



*Mitchell E. Daniels, Jr.*  
Governor

*Thomas W. Easterly*  
Commissioner

100 North Senate Avenue  
Indianapolis, Indiana 46204  
(317) 232-8603  
(800) 451-6027  
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TO: Interested Parties / Applicant  
DATE: December 6, 2006  
RE: Elsa, LLC / 095-16479-00048  
FROM: Nisha Sizemore  
Chief, Permits Branch  
Office of Air Quality

### **Notice of Decision: Approval – Effective Immediately**

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).

For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of an initial Title V operating permit, permit renewal, or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency  
401 M Street  
Washington, D.C. 20406

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.



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**PART 70 OPERATING PERMIT RENEWAL  
OFFICE OF AIR QUALITY  
and  
Anderson Office of Air Management**

**ELSA, LLC.  
1240 South State Road 37  
Elwood, Indiana 46036**

(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.

**The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. 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. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.**

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.: T095-16479-00048	
Original signed by:  Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: December 6, 2006  Expiration Date: December 6, 2011

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## SECTION A SOURCE SUMMARY

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

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

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The Permittee owns and operates a stationary fuel tank and exhaust systems manufacturing plant.

Responsible Official:	Vice President
Source Address:	1240 South State Road 37, Elwood, Indiana 46036
Mailing Address:	1240 South State Road 37, Elwood, Indiana 46036
General Source Phone Number:	(765) 557-2009
SIC Code:	3714
County Location:	Madison
Source Location Status:	Nonattainment for 8-hour ozone standard Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Minor Source under PSD and Emission Offset Rules; Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) One (1) open top vapor degreaser utilizing trichloroethylene, identified as AN-01, constructed in 1989, with a maximum capacity of 2.3 gallons per hour, and exhausting to stack S3. Under 40 CFR Part 63, Subpart T, this is considered a batch vapor cold solvent cleaning machine.
- (b) One (1) paint booth coating metal parts, identified as AM-08 Robotic (formerly Subaru) Paint Booth, constructed in 1989, with a maximum capacity of 28 units per hour, using dry filters to control particulate emissions, and exhausting to stack S14.
- (c) One (1) paint booth coating metal parts, identified as AM-09 Robotic (formerly Top Coat) Booth, constructed in 1989, with a maximum capacity of 25 fuel tanks/hr, using a robotic spray arm, using dry filters to control particulate emissions, and exhausting to stack S15.
- (d) One (1) paint booth coating metal parts, identified as AM-10 Paint (formerly Touch-up) Booth, constructed in 1989, with a maximum capacity of 25 fuel tanks/hr, using dry filters to control particulate emissions, and exhausting to stack S16.
- (e) One (1) paint booth coating metal parts, identified as BU-39 (formerly BU) Paint Booth, constructed in 1994, with a maximum capacity of 31 units per hour, using dry filters to control particulate emissions, and exhausting to stack S17.
- (f) One (1) paint booth coating metal parts, identified as BE-04 Robotic (formerly PSU Tank Robot) Paint Booth, constructed in 1993, with a maximum capacity of 36 fuel tanks per hour, using dry filters to control particulate emissions, and exhausting to stack S34.
- (g) One (1) paint booth coating metal parts, identified as BE-05 Paint (formerly PSU Touch-up) Booth, constructed in 1993, with a maximum capacity of 36 fuel tanks per hour, using dry filters to control particulate emissions, and exhausting to stack S35.

- (h) One (1) paint booth coating metal parts, identified as BE-06 Robotic (formerly PSU Tank Final) Paint Booth, constructed in 2005, with a maximum capacity of 25 fuel tanks/hour, using dry filters to control particulate emissions and exhausting to stack S42.
- (i) One (1) paint booth coating metal parts, identified as Exhaust Robotic (formerly PSU Exhaust Robot) Paint Booth, constructed in 1997 and modified in 2006, with a maximum capacity of 23 mufflers per hour, using dry filters to control particulate emissions, and exhausting to stack S44.

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) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment cutting torches, soldering equipment, welding equipment [326 IAC 6-3-2].
  - (1) Nine (9) metal inert gas (MIG) welders, identified as AC31, AC36-1, AJ29, AJ28-1, AP12, AP19, AP23, AP32, and AP40, constructed in 2000, 2000, 1992, 1992, 1989, 1990, 1990, 1990, and 1990, respectively, each with a maximum wire consumption of 0.94 pounds per hour, all exhausting to stack 4.
  - (2) Six (6) metal inert gas (MIG) welders, identified as AE12, AE30-11, AE31, AE32, AE33, and AE34, all constructed in 1998, each with a maximum wire consumption of 0.80 pounds per hour, all exhausting to stack 5.
  - (3) Nine (9) metal inert gas (MIG) welders, identified as AA08-2, AA13, AF24, AF30, AF31, AF32-2, AF35, AF36, and AF37, constructed in 1998, 1993, 1998, 1992, 1992, 1998, 1995, 1993, and 1998, respectively, each with a maximum wire consumption of 0.74 pounds per hour, all exhausting to stack 7.
  - (4) Five (5) metal inert gas (MIG) welders, identified as AB313, AB31-A, AB38, AB39, and AB40, constructed in 2000, 2000, 2000, 2000, and 1992 respectively, each with a maximum wire consumption of 0.75 pounds per hour, all exhausting to stacks 6 and 8.
  - (5) One (1) metal inert gas (MIG) welder, identified as kaizen, constructed in 1994, with a maximum wire consumption of 0.74 pounds per hour, exhausting to stack 17.
  - (6) Fifteen (15) metal inert gas (MIG) welders, identified as AW01, AW02, AW03, AW04, AY02, AY03, AY05, AY07, AY12, AY13, AZ02, AZ03, AZ05, AZ06, and AZ08, constructed in 1990, 1995, 1994, 1994, 1995, 1989, 1993, 1995, 1994, 1994, 1994, 1995, 1992, 1994, and 1994, respectively, each with a maximum wire consumption of 0.74 pounds per hour, all exhausting to stack 28.
  - (7) Fourteen (14) metal inert gas (MIG) welders, identified as AI31-2, AI33-1, AI33-2, AI33-3, AI34-1, AS24, AS26, AS30, AS31, AS33-1, AS38, AS39, AS47, and AS50, constructed in 1995, 1995, 1995, 1997, 1997, 1997, 1989, 1995, 1995, 1997, 1997, 1997, 1995, and 1997, respectively, each with a maximum wire consumption of 0.74 pounds per hour, and two (2) tungsten inert gas (TIG) welders, identified as AS55, and AS59, both constructed in 1997, both with a maximum metal consumption of 0.03 pounds per hour, and all exhausting to stack 29.
  - (8) Nineteen (19) metal inert gas (MIG) welders, identified as BK01, BK05, BK14, BK18, BL10, BL11, BL16, BL29-1, BL29-2, BQ22, BQ23, BS10, BS11, BS12-1,

BS13, BS14, BS15, BS16-1, and BS17-1, constructed in 1996, 1996, 1996, 1996, 1996, 1992, 1996, 1992, 1992, 1999, 1999, 1999, 1999, 1995, 1996, 1996, 1996, 19996, and 1996, respectively each with a maximum wire consumption of 0.74 pounds per hour, and three (3) tungsten inert gas (TIG) welders, identified as BS17-2, BV10, and BV11, constructed in 1996, 1995, and 1993, respectively, each with a maximum metal consumption of 0.03 pounds per hour, and all exhausting to stack 33.

- (9) Twenty-two (22) metal inert gas (MIG) welders, identified as AG02, AE24, AG01, AG09, AG10, AK01, AQ00, AS01, AS04-1, AY10-1, AM00, AM01, AP01, AV08, AV09, AV01, AV02, AV04, AV05, AV06, AV07, and AV07-1, constructed in 1990, 1990, 1990, 1990, 1990, 1989, 1993, 1991, 1991, 1991, 1990, 1992, 1992, 1990, 1990, 1990, 1990, 1995, 1995, 1990, and 1990, respectively, each with a maximum wire consumption of 0.75 pounds per hour, all exhausting to stack 37.
- (10) Seventeen (17) metal inert gas (MIG) welders, identified as BH02, BH05, BH06, BH07, BH07-1, BH08, BH08-1, BH10, BH11, BH11-1, BH13, BH14, BH17, BH3-1, BH3-2, BU32, and BH34-1, constructed in 1999, 1999, 1999, 1999, 1999, 1999, 1999, 1999, 1999, 1999, 1999, 1999, 1999, 1999, 1993, and 1993, respectively, each with a maximum wire consumption of 0.74 pounds per hour, and two (2) tungsten inert gas (TIG) welders, identified as BU43-1 and BU45-1, constructed in 1992 and 1995, respectively, both with a maximum metal consumption of 0.03 pounds per hour, and all exhausting to stack 38.
- (11) One (1) metal inert gas (MIG) welder, identified as eng, constructed in 1995, with a maximum wire consumption of 0.74 pounds per hour, exhausting to stack 43.
- (12) Seven (7) metal inert gas (MIG) welders, identified as DC1, DC2, DC3, DC4, DC5, DC6, and AG1, all constructed in 2002, each with a maximum wire consumption of 0.74 pounds per hour, all exhausting to stack 99.
- (13) Twenty-one (21) metal inert gas (MIG) welders, identified as BG28A, BG28B, BG32A, BG32B, BG33A, BG33B, BG35A, BG35B, BG47A, BG47B, 2300, BG20, BG21, BG22-2, BG23, BG24, BG25, BG25-1, BG27A, BG27B, and BG27C, constructed in 2001, 2001, 2001, 2001, 2001, 2001, 2001, 2001, 2001, 2001, 2001, 1993, 2001, 2001, 2001, 2001, 2001, 2001, 2001, 2001, and 2001, respectively, each with a maximum wire consumption of 0.75 pounds per hour, all exhausting to stack 100.

(b) Activities with emissions equal to or less than the following thresholds: 5 tons per year PM or PM10, 10 tons per year SO<sub>2</sub>, NO<sub>x</sub>, or VOC, 0.2 tons per year Pb, 1.0 tons per year of a single HAP, or 2.5 tons per year of any combination of HAPs:

- (1) One (1) paint burn-off oven, constructed in 2002. [326 IAC 4-2-2]

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

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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).

## **SECTION B GENERAL CONDITIONS**

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

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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, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

### **B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5] [326 IAC 2-7-4(a)(1)(D)] [IC 13-15-3-6(a)]**

- (a) This permit, T095-16479-00048, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal 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.

### **B.3 Term of Conditions [326 IAC 2-1.1-9.5]**

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Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

### **B.4 Enforceability [326 IAC 2-7-7]**

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

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

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

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

### **B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]**

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- (a) The Permittee shall furnish to IDEM, OAQ, and Anderson Office of Air Management within a reasonable time, any information that IDEM, OAQ, and Anderson Office of Air Management 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. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, and Anderson Office of Air Management copies of records required to be kept by this permit.
  - (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of

requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification 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, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.9 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. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than July 1 of each year to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251

and

Anderson Office of Air Management  
P.O. Box 2100  
120 East 8th Street  
Anderson, Indiana 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, OAQ, and Anderson Office of Air Management on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

- (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, and Anderson Office of Air Management 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.10 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]**

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare, maintain, and implement Preventive Maintenance Plans (PMPs) 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; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ, and Anderson Office of Air Management upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ and Anderson Office of Air Management. IDEM, OAQ, and Anderson Office of Air Management may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

**B.11 Emergency Provisions [326 IAC 2-7-16]**

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- (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.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and Anderson Office of Air Management within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,  
Compliance Section), or  
Telephone Number: 317-233-0178 (ask for Compliance Section)  
Facsimile Number: 317-233-6865

Anderson Office of Air Management  
Telephone Number: 765-648-6158  
Facsimile Number: 765-648-5924

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251

and

Anderson Office of Air Management  
P.O. Box 2100  
120 East 8th Street  
Anderson, Indiana 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). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
  - (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ, and Anderson Office of Air Management 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, OAQ, and Anderson Office of Air Management by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

- (g) 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.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

**B.12 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]**

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- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced 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 or for applicable requirements for which a permit shield has been granted.  
  
This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.
- (b) 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, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) 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. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) 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.
- (e) 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).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]

- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(c)(7)]

**B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]**

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- (a) All terms and conditions of permits established prior to T095-16479-00048 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
  - (2) revised under 326 IAC 2-7-10.5, or
  - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

**B.14 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]**

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

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- (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 Data Section, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251

and

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

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

**B.16 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]**

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

- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, or Anderson Office of Air Management determines any of the following:
  - (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, or Anderson Office of Air Management to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, or Anderson Office of Air Management at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, or Anderson Office of Air Management may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-3] [326 IAC 2-7-4] [326 IAC 2-7-8(e)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and Anderson Office of Air Management 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). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251

and

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

- (b) A timely renewal application is one that is:
  - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
  - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and Anderson Office of Air Management on or before the date it is due.

- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, and Anderson Office of Air Management takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, and Anderson Office of Air Management any additional information identified as being needed to process the application.

**B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12][40 CFR 72]**

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- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251

and

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

Any such application shall be certified 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.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]**

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- (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) 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.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]**

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- (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 preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251

and

Anderson Office of Air Management  
P.O. Box 2100  
120 East 8th Street  
Anderson, Indiana 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, on a rolling five (5) year basis, which document all such changes and emissions trades that are subject to 326 IAC 2-7-20(b), (c), or (e). The Permittee shall make such records available, upon reasonable request, for public review.

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

(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). 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 is not considered an application form, report or compliance certification. Therefore, the notification 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 emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.21 Source Modification Requirement [326 IAC 2-7-10.5] [326 IAC 2]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1] [IC 13-17-3-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, Anderson Office of Air Management, 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) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

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

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251

and

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

Anderson, Indiana 46011

The application 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) 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.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, and Anderson Office of Air Management within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, Anderson Office of Air Management the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), 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 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314][326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

**SECTION C**

**SOURCE OPERATION CONDITIONS**

Entire Source

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

**C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]**

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

**C.2 Opacity [326 IAC 5-1]**

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), 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 (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]**

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.

**C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]**

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

**C.5 Fugitive Dust Emissions [326 IAC 6-4]**

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4(4) are not federally enforceable.

**C.6 Stack Height [326 IAC 1-7]**

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-1(3), 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4, and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.

**C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]**

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or

before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
  - (A) Asbestos removal or demolition start date;
  - (B) Removal or demolition contractor; or
  - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251

and

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. 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 applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable 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) **Demolition and renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **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 to use an Indiana Accredited Asbestos inspector is not federally enforceable.

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

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

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- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251

and

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ and Anderson Office of Air Management not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, and Anderson Office of Air Management if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

## Compliance Requirements [326 IAC 2-1.1-11]

### C.9 Compliance Requirements [326 IAC 2-1.1-11]

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The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

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

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

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Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251

and

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

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

**C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

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Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

**C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

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- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

**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]**

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

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

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251

and

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

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

The ERP does require the certification by the "responsible official" as defined by

326 IAC 2-7-1(34).

- (c) If the ERP is disapproved by IDEM, OAQ, and Anderson Office of Air Management, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ, and Anderson Office of Air Management, 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]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.15 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
  - (1) initial inspection and evaluation;
  - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
  - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
  - (1) monitoring results;
  - (2) review of operation and maintenance procedures and records;
  - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
  - (1) monitoring data;

- (2) monitor performance data, if applicable; and
- (3) corrective actions taken.

