{ lb/gal} * 0.83 \text{ (fraction Solids)} * 0.15 \text{ gal/hr} * (1 - 0.75 \text{ (fraction transferred)}) = 0.27 \text{ lb/hr}$$

$$0.27 \text{ lb/hr} * 8760 \text{ hr/yr} * 1/2000 \text{ ton/lb} = 1.19 \text{ tons PM/yr}$$

PM10 is determined to be equal to PM in this case.

**EMISSIONS AFTER CONTROLS:**

The PM/PM10 emissions are controlled by a dry filter system. The following calculations determine the emissions after controls.

The following calculations determine the emissions after controls from the proposed surface coating line based on the estimated emissions before controls, a design control efficiency of 95%, and 8760 hours of operation.

$$\text{PM/PM10 Emissions Before Controls (1.19 tons/yr)} * (1 - 0.95) = 0.06 \text{ ton (PM/PM10)/yr}$$

### Potential To Emit

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

This table reflects the PTE before controls due to the proposed modification based on the above estimated emissions calculations. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	1.19
PM-10	1.19
SO <sub>2</sub>	-
VOC	0.57
CO	-
NO <sub>x</sub>	-

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

Pollutant	Potential To Emit (tons/year)
Single HAP (methylbenzene)	0.02
Total Combined HAPs	0.02

The emissions generated by the proposed surface coating line are particulate matter (PM), PM10, volatile organic compounds (VOCs), and hazardous air pollutants (HAP). Based on the information submitted by Nishikawa Standard Company, the estimated PM/PM10, VOC and combined HAP emissions are determined to be 1.19, 0.57, and 0.02 tons per year, respectively.

Therefore, the proposed surface coating line shall be exempted from the source modification requirements of 326 IAC 2-7-10.5 because pursuant to 326 IAC 2-1.1-3(d)(1)(A), (D), and (H), modifications with PM, PM10, VOC, single HAP, and combined HAP PTE less than 5, 5, 10, 1, and 2.5 tons per year, respectively, are not subject to the source modification requirements of 326 IAC 2-7-10.5.

However, the proposed surface coating line shall be incorporated into the existing source Title V permit via an Administrative Amendment pursuant to 326 IAC 2-7-11(a)(8) which states that revisions consisting of descriptive information changes only that do not trigger any new applicable requirements, may be incorporated into the existing source permit via an administrative amendment.

### County Attainment Status

The source is located in LaGrange County.

Pollutant	Status
PM <sub>10</sub>	Attainment or Unclassifiable
SO <sub>2</sub>	Attainment or Unclassifiable
NO <sub>2</sub>	Attainment or Unclassifiable
Ozone	Attainment or Unclassifiable
CO	Attainment or unclassifiable
Lead	Attainment or unclassifiable

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

**Existing Source Status**

Existing Source PSD Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Unit	PM (tons/yr)	PM10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Ind. HAP (tons/yr)	Comb. HAPs (tons/yr)
Source Emissions	<100	<100	<100	<100	>100	<100	<10	<25
PSD Levels	250	250	250	250	250	250	-	-
Part 70 Levels	-	100	100	100	100	100	10	25

- (a) The existing source is not a major PSD stationary source because no 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) The existing source is a Title V major stationary source because the potential to emit (PTE) of VOC exceeds the applicable level of 100 tons/yr.

**Existing Source Status After the Proposed Modification:**

Existing Source PSD Definition (emissions after controls, after the proposed modification, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Unit	PM (tons/yr)	PM10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Ind. HAP (tons/yr)	Comb. HAPs (tons/yr)
Source Emissions	<100	<100	<100	<100	>100	<100	<10	<25
PSD Levels	250	250	250	250	250	250	-	-
Part 70 Levels	-	100	100	100	100	100	10	25

- (a) The existing source after the proposed modification is still not a major PSD stationary source because no 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) The existing source after the proposed modification is still a Title V major stationary source because the VOC PTE exceeds the applicable level of 100 tons/yr.

