



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

May 24, 2004

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Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

TO: Interested Parties / Applicant

RE: General Motors Corporation - Truck Group / 003-17476-00036

FROM: Paul Dubenetzky
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 13-17-3-4 and 326 IAC 2, this approval 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 13-15-7-3 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 Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice.** 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.

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.

Enclosures
FNPER-MOD.dot 9/16/03

May 24, 2004

George Kioultzopoulos
General Motors Corporation - Truck Group
12200 Lafayette Center Road
Roanoke, IN 46783-9628

Re: 003-17476-00036
Significant Permit Modification to
Part 70 Permit 003-5959-00036

Dear Mr. Kioultzopoulos:

General Motors Corporation - Truck Group was issued a Part 70 operation permit on June 24, 2002 for a motor vehicle assembly plant located at 12200 Lafayette Center Road, Roanoke, IN 46783-9628. An application to modify the permit was received on June 30, 2003. Pursuant to the provisions of 326 IAC 2-7-12, a Significant Permit Modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification was made to change permit language regarding the New Source Performance Standards, to resolve some or all of the issues brought forth in a previous legal appeal, and to correct known typographical and clerical errors.

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

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Allen R. Davidson at (800) 451-6027, press 0 and ask for extension 3-5693, or dial (317) 233-5693.

Sincerely,

Original Signed by Paul Dubenetzky

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
ARD

cc: File - Allen County
U.S. EPA, Region V
Allen County Health Department
Air Compliance Section Inspector - Jennifer Dorn
Compliance Data Section - Karen Nowak
Administrative and Development
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**General Motors Corporation
12200 Lafayette Center Road
Roanoke, IN 46783**

(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.: T003-5959-00036	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: June 24, 2002 Expiration Date: June 24, 2007
First Significant Permit Modification 003-17476-00036	(Pages were renumbered as 1 through 53) Pages Amended: 1 - 41
Issued by: Original Signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: May 24, 2004

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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)]

The Permittee owns and operates a stationary automobile and light duty truck assembly plant.

Responsible Official:	Catherine Clegg
Source Address:	12200 Lafayette Center Road, Roanoke, IN 46783
Mailing Address:	12200 Lafayette Center Road, Roanoke, IN 46783
General Source Phone No.	(219) 673-2480
SIC Code:	3711
County Location:	Allen
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major, under PSD Rules; Major Source, Section 112 of the Clean Air Act

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

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

- (a) Facility-wide natural gas usage, including combustion units described as follows:
- (1) One (1) natural gas/No. 2 or No. 6 fuel oil/landfill gas fired boiler, identified as 003, constructed in 1968 and relocated to the source in August 1985, with a maximum capacity of 240 MMBtu/hr, using low excess air as control, and exhausting to stack 01,
 - (2) One (1) natural gas/No.2 fuel oil fired boiler, identified as 004, constructed in April 1992, with a maximum capacity of 228 MMBtu/hr for natural gas, and 220 MMBtu/hr for No. 2 fuel oil, using low NO_x burners and flue gas recirculation as control, and exhausting to stack 01,
 - (3) One (1) natural gas/No. 2 fuel oil fired boiler, identified as 005, constructed in March, 1993, with a maximum capacity of 228 MMBtu/hr for natural gas, and 220 MMBtu/hr for No. 2 fuel oil, using low NO_x burners and flue gas recirculation as control, and exhausting to stack 01,
 - (4) Space heaters and process heaters using natural gas, identified as 007, with capacities from 10 to 100 MMBtu/hr, using no control, and exhausting to various stacks denoted as stack 13, and twenty (20) natural gas fired burners identified as MOD 1 through MOD 10 air supply house burners (each mod air supply house contains two burners) with emissions exhausted through their respective booth stacks denoted as SO4, each burner is rated at 12.6 MMBtu per hour.
- (b) One (1) ELPO dipping system, identified as 006, constructed in August 1985, using natural gas thermal incinerators identified as #1 through #3 on the drying ovens as VOC control, and exhausting to stack 02,