**C.16 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 response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do 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.17 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) Pursuant to 326 IAC 2-6-3(b)(2), starting in 2005 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
  - (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
  - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251

and

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

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

- (b) The emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and Anderson

Office of Air Management on or before the date it is due.

**C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]**

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- (a) Records of all required monitoring data, reports and support information required by this permit 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 physically present or electronically accessible at the source location 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 Anderson Office of Air Management makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or Anderson Office of Air Management within a reasonable time.
- (b) Unless otherwise specified in this permit, 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)] [326 IAC 2-1.1-11]**

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- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251

and

Anderson Office of Air Management  
P.O. Box 2100  
120 East 8th Street  
Anderson, Indiana 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, OAQ, and Anderson Office of Air Management on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

**Stratospheric Ozone Protection**

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

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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)]:

- (a) One (1) open top vapor degreaser utilizing trichloroethylene, identified as AN-01, constructed in 1989, with a maximum capacity of 2.3 gallons per hour, and exhausting to stack S3. Under 40 CFR Part 63, Subpart T, this is considered a batch vapor cold solvent cleaning machine.

(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 (VOC) [326 IAC 8-3-3]

Pursuant to 326 IAC 8-3-3 (Open Top Vapor Degreasing Operations) for open top vapor degreasing operations (AN-01) constructed after January 1, 1980, the Permittee shall:

- (a) Equip the open top vapor degreaser with a cover that can be opened and closed easily without disturbing the vapor zone;
- (b) Keep the cover closed at all times except when processing workloads through the degreaser;
- (c) Minimize solvent carry-out by:
  - (1) Racking parts to allow complete drainage;
  - (2) Moving parts in and out of the degreaser at less than eleven (11) feet per minute;
  - (3) Degreasing the workload in the vapor zone at least thirty (30) seconds or until condensation ceases;
  - (4) Tipping out any pools of solvent on the cleaned parts before removal;
  - (5) Allowing parts to dry within the degreaser for at least fifteen (15) seconds or until visually dry;
- (d) Not degrease porous or absorbent materials, such as cloth, leather, wood or rope;
- (e) Not occupy more than half of the degreaser's open top area with the workload;
- (f) Not load the degreaser such that the vapor level drops more than fifty percent (50%) of the vapor depth when the workload is removed;
- (g) Never spray above the vapor level;
- (h) Repair solvent leaks immediately, or shut down the degreaser;
- (i) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, such that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere;
- (j) Not use workplace fans near the degreaser opening;
- (k) Not allow visually detectable water in the solvent exiting the water separator; and
- (l) Provide a permanent, conspicuous label summarizing the operating requirements.

#### D.1.2 HAP Minor Limitations [40 CFR 63, Subpart M] ---

The amount of HAP used in the open top vapor degreaser (AN-01) (listed in this Section), combined with the amount of HAP used in the surface coating operations shall be limited to less than nine and nine-tenths (9.9) tons per twelve (12) consecutive month period for any single HAP and less than 24.4 tons per twelve (12) consecutive month period for any combination of HAPs.

This limit, combined with the HAP usage limits in Condition D.2.4 and the HAP emissions from the other emission units at this source, will limit the source-wide emissions of HAPs to less than ten (10) tons of a single HAP and less than twenty-five (25) tons of a combination of HAPs per twelve (12) consecutive month period. Compliance with these limits makes the requirements of 40 CFR 63, Subpart M not applicable to this source.

### **Compliance Determination Requirements**

#### D.1.3 Hazardous Air Pollutants (HAP) ---

Compliance with the HAP usage limitations in Condition D.1.2 shall be determined by one of the following:

- (a) The manufacturer's certified product data sheet.
- (b) The manufacturer's material safety data sheet.
- (c) Sampling and analysis, using methods outlined in 40 CFR 63.3941, Subpart M.
- (d) An alternate method approved by IDEM, OAQ and Anderson Office of Air Management.

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

#### D.1.4 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 HAP usage limits established in Condition D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
  - (1) The amount and HAP content of each solvent used on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
  - (2) The total HAP usage for each month; and
  - (3) The weight of HAPs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.5 Reporting Requirements ---

A quarterly summary of the information to document compliance with Condition D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

## **National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-7-5(1)]**

### **D.1.6 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants for Halogenated Solvent Cleaning [40 CFR 63.460] [326 IAC 20-1] [40 CFR Part 63, Subpart A]**

- (a) Pursuant to 40 CFR 63.460, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1 for the open top vapor degreaser (AN-01) as specified in Appendix A of 40 CFR Part 63, Subpart T in accordance with the schedule in 40 CFR 63 Subpart T.
- (b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251

### **D.1.7 National Emission Standards for Hazardous Air Pollutants for Halogenated Solvent Cleaning [40 CFR Part 63, Subpart T] [326 IAC 20-6]**

Pursuant to 40 CFR Part 63, Subpart T, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart T for the open top vapor degreaser (AN-01), as follows:

#### **§ 63.460 Applicability and designation of source.**

(a) The provisions of this subpart apply to each individual batch vapor, in-line vapor, in-line cold, and batch cold solvent cleaning machine that uses any solvent containing methylene chloride (CAS No. 75-09-2), perchloroethylene (CAS No. 127-18-4), trichloroethylene (CAS No. 79-01-6), 1,1,1-trichloroethane (CAS No. 71-55-6), carbon tetrachloride (CAS No. 56-23-5) or chloroform (CAS No. 67-66-3), or any combination of these halogenated HAP solvents, in a total concentration greater than 5 percent by weight, as a cleaning and/or drying agent. The concentration of these solvents may be determined using EPA test method 18, material safety data sheets, or engineering calculations. Wipe cleaning activities, such as using a rag containing halogenated solvent or a spray cleaner containing halogenated solvent are not covered under the provisions of this subpart.

(b) Except as noted in appendix C (General Provisions Applicability to Subpart T) of this subpart, the provisions of subpart A of this part (General Provisions) apply to owners or operators of any solvent cleaning machine meeting the applicability criteria of paragraph (a) of this section.

(d) Except as provided in paragraph (g) of this section, each solvent cleaning machine subject to this subpart that commenced construction or reconstruction on or before November 29, 1993 shall achieve compliance with the provisions of this subpart no later than December 2, 1997.

#### **§ 63.463 Batch vapor and in-line cleaning machine standards.**

(a) Except as provided in §63.464 for all cleaning machines, each owner or operator of a solvent cleaning machine subject to the provisions of this subpart shall ensure that each existing or new batch vapor or in-line solvent cleaning machine subject to the provisions of this subpart conforms to the design requirements specified in paragraphs (a)(1) through (7) of this section. The owner or operator of a continuous web cleaning machine shall comply with the requirements of paragraph (g) or (h) of this section, as appropriate, in lieu of complying with this paragraph.

(1) Each cleaning machine shall be designed or operated to meet the control equipment or technique parts through removal of cleaned parts.

(ii) A reduced room draft as described in §63.463(e)(2)(ii).

(2) Each cleaning machine shall have freeboard ratio of 0.75 or greater.

(3) Each cleaning machine shall have an automated parts handling system capable of moving parts or parts baskets at a speed of 3.4 meters per minute (11 feet per minute) or less from the initial loading of parts through removal of cleaned parts.

(4) Each vapor cleaning machine shall be equipped with a device that shuts off the sump heat if the sump liquid solvent level drops to the sump heater coils. This requirement does not apply to a vapor cleaning machine that uses steam to heat the solvent.

(5) Each vapor cleaning machine shall be equipped with a vapor level control device that shuts off sump heat if the vapor level in the vapor cleaning machine rises above the height of the primary condenser.

(6) Each vapor cleaning machine shall have a primary condenser.

(7) Each cleaning machine that uses a lip exhaust shall be designed and operated to route all collected solvent vapors through a properly operated and maintained carbon adsorber that meets the requirements of paragraph (e)(2)(vii) of this section.

(b) Except as provided in §63.464, each owner or operator of an existing or new batch vapor cleaning machine shall comply with either paragraph (b)(1) or (b)(2) of this section.

(2) Each owner or operator of a batch vapor cleaning machine with a solvent/air interface area greater than 1.21 square meters (13 square feet) shall comply with the requirements specified in either paragraph (b)(2)(i) or (b)(2)(ii) of this section.

(i) Employ one of the control combinations listed in table 2 of this subpart or other equivalent methods of control as determined using the procedure in §63.469, equivalent methods of control.

**Table 2 Control Combinations for Batch Vapor Solvent Cleaning Machines  
With a Solvent/Air Interface Area Greater than 1.21 Square Meters (13  
Square Feet)**

Option	Control combinations
6.....	Freeboard refrigeration device, reduced room draft, freeboard ratio of 1.0.

(d) Except as provided in §63.464 for all cleaning machines, each owner or operator of an existing or new batch vapor or in-line solvent cleaning machine shall meet all of the following required work and operational practices specified in paragraphs (d)(1) through (12) of this section as applicable. The owner or operator of a continuous web cleaning machine shall comply with the requirements of paragraph (g) or (h) of this section, as appropriate, in lieu of complying with this paragraph.

(1) Control air disturbances across the cleaning machine opening(s) by incorporating the control equipment or techniques in paragraph (d)(1)(i) or (d)(1)(ii) of this section.

(ii) A reduced room draft as described in §63.463(e)(2)(ii).

(2) The parts baskets or the parts being cleaned in an open-top batch vapor cleaning machine shall not occupy more than 50 percent of the solvent/air interface area unless the parts baskets or parts are introduced at a speed of 0.9 meters per minute (3 feet per minute) or less.

(3) Any spraying operations shall be done within the vapor zone or within a section of the solvent cleaning machine that is not directly exposed to the ambient air (i.e., a baffled or enclosed area of the solvent cleaning machine).

(4) Parts shall be oriented so that the solvent drains from them freely. Parts having cavities or blind holes shall be tipped or rotated before being removed from any solvent cleaning machine unless an equally effective approach has been approved by the Administrator.

- (5) Parts baskets or parts shall not be removed from any solvent cleaning machine until dripping has stopped.
- (6) During startup of each vapor cleaning machine, the primary condenser shall be turned on before the sump heater.
- (7) During shutdown of each vapor cleaning machine, the sump heater shall be turned off and the solvent vapor layer allowed to collapse before the primary condenser is turned off.
- (8) When solvent is added or drained from any solvent cleaning machine, the solvent shall be transferred using threaded or other leakproof couplings and the end of the pipe in the solvent sump shall be located beneath the liquid solvent surface.
- (9) Each solvent cleaning machine and associated controls shall be maintained as recommended by the manufacturers of the equipment or using alternative maintenance practices that have been demonstrated to the Administrator's satisfaction to achieve the same or better results as those recommended by the manufacturer.
- (10) Each operator of a solvent cleaning machine shall complete and pass the applicable sections of the test of solvent cleaning procedures in appendix A to this part if requested during an inspection by the Administrator.
- (11) Waste solvent, still bottoms, and sump bottoms shall be collected and stored in closed containers. The closed containers may contain a device that would allow pressure relief, but would not allow liquid solvent to drain from the container.
- (12) Sponges, fabric, wood, and paper products shall not be cleaned.
- (e) Each owner or operator of a solvent cleaning machine complying with paragraph (b), (c), (g), or (h) of this section shall comply with the requirements specified in paragraphs (e)(1) through (4) of this section.
- (1) Conduct monitoring of each control device used to comply with §63.463 of this subpart as provided in §63.466.
- (2) Determine during each monitoring period whether each control device used to comply with these standards meets the requirements specified in paragraphs (e)(2)(i) through (xi) of this section.
- (i) If a freeboard refrigeration device is used to comply with these standards, the owner or operator shall ensure that the chilled air blanket temperature (in °F), measured at the center of the air blanket, is no greater than 30 percent of the solvent's boiling point.
- (ii) If a reduced room draft is used to comply with these standards, the owner or operator shall comply with the requirements specified in paragraphs (e)(2)(ii)(A) and (e)(2)(ii)(B) of this section.
- (A) Ensure that the flow or movement of air across the top of the freeboard area of the solvent cleaning machine or within the solvent cleaning machine enclosure does not exceed 15.2 meters per minute (50 feet per minute) at any time as measured using the procedures in §63.466(d).
- (B) Establish and maintain the operating conditions under which the wind speed was demonstrated to be 15.2 meters per minute (50 feet per minute) or less as described in §63.466(d).
- (3) If any of the requirements of paragraph (e)(2) of this section are not met, determine whether an exceedance has occurred using the criteria in paragraphs (e)(3)(i) and (e)(3)(ii) of this section.
- (i) An exceedance has occurred if the requirements of paragraphs (e)(2)(ii)(B), (e)(2)(iii)(A), (e)(2)(iv)(A), (e)(2)(v), (e)(2)(vi)(B), (e)(2)(vi)(C), (e)(2)(vii)(B), or (e)(2)(vii)(C) of this section have not been met.
- (ii) An exceedance has occurred if the requirements of paragraphs (e)(2)(i), (e)(2)(ii)(A), (e)(2)(iii)(B), (e)(2)(iv)(B), (e)(2)(vi)(A) or (e)(2)(vii)(A) of this section have not been met and are not corrected within 15 days of detection. Adjustments of repairs shall be made to the solvent cleaning system or control device to reestablish required levels. The parameter must be remeasured immediately upon adjustment or repair and demonstrated to be within required limits.

(4) The owner or operator shall report all exceedances and all corrections and adjustments made to avoid an exceedance as specified in §63.468(h).

### § 63.465 Test Methods

(e) An owner or operator of a source shall determine their potential to emit from all solvent cleaning operations, using the procedures described in paragraphs (e)(1) through (e)(3) of this section. A facility's total potential to emit is the sum of the HAP emissions from all solvent cleaning operations, plus all HAP emissions from other sources within the facility.

(1) Determine the potential to emit for each individual solvent cleaning using equation 6.

$$PTE_i = H_i \times W_i \times SAI_i \quad (6)$$

Where:

$PTE_i$  = the potential to emit for solvent cleaning machine  $i$  (kilograms of solvent per year).

$H_i$  = hours of operation for solvent cleaning machine  $i$  (hours per year).

= 8760 hours per year, unless otherwise restricted by a Federally enforceable requirement.

$W_i$  = the working mode uncontrolled emission rate (kilograms per square meter per hour).

= 1.95 kilograms per square meter per hour for batch vapor and cold cleaning machines.

= 1.12 kilograms per square meter per hour for in-line cleaning machines.

$SAI_i$  = solvent/air interface area of solvent cleaning machine  $i$  (square meters). Section 63.461 defines the solvent/air interface area for those machines that have a solvent/air interface. Cleaning machines that do not have a solvent/air interface shall calculate a solvent/air interface area using the procedure in paragraph (e)(2) of this section.

(2) Cleaning machines that do not have a solvent/air interface shall calculate a solvent/air interface area using equation 7.

$$SAI = 2.20 * (Vol)^{0.6} \quad (7)$$

Where:

$SAI$  = the solvent/air interface area (square meters).