**Federal Rule Applicability**

**New Source Performance Standards (NSPS):**

There are no New Source Performance Standards (326 IAC 12 and 40 CFR Part 60) that become applicable due to the proposed modification.

**National Emission Standards for Hazardous Air Pollutants (NESHAPs):**

There are no National Emission Standards for Hazardous Air Pollutants (326 IAC 14 and 20 and 40 CFR Part 61 and 63) that become applicable due to the proposed modification.

**State Rule Applicability**

**(a) Entire State Rule Applicability:**

326 IAC 1-6-3 (Preventive Maintenance Plan):

The source is still required to have a preventive maintenance plan for the emission units and control devices of the source.

326 IAC 2-4.1 (HAP Major Sources)

This source is still not subject to the requirements of 326 IAC 2-4.1 because no single hazardous air pollutant (HAP) emissions exceed 10 tons per year, and the combined HAP emissions are less than 25 tons per year.

326 IAC 2-6 (Emission Reporting)

This source is still subject to 326 IAC 2-6 (Emission Reporting), because the VOC emissions exceed the applicable level of 100 tons/yr.

### 326 IAC 5-1-2 (Opacity Limitations)

The proposed surface coating line is subject to 326 IAC 5-1-2 because the coating line will generate PM/PM10 emissions

Pursuant to 326 IAC 5-1-2, opacity shall not exceed an average of 40% in any one 6 minute averaging period. Opacity shall not exceed 60% for more than a cumulative total of fifteen minutes.

The existing source permit already includes in Condition C.2, the source opacity requirements. These requirements are the requirements that apply to the proposed surface coating line. Thus, the proposed surface coating line shall meet the requirements specified in Condition C.2.

### (b) Individual State Rule Applicability:

#### 326 IAC 6-3 (Process Operations), Surface Coating Line:

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) emissions from the surface coating line shall not exceed the limits established utilizing the following equation:

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

where: E = rate of emission in pounds per hour,  
P = process weight in tons per hour

The existing source permit already includes in Condition D.1.3 , the source PM overspray requirements. These requirements are the requirements that apply to the proposed surface coating line. Thus, the proposed surface coating line shall meet the requirements specified in Condition D.1.3.

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

The proposed surface coating line is not subject to 326 IAC 8-2-9 because the coatings are applied to rubber parts, not metal.

#### 326 IAC 8-1-6 (State BACT Requirements)

Although there are no other Article 8 rules, 326 IAC 8-1-6 does not apply because the VOC UPTE of the proposed surface coating line (0.57 tons/yr) are less than the applicable level of 25 tons per year.

### Changes to the Permit

#### 1. Condition A.2, Source Description:

The source description of Condition A.2 shall be amended as follows to include the proposed surface coating line:

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:

- (a) One (1) spray coating line, identified as emission unit X025, constructed in 1997 and modified in 1999, equipped with one (1) robotic spray booth equipped with three (3) high volume-low pressure (HVLP) spray guns and exhausting to PEF-D5, one (1) 1.5 Million British thermal units per hour natural gas-fired preheat oven exhausting to PEV-D1, one (1) 2.0 Million British thermal units per hour natural gas-fired curing oven exhausting to PEV-D2, one (1) 1.5 Million British thermal units per hour natural gas-fired make-up air heater, two (2) spray guns for spraying primer, and one (1) coating prep and supply area exhausting to PEF-D4, capacity: 195 extruded rubber parts per hour.
- (b) One (1) spray booth, identified as Line 2, constructed in 2000, equipped with three (3) airless high volume-low pressure (HVLP) guns, using dry filters as control, and exhausting to one (1) stack identified as PEV-A27, maximum capacity: 3.97 pounds of waterborne urethane coating per hour.
- (c) One (1) spray booth, identified as Line 3, constructed in 2000, equipped with three (3) airless high volume-low pressure (HVLP) guns, using dry filters as control, and exhausting to one (1) stack identified as PEV-A28, maximum capacity: 3.97 pounds of waterborne urethane coating per hour.
- (d) One (1) spray booth, identified as Line 5, constructed in 2000, equipped with six (6) airless high volume-low pressure (HVLP) guns, using dry filters as control, and exhausting to one (1) stack identified as PEV-A29, maximum capacity: 7.93 pounds of waterborne urethane coating per hour.
- (e) One (1) spray booth, identified as Line 6, constructed in 2000, equipped with six (6) airless high volume-low pressure (HVLP) guns, using dry filters as control, and exhausting to one (1) stack identified as PEV-A30, maximum capacity: 7.93 pounds of waterborne urethane coating per hour.
- (f) One (1) silicone application line, identified as line 1, emission unit X001, constructed in 1993, equipped with four (4) drip applicators and one (1) drying oven rated at 4.9 million British thermal units per hour, and exhausting at stacks PEV-A8 and PEV-A16, maximum capacity: 0.00086 gallons per meter and 4,080 meters per hour.
- (g) Seven (7) CV finishing touchup stations, identified as emission unit X003, constructed in 1990, equipped with seven (7) electric dryers and exhausting at stack PEF-D2, maximum capacity: 2 pounds of coating per hour per station.
- (h) Two (2) CV finishing touchup stations, identified as emission unit X004, constructed in 1990, equipped with two (2) electric dryers and exhausting at stack PEF-D1, maximum capacity: 2 pounds of coating per hour per station.
- (i) One (1) silicone application line, identified as emission unit X019, constructed in 1994, equipped with five (5) spray guns and drip applicators and one (1) natural gas-fired drying oven rated at 2.0 million British thermal units per hour, and exhausting at stacks PEV-B1, PEV-B2, and PEV-B3, maximum capacity: 0.00086 gallons per meter and 4,080 meters per hour for the drip and wipe and 10 grams of coating per minute per gun for the spray application.
- (j) One (1) urethane application line, identified as emission unit X020, constructed in 1996, equipped with six (6) spray guns and one (1) blown air dryer, and exhausting at stack PEV-A21, capacity: 10 grams of coating per minute per gun.



- (k) One (1) urethane application line, identified as emission unit X021, constructed in 1996, equipped with three (3) spray guns and one (1) blown air dryer, one (1) 1.0 MM Btu/hr natural gas fired curing oven, and exhausting at stack PEV-B12, capacity: 10 grams of coating per minute per gun.
- (l) One (1) urethane application line, identified as emission unit X023, constructed in 1997, equipped with six (6) spray guns and one (1) blown air dryer, and exhausting at stack PEV-A25, capacity: 10 grams of coating per minute per gun.
- (m) One (1) portable spray booth for urethane coating, identified as emission unit X024, constructed in 1996, equipped with one (1) high volume, low pressure (HVLP) spray applicators and exhausting to a dry filter, capacity: 10 grams of coating per minute per gun.
- (n) One (1) waterborne urethane coating booth, identified as Line 4, equipped with dry filters and exhausting to stack PEV-A24, capacity: 0.45 gallons per hour.
- (o) One (1) waterborne urethane coating booth, identified as Line 7, equipped with dry filters and exhausting to stack PEV-A25, capacity: 1.36 gallons per hour.
- (p) One (1) waterborne urethane coating booth, identified as Small Robot, equipped with dry filters and exhausting to stack PEV-A26, capacity: 0.15 gallons per hour.
- (q) One (1) CV extrusion line, identified as line 1, emission unit X005, constructed in 1987, equipped with one (1) extruder, one (1) feed hopper, one (1) duster, one (1) curing oven, one (1) 1.59 million British thermal units per hour natural gas-fired deodorizing furnace and one (1) 0.298 million British thermal units per hour natural gas-fired core metal heater, with the duster and hopper exhausting to a fabric filter identified as CE-03 and exhausting to stack PEF-A2, with all other operations exhausting at stack PEF-A3, maximum capacity: 200 pounds of rubber per hour and 2 pounds of talc per hour.
- (r) One (1) CV extrusion line, identified as line 2, emission unit X006, constructed in 1987, equipped with one (1) extruder, one (1) feed hopper, one (1) duster, one (1) curing oven, one (1) 1.59 million British thermal units per hour natural gas-fired deodorizing furnace and one (1) 0.298 million British thermal units per hour natural gas-fired core metal heater, with the duster and hopper exhausting to a fabric filter identified as CE-03 and exhausting to stack PEF-A2, with all other operations exhausting at stack PEF-A3, maximum capacity: 200 pounds of rubber per hour and 2 pounds of talc per hour.
- (s) One (1) CV extrusion line, identified as line 3, emission unit X007, constructed in 1987, equipped with one (1) extruder, one (1) feed hopper, one (1) duster, one (1) curing oven, one (1) 1.59 million British thermal units per hour natural gas-fired deodorizing furnace and one (1) 0.298 million British thermal units per hour natural gas-fired core metal heater, with the duster and hopper exhausting to a fabric filter identified as CE-03 and exhausting to stack PEF-A2, with all other operations exhausting at stack PEF-A3, maximum capacity: 200 pounds of rubber per hour and 2 pounds of talc per hour.