$Vol$  = the cleaning capacity of the solvent cleaning machine (cubic meters).

(3) Sum the  $PTE_i$  for all solvent cleaning operations to obtain the total potential to emit for solvent cleaning operations at the facility.

### § 63.466 Monitoring procedures.

(a) Except as provided in paragraph (g) of this section, each owner or operator of a batch vapor or in-line solvent cleaning machine complying with the equipment standards in §63.463(b)(1)(i), (b)(2)(i), (c)(1)(i), (c)(2)(i), (g)(1), or (g)(2) shall conduct monitoring and record the results on a weekly basis for the control devices, as appropriate, specified in paragraphs (a)(1) through (5) of this section.

(1) If a freeboard refrigeration device is used to comply with these standards, the owner or operator shall use a thermometer or thermocouple to measure the temperature at the center of the air blanket during the idling mode.

(c) Except as provided in paragraph (g) of this section, each owner or operator of a batch vapor or in-line solvent cleaning machine complying with the equipment or idling standards in §63.463 shall monitor the hoist speed as described in paragraphs (c)(1) through (c)(4) of this section.

(1) The owner or operator shall determine the hoist speed by measuring the time it takes for the hoist to travel a measured distance. The speed is equal to the distance in meters divided by the time in minutes (meters per minute).

(2) The monitoring shall be conducted monthly. If after the first year, no exceedances of the hoist speed are measured, the owner or operator may begin monitoring the hoist speed quarterly.

(3) If an exceedance of the hoist speed occurs during quarterly monitoring, the monitoring frequency returns to monthly until another year of compliance without an exceedance is demonstrated.

(4) If an owner or operator can demonstrate to the Administrator's satisfaction in the initial compliance report that the hoist cannot exceed a speed of 3.4 meters per minute (11 feet per minute), the required monitoring frequency is quarterly, including during the first year of compliance.

(d) Except as provided in paragraph (g) of this section, each owner or operator of a batch vapor or in-line solvent cleaning machine complying with the equipment standards in §63.463 (b)(1)(i), (b)(2)(i), (c)(1)(i), or (c)(2)(i) using a reduced room draft shall conduct monitoring and record the results as specified in paragraph(d)(1) or (d)(2) of this section.

(1) If the reduced room draft is maintained by controlling room parameters (i.e., redirecting fans, closing doors and windows, etc.), the owner or operator shall conduct an initial monitoring test of the windspeed and of room parameters, quarterly monitoring of windspeed, and weekly monitoring of room parameters as specified in paragraphs (d)(1)(i) and (d)(1)(ii) of this section.

(i) Measure the windspeed within 6 inches above the top of the freeboard area of the solvent cleaning machine using the procedure specified in paragraphs (d)(1)(i)(A) through (d)(1)(i)(D) of this section.

(A) Determine the direction of the wind current by slowly rotating a velometer or similar device until the maximum speed is located.

(B) Orient a velometer in the direction of the wind current at each of the four corners of the machine.

(C) Record the reading for each corner.

(D) Average the values obtained at each corner and record the average wind speed.

(ii) Monitor on a weekly basis the room parameters established during the initial compliance test that are used to achieve the reduced room draft.

(g) Each owner or operator using a control device listed in paragraphs (a) through (e) of this section can use alternative monitoring procedures approved by the Administrator.

### **§ 63.467 Recordkeeping requirements**

(a) Each owner or operator of a batch vapor or in-line solvent cleaning machine complying with the provisions of §63.463 shall maintain records in written or electronic form specified in paragraphs (a)(1) through (7) of this section for the lifetime of the machine.

(1) Owner's manuals, or if not available, written maintenance and operating procedures, for the solvent cleaning machine and control equipment.

(2) The date of installation for the solvent cleaning machine and all of its control devices. If the exact date for installation is not known, a letter certifying that the cleaning machine and its control devices were installed prior to, or on, November 29, 1993, or after November 29, 1993, may be substituted.

(5) Records of the halogenated HAP solvent content for each solvent used in a solvent cleaning machine subject to the provisions of this subpart.

(b) Each owner or operator of a batch vapor or in-line solvent cleaning machine complying with §63.463 shall maintain records specified in paragraphs (b)(1) through (b)(4) of this section either in electronic or written form for a period of 5 years.

- (1) The results of control device monitoring required under §63.466.
- (2) Information on the actions taken to comply with §63.463(e) and (f). This information shall include records of written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to accepted levels.
- (3) Estimates of annual solvent consumption for each solvent cleaning machine.

**§ 63.468 Reporting requirements.**

(a) Each owner or operator of an existing solvent cleaning machine subject to the provisions of this subpart shall submit an initial notification report to the Administrator no later than August 29, 1995. This report shall include the information specified in paragraphs (a)(1) through (a)(6) of this section.

- (1) The name and address of the owner or operator.
- (2) The address (i.e., physical location) of the solvent cleaning machine(s).
- (3) A brief description of each solvent cleaning machine including machine type (batch vapor, batch cold, vapor in-line or cold in-line), solvent/air interface area, and existing controls.
- (4) The date of installation for each solvent cleaning machine or a letter certifying that the solvent cleaning machine was installed prior to, or after, November 29, 1993.
- (5) The anticipated compliance approach for each solvent cleaning machine.
- (6) An estimate of annual halogenated HAP solvent consumption for each solvent cleaning machine.

(d) Each owner or operator of a batch vapor or in-line solvent cleaning machine complying with the provisions of §63.463 shall submit to the Administrator an initial statement of compliance for each solvent cleaning machine. For existing sources, this report shall be submitted to the Administrator no later than 150 days after the compliance date specified in §63.460(d). For new sources, this report shall be submitted to the Administrator no later than 150 days after startup or May 1, 1995, whichever is later. This statement shall include the requirements specified in paragraphs (d)(1) through (d)(6) of this section.

- (1) The name and address of the owner or operator.
- (2) The address (i.e., physical location) of the solvent cleaning machine(s).
- (3) A list of the control equipment used to achieve compliance for each solvent cleaning machine.
- (4) For each piece of control equipment required to be monitored, a list of the parameters that are monitored and the values of these parameters measured on or during the first month after the compliance date.
- (5) Conditions to maintain the wind speed requirements of §63.463(e)(2)(ii), if applicable.

(f) Each owner or operator of a batch vapor or in-line solvent cleaning machine complying with the provisions of §63.463 shall submit an annual report by February 1 of the year following the one for which the reporting is being made. This report shall include the requirements specified in paragraphs (f)(1) through (f)(3) of this section.

- (1) A signed statement from the facility owner or his designee stating that, "All operators of solvent cleaning machines have received training on the proper operation of solvent cleaning machines and their control devices sufficient to pass the test required in §63.463(d)(10)."
- (2) An estimate of solvent consumption for each solvent cleaning machine during the reporting period.
- (3) The reports required under paragraphs (f) and (g) of this section can be combined into a single report for each facility.

(h) Each owner or operator of a batch vapor or in-line solvent cleaning machine shall submit an exceedance report to the Administrator semiannually except when, the Administrator determines on a case-by-case basis that more frequent reporting is necessary to accurately assess the compliance status of the source or, an exceedance occurs. Once an exceedance has occurred the owner or operator shall follow a quarterly reporting format until a request to reduce reporting frequency under paragraph (i) of this section is approved. Exceedance reports shall be delivered or postmarked by the 30th day following the end of each calendar half or quarter, as appropriate. The exceedance report shall include the applicable information in paragraphs (h) (1) through (3) of this section.

(1) Information on the actions taken to comply with §63.463 (e) and (f). This information shall include records of written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to accepted levels.

(2) If an exceedance has occurred, the reason for the exceedance and a description of the actions taken.

(3) If no exceedances of a parameter have occurred, or a piece of equipment has not been inoperative, out of control, repaired, or adjusted, such information shall be stated in the report.

(i) An owner or operator who is required to submit an exceedance report on a quarterly (or more frequent) basis may reduce the frequency of reporting to semiannual if the conditions in paragraphs (i)(1) through (i)(3) of this section are met.

(1) The source has demonstrated a full year of compliance without an exceedance.

(2) The owner or operator continues to comply with all relevant recordkeeping and monitoring requirements specified subpart A (General Provisions) and in this subpart.

(3) The Administrator does not object to a reduced frequency of reporting for the affected source as provided in paragraph (e)(3)(iii) of subpart A (General Provisions).

(k) Each owner or operator of a solvent cleaning machine requesting an equivalency determination, as described in §63.469 shall submit an equivalency request report to the Administrator. For existing sources, this report must be submitted to the Administrator no later than June 3, 1996. For new sources, this report must be submitted and approved by the Administrator prior to startup.

#### **§ 63.469 Equivalent methods of control.**

Upon written application, the Administrator may approve the use of equipment or procedures after they have been satisfactorily demonstrated to be equivalent, in terms of reducing emissions of methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride or chloroform to the atmosphere, to those prescribed for compliance within a specified paragraph of this subpart. The application must contain a complete description of the equipment or procedure and the proposed equivalency testing procedure and the date, time, and location scheduled for the equivalency demonstration.

#### **§ 63.470 Implementation and enforcement.**

(a) This subpart can be implemented and enforced by the U.S. EPA, or a delegated authority such as the applicable State, local, or Tribal agency. If the U.S. EPA Administrator has delegated authority to a State, local, or Tribal agency, then that agency, in addition to the U.S. EPA, has the authority to implement and enforce this subpart. Contact the applicable U.S. EPA Regional Office to find out if implementation and enforcement of this subpart is delegated to a State, local, or Tribal agency.

(b) In delegating implementation and enforcement authority of this subpart to a State, local, or Tribal agency under subpart E of this part, the authorities contained in paragraph (c) of this section are retained by the Administrator of U.S. EPA and cannot be transferred to the State, local, or Tribal agency.

(c) The authorities that cannot be delegated to State, local, or Tribal agencies are as specified in paragraphs (c)(1) through (4) of this section.

- (1) Approval of alternatives to the requirements in §§63.460, 63.462(a) through (d), and 63.463 through 63.464 (except for the authorities in §63.463(d)(9)). Use the procedures in §63.469 to request the use of alternative equipment or procedures.
- (2) Approval of major alternatives to test methods under §63.7(e)(2)(ii) and (f), as defined in §63.90, and as required in this subpart.
- (3) Approval of major alternatives to monitoring under §63.8(f), as defined in §63.90, and as required in this subpart.
- (4) Approval of major alternatives to recordkeeping and reporting under §63.10(f), as defined in §63.90, and as required in this subpart.

## SECTION D.2

## FACILITY OPERATION CONDITIONS

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

- (b) One (1) paint booth coating metal parts, identified as AM-08 Robotic (formerly Subaru) Paint Booth, constructed in 1989, with a maximum capacity of 28 units per hour, using dry filters to control particulate emissions, and exhausting to stack S14.
- (c) One (1) paint booth coating metal parts, identified as AM-09 Robotic (formerly Top Coat) Booth, constructed in 1989, with a maximum capacity of 25 fuel tanks/hr, using a robotic spray arm, using dry filters to control particulate emissions, and exhausting to stack S15.
- (d) One (1) paint booth coating metal parts, identified as AM-10 Paint (formerly Touch-up) Booth, constructed in 1989, with a maximum capacity of 25 fuel tanks/hr, using dry filters to control particulate emissions, and exhausting to stack S16.
- (e) One (1) paint booth coating metal parts, identified as BU-39 (formerly BU) Paint Booth, constructed in 1994, with a maximum capacity of 31 units per hour, using dry filters to control particulate emissions, and exhausting to stack S17.
- (f) One (1) paint booth coating metal parts, identified as BE-04 Robotic (formerly PSU Tank Robot) Paint Booth, constructed in 1993, with a maximum capacity of 36 fuel tanks per hour, using dry filters to control particulate emissions, and exhausting to stack S34.
- (g) One (1) paint booth coating metal parts, identified as BE-05 Paint (formerly PSU Touch-up) Booth, constructed in 1993, with a maximum capacity of 36 fuel tanks per hour, using dry filters to control particulate emissions, and exhausting to stack S35.
- (h) One (1) paint booth coating metal parts, identified as BE-06 Robotic (formerly PSU Tank Final) Paint Booth, constructed in 2005, with a maximum capacity of 25 fuel tanks/hour, using dry filters to control particulate emissions and exhausting to stack S42.
- (i) One (1) paint booth coating metal parts, identified as Exhaust Robotic (formerly PSU Exhaust Robot) Paint Booth, constructed in 1997 and modified in 2006, with a maximum capacity of 23 mufflers per hour, using dry filters to control particulate emissions, and exhausting to stack S44.

### Insignificant Activities

- (b) Activities with emissions equal to or less than the following thresholds: 5 tons per year PM or PM10, 10 tons per year SO<sub>2</sub>, NO<sub>x</sub>, or VOC, 0.2 tons per year Pb, 1.0 tons per year of a single HAP, or 2.5 tons per year of any combination of HAPs:

- (1) One (1) paint burn-off oven, constructed in 2002. [326 IAC 4-2-2]

(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.2.1 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9, for the surface coating booths identified as BU-39 Paint Booth (S17), BE-04 Robotic Paint Booth (S34), BE-05 Paint Booth (S35), BE-06 Robotic Paint Booth (S42), and the Exhaust Robotic Paint Booth (S44), the Permittee shall not allow the discharge into the atmosphere VOC in excess of three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator.

#### D.2.2 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

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Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment of the surface coating booths identified as BU-39 Paint Booth (S17), BE-04 Robotic Paint Booth (S34), BE-05 Paint Booth (S35), BE-06 Robotic Paint Booth (S42), and the Exhaust Robotic Paint Booth (S44) during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

#### D.2.3 PSD Minor Modification Limit [326 IAC 2-2]

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- (a) Pursuant to CP 095-3082-00056, issued on February 18, 1994, the PM emissions from the BU-39 Paint Booth (S17) shall be less than 5.70 pounds per hour. The PM-10 emissions from the BU-39 Paint Booth (S17) shall be less than 3.42 pounds per hour. These limitations are equivalent to PM emissions of less than 25 tons per year and PM-10 emissions of less than 15 tons per year for the modifications performed in 1994. Compliance with these limitations ensures that the requirements of 326 IAC 2-2 do not apply to the modification made in 1994.
- (b) Pursuant to CP 095-7134-00048, issued on June 9, 1997, the PM emissions from the Exhaust Robotic Paint Booth (S44) shall be less than 5.70 pounds per hour. The PM-10 emissions from the Exhaust Robotic Paint Booth (S44) shall be less than 3.42 pounds per hour. These limitations are equivalent to PM emissions of less than 25 tons per year and PM-10 emissions of less than 15 tons per year for the modifications performed in 1997. Compliance with these limitations ensures that the requirements of 326 IAC 2-2 do not apply to the modification made in 1997.
- (c) Pursuant to SSM 095-19454-00048, issued February 3, 2005, the PM emissions from the BE-06 Robotic Paint Booth (S42) shall be less than 5.70 pounds per hour. The PM-10 emissions from the BE-06 Robotic Paint Booth (S42) shall be less than 3.42 pounds per hour. These limitations are equivalent to PM emissions of less than 25 tons per year and PM-10 emissions of less than 15 tons per year for the modifications performed in 2005. Compliance with these limitations ensures that the requirements of 326 IAC 2-2 do not apply to the modification made in 2005.

Compliance with these limits makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable for PM and PM10 to the modifications performed in 1994, 1997 and 2005.

#### D.2.4 HAP Minor Limitations [40 CFR 63, Subpart M] [40 CFR 63, Subpart M]

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The amount of HAP used in the surface coating operations (AM-08 Robotic Paint Booth (S14), AM-09 Robotic Paint Booth (S15), AM-10 Paint Booth (S16), BU-39 Paint Booth (S17), BE-04 Robotic Paint Booth (S34), BE-05 Paint Booth (S35), BE-06 Robotic Paint Booth (S42), and the Exhaust Robotic Paint Booth (S44), combined with the amount of HAP used in the open top vapor degreaser (AN-01) shall be limited to less than nine and nine-tenths (9.9) tons per twelve (12) consecutive month period for any single HAP and less than 24.4 tons per twelve (12) consecutive month period for any combination of HAPs with compliance determined at the end of each month.

These limits, combined with the HAP usage limits in Condition D.1.2 and the HAP emissions from the other emission units at this source, will limit the source-wide emissions of HAPs to less than ten (10) tons of a single HAP and less than twenty-five (25) tons of a combination of HAPs per twelve (12) consecutive month period. Compliance with these limits makes the requirements of 40 CFR 63, Subpart M not applicable to this source.

#### D.2.5 Emission Offset Minor Limitation [326 IAC 2-3]

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The amount of VOC used in the Exhaust Robotic Paint Booth (S44) shall be limited to less than forty (40.0) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Compliance with this limit makes the modifications to the Exhaust Robotic Paint Booth (S44) done in 2006 minor under Emission Offset (326 IAC 2-3).

#### D.2.6 Incinerators [326 IAC 4-2-2]

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Pursuant to 326 IAC 4-2-2 (Incinerators), the insignificant paint burn-off oven shall comply with the following:

- (a) All incinerators shall comply with the following requirements:
  - (1) Consist of primary and secondary chambers or the equivalent.
  - (2) Be equipped with a primary burner unless burning only wood products.
  - (3) Comply with 326 IAC 5-1 and 326 IAC 2.
  - (4) Be maintained, operated, and burn waste in accordance with the manufacturer's specifications or an operation and maintenance plan as specified in paragraph (c).
  - (5) Not emit particulate matter in excess of one (1) of the following:
    - (A) Three-tenths (0.3) pound of particulate matter per one thousand (1,000) pounds of dry exhaust gas under standard conditions corrected to fifty percent (50%) excess air for incinerators with a maximum solid waste capacity of greater than or equal to two hundred (200) pounds per hour.
    - (B) Five-tenths (0.5) pound of particulate matter per one thousand (1,000) pounds of dry exhaust gas under standard conditions corrected to fifty percent (50%) excess air for incinerators with solid waste capacity less than two hundred (200) pounds per hour.
  - (6) If any of the requirements of subparagraph (1) through (5) are not met, then the owner or operator shall stop charging the incinerator until adjustments are made that address the underlying cause of the deviation.
- (b) An incinerator is exempt from paragraph (a)(5) if subject to a more stringent particulate matter emission limit in 40 CFR 52 Subpart P, State Implementation Plan for Indiana.
- (c) An owner or operator developing an operation and maintenance plan pursuant to paragraph (a)(4) must comply with the following:
  - (1) The operation and maintenance plan must be designed to meet the particulate matter emission limitation specified in subsection (a)(5) and include the following:
    - (A) Procedures for receiving, handling, and charging waste.
    - (B) Procedures for incinerator startup and shutdown.
    - (C) Procedures for responding to a malfunction.
    - (D) Procedures for maintaining proper combustion air supply levels.
    - (E) Procedures for operating the incinerator and associated air pollution control systems.
    - (F) Procedures for handling ash.
    - (G) A list of wastes that can be burned in the incinerator.
  - (2) Each incinerator operator shall review the plan before initial implementation of the operation and maintenance plan and annually thereafter.
  - (3) The operation and maintenance plan must be readily accessible to incinerator operators.
  - (4) The owner or operator of the incinerator shall notify the department, in writing, thirty (30) days after the operation and maintenance plan is initially developed pursuant to this section.

- (d) The owner or operator of the incinerator must make the manufacturer's specifications or the operation and maintenance plan available to the department upon request.

**D.2.7 Particulate [326 IAC 6-3-2(d)]**

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Pursuant to 326 IAC 6-3-2(d), CP 095-7134-00048, issued June 9, 1997, and in order to comply with Condition D.2.3, particulate from the surface coating operations identified as AM-08 Robotic Paint Booth (S14), AM-09 Robotic Paint Booth (S15), AM-10 Paint Booth (S16), BU-39 Paint Booth (S17), BE-04 Robotic Paint Booth (S34), BE-05 Paint Booth (S35), BE-06 Robotic Paint Booth (S42), and Exhaust Robotic Paint Booth (S44) shall be controlled by a dry particulate filter, and the Permittee shall operate the control devices in accordance with manufacturer's specifications.

**D.2.8 Carbon Monoxide [326 IAC 9-1-2]**

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Pursuant to 326 IAC 9-1-2(a)(2), for the paint burn-off oven, the Permittee shall burn the waste gas stream in a direct flame afterburner or a secondary chamber.

**D.2.9 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

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

**Compliance Determination Requirements**

**D.2.10 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP) [326 IAC 8-1-2] [326 IAC 8-1-4]**

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- (a) Compliance with the VOC content limits contained in Conditions D.2.1 and D.2.5 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ and Anderson Office of Air Management reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.
- (b) Compliance with the HAP usage limitations in Condition D.2.4 shall be determined by one of the following:
- (1) The manufacturer's certified product data sheet.
  - (2) The manufacturer's material safety data sheet.
  - (3) Sampling and analysis, using methods outlined in 40 CFR 63.3941, Subpart Mmmm.
  - (4) An alternate method approved by IDEM, OAQ and Anderson Office of Air Management.

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

**D.2.11 Monitoring**

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- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (S14, S15, S16, S17, S34, S35, S42, and S44) while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable

change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

### **D.2.12 Record Keeping Requirements**

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- (a) To document compliance with Condition D.2.4, 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 HAP usage limits established in Condition D.2.4. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The amount and HAP content of each coating material and solvent used on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
  - (2) The total HAP usage for each month; and
  - (3) The weight of HAPs emitted for each compliance period.
- (b) To document compliance with Conditions D.2.1 and D.2.5, the Permittee shall maintain records in accordance with (1) through (3) below for the surface coating booths identified as BU-39 Paint Booth (S17), BE-04 Robotic Paint Booth (S34), BE-05 Paint Booth (S35), BE-06 Robotic Paint Booth (S42), and the Exhaust Robotic Paint Booth (S44). Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC content limit established in Condition D.2.1 and D.2.5.
- (1) The VOC content and amount of each coating material and solvent used less water. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents; and
  - (2) The volume weighted VOC content of the coatings used for each month.
  - (3) The weight of VOC emitted for each compliance period.
- (c) To document compliance with Condition D.2.11, the Permittee shall maintain a log of weekly overspray observations, and daily and monthly inspections.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

### **D.2.13 Reporting Requirements**

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A quarterly summary of the information to document compliance with Condition D.2.4 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**SECTION D.3**

**FACILITY OPERATION CONDITIONS**

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

**Insignificant Activities**

- (a) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment cutting torches, soldering equipment, welding equipment [326 IAC 6-3-2].
- (1) Nine (9) metal inert gas (MIG) welders, identified as AC31, AC36-1, AJ29, AJ28-1, AP12, AP19, AP23, AP32, and AP40, constructed in 2000, 2000, 1992, 1992, 1989, 1990, 1990, 1990, and 1990, respectively, each with a maximum wire consumption of 0.94 pounds per hour, all exhausting to stack 4.
  - (2) Six (6) metal inert gas (MIG) welders, identified as AE12, AE30-11, AE31, AE32, AE33, and AE34, all constructed in 1998, each with a maximum wire consumption of 0.80 pounds per hour, all exhausting to stack 5.
  - (3) Nine (9) metal inert gas (MIG) welders, identified as AA08-2, AA13, AF24, AF30, AF31, AF32-2, AF35, AF36, and AF37, constructed in 1998, 1993, 1998, 1992, 1992, 1998, 1995, 1993, and 1998, respectively, each with a maximum wire consumption of 0.74 pounds per hour, all exhausting to stack 7.
  - (4) Five (5) metal inert gas (MIG) welders, identified as AB313, AB31-A, AB38, AB39, and AB40, constructed in 2000, 2000, 2000, 2000, and 1992 respectively, each with a maximum wire consumption of 0.75 pounds per hour, all exhausting to stacks 6 and 8.
  - (5) One (1) metal inert gas (MIG) welder, identified as kaizen, constructed in 1994, with a maximum wire consumption of 0.74 pounds per hour, exhausting to stack 17.
  - (6) Fifteen (15) metal inert gas (MIG) welders, identified as AW01, AW02, AW03, AW04, AY02, AY03, AY05, AY07, AY12, AY13, AZ02, AZ03, AZ05, AZ06, and AZ08, constructed in 1990, 1995, 1994, 1994, 1995, 1989, 1993, 1995, 1994, 1994, 1994, 1995, 1992, 1994, and 1994, respectively, each with a maximum wire consumption of 0.74 pounds per hour, all exhausting to stack 28.
  - (7) Fourteen (14) metal inert gas (MIG) welders, identified as AI31-2, AI33-1, AI33-2, AI33-3, AI34-1, AS24, AS26, AS30, AS31, AS33-1, AS38, AS39, AS47, and AS50, constructed in 1995, 1995, 1995, 1997, 1997, 1997, 1989, 1995, 1995, 1997, 1997, 1997, 1995, and 1997, respectively, each with a maximum wire consumption of 0.74 pounds per hour, and two (2) tungsten inert gas (TIG) welders, identified as AS55, and AS59, both constructed in 1997, both with a maximum metal consumption of 0.03 pounds per hour, and all exhausting to stack 29.
  - (8) Nineteen (19) metal inert gas (MIG) welders, identified as BK01, BK05, BK14, BK18, BL10, BL11, BL16, BL29-1, BL29-2, BQ22, BQ23, BS10, BS11, BS12-1, BS13, BS14, BS15, BS16-1, and BS17-1, constructed in 1996, 1996, 1996, 1996, 1996, 1992, 1996, 1992, 1992, 1999, 1999, 1999, 1999, 1995, 1996, 1996, 1996, 19996, and 1996, respectively each with a maximum wire consumption of 0.74 pounds per hour, and three (3) tungsten inert gas (TIG) welders, identified as BS17-2, BV10, and BV11, constructed in 1996, 1995, and 1993, respectively, each with a maximum metal consumption of 0.03 pounds per hour, and all exhausting to stack 33.

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

**SECTION D.3 FACILITY OPERATION CONDITIONS (Continued)**

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

- (12) Twenty-two (22) metal inert gas (MIG) welders, identified as AG02, AE24, AG01, AG09, AG10, AK01, AQ00, AS01, AS04-1, AY10-1, AM00, AM01, AP01, AV08, AV09, AV01, AV02, AV04, AV05, AV06, AV07, and AV07-1, constructed in 1990, 1990, 1990, 1990, 1990, 1989, 1993, 1991, 1991, 1991, 1990, 1992, 1992, 1990, 1990, 1990, 1990, 1990, 1995, 1995, 1990, and 1990, respectively, each with a maximum wire consumption of 0.75 pounds per hour, all exhausting to stack 37.
- (10) Seventeen (17) metal inert gas (MIG) welders, identified as BH02, BH05, BH06, BH07, BH07-1, BH08, BH08-1, BH10, BH11, BH11-1, BH13, BH14, BH17, BH3-1, BH3-2, BU32, and BH34-1, constructed in 1999, 1999, 1999, 1999, 1999, 1999, 1999, 1999, 1999, 1999, 1999, 1999, 1999, 1999, 1999, 1999, 1993, and 1993, respectively, each with a maximum wire consumption of 0.74 pounds per hour, and two (2) tungsten inert gas (TIG) welders, identified as BU43-1 and BU45-1, constructed in 1992 and 1995, respectively, both with a maximum metal consumption of 0.03 pounds per hour, and all exhausting to stack 38.
- (11) One (1) metal inert gas (MIG) welder, identified as eng, constructed in 1995, with a maximum wire consumption of 0.74 pounds per hour, exhausting to stack 43.
- (12) Seven (7) metal inert gas (MIG) welders, identified as DC1, DC2, DC3, DC4, DC5, DC6, and AG1, all constructed in 2002, each with a maximum wire consumption of 0.74 pounds per hour, all exhausting to stack 99.
- (13) Twenty-one (21) metal inert gas (MIG) welders, identified as BG28A, BG28B, BG32A, BG32B, BG33A, BG33B, BG35A, BG35B, BG47A, BG47B, 2300, BG20, BG21, BG22-2, BG23, BG24, BG25, BG25-1, BG27A, BG27B, and BG27C, constructed in 2001, 2001, 2001, 2001, 2001, 2001, 2001, 2001, 2001, 2001, 2001, 1993, 2001, 2001, 2001, 2001, 2001, 2001, 2001, 2001, and 2001, respectively, each with a maximum wire consumption of 0.75 pounds per hour, all exhausting to stack 100.

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

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

**D.3.1 Particulate [326 IAC 6-3-2]**

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the welding operations shall not exceed 9.03 pounds per hour when operating at a process weight rate of 6,500 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

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

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

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

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
and  
Anderson Office of Air Management**

**PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: ELSA, LLC.  
Source Address: 1240 South State Road 37, Elwood, Indiana 46036  
Mailing Address: 1240 South State Road 37, Elwood, Indiana 46036  
Part 70 Permit No.: T095-16479-00048

**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:

- Annual Compliance Certification Letter
- Test Result (specify)
- Report (specify)
- Notification (specify)
- Affidavit (specify)
- 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:

Phone:

Date:

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

**VOC Usage Quarterly Report**

Source Name: ELSA, LLC.  
Source Address: 1240 South State Road 37, Elwood, Indiana 46036  
Mailing Address: 1240 South State Road 37, Elwood, Indiana 46036  
Part 70 Permit No.: T095-16479-00048  
Parameter: VOC Usage  
Facility: Exhaust Robotic Paint Booth (S44)  
Limit: Less than forty (40.0) tons per twelve (12) month consecutive period, with compliance determined at the end of each month.