- (t) One (1) CV extrusion line, identified as line 4, emission unit X008, constructed in 1988, equipped with one (1) extruder, one (1) feed hopper, one (1) duster, one (1) curing oven, one (1) 1.59 million British thermal units per hour natural gas-fired deodorizing furnace and one (1) 0.298 million British thermal units per hour natural gas-fired core metal heater, with the duster and hopper exhausting to a fabric filter identified as CE-03 and exhausting to stack PEF-A2, with all other operations exhausting at stack PEF-A3, maximum capacity: 200 pounds of rubber per hour and 2 pounds of talc per hour.
- (u) One (1) CV extrusion line, identified as line 5, emission unit X009, constructed in 1989, equipped with two (2) extruders, two (2) feed hoppers, one (1) duster, one (1) curing oven, and one (1) 1.59 million British thermal units per hour natural gas-fired deodorizing furnace, with the duster and hoppers exhausting to a fabric filter identified as CE-03 and exhausting to stack PEF-A2, with all other operations exhausting at stacks PEF-A9, PEV-A10 and PEV-A20, maximum capacity: 400 pounds of rubber per hour and 2 pounds of talc per hour.
- (v) One (1) CV extrusion line, identified as line 6, emission unit X010, constructed in 1989, equipped with two (2) extruders, two (2) feed hoppers, one (1) duster, one (1) curing oven, and one (1) 1.59 million British thermal units per hour natural gas-fired deodorizing furnace, with the duster and hoppers exhausting to a fabric filter identified as CE-03 and exhausting to stack PEF-A2, with all other operations exhausting at stacks PEF-A1, PEV-A15 and PEV-A20, maximum capacity: 400 pounds of rubber per hour and 2 pounds of talc per hour.
- (w) One (1) CV extrusion line, identified as line 7, emission unit X011, constructed in 1991, equipped with three (3) extruders, three (3) feed hoppers, one (1) duster, one (1) curing oven, and one (1) 1.59 million British thermal units per hour natural gas-fired deodorizing furnace, with the duster and hoppers exhausting to a fabric filter identified as CE-03 and exhausting to stack PEF-A2, with all other operations exhausting at stacks PEF-A1 and PEV-A5, maximum capacity: 600 pounds of rubber per hour and 2 pounds of talc per hour.
- (x) One (1) CV extrusion line, identified as line 8, emission unit X012, constructed in 1995, equipped with four (4) extruders, two (2) feed hoppers, two (2) electroless dusters, and one (1) 1.59 million British thermal units per hour natural gas-fired vulcanizing oven, with the dusters exhausting to a fabric filter identified as CE-05 and exhausting inside, and the hoppers exhausting to a fabric filter identified as CE-03 and exhausting to stack PEF-A2, with the vulcanizing oven exhausting at stacks PEV-A4, PEV-A3 and PEV-A2, maximum capacity: 400 pounds of rubber per hour and 2 pounds of sodium bicarbonate per hour.
- (y) One (1) CV extrusion line, identified as line 9, emission unit X013, constructed in 1995, equipped with four (4) extruders, two (2) feed hoppers, two (2) electroless dusters, and one (1) 1.59 million British thermal units per hour natural gas-fired vulcanizing oven, with the dusters exhausting to a fabric filter identified as CE-06 and exhausting inside, and the hoppers exhausting to a fabric filter identified as CE-03 and exhausting to stack PEF-A2, with the vulcanizing oven exhausting at stacks PEV-A17, PEV-A18 and PEV-A19, maximum capacity: 400 pounds of rubber per hour and 2 pounds of sodium bicarbonate per hour.

- (z) One (1) SDM EA extrusion line, identified as emission unit X014, constructed in 1987, equipped with one (1) sponge extruder, one (1) dense extruder, one (1) sponge extruder feed hopper, one (1) 1.19 million British thermal units per hour natural gas-fired core metal heater, one (1) carrier dryer, one (1) curing oven, one (1) 1.99 million British thermal units per hour natural gas-fired deodorizing furnace, one (1) bead recovery dryer, and one (1) bead blow off station, with the sponge extruder feed hopper exhausting to a fabric filter identified as CE-04 and exhausting to stack PEF-B5, the core metal heater exhausting to stack PEF-B7, the deodorizing furnace exhausting to stack PEV-B9, the curing oven exhausting to stack PEF-B3, the bead recovery dryer exhausting to stack PEV-B7, and the bead blow off station exhausting to stack PEV-B8, maximum capacity: 400 pounds of rubber per hour, 400 pounds of color ribbon per hour, 350 pounds of metal strip per hour, and 50 pounds of carrier per hour.
- (aa) One (1) SDM EB extrusion line, identified as emission unit X015, constructed in 1989, equipped with one (1) sponge extruder, one (1) dense extruder, one (1) sponge extruder feed hopper, one (1) 1.19 million British thermal units per hour natural gas-fired core metal heater, one (1) carrier dryer, one (1) curing oven, one (1) 1.99 million British thermal units per hour natural gas-fired deodorizing furnace, one (1) bead recovery dryer, and one (1) bead blow off station, with the sponge extruder feed hopper exhausting to a fabric filter identified as CE-04 and exhausting to stack PEF-B5, the core metal heater exhausting to stack PEF-B6, the deodorizing furnace exhausting to stack PEV-B10, the curing oven exhausting to stack PEF-B2, the bead recovery dryer exhausting to stack PEV-B5, and the bead blow off station exhausting to stack PEV-B6, maximum capacity: 400 pounds of rubber per hour, 400 pounds of color ribbon per hour, 350 pounds of metal strip per hour, and 50 pounds of carrier per hour.
- (bb) One (1) SDM EC extrusion line, identified as emission unit X016, constructed in 1994, equipped with one (1) sponge extruder, one (1) dense extruder, one (1) sponge extruder feed hopper, one (1) 1.19 million British thermal units per hour natural gas-fired core metal heater, one (1) carrier dryer, one (1) curing oven, one (1) 1.99 million British thermal units per hour natural gas-fired deodorizing furnace, one (1) bead recovery dryer, and one (1) bead blow off station, with the sponge extruder feed hopper exhausting to a fabric filter identified as CE-04 and exhausting to stack PEF-B5, the core metal heater exhausting to stack PEF-B4, the deodorizing furnace exhausting to stack PEV-B11, the curing oven exhausting to stack PEF-B1, and the bead recovery dryer exhausting and the bead blow off station exhausting to stack PEV-B4, maximum capacity: 400 pounds of rubber per hour, 400 pounds of color ribbon per hour, 350 pounds of metal strip per hour, and 50 pounds of carrier per hour.
- (cc) One (1) mixing department, identified as X017, constructed in 1987, equipped with one (1) rubber weigh station, one (1) pelletizer line, two (2) mixing mills, one (1) talcing system, one (1) talc sifter unit, and one (1) pelletizing vacuum, all exhausting to a large baghouse identified as CE-01 and exhausting at stack PEF-A9, capacity: 562 pounds of rubber per hour and 4.8 pounds of talc per hour.
- (dd) One (1) mixing department, identified as X018, constructed in 1987, equipped with one (1) carbon black weigh station, two (2) mixing mills, and one (1) Barwell pelletizer line, all exhausting to a small baghouse identified as CE-02 and exhausting at stack PEF-A10, capacity: 416.7 pounds of rubber per hour, 3.2 pounds of talc per hour, and 83.3 pounds of carbon black per hour.