QUARTER:

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.  
Deviation has been reported on:

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

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

**HAP Usage Quarterly Report**

Source Name: ELSA, LLC.  
 Source Address: 1240 South State Road 37, Elwood, Indiana 46036  
 Mailing Address: 1240 South State Road 37, Elwood, Indiana 46036  
 Part 70 Permit No.: T095-16479-00048  
 Parameter: Single HAP, Combination HAPs  
 Facility: Open Top Vapor Degreaser (AN-01), AM-08 Robotic Paint Booth (S14), AM-09 Robotic Paint (S15), AM-10 Paint Booth (S16), BU-39 Paint Booth (S17), BE-04 Robotic Paint Booth (S34), BE-05 Paint Booth (S35), BE-06 Robotic Paint Booth (S42), and Exhaust Robotic Paint Booth (S44).  
 Limit: Less than 9.9 tons for a single HAP and less than 24.4 tons for a combination of HAPs per twelve (12) month consecutive period.

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

Month	Column 1		Column 2		Column 1 + Column 2	
	This Month		Previous 11 Months		12 Month Total	
	Single HAP	Comb. HAPs	Single HAP	Comb. HAPs	Single HAP	Comb. HAPs
Month 1						
Month 2						
Month 3						

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.  
 Deviation has been reported on:

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

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251  
Phone: 317-233-0178  
Fax: 317-233-6865  
and  
Anderson Office of Air Management**

**PART 70 OPERATING PERMIT  
EMERGENCY OCCURRENCE REPORT**

Source Name: ELSA, LLC.  
Source Address: 1240 South State Road 37, Elwood, Indiana 46036  
Mailing Address: 1240 South State Road 37, Elwood, Indiana 46036  
Part 70 Permit No.: T095-16479-00048

**This form consists of 2 pages**

**Page 1 of 2**

<input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)
X The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
X The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.

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:
Describe the cause of the Emergency:

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

**Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency?    Y    N
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
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: \_\_\_\_\_

A certification is not required for this report.

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

**PART 70 OPERATING PERMIT  
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: ELSA, LLC.  
 Source Address: 1240 South State Road 37, Elwood, Indiana 46036  
 Mailing Address: 1240 South State Road 37, Elwood, Indiana 46036  
 Part 70 Permit No.: T095-16479-00048

**Months:** \_\_\_\_\_ **to** \_\_\_\_\_ **Year:** \_\_\_\_\_

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**Indiana Department of Environmental Management  
Office of Air Quality  
and  
Anderson Office of Air Management**

**Technical Support Document (TSD) for a Part 70 Operating Permit Renewal**

**Source Background and Description**

Source Name:	ELSA, LLC.
Source Location:	1240 South State Road 37, Elwood, Indiana 46036
County:	Madison
SIC Code:	3714
Operation Permit No.:	T095-7668-00048
Operation Permit Issuance Date:	April 17, 1998
Permit Renewal Number:	T095-16479-00048
Permit Reviewer:	ERG/ST

The Office of Air Quality (OAQ) has reviewed a Part 70 permit application from ELSA, LLC. relating to the operation of a fuel tanks and exhaust systems manufacturing plant.

**Permitted Emission Units and Pollution Control Equipment**

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) open top vapor degreaser utilizing trichloroethylene, identified as AN-01, constructed in 1989, with a maximum capacity of 2.3 gallons per hour, and exhausting to stack S3. Under 40 CFR Part 63, Subpart T, this is considered a batch vapor cold solvent cleaning machine.
- (b) One (1) paint booth coating metal parts, identified as AM-08 Robotic (formerly Subaru) Paint Booth, constructed in 1989, with a maximum capacity of 28 units per hour, using dry filters to control particulate emissions, and exhausting to stack S14.
- (c) One (1) paint booth coating metal parts, identified as AM-09 Robotic (formerly Top Coat) Booth, constructed in 1989, with a maximum capacity of 25 fuel tanks/hr, using a robotic spray arm, using dry filters to control particulate emissions, and exhausting to stack S15.
- (d) One (1) paint booth coating metal parts, identified as AM-10 Paint (formerly Touch-up) Booth, constructed in 1989, with a maximum capacity of 25 fuel tanks/hr, using dry filters to control particulate emissions, and exhausting to stack S16.
- (e) One (1) paint booth coating metal parts, identified as BU-39 (formerly BU) Paint Booth, constructed in 1994, with a maximum capacity of 31 units per hour, using dry filters to control particulate emissions, and exhausting to stack S17.
- (f) One (1) paint booth coating metal parts, identified as BE-04 Robotic (formerly PSU Tank Robot) Paint Booth, constructed in 1993, with a maximum capacity of 36 fuel tanks per hour, using dry filters to control particulate emissions, and exhausting to stack S34.

- (g) One (1) paint booth coating metal parts, identified as BE-05 Paint (formerly PSU Touch-up) Booth, constructed in 1993, with a maximum capacity of 36 fuel tanks per hour, using dry filters to control particulate emissions, and exhausting to stack S35.
- (h) One (1) paint booth coating meta parts, identified as BE-06 Robotic (formerly PSU Tank Final) Paint Booth, constructed in 2005, with a maximum capacity of 25 fuel tanks/hour, using dry filters to control particulate emissions and exhausting to stack S42.
- (i) One (1) paint booth coating metal parts, identified as Exhaust Robotic (formerly PSU Exhaust Robot) Paint Booth, constructed in 1997 and modified in 2006, with a maximum capacity of 23 mufflers per hour, using dry filters to control particulate emissions, and exhausting to stack S44.

### **Unpermitted Emission Units and Pollution Control Equipment**

There are no unpermitted emission units operating at this source during this review process.

### **Insignificant Activities**

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment cutting torches, soldering equipment, welding equipment [326 IAC 6-3-2].
  - (1) Nine (9) metal inert gas (MIG) welders, identified as AC31, AC36-1, AJ29, AJ28-1, AP12, AP19, AP23, AP32, and AP40, constructed in 2000, 2000, 1992, 1992, 1989, 1990, 1990, 1990, and 1990, respectively, each with a maximum wire consumption of 0.94 pounds per hour, all exhausting to stack 4.
  - (2) Six (6) metal inert gas (MIG) welders, identified as AE12, AE30-11, AE31, AE32, AE33, and AE34, all constructed in 1998, each with a maximum wire consumption of 0.80 pounds per hour, all exhausting to stack 5.
  - (3) Nine (9) metal inert gas (MIG) welders, identified as AA08-2, AA13, AF24, AF30, AF31, AF32-2, AF35, AF36, and AF37, constructed in 1998, 1993, 1998, 1992, 1992, 1998, 1995, 1993, and 1998, respectively, each with a maximum wire consumption of 0.74 pounds per hour, all exhausting to stack 7.
  - (4) Five (5) metal inert gas (MIG) welders, identified as AB313, AB31-A, AB38, AB39, and AB40, constructed in 2000, 2000, 2000, 2000, and 1992 respectively, each with a maximum wire consumption of 0.75 pounds per hour, all exhausting to stacks 6 and 8.
  - (5) One (1) metal inert gas (MIG) welder, identified as kaizen, constructed in 1994, with a maximum wire consumption of 0.74 pounds per hour, exhausting to stack 17.
  - (6) Fifteen (15) metal inert gas (MIG) welders, identified as AW01, AW02, AW03, AW04, AY02, AY03, AY05, AY07, AY12, AY13, AZ02, AZ03, AZ05, AZ06, and AZ08, constructed in 1990, 1995, 1994, 1994, 1995, 1989, 1993, 1995, 1994, 1994, 1994, 1995, 1992, 1994, and 1994, respectively, each with a maximum wire consumption of 0.74 pounds per hour, all exhausting to stack 28.
  - (7) Fourteen (14) metal inert gas (MIG) welders, identified as AI31-2, AI33-1, AI33-2, AI33-3, AI34-1, AS24, AS26, AS30, AS31, AS33-1, AS38, AS39, AS47, and

- AS50, constructed in 1995, 1995, 1995, 1997, 1997, 1997, 1989, 1995, 1995, 1997, 1997, 1997, 1995, and 1997, respectively, each with a maximum wire consumption of 0.74 pounds per hour, and two (2) tungsten inert gas (TIG) welders, identified as AS55, and AS59, both constructed in 1997, both with a maximum metal consumption of 0.03 pounds per hour, and all exhausting to stack 29.
- (8) Nineteen (19) metal inert gas (MIG) welders, identified as BK01, BK05, BK14, BK18, BL10, BL11, BL16, BL29-1, BL29-2, BQ22, BQ23, BS10, BS11, BS12-1, BS13, BS14, BS15, BS16-1, and BS17-1, constructed in 1996, 1996, 1996, 1996, 1996, 1992, 1996, 1992, 1992, 1999, 1999, 1999, 1999, 1995, 1996, 1996, 1996, 19996, and 1996, respectively each with a maximum wire consumption of 0.74 pounds per hour, and three (3) tungsten inert gas (TIG) welders, identified as BS17-2, BV10, and BV11, constructed in 1996, 1995, and 1993, respectively, each with a maximum metal consumption of 0.03 pounds per hour, and all exhausting to stack 33.
- (9) Twenty-two (22) metal inert gas (MIG) welders, identified as AG02, AE24, AG01, AG09, AG10, AK01, AQ00, AS01, AS04-1, AY10-1, AM00, AM01, AP01, AV08, AV09, AV01, AV02, AV04, AV05, AV06, AV07, and AV07-1, constructed in 1990, 1990, 1990, 1990, 1990, 1989, 1993, 1991, 1991, 1991, 1990, 1992, 1992, 1990, 1990, 1990, 1990, 1995, 1995, 1990, and 1990, respectively, each with a maximum wire consumption of 0.75 pounds per hour, all exhausting to stack 37.
- (10) Seventeen (17) metal inert gas (MIG) welders, identified as BH02, BH05, BH06, BH07, BH07-1, BH08, BH08-1, BH10, BH11, BH11-1, BH13, BH14, BH17, BH3-1, BH3-2, BU32, and BH34-1, constructed in 1999, 1999, 1999, 1999, 1999, 1999, 1999, 1999, 1999, 1999, 1999, 1999, 1999, 1999, 1999, 1993, and 1993, respectively, each with a maximum wire consumption of 0.74 pounds per hour, and two (2) tungsten inert gas (TIG) welders, identified as BU43-1 and BU45-1, constructed in 1992 and 1995, respectively, both with a maximum metal consumption of 0.03 pounds per hour, and all exhausting to stack 38.
- (11) One (1) metal inert gas (MIG) welder, identified as eng, constructed in 1995, with a maximum wire consumption of 0.74 pounds per hour, exhausting to stack 43.
- (12) Seven (7) metal inert gas (MIG) welders, identified as DC1, DC2, DC3, DC4, DC5, DC6, and AG1, all constructed in 2002, each with a maximum wire consumption of 0.74 pounds per hour, all exhausting to stack 99.
- (13) Twenty-one (21) metal inert gas (MIG) welders, identified as BG28A, BG28B, BG32A, BG32B, BG33A, BG33B, BG35A, BG35B, BG47A, BG47B, 2300, BG20, BG21, BG22-2, BG23, BG24, BG25, BG25-1, BG27A, BG27B, and BG27C, constructed in 2001, 2001, 2001, 2001, 2001, 2001, 2001, 2001, 2001, 2001, 2001, 1993, 2001, 2001, 2001, 2001, 2001, 2001, 2001, 2001, and 2001, respectively, each with a maximum wire consumption of 0.75 pounds per hour, all exhausting to stack 100.
- (b) Activities with emissions equal to or less than the following thresholds: 5 tons per year PM or PM10, 10 tons per year SO<sub>2</sub>, NO<sub>x</sub>, or VOC, 0.2 tons per year Pb, 1.0 tons per year of a single HAP, or 2.5 tons per year of any combination of HAPs:
- (1) One (1) paint burn-off oven, constructed in 2002. [326 IAC 4-2-2]
- (2) One (1) Robot, constructed in 2002, applying a thin film of corrosion prevention compound, NO<sub>x</sub>-Rust, around the pump.

- (c) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
- (1) One (1) heater, identified as Shipping Space Heater, constructed in 1994, with a maximum capacity of 3.8 MMBtu/hr, and exhausting to stack 10.
  - (2) One (1) heating unit, identified as Receiving Heating Unit, constructed in 1988, with a maximum capacity of 3.8 MMBtu/hr, and exhausting to stack 13.
  - (3) One (1) oven, identified as Dry-Off Oven 1, constructed in 1989, with a maximum capacity of 4.5 MMBtu/hr, and exhausting to stack 18.
  - (4) One (1) washer, identified as Washer B, constructed in 1989, with a maximum capacity of 1.75 MMBtu/hr, and exhausting to stacks 20, 21 and 25.
  - (5) One (1) washer, identified as Washer C, constructed in 1989, with a maximum capacity of 1.75 MMBtu/hr, and exhausting to stacks 22, 23 and 26.
  - (6) One (1) washer, identified as Washer D, constructed in 1992, with a maximum capacity of 2.5 MMBtu/hr, and exhausting to stacks 31 and 32.
  - (7) One (1) bake oven, identified as Paint Oven 1, constructed in 1993, with a maximum capacity of 2.75 MMBtu/hr, and exhausting to stack 36.
  - (8) One (1) oven, identified as Paint Oven 2, constructed in 1989, with a maximum capacity of 4.2 MMBtu/hr, and exhausting to stack 19.
  - (9) One (1) air rotation unit, identified as Air Rotation Unit - Receiving, constructed in 1994, with a maximum capacity of 0.08 MMBtu/hr, and exhausting to stack 40.
  - (10) One (1) oven, identified as Main Oven, constructed in 1989, with a maximum capacity of 0.74 MMBtu/hr, and exhausting to stack 45.
  - (11) One (1) oven, identified as Dry-Off Oven 2, constructed in 1989, with a maximum capacity of 1.0 MMBtu/hr, and exhausting to stack 47.
  - (12) Nine (9) air rotation units, identified as Air Rotation Units - Waterplant, Shipping, Electric Room, Maintenance Office, Welding, Kaizen, Die Maintenance, Gatekeeper, and Compress, constructed in 1989, 1996, 1990, 1990, 1990, 2001, 2001, 1989, 2001, respectively, each with a maximum capacity of 0.08 MMBtu/hr, and exhausting to stacks 48, 49, 50, 51, 52, 53, 54, 55, and 66, respectively.
  - (13) Three (3) HVAC units, identified as F. Breakroom/Nonsmoke, HVAC Sales/Purchase, and F. Breakroom, constructed in 1989, 2000, and 1989, respectively, each with a maximum capacity of 0.15 MMBtu/hr, and exhausting to stacks 56, 64, and 65.
  - (14) Five (5) HVAC units, identified as President Office, Vice President Office, Acc. Office, Nurse, and Training Room, constructed in 1989, 1989, 1989, 1989, and 2000, respectively, each with a maximum capacity of 0.10 MMBtu/hr, and exhausting to stacks 57, 58, 60, 62, and 63.

- (15) Two (2) HVAC units, both identified as Acc. Office, both constructed in 1989, each with a maximum capacity of 0.13 MMBtu/hr, and exhausting to stacks 59 and 61.
  - (16) Two (2) air rotation units, both identified as Plant Air Rotation, constructed in 2001 and 1992, respectively, each with a maximum capacity of 2.9 MMBtu/hr, and exhausting to stacks 90 and 91.
  - (17) Two (2) air makeup units, both identified as Air Makeup Unit #5 and #6, both constructed in 1992, each with a maximum capacity of 2.5 MMBtu/hr, and exhausting to stacks 92 and 93.
  - (18) Two (2) air makeup units, both identified as Air Makeup Unit #1 and #2, both constructed in 1992, each with a maximum capacity of 6 MMBtu/hr, and exhausting to stacks 95 and 96.
  - (19) One (1) air makeup unit, identified as Air Makeup Unit #3, constructed in 1992, with a maximum capacity of 6 MMBtu/hr, and exhausting to stack 97.
  - (20) One (1) air makeup unit, identified as Air Makeup Unit #4, constructed in 1992, with a maximum capacity of 6 MMBtu/hr, and exhausting to stack 98.
  - (21) Two (2) overhead heaters, constructed in 2003, using natural gas as fuel, each with a maximum heat input rate of 0.12 MMBtu/hr, and exhausting to stacks 120 and 121, respectively.
  - (22) One (1) spinning converter oven, constructed in 2003, using natural gas as fuel, with a maximum heat input rate of 0.9 MMBtu/hr, and exhausting to stack 122.
- (d) Combustion source flame safety purging on startup.
  - (e) Non-contact, forced and induced, draft cooling tower system not regulated under a NESHAP.
  - (f) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
  - (g) Underground conveyors.
  - (h) Stationary fire pumps.
  - (i) Any operation using aqueous solutions containing less than or equal to one percent (1%) by weight of VOCs excluding HAPs, consisting of a hot water aqueous degreaser.

### Existing Approvals

The source has been operating under Part 70 Permit T095-7668-00048, issued on April 17, 1998, and the following previous approvals:

- (a) Administrative Amendment 095-15742-00048, issued on July 26, 2002;
- (b) Administrative Amendment 095-16128-00048, issued on November 25, 2002;
- (c) Administrative Amendment 095-17348-00048, issued on July 25, 2003;
- (d) Significant Source Modification 095-19454-00048, issued on February 3, 2005; and

- (e) Significant Permit Modification 095-20388-00048, issued on February 22, 2005.
- (f) Administrative Amendment 095-22614-00048, issued on February 17, 2006.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous permits are superseded by this permit.

### **Enforcement Issue**

There are no enforcement actions pending.

### **Recommendation**

The staff recommends to the Commissioner that the Part 70 permit renewal 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 administratively incomplete Part 70 permit renewal application for the purposes of this review was received on August 19, 2002. Additional information received May 28, 2003, June 12, 2003, June 19, 2003, June 30, 2003, and May 18, 2006 makes the Part 70 permit renewal application administratively complete.

A notice of completeness letter was not mailed to the Permittee.

### **Emission Calculations**

See Appendix A of this document for detailed emission calculations (pages 1 through 4).

### **Potential to Emit of the Source**

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

The source was issued a Part 70 Operating Permit on April 17, 1998. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of the original Part 70 operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/emission unit	Potential to Emit (tons/year)						HAPs*
	PM	PM10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	
Degreaser AN-01	0	0	0	6.85	0	0	Hexane: Less than 9.5 Single HAP: Less than 9.9 Combination HAPs: Less than 24.4
Surface Coating	56.9**	56.9**	0	89.7	0	0	
Welding	11.7	11.7	0	0	0	0	0.022
Combustion Units	2.1	2.1	0.2	1.5	23.4	27.9	0.5 (Hexane) 0.03 (All Others)
Total PTE*	72.3	72.3	0.2	98.0	23.4	27.9	Single HAP: Less than 10 Combination HAPs: Less than 25

\* The source has accepted limits on the usage of HAPs such that emissions of a single HAP will be limited to less than ten 10 tons per year and emissions of a combination of HAPs will be limited to less than twenty-five 25 tons per year.

\*\* Particulate emissions are limited by the requirements of 326 IAC 6-3-2(d).

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC is less than 100 tons per year. However, the source has elected to remain a Title V source under 326 IAC 2-7-2(c).
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. However, the source has accepted enforceable limits on the amount of HAPs that may be used.
- (c) Fugitive Emissions  
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

**Actual Emissions**

The following table shows the actual emissions from the source. This information reflects the 2003 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM10	0
PM2.5	0
SO <sub>2</sub>	4
VOC	21
CO	0
NO <sub>x</sub>	1
HAP	Not Reported

## County Attainment Status

The source is located in Madison County.

Pollutant	Status
PM10	Attainment
PM 2.5	Attainment
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment
8-hour Ozone	Basic Nonattainment
CO	Attainment
Lead	Attainment

- (a) Madison County has been classified as unclassifiable or attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM 2.5 emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as a surrogate for PM2.5 emissions. See the State Rule Applicability – Entire Source section of this document for more information.
- (b) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. Madison County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Emission Offset. See the State Rule Applicability – Entire Source section of this document for more information.
- (c) Madison County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section of this document for more information.
- (d) On August 7, 2006, a temporary emergency rule took effect revoking the one-hour ozone standard in Indiana. The Indiana Air Pollution Control Board has approved a permanent rule revision to incorporate this change into 326 IAC 1-4-1. A permanent revision to 326 IAC 1-4-1 will take effect prior to the expiration of the emergency rule.

## Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assure that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

## Federal Rule Applicability

- (a) The requirements of 40 CFR Part 64, Compliance Assurance Monitoring (CAM), are not included in this permit. This source does not involve a pollutant-specific emissions unit (as defined in 40 CFR 64.1) with the potential to emit before controls equal to or greater

than the major source threshold for a regulated air pollutant, that is subject to an emission limitation or standard for that regulated pollutant and that uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard.

The requirements of 40 CFR Part 64, (CAM) are not included for the open top vapor degreaser (AN-O1). Although this emission unit has a potential to emit greater than ten (10) tons per year of a single HAP and greater than twenty-five (25) tons per year of a combination of HAPs, the facility is not subject to any HAP emission limit and does not use a control device to achieve compliance.

The requirements of 40 CFR Part 64, (CAM) are not included for the paint booths. The potential to emit of VOCs and PM10 from each individual booth is less than one hundred (100) tons per year. Although the potential to emit of a single HAP from the Exhaust Robotic Paint Booth is greater than ten (10) tons per year, the booth does not use a control device.

The requirements of 40 CFR Part 64, (CAM) are not included for the welding operations. The potential to emit for PM, PM10, and VOCs from the welding operations are less than one hundred (100) tons per year.

- (b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit.
- (c) The requirements of the New Source Performance Standard for Incinerators (40 CFR Part 60, Subpart E, 326 IAC 12) are not included in this permit for the insignificant paint burn-off oven. The charging rate of this incinerator is less than 50 tons per day.
- (d) The requirements of the New Source Performance Standard for Automobile and Light Duty Truck Surface Coating Operations (40 CFR 63, Subpart MM) are not included in this permit for the surface coating operations. These facilities are not located at an automobile or light duty truck assembly plant.
- (e) The source is subject to the National Emission Standards for Hazardous Air Pollutants for Halogenated Solvent Cleaning (40 CFR Part 63, Subpart T) which is incorporated by reference as 326 IAC 20-6. The open top batch vapor degreaser identified as AN-01 utilizes trichloroethylene in a total concentration greater than five percent (5%) by weight as a cleaning and drying agent.

Pursuant to 40 CFR 63.460(d), degreaser AN-01 shall comply with the requirements of 40 CFR Part 63, Subpart T on and after December 2, 1997.

Non applicable portions of the NESHAP are not included in the permit. The open top vapor degreaser (AN-01) is subject to the following portions of 40 CFR Part 63, Subpart T:

- (1) 40 CFR 63.460(a), (b), (d)
- (2) 40 CFR 63.463(a)(1)(ii), (a)(2) – (7)
- (3) 40 CFR 63.463(b)(2)(i)
- (4) 40 CFR 63.463(d)(1)(ii), (d)(2) – (12)
- (5) 40 CFR 63.463(e)(1), (e)(2)(i), (e)(2)(ii)(A) – (B), (e)(3), (e)(4)
- (6) 40 CFR 63.465(e)
- (7) 40 CFR 63.466(a)(1)
- (8) 40 CFR 63.466(c)(1) – (4)
- (9) 40 CFR 63.466(d)(1)
- (10) 40 CFR 63.466(g)
- (11) 40 CFR 63.467(a)(1), (a)(2), (a)(5)

- (12) 40 CFR 63.467(b)(1) – (3)
- (13) 40 CFR 63.468(a), (d)(1) – (d)(5), (f), (h), (i), (k)
- (14) 40 CFR 63.469
- (15) 40 CFR 63.470

The provisions of 40 CFR 63 Subpart A – General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the open top vapor degreaser (AN-01) except when otherwise specified in 40 CFR 63, Subpart T.

- (f) The requirements of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products (40 CFR 63, Subpart MMMM) are not included in this permit for the surface coating operations. The source applies surface coating to metal parts and products and has the potential to emit greater than 10 tons per year of a single HAP. However, the source has accepted a limit on the potential to emit a single HAP of less than 10 tons per year and a limit on the potential to emit a combination of HAPs of less than 25 tons per year (see 326 IAC 2-4.1 discussion under State Rule Applicability). By limiting the HAP emissions prior to the January 2, 2007 compliance date, the surface coating operations are not subject to 40 CFR 63, Subpart MMMM, National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products because the source is not a major source of HAPs, as defined in 40 CFR 63, Subpart A. Recordkeeping and reporting requirements are included in this permit to ensure that the source does not exceed the HAP emission threshold.
- (g) The requirements of the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters (40 CFR Part 63, Subpart DDDDD), are not included in this permit for the insignificant natural gas-fired combustion facilities at this source. None of the insignificant natural gas-fired combustion facilities at this source are an industrial, commercial, or institutional boiler or process heater, as that term is defined in 40 CFR 63.7575.
- (h) The requirements of the National Emission Standards for Hazardous Air Pollutants from Hazardous Waste Combustors (40 CFR Part 63, Subpart EEE) are not included in this permit for the insignificant paint burn-off oven. The paint that is burned off of the metal parts, prior to their reuse, is not considered to be a hazardous waste, as that term is defined and characterized in 40 CFR 261.3, 40 CFR 261.10, and 40 CFR 261.20-24.
- (i) The requirements of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Automobiles and Light Duty Trucks (40 CFR 63, Subpart IIII) are not included in this permit for the surface coating operations. The surface coating operations do not apply coatings to body parts for automobile and light duty trucks.

### **State Rule Applicability-Entire Source**

#### **326 IAC 2-2 (Prevention of Significant Deterioration) and 326 IAC 2-3 (Emission Offset)**

This source is not in 1 of the 28 source categories and there are no applicable New Source Performance Standards that were in effect on August 7, 1980. Therefore, fugitive emissions of VOC and PM are not counted towards applicability of PSD.

This source was constructed in 1989. At the time of initial construction, the PTE for PM, PM10, SO<sub>2</sub>, NO<sub>x</sub>, and CO was each less than 250 tons per year and the source was a PSD minor source.

In 1993, the source constructed the BE-04 Robotic (formerly PSU Tank Robot), Paint Booth (S34), the BE-05 Paint Booth (S35) (formerly PSU Touch Up) and changed degreaser solvents from 1,1,1 Trichloroethane to Trichloroethylene. This modification did not trigger PSD review

because the increase in potential to emit of VOC due to this modification (190 tons per year) was less than the PSD significant level for a minor PSD source (250 tons per year). After this modification, the VOC PTE of the entire source was greater than 250 tons per year and the source was a PSD major source.

In 1994, the source constructed the BV Paint Booth (S41) and the BU-39 (formerly BU) Paint Booth (S17). This modification did not trigger PSD review with respect to VOC because the increase in potential to emit of VOC due to the modification (19.1 tons per year) was less than the PSD significant threshold of 40 tons per year. The pre-control PM/PM10 PTE of the modification was greater than the PSD significant thresholds of 25 and 15 tons per year, respectively. However, in order to render the requirements of 326 IAC 2-2 (PSD) not applicable, the following limitations were established:

Pursuant to CP095-3082-00056, issued on February 18, 1994,

- (1) The PM emissions from the BU-39 (formerly BU) Paint Booth (S17) shall not exceed 2.56 pounds per hour. The PM-10 emissions from the BU-39 (formerly BU) Paint Booth (S17) shall not exceed 1.53 pounds per hour.
- (2) The PM emissions from the BV Paint Booth (S41) shall not exceed 3.14 pounds per hour. The PM-10 emissions from the BV Paint Booth (S41) shall not exceed 1.88 pounds per hour.

These limitations are equivalent to PM emissions of less than 25 tons per year and PM-10 emissions of less than 15 tons per year for the modification performed in 1994. Compliance with these limitations renders the requirements of 326 IAC 2-2 not applicable to the 1994 modification.

Under CP095-7134-00048, issued on June 14, 1997, the source constructed the Exhaust Robotic (formerly PSU Exhaust Robot) Paint Booth (S44). This modification did not trigger PSD review with respect to VOC because the increase in potential to emit of VOC due to the modification (23.8 tons per year) was less than the PSD significant threshold of 40 tons per year. The pre-control PM/PM10 PTE of the modification (80.8 tons per year) was greater than the PSD significant thresholds of 25 tons and 15 tons per year, respectively. However, this modification did not trigger PSD review because the permit required the use of particulate controls. The increase in potential to emit of PM and PM10 after the required controls (12.1 tons per year) was less than the PSD significant threshold. After this modification, the potential to emit of the entire source for VOC was greater than 250 tons per year and the source was a major source under PSD.

Pursuant to CP095-7134-00048, issued on June 14, 1997, the PM emissions from the Exhaust Robotic (formerly PSU Exhaust Robot) Paint Booth (S44) shall not exceed 5.70 pounds per hour. The PM10 emissions from the Exhaust Robotic (formerly PSU Exhaust Robot) Paint Booth (S44) shall not exceed 3.42 pounds per hour. These limitations are equivalent to PM emissions of less than 25 tons per year and PM10 emissions of less than 15 tons per year for the modification performed in 1997. Compliance with these limitations renders the requirements of 326 IAC 2-2 not applicable to the 1997 modification.

In 2002, under Administrative Amendment 095-15742-00048, the source added the insignificant Mitsubishi Fuel Tank Final paint booth and the insignificant lube Robot for the application of a corrosion prevention compound. In addition, the Ford Final Fuel Tank Paint Booth and the Subaru Final Paint Booth units were removed. This modification was not subject to the requirements of PSD because the increase in potential to emit of VOC due to this modification (0.07 tons per year) was less than the PSD significant threshold (40 tons per year).

In 2002, the source added the insignificant BW Final Paint Booth. This modification was not subject to the requirements of PSD because the increase in potential to emit of VOC due to this modification (0.82 tons per year) was less than the PSD significant threshold (40 tons per year).

In 2002, under Administrative Amendment 095-16128-00048, the source added the insignificant paint burn-off oven. This modification was not subject to the requirements of PSD because the increase in potential to emit of VOC due to this modification (0.09 tons per year) was less than the PSD significant threshold (40 tons per year).

This source is located in Madison County. Madison County was designated as a basic nonattainment area for the 8-hour ozone standard on June 15, 2004. The VOC potential to emit of this source, after limits, is greater than 100 tons per year. Therefore, this source is a major source under Emission Offset. Any future modifications that increase VOC or NO<sub>x</sub> emissions must be reviewed in accordance with 326 IAC 2-3.