- (ee) One (1) SDM ED extrusion line, identified as emission unit X-033, with a maximum capacity of 1,289 pounds of rubber per hour, equipped with two (2) natural gas-fired microwave curing ovens, each has a heat input capacity of 0.143 million British Thermal Units per hour (mmBtu/hr), exhausting to vents PEV-E1 and PEV-E2; two (2) natural gas-fired hot air rubber curing ovens, each has a heat input capacity of 0.850 mmBtu/hr exhausting to stacks PEF-E1 and PEF-E2; and one wire metal system consisting of two (2) natural gas-fired burners, each has a heat input capacity of 0.375 mmBtu/hr and exhausting to stack PEF-E6.
- (ff) One (1) spray line identified as X-034, equipped with six (6) High Volume Low Pressure (HVLP) spray guns, using dry filters to control PM overspray emissions, exhausting to stack PEF-E3, and two (2) natural gas-fired coating cure ovens, each has a heat input capacity of 0.340 mmBtu/hr exhausting to stacks PEF-E4 and PEF-E5.
- (gg) **One (1) surface coating line, identified as X-033, including:**
  - (1) **one (1) surface coating booth, equipped with one (1) high volume low pressure (HVLP) spray gun, applying surface coatings to rubber parts at a maximum design rate of 0.15 gallons per hour, with particulate emissions controlled by a dry filter system, with emissions exhausted through Stack PEF-D2, and**
  - (2) **one (1) electric curing oven.**

## 2. Condition C.2, Source Opacity Requirements:

No changes to Condition C.2 are necessary as a result of the proposed modification because Condition C.2 is written such that it already includes the 326 IAC 5-1-2 opacity requirements that are applicable to the proposed surface coating line.

## 3. Section D.1, Unit Description:

The unit description of Section D.1 shall be amended as follows to reflect the new surface coating line.

### SECTION D.1 FACILITY OPERATION CONDITIONS

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

- (a) One (1) spray coating line, identified as emission unit X025, constructed in 1997 and modified in 1999, equipped with one (1) robotic spray booth equipped with three (3) high volume-low pressure (HVLP) spray guns and exhausting to PEF-D5, one (1) 1.5 Million British thermal units per hour natural gas-fired preheat oven exhausting to PEV-D1, one (1) 2.0 Million British thermal units per hour natural gas-fired curing oven exhausting to PEV-D2, one (1) 1.5 Million British thermal units per hour natural gas-fired make-up air heater, two (2) spray guns for spraying primer, and one (1) coating prep and supply area exhausting to PEF-D4, capacity: 195 extruded rubber parts per hour.
- (b) One (1) spray booth, identified as Line 2, constructed in 2000, equipped with three (3) airless high volume-low pressure (HVLP) guns, using dry filters as control, and exhausting to one (1) stack identified as PEV-A27, maximum capacity: 3.97 pounds of waterborne urethane coating per hour.
- (c) One (1) spray booth, identified as Line 3, constructed in 2000, equipped with three (3) airless high volume-low pressure (HVLP) guns, using dry filters as control, and exhausting to one (1) stack identified as PEV-A28, maximum capacity: 3.97 pounds of waterborne urethane coating per hour.