In 2005, under Significant Source Modification 095-19454-00048, the source added BE-06 Robotic (formerly PSU Tank Final) Paint Booth (S42), a robotic spray arm to the AM-09 Robotic Paint (formerly Top Coat) Booth (S15) and changed the paint formulation used in the AM-10 Paint (formerly Touch-up) Paint Booth (S16). This modification was not subject to the requirements of Emission Offset because the increase in potential to emit of VOC and NO<sub>x</sub> due to this modification (9.7 tons and 0.0 tons per year, respectively) was less than the Emission Offset significant level (40 tons per year) for a major VOC source located in an area designated as basic nonattainment for the 8-hour ozone standard. The pre-control PM/PM10 PTE of the modification was greater than the PSD significant thresholds of 25 and 15 tons per year, respectively. However, in order to render the requirements of 326 IAC 2-2 (PSD) not applicable, the following limitations were established:

Pursuant to SSM 095-19454-00048, issued February 3, 2005, the PM emissions from the BE-06 Robotic (formerly PSU Tank Final) Paint Booth (S42) shall not exceed 5.70 pounds per hour. The PM10 emissions from the BE-06 Robotic (formerly PSU Tank Final) Paint Booth (S42) shall not exceed 3.42 pounds per hour. These limitations are equivalent to PM emissions of less than 25 tons per year and PM10 emissions of less than 15 tons per year for the modification performed in 2005. Compliance with these limitations renders the requirements of 326 IAC 2-2 not applicable to the 2005 modification.

After this modification, the potential to emit of the entire source for VOC was greater than 250 tons per year and the source was a major source under PSD and Emission Offset.

In 2006, the source removed the BV Paint Booth, the insignificant BW Final Paint Booth, and the insignificant Mitsubishi Fuel Tank Final Paint Booth. The source re-named all the surface coating booths.

In 2006, during the permit renewal process, the source requested a change in the paint formulations in the surface coating booths. This change will not increase PTE of VOC for any of the surface coating booths except the Exhaust Robotic Paint Booth (S44). The Permittee accepted a limit on the input of VOC to the Exhaust Robotic Paint Booth (S44) such that the increase in PTE of VOC due to this modification will be limited to less than forty (40) tons of VOC per year. This modification does not trigger the requirements of Emission Offset because the PTE of VOC of this modification is limited to less than the Emission Offset significant level (40 tons per year). The following limit is included in the permit:

The amount of VOC used in the Exhaust Robotic Paint Booth (S44) shall be limited to less than forty (40.0) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Compliance with this limit makes the modifications to the Exhaust Robotic Paint Booth (S44) done in 2006 minor under Emission Offset (326 IAC 2-3).

Subsequent to this modification, the limited PTE of VOC from the entire source is less than 100 tons per year and the source is a minor source under Emission Offset (326 IAC 2-3). The PTE of PM, PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>x</sub> and CO of the entire source is less than 250 tons per year. The source is a minor source under PSD (326 IAC 2-2).

326 IAC 2-4.1 (Hazardous Air Pollutants)

- (a) The open top vapor degreaser (AN-01) was constructed prior to July 27, 1997 and is subject to 40 CFR 63, Subpart T. Therefore, the requirements of 326 IAC 2-4.1 do not apply.
- (b) The surface coating booths at this source identified as AM-08 Robotic (formerly Subaru) Paint Booth (S14), AM-09 Robotic Paint (formerly Top Coat) Booth (S15), AM-10 Paint (formerly Touch-up) Booth (S16), BU-39 (formerly BU) Paint Booth (S17), BE-04 Robotic (formerly PSU Tank Robot) Paint Booth (S34), and BE-05 Paint (formerly PSU Touch-Up) Booth (S35), were constructed prior to July 27, 1997. Therefore, the requirements of 326 IAC 2-4.1 do not apply to those booths.
- (c) The surface coating booth at this source identified as BE-06 Robotic (formerly PSU Tank Final) Paint Booth (S42) was constructed after July 27, 1997. However, this booth has a potential to emit that is less than 10 tons per year of any single HAP and less than 25 tons per year of any combination of HAPs. Therefore, the requirements of 326 IAC 2-4.1 do not apply.
- (d) The surface coating booth at this source identified as Exhaust Robotic (formerly PSU Exhaust Robot) Paint Booth (S44) was constructed after July 27, 1997 and modified in 2006. This booth has a potential to emit that is greater than 10 tons per year for a single HAP. However, the source has accepted source-wide limits on HAPs emissions as follows: The amount of HAP used in the surface coating operations (AM-08 Robotic Paint Booth (S14), AM-09 Robotic Paint Booth (S15), AM-10 Paint Booth (S16), BU-39 Paint Booth (S17), BE-04 Robotic Paint Booth (S34), BE-05 Paint Booth (S35), BE-06 Robotic Paint Booth (S42), and the Exhaust Robotic Paint Booth (S44), combined with the amount of HAP used in the open top vapor degreaser (AN-01) shall be limited to less than nine and nine-tenths (9.9) tons per twelve (12) consecutive month period for any single HAP and less than 24.4 tons per twelve (12) consecutive month period for any combination of HAPs. These limits, combined with the HAP emissions from the other emission units at this source, will limit the source-wide emissions of HAPs to less than ten (10) tons of a single HAP and less than twenty-five (25) tons of a combination of HAPs per twelve (12) consecutive month period. This limit makes the requirements of 326 IAC 2-4.1 not applicable to this booth (S44). This limit also makes the requirements of 40 CFR 63, Subpart M not applicable to this source. Appropriate recordkeeping and reporting requirements have been added to the permit to verify that the source is in compliance with this limit.
- (e) The welding operations that were constructed after July 27, 1997 have a potential to emit that is less than 10 tons per year of any single HAP and less than 25 tons per year of any combination of HAPs. Therefore, the requirements of 326 IAC 2-4.1 do not apply to those operations.
- (f) The combustion sources that were constructed after July 27, 1997 have a potential to emit that is less than 10 tons per year of any single HAP and less than 25 tons per year of any combination of HAPs. Therefore, the requirements of 326 IAC 2-4.1 do not apply to those units.

### 326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting) because it has an operating permit under 326 IAC 2-7, Part 70 Permit Program. Pursuant to this rule, the Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. This statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6-3 and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period identified in 326 IAC 2-6.

### 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 the permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

### 326 IAC 8-6 (Organic Solvent Emission Limitations)

The source is not subject to the requirements of 326 IAC 8-6 even though it has the potential to emit greater than 100 tons per year of VOC because it was constructed after January 1, 1980.

## **State Rule Applicability – Open Top Vapor Degreaser**

### 326 IAC 6-3-2 (Particulate Emissions Limitations for Manufacturing Processes)

The open top vapor degreaser (AN-01) is not subject to 326 IAC 6-3-2 because it does not have the potential to emit particulate.

### 326 IAC 8-1-6 (Volatile Organic Compounds (VOC))

The open top vapor degreaser (AN-01) is not subject to 326 IAC 8-1-6 even though it was constructed after January 1, 1980 and, at the time of construction, had a potential to emit greater than twenty-five (25) tons per year of VOC because it is subject to another Article 8 rule (326 IAC 8-3-3).

### 326 IAC 8-3-3 (Volatile Organic Compounds (VOC))

The open top vapor degreaser (AN-01) is subject to 326 IAC 8-3-3 because it was constructed after January 1, 1980 and it performs organic solvent degreasing operations.

Pursuant to 326 IAC 8-3-3 (Open Top Vapor Degreasing Operations) for open top vapor degreasing operations constructed after January 1, 1980, the Permittee shall:

- (a) Equip the open top vapor degreaser (AN-01) with a cover that can be opened and closed easily without disturbing the vapor zone;
- (b) Keep the cover closed at all times except when processing workloads through the degreaser;
- (c) Minimize solvent carry-out by:
  - (1) Racking parts to allow complete drainage;
  - (2) Moving parts in and out of the degreaser at less than eleven (11) feet per minute;

- (3) Degreasing the workload in the vapor zone at least thirty (30) seconds or until condensation ceases;
- (4) Tipping out any pools of solvent on the cleaned parts before removal;
- (5) Allowing parts to dry within the degreaser for at least fifteen (15) seconds or until visually dry;
- (d) Not degrease porous or absorbent materials, such as cloth, leather, wood or rope;
- (e) Not occupy more than half of the degreaser's open top area with the workload;
- (f) Not load the degreaser such that the vapor level drops more than fifty percent (50%) of the vapor depth when the workload is removed;
- (g) Never spray above the vapor level;
- (h) Repair solvent leaks immediately, or shut down the degreaser;
- (i) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, such that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere;
- (j) Not use workplace fans near the degreaser opening;
- (k) Not allow visually detectable water in the solvent exiting the water separator; and
- (l) Provide a permanent, conspicuous label summarizing the operating requirements.

**326 IAC 8-3-6 (Volatile Organic Compounds (VOC))**

The open top vapor degreaser (AN-01) is not subject to 326 IAC 8-3-6 because it was constructed before July 1, 1990.

**State Rule Applicability – Surface Coating Booths**

**326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)**

Pursuant to 326 IAC 6-3-2(d) (Particulate Emissions Limitations for Manufacturing Processes) particulate from the AM-08 Robotic (formerly Subaru) Paint Booth (S14), AM-09 Robotic Paint (formerly Top Coat) Booth (S15), AM-10 Paint (formerly Touch-up) Booth (S16), BU-39 (formerly BU) Paint Booth (S17), BE-04 Robotic (formerly PSU Tank Robot) Paint Booth (S34), BE-05 Paint (formerly PSU Touch-Up) Booth (S35), BE-06 Robotic (formerly PSU Tank Final) Paint Booth (S42), and Exhaust Robotic (formerly PSU Exhaust Robot) Paint Booth (S44) shall be controlled by a dry particulate filter and the Permittee shall operate the control devices in accordance with manufacturer's specifications.

**326 IAC 8-1-6 (New Facilities; General Reduction Requirements)**

- (a) The AM-08 Robotic (formerly Subaru) Paint Booth (S14), AM-09 Robotic Paint (formerly Top Coat) Booth (S15), AM-10 Paint (formerly Touch-up) Booth (S16), BU-39 (formerly BU) Paint Booth (S17), and BE-06 Robotic (formerly PSU Tank Final) Paint Booth (S42) were constructed after January 1, 1980 and before July 1, 1990. However, these booths do not have the potential to emit twenty-five (25) tons or greater of VOC per year. Therefore, these paint booths are not subject to the requirements of 326 IAC 8-1-6.
- (b) The BE-04 Robotic (formerly PSU Tank Robot) Paint Booth (S34) and BE-05 Paint (formerly PSU Touch-Up) Booth (S35) were constructed after January 1, 1980 and at the time of construction, had the potential to emit greater than twenty-five (25) tons per year

of VOC. However, these paint booths are subject to the requirements of 326 IAC 8-2-9. Therefore, these paint booths are not subject to the requirements of 326 IAC 8-1-6.

- (c) The Exhaust Robotic (formerly PSU Exhaust Robot) Paint Booth (S44) was constructed after January 1, 1980 and was modified in 2006. The PTE of this booth is greater than twenty-five (25) tons per year of VOC. However, this paint booth is subject to the requirements of 326 IAC 8-2-9. Therefore, this paint booth is not subject to the requirements of 326 IAC 8-1-6.

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

- (a) The AM-08 Robotic (formerly Subaru) Paint Booth (S14), AM-09 Robotic Paint (formerly Top Coat) Booth (S15) and the AM-10 Paint (formerly Touch-up) Booth (S16) are located in Madison County, were constructed after November 1, 1980 and before July 1, 1990 and apply surface coatings to metal. However, these facilities each have a potential to emit of less than twenty-five (25) tons of VOC per year. Therefore, these paint booths are not subject to the requirements of 326 IAC 8-2-9.
- (b) The BU-39 (formerly BU) Paint Booth (S17), BE-04 Robotic (formerly PSU Tank Robot) Paint Booth (S34), BE-05 Paint (formerly PSU Touch-Up) Booth (S35), BE-06 Robotic (formerly PSU Tank Final) Paint Booth (S42), and the Exhaust Robotic (formerly PSU Exhaust Robot) Paint Booth (S44) are located in Madison County, were constructed after July 1, 1990, apply surface coatings to metal and, at the time of construction, had actual emissions of greater than fifteen (15) pounds per day of VOC before add-on controls. Therefore, these paint booths are subject to the requirements of 326 IAC 8-2-9.

Pursuant to 326 IAC 8-2-9, the volatile organic compound (VOC) content of the coating delivered to the applicator at the spray booths identified as BU-39 (formerly BU) Paint Booth (S17), BE-04 Robotic (formerly PSU Tank Robot) Paint Booth (S34), BE-05 Paint (formerly PSU Touch-Up) Booth (S35), BE-06 Robotic (formerly PSU Tank Final) Paint Booth (S42), and the Exhaust Robotic (formerly PSU Exhaust Robot) Paint Booth (S44) shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for extreme performance coatings.

Pursuant to 326 IAC 8-2-9(f), solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS submitted by the source and calculations made, the spray booths are in compliance with this requirement (see TSD Appendix A, Page 1).

#### State Rule Applicability – Insignificant Welding Operations

##### 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-2, the particulate from the welding operations shall not exceed 9.03 pounds per hour when operating at a process weight rate of 6,500 pounds per hour.

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

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

##### 326 IAC 8 (Volatile Organic Compounds)

The welding operations are not subject to any 326 IAC 8 rules because they do not have the potential to emit VOC.

### **State Rule Applicability – Insignificant Combustion Operations**

#### 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)

The combustion facilities at this source are not subject to the requirements of 326 IAC 6-2 because they are not sources of indirect heating.

### **State Rule Applicability – Insignificant Paint Drying Ovens and Paint Burn-Off Oven**

#### 326 IAC 4-2-2 (Incinerators)

The insignificant Dry-Off Oven 1, Paint Oven 1, Paint Oven 2, Main Oven, and Dry-Off Oven 2 are used to accelerate the curing of paint applied to metal parts and are not incinerators. Therefore, the requirements of 326 IAC 4-2 do not apply.