- (d) One (1) spray booth, identified as Line 5, constructed in 2000, equipped with six (6) airless high volume-low pressure (HVLP) guns, using dry filters as control, and exhausting to one (1) stack identified as PEV-A29, maximum capacity: 7.93 pounds of waterborne urethane coating per hour.
- (e) One (1) spray booth, identified as Line 6, constructed in 2000, equipped with six (6) airless high volume-low pressure (HVLP) guns, using dry filters as control, and exhausting to one (1) stack identified as PEV-A30, maximum capacity: 7.93 pounds of waterborne urethane coating per hour.
- (f) One (1) silicone application line, identified as line 1, emission unit X001, constructed in 1993, equipped with four (4) drip applicators and one (1) drying oven rated at 4.9 million British thermal units per hour, and exhausting at stacks PEV-A8 and PEV-A16, maximum capacity: 0.00086 gallons per meter and 4,080 meters per hour.
- (g) Seven (7) CV finishing touchup stations, identified as emission unit X003, constructed in 1990, equipped with seven (7) electric dryers and exhausting at stack PEF-D2, maximum capacity: 2 pounds of coating per hour per station.
- (h) Two (2) CV finishing touchup stations, identified as emission unit X004, constructed in 1990, equipped with two (2) electric dryers and exhausting at stack PEF-D1, maximum capacity: 2 pounds of coating per hour per station.
- (i) One (1) silicone application line, identified as emission unit X019, constructed in 1994, equipped with five (5) spray guns and drip applicators and one (1) natural gas-fired drying oven rated at 2.0 million British thermal units per hour, and exhausting at stacks PEV-B1, PEV-B2, and PEV-B3, maximum capacity: 0.00086 gallons per meter and 4,080 meters per hour for the drip and wipe and 10 grams of coating per minute per gun for the spray application.
- (j) One (1) urethane application line, identified as emission unit X020, constructed in 1996, equipped with six (6) spray guns and one (1) blown air dryer, and exhausting at stack PEV-A21, capacity: 10 grams of coating per minute per gun.
- (k) One (1) urethane application line, identified as emission unit X021, constructed in 1996, equipped with three (3) spray guns and one (1) blown air dryer, one (1) 1.0 MM Btu/hr natural gas fired curing oven, and exhausting at stack PEV-B12, capacity: 10 grams of coating per minute per gun.
- (l) One (1) urethane application line, identified as emission unit X023, constructed in 1997, equipped with six (6) spray guns and one (1) blown air dryer, and exhausting at stack PEV-A25, capacity: 10 grams of coating per minute per gun.
- (m) One (1) portable spray booth for urethane coating, identified as emission unit X024, constructed in 1996, equipped with one (1) high volume-low pressure (HVLP) spray applicators and exhausting to a dry filter, capacity: 10 grams of coating per minute per gun.
- (n) One (1) waterborne urethane coating booth, identified as Line 4, equipped with dry filters and exhausting to stack PEV-A24, capacity: 0.45 gallons per hour.
- (o) One (1) waterborne urethane coating booth, identified as Line 7, equipped with dry filters and exhausting to stack PEV-A25, capacity: 1.36 gallons per hour.
- (p) One (1) waterborne urethane coating booth, identified as Small Robot, equipped with dry filters and exhausting to stack PEV-A26, capacity: 0.15 gallons per hour.
- (q) One (1) surface coating line, identified as X-033, including:**
  - (1) one (1) surface coating booth, equipped with one (1) high volume low pressure (HVLP) spray gun, applying surface coatings to rubber parts at a maximum design rate of 0.15 gallons per hour, with particulate emissions controlled by a dry filter system, with emissions exhausted through Stack PEF-D2, and**

**(2) one (1) electric curing oven.**

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

**4. Condition D.1.3, 326 IAC 6-3-2 PM limitations:**

Condition D.1.3 shall be amended as follows to include the proposed surface coating line.

**D.1.3 Particulate Matter (PM) [326 IAC 6-3-2]**

The PM from the one (1) spray coating line (X025), **one (1) surface coating line (X-033)**, four (4) spray booths (Lines 2, 3, 5 and 6), two (2) silicone application lines (X001 and X019), nine (9) CV finishing touchup stations (X003 and X004), three (3) urethane application lines (X020, X021, X023), one (1) portable spray booth and three (3) waterborne urethane coating booths (Lines 4 and 7 and Small Robot) shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

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

**Conclusion**

The proposed surface coating line shall be constructed and operated pursuant to the requirements specified in this proposed administrative amendment (**087-15216-00031**) and existing Title V (087-7182-00031).