The insignificant paint burn-off oven meets the definition of incinerator in 326 IAC 1-2-34 because it is used to remove paint from metal parts prior to recoating by means of raising the temperature of the coated substrate (metal) to the point where the coating (paint, etc.) is thermally degraded. Therefore, the requirements of 326 IAC 4-2 apply to this emission unit. Pursuant to 326 IAC 4-2-2 (Incinerators):

- (a) All incinerators shall comply with the following requirements:
  - (1) Consist of primary and secondary chambers or the equivalent.
  - (2) Be equipped with a primary burner unless burning only wood products.
  - (3) Comply with 326 IAC 5-1 and 326 IAC 2.
  - (4) Be maintained, operated, and burn waste in accordance with the manufacturer's specifications or an operation and maintenance plan as specified in subsection (c).
  - (5) Not emit particulate matter in excess of one (1) of the following:
    - (A) Three-tenths (0.3) pound of particulate matter per one thousand (1,000) pounds of dry exhaust gas under standard conditions corrected to fifty percent (50%) excess air for incinerators with a maximum solid waste capacity of greater than or equal to two hundred (200) pounds per hour.
    - (B) Five-tenths (0.5) pound of particulate matter per one thousand (1,000) pounds of dry exhaust gas under standard conditions corrected to fifty percent (50%) excess air for incinerators with solid waste capacity less than two hundred (200) pounds per hour.
  - (6) If any of the requirements of subdivisions (1) through (5) are not met, then the owner or operator shall stop charging the incinerator until adjustments are made that address the underlying cause of the deviation.
- (b) An incinerator is exempt from subsection (a)(5) if subject to a more stringent particulate matter emission limit in 40 CFR 52 Subpart P, State Implementation Plan for Indiana.
- (c) An owner or operator developing an operation and maintenance plan pursuant to subsection (a)(4) must comply with the following:
  - (1) The operation and maintenance plan must be designed to meet the particulate matter emission limitation specified in subsection (a)(5) and include the following:

- (A) Procedures for receiving, handling, and charging waste.
  - (B) Procedures for incinerator startup and shutdown.
  - (C) Procedures for responding to a malfunction.
  - (D) Procedures for maintaining proper combustion air supply levels.
  - (E) Procedures for operating the incinerator and associated air pollution control systems.
  - (F) Procedures for handling ash.
  - (G) A list of wastes that can be burned in the incinerator.
- (2) Each incinerator operator shall review the plan before initial implementation of the operation and maintenance plan and annually thereafter.
  - (3) The operation and maintenance plan must be readily accessible to incinerator operators.
  - (4) The owner or operator of the incinerator shall notify the department, in writing, thirty (30) days after the operation and maintenance plan is initially developed pursuant to this section.
- (d) The owner or operator of the incinerator must make the manufacturer's specifications or the operation and maintenance plan available to the department upon request.

#### 326 IAC 9-1-2 (Carbon Monoxide Emission Limits)

The paint burn-off oven is considered refuse burning equipment. Pursuant to 326 IAC 9-1-2(a)(3), the Permittee shall not operate refuse burning equipment unless the waste gas stream is burned in a direct flame afterburner or a secondary chamber. The Permittee complies with this requirement by burning the waste gas stream in a secondary chamber.

#### Testing Requirements

- (a) **Surface Coating Operations**  
The surface coating operations do not have a testing requirement for PM, PM10 or VOC. The surface coating operations at this source do not have a testing requirement for PM or PM10 because each of these emissions units accounts for a small portion of the total potential to emit for PM or PM10 from the source before controls. The Permittee is not required to perform compliance stack tests on the surface coating facilities for VOC emissions because there are no VOC control devices in operation and records must be kept of all VOCs used at the source to ensure compliance with 326 IAC 8-2-9.
- (b) IDEM may require testing at any time to determine if the facilities are in compliance with the emissions limitations contained in 326 IAC 5-1, 326 IAC 6-3-2, and 326 IAC 8-2-9.

#### 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 in 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.

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

1. The surface coating booths identified as: AM-08 Robotic Paint Booth (S14), AM-09 Robotic Booth (S15), AM-10 Paint Booth (S16), BU-39 Paint Booth (S17), BE-04 Robotic Paint Booth (S34), BE-05 Paint Booth (S35), BE-06 Robotic Paint Booth (S42), and Exhaust Robotic Paint Booth (S44) have applicable compliance monitoring conditions as specified below:
  - (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (S14, S15, S16, S17, S34, S35, S42, and S44) while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
  - (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

These monitoring conditions are necessary because the filters for the surface coating booths must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-7 (Part 70).

## Conclusion

The operation of this fuel tank and exhaust system manufacturing plant shall be subject to the conditions of this Part 70 permit 095-16479-00048.

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

**Company Name:** ELSA, LLC.  
**Address:** 1240 South SR 37, Elwood, Indiana 46036  
**Permit Number:** T095-16479-00048  
**Reviewer:** ERG/ST  
**Date:** August 18, 2006

Booth Identification (Booth Stack ID) Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non- Volatiles (solids)	Max. Usage (gal/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential to Emit VOC (tons/ year)	Potential to Emit PM/PM10 (tons/year)	lb VOC/gal solids	Transfer Efficiency	Control Efficiency	Controlled Potential to Emit PM/PM10 (tons/year)										
<b>AM-08 Robotic Paint Booth (S14)</b>																											
Penguin Coat 1605	12.3	4.50%	0.00%	4.50%	0.00%	89.5%	4.00	0.55	0.55	2.22	53.2	9.71	51.5	0.62	75%	80%	10.3										
<b>AM-09 Robotic Paint Booth (S15)</b>																											
Penguin Coat 1605	12.3	4.50%	0%	4.50%	0.00%	89.5%	4.00	0.55	0.55	2.22	53.2	9.71	51.5	0.62	75%	80%	10.3										
<b>AM-10 Paint Booth (S16)</b>																											
Penguin Coat 1605	12.3	4.50%	0.00%	4.50%	0.00%	89.5%	0.32	0.55	0.55	0.18	4.25	0.78	4.12	0.62	75%	80%	0.82										
<b>BU-39 Paint Booth (S17)</b>																											
Penguin Coat 1605	12.3	4.50%	0.00%	4.50%	0.00%	89.5%	4.00	0.55	0.55	2.22	53.2	9.71	51.5	0.62	75%	80%	10.3										
<b>BE-04 Robotic Paint Booth (S34)</b>																											
Penguin Coat 1605	12.3	4.50%	0%	4.50%	0.00%	89.5%	4.00	0.55	0.55	2.22	53.2	9.71	51.5	0.62	75%	80%	10.3										
<b>BE-05 Paint Booth (S35)</b>																											
Penguin Coat 1605	12.3	4.50%	0.00%	4.50%	0.00%	89.5%	0.32	0.55	0.55	0.18	4.25	0.78	4.12	0.62	75%	80%	0.82										
<b>BE-06 Robotic Paint Booth (S42)</b>																											
Penguin Coat 1605	12.3	4.50%	0.00%	4.50%	0.00%	89.5%	4.00	0.55	0.55	2.22	53.2	9.71	51.5	0.62	75%	80%	10.3										
<b>Exhaust Robotic Paint Booth (S44) *</b>																											
Okitsumo Black Heat Resistant Paint	9.31	34.69%	0.00%	34.69%	0.00%	60.00%	2.80	3.23	3.23	9.0	217	39.6	18.6	5.38	75%	80%	3.73										
<b>Degreaser AN-01 (S3)</b>																											
Trichloroethylene	12.16	99.90%	0.00%	99.90%	0.00%	0.00%	0.13	12.1	12.1	1.56	37.5	6.85	0.00	0.00	100%	99%	0.000										
<b>Total</b>												<b>96.5</b>	<b>284</b>														<b>56.9</b>

Hourly usage of trichloroethylene in degreaser is based on reported usage of 9770 lb per year and the plants reported operating schedule of 6240 hours per year. PTE is based on 8760 hours per year.

\* The input of VOC to the Exhaust Robotic Paint Booth (S44) is limited by an Emission Offset Minor limit in the permit such that limited PTE is less than 40 tons per year.

**Methodology**

Usage Rate (Degreaser) (gal/hr) = 7990 lbs/yr x 1gal/12.16 lbs x 1 yr/6240 hrs operation

Pounds of VOC per Gallon Coating less Water = Density (lbs/gal) x Weight % Organics x 1/ (1-Volume % Water)

Pounds of VOC per Gallon Coating = Density (lbs/gal) x Weight % Organics

PTE of VOC (lbs/hour) = Pounds of VOC per Gallon Coating (lbs/gal) x Max. Usage (gals/hour)

PTE of VOC (lbs/day) = Pounds of VOC per Gallon Coating (lb/gal) x Max. Usage (gal/hour) x 24 hours/day

PTE of VOC (tons/year) = Pounds of VOC per Gallon Coating (lbs/gal) x Max. Usage (gal/hour) x 8760 hours/year x 1 ton/2000 lbs

PTE of PM/PM10 (tons/year) = Density (lbs/gal) x Max. Usage (gal/hour) x (1- Weight % Volatiles) x (1-Transfer Efficiency%) x 8760 hours/year x 1 ton/2000 lbs

Pounds VOC per Gallon of Solids = (Density (lbs/gal) x Weight % organics) / (Volume % solids)

**Appendix A: Emission Calculations  
HAP Emission Calculations**

**Company Name:** ELSA, LLC.  
**Address:** 1240 South SR 37, Elwood, Indiana 46036  
**Permit Number:** T095-16479-00048  
**Reviewer:** ERG/ST  
**Date:** August 18, 2006

Booth ID (Stack ID)	Material	Density (Lb/Gal)	Usage rate (gal/hr)	Weight % Trichloroethylene	Weight % Xylene	Weight % Ethyl Benzene	Weight % Napthalene	PTE of Trichloroethylene (tons/year)	PTE of Xylene (tons/year)	PTE of Ethyl Benzene (tons/year)	PTE of Napthalene (tons/year)	PTE of Total HAPS (tons/year)
<b>Exhaust Robotic Paint Booth (S44)</b>												
	Okitsumo Black Heat Resistant Paint *	9.31	2.60	0.00%	9.3%	2.2%	1.29%	0.00	<b>9.87</b>	2.35	1.37	13.6
<b>Degreaser AN-01 (S3)</b>												
	Trichloroethylene	12.16	0.13	99.9%	0.00%	0.00%	0.00%	6.85	0.00	0.00	0.00	6.85
<b>Total</b>								<b>6.85</b>	<b>9.87</b>	<b>2.35</b>	<b>1.37</b>	<b>20.4</b>

Note: HAPs are not emitted from the other paint booths

Hourly usage of trichloroethylene in degreaser is based on reported usage of 9770 lb per year and the plants reported operating schedule of 6240 hours per year. PTE is based on 8760 hours per year.

HAP input to the Exhaust Robotic Paint Booth (S44) is limited by conditions in the permit such that emissions of a single HAP are equal to or less than 9.9 tons per year.

**METHODOLOGY**

Usage Rate (Degreaser) (gal/hr) = 7990 lbs/yr x 1gal/12.16 lbs x 1 yr/6240 hrs operation

PTE of HAPS (tons/year) = Density (lbs/gal) x Usage (gals/unit) x Maximum (units/hour) x Weight % HAP x 8760 hours/year x 1 ton/2000 lbs

**Appendix A: Emissions Calculations**

**Combustion Emissions from Natural Gas-fired Heaters, Air Make-up Units, Ovens and Washers**

**Company Name:** ELSA, LLC.  
**Address:** 1240 South SR 37, Elwood, Indiana 46036  
**Permit Number:** T095-16479-00048  
**Reviewer:** ERG/ST  
**Date:** August 18, 2006

Total Heat Input Capacity MMBtu/hr 63.6
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Potential Throughput MMCF/yr 557.1
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	Pollutant						
Emission Factor (lbs/MMCF)	PM*	PM10*	SO <sub>2</sub>	NOx **	VOC	CO	HAPs
PTE (tons/year)	0.53	2.12	0.17	27.9	1.53	23.4	0.53

\* PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM and PM10 combined.

\*\*Emission factor for NOx: Uncontrolled = 100

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

**Methodology**

Potential Throughput (MMCF/year) = Heat Input Capacity (MMBtu/hour) x 8,760 hours/year x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

PTE (tons/year) = Throughput (MMCF/year) x Emission Factor (lbs/MMCF) x 1 ton/2,000 lbs

**Appendix A: Emissions Calculations  
Welding Operations**

**Company Name:** ELSA, LLC.  
**Address:** 1240 South SR 37, Elwood, Indiana 46036  
**Permit Number:** T095-16479-00048  
**Reviewer:** ERG/ST  
**Date:** August 18, 2006

PROCESS  WELDING	Number of Stations	Max. electrode consumption per station (lbs/hr)	EMISSION FACTORS (lb pollutant/lb electrode)				Potential to Emit (tons/year)			
			PM=PM10	Mn	Ni	Cr	PM / PM10	Mn	Ni	Cr
Metal Inert Gas (MIG)(carbon steel) (S4)	9	0.94	0.0241	0.000034	NA	0.00001	0.893	0.00126	0	0.00037
Metal Inert Gas (MIG)(carbon steel) (S5)	6	0.8	0.0241	0.000034	NA	0.00001	0.507	0.00071	0	0.00021
Metal Inert Gas (MIG)(carbon steel) (S7)	9	0.74	0.0241	0.000034	NA	0.00001	0.703	0.00099	0	0.00029
Metal Inert Gas (MIG)(carbon steel) (S6 and 8)	5	0.75	0.0241	0.000034	NA	0.00001	0.396	0.00056	0	0.00016
Metal Inert Gas (MIG)(carbon steel) (S17)	1	0.74	0.0241	0.000034	NA	0.00001	0.078	0.00011	0	0.00003
Metal Inert Gas (MIG)(carbon steel) (S28)	15	0.74	0.0241	0.000034	NA	0.00001	1.172	0.00165	0	0.00049
Metal Inert Gas (MIG)(carbon steel) (S29)	14	0.74	0.0241	0.000034	NA	0.00001	1.094	0.00154	0	0.00045
Metal Inert Gas (MIG)(carbon steel) (S33)	19	0.74	0.0241	0.000034	NA	0.00001	1.484	0.00209	0	0.00062
Metal Inert Gas (MIG)(carbon steel) (S37)	22	0.75	0.0241	0.000034	NA	0.00001	1.742	0.00246	0	0.00072
Metal Inert Gas (MIG)(carbon steel) (S38)	17	0.74	0.0241	0.000034	NA	0.00001	1.328	0.00187	0	0.00055
Metal Inert Gas (MIG)(carbon steel) (S43)	1	0.74	0.0241	0.000034	NA	0.00001	0.078	0.00011	0	0.00003
Metal Inert Gas (MIG)(carbon steel) (S99)	7	0.74	0.0241	0.000034	NA	0.00001	0.547	0.00077	0	0.00023
Metal Inert Gas (MIG)(carbon steel) (S100)	21	0.75	0.0241	0.000034	NA	0.00001	1.663	0.00235	0	0.00069
Tungsten Inert Gas (TIG)(carbon steel) (S29)	2	0.03	0.0055	0.0005	NA		0.001	0.00013	0	0.00000
Tungsten Inert Gas (TIG)(carbon steel) (S33)	3	0.03	0.0055	0.0005	NA		0.002	0.00020	0	0.00000
Tungsten Inert Gas (TIG)(carbon steel) (S38)	2	0.03	0.0055	0.0005	NA		0.001	0.00013	0	0.00000
<b>Totals</b>							<b>11.7</b>	<b>0.0169</b>	<b>0.00</b>	<b>0.0048</b>

TIG welding emission factors are from an internal training session document.

MIG welding emission factors are from AP 42, Chapter 12-19, Tables 12-19.1 and 12-19.2 (SCC 3-09-052-26) January 1995.

**Methodology**

PTE (tons/year) = Number of Stations x Electrode Consumption (lbs/hour) x Emission Factor (lbs /lb electrode) x 8760 (hours/year) x 1 ton/2,000 lbs