- (c) One (1) topcoat system, identified as 008, constructed in August 1985, using ten (10) natural gas fired catalytic oxidizers identified as #1 - #10 on the drying ovens as VOC control, with maximum capacity of the oxidizers #1 - #7 being 7.5 MMBtu/hr each, and the maximum capacity of oxidizers #8 - #10 being 9.5 MMBtu/hr each, and using water wash as PM control, and exhausting to stack 04,
- (d) Miscellaneous sealers/adhesives/additives/solvents, identified as 009, constructed in August 1985, using no controls, and exhausting to stacks 07 and 08,
- (e) One (1) primer surfacer system, identified as 010, constructed in March 1994, using a natural gas fired regenerative thermal oxidizer with a maximum capacity of 16 MMBtu/hr as VOC control, and water wash as PM control, and exhausting to stack 03,
- (f) One (1) final repair operation, identified as 012, constructed in August 1985, using no control, and exhausting to stack 06 and spot repair stalls,
- (g) One (1) maintenance paint operation, identified as 013, constructed in August 1985, using no control, and exhausting to stack 10,
- (h) One (1) gasoline fill operation, identified as 014, constructed in August 1985, using a natural gas afterburner with a maximum capacity of 0.15 MMBtu/hr as VOC control, and exhausting to stack 12.

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

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

- (a) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
- (b) Storage tanks, identified as 1 (solvent/thinner), 2, (solvent/thinner), 7(automatic transmission fluid), 12 (fuel oil), 13 (fuel oil), 14 (fuel oil), 15 (fuel oil), and two (2) 18,900 gallon waste purge solvent tanks, all constructed after July 23, 1984.

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

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

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

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, 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]

This permit is issued for a fixed term of five (5) years from the original date, 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.

B.3 Enforceability [326 IAC 2-7-7]

Unless 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, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

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

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

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

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

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

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

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

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. 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, 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.
- (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. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

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

and

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
- (1) The 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, 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]**

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain 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.

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

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

The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept 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 makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

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

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (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, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted 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, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

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

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in 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.

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

- (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 in 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 minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(7)]

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

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
- (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted
- by this permit.
- (b) All previous registrations and permits are superseded by this permit.

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

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

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

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 independently 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.
- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination

- [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]
- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] 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, determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

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

B.16 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). 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, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
 - (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]

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

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

B.17 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (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, P.O. Box 6015
Indianapolis, Indiana 46206-6015

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

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.19 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

- (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 emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

- (4) The Permittee notifies the:

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

and

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

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

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

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

- (b) 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 increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

B.20 Source Modification Requirement [326 IAC 2-7-10.5]

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

B.21 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]

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, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy any records that must be kept under the conditions of this permit;
- (c) 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 and IC 13-14-2-2, 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 and IC 13-14-2-2, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

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

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

The application which shall be submitted by the Permittee does 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.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, 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 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

- C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [40 CFR 50 Subpart P] [326 IAC 6-3-2]
- (a) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (b) 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. This condition is not federally enforceable.
- 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. 326 IAC 9-1-2 is not federally enforceable.
- C.5 Fugitive Dust Emissions [326 IAC 6-4]
- The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.
- C.6 Operation of Equipment [326 IAC 2-7-6(6)]
- Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 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 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.

C.8 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, P.O. Box 6015
Indianapolis, Indiana 46206-6015

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 14-10-4, 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) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

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

C.9 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing 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, P. O. Box 6015
Indianapolis, Indiana 46206-6015

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 not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source 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.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. 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.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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, P. O. Box 6015
Indianapolis, Indiana 46206-6015

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

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

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

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

C.13 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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.14 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

- (a) Whenever a condition in this permit requires the measurement of a temperature or flow rate, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.

- (b) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

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

C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

- (b) These ERPs shall be submitted for approval to:

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

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

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

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

C.16 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

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

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP).

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

C.17 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP's shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
- (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.

- (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

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

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
 - (1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

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

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

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

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

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time. Such records may be maintained in computerized form.
- (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.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The source 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, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, 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) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

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

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

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

SECTION D.1

FACILITY OPERATION CONDITIONS

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

Facility-wide natural gas usage, including combustion units described as follows:

- (a) One (1) natural gas/No. 2 or No. 6 fuel oil/landfill gas fired boiler, identified as 003, constructed in 1968 and relocated to the source in August 1985, with a maximum capacity of 240 MMBtu/hr, using low excess air as control, and exhausting to stack 01,
- (b) One (1) natural gas/No.2 fuel oil fired boiler, identified as 004, with a maximum capacity of 228 MMBtu/hr for natural gas, and 220 MMBtu/hr for No. 2 fuel oil, using low NO_x burners and flue gas recirculation as control, and exhausting to stack 01, (constructed in April, 1992)
- (c) One (1) natural gas/No. 2 fuel oil fired boiler, identified as 005, with a maximum capacity of 228 MMBtu/hr for natural gas, and 220 MMBtu/hr for No. 2 fuel oil, using low NO_x burners and flue gas recirculation as control, and exhausting to stack 01, (constructed in March, 1993)
- (d) Space heaters and process heaters using natural gas, identified as 007, with capacities from 10 to 100 MMBtu/hr, using no control, and exhausting to various stacks denoted as stack 13, and twenty (20) natural gas fired burners identified as MOD 1 through MOD 10 air supply house burners (each mod air supply house contains two burners) with emissions exhausted through their respective booth stacks denoted as SO4, each burner is rated at 12.6 MMBtu per hour.

(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 New Source Performance Standards (NSPS) for Fossil-Fuel-Fired Steam Generators [40 CFR 60, Subpart Db]

Boilers 004 and 005 are subject to the requirements of NSPS, 326 IAC 12, (40 CFR 60.44, Subpart Db) as follows:

- (a) Pursuant to 40 CFR 60.44b(a), nitrogen oxide emissions from Boilers 004 and 005 shall not exceed 0.20 pounds per million BTU when combusting natural gas or #2 fuel oil. However, the above requirement is superseded by more stringent requirements elsewhere in this permit.
- (b) Pursuant to 40 CFR 60.43b(f), opacity from Boilers 004 and 005 shall not exceed 20% per 6-minute average except for one 6-minute period per hour of not more than 27% opacity. The opacity standards apply at all times, except during periods of startup, shutdown, or malfunction.
- (c) Pursuant to 40 CFR 60.42b(j), sulfur dioxide emissions from Boilers 004 and 005 shall not exceed 0.5 pounds per million BTU heat input when combusting #2 fuel oil. This requirement exempts the boilers from the requirements of 40 CFR 60.42b(a).

D.1.2 Prevention of Significant Deterioration (PSD) Best Available Control Technology (BACT) Limits [326 IAC 2-2] [40 CFR 52.21]

Pursuant to 326 IAC 2-2-3 PSD BACT:

- (a) for Boiler 003:
 - (1) PM emissions from Boiler 003 shall not exceed 0.015 lb/MMBtu when combusting natural gas, and shall not exceed 0.056 lb/MMBtu when combusting fuel oil. Compliance with these limits shall satisfy the requirements of 326 IAC 6-2-4.
 - (2) PM emissions shall not exceed 16 tons per year from the combustion of natural gas, and shall not exceed 59 tons per year from the combustion of fuel oil.
 - (3) NO_x emissions shall not exceed 0.2 lb/MMBtu when combusting natural gas, and shall not exceed 0.3 lb/MMBtu when combusting fuel oil. These limits are considered PSD BACT for this emission unit.

- (b) for Boiler 004:
 - (1) No. 2 fuel consumption shall not exceed 1.1 million gallons and this, with a fuel sulfur content of 0.49% shall in effect limit SO₂ emissions to less than 40 tons per 12 consecutive month period. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) do not apply.
 - (2) NO_x emissions shall not exceed 0.098 lb/MMBtu input from the combustion of natural gas and shall not exceed 0.13 lb/MMBtu input from the combustion of No. 2 fuel oil. Fuel gas recirculation and low NO_x burners are considered PSD BACT for this emission unit.

- (c) for Boiler 005:
 - (1) No. 2 fuel consumption shall not exceed 3.2 million gallons, and with an average heat content of 140,000 Btu/gallons, based on a 12 month rolling average, this fuel input limit shall, in effect, limit NO_x emissions to less than 40 tons per consecutive 12 month period. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) do not apply.
 - (2) NO_x emissions shall not exceed 0.098 lb/MMBtu from the combustion of natural gas and shall not exceed 0.13 lb/MMBtu from the combustion of No. 2 fuel oil.

D.1.3 SO₂ Emission Limits [326 IAC 7-1.1-2]

Pursuant to 326 IAC 7-1.1-2, SO₂ emissions:

- (a) from Boiler 003 shall not exceed 1.6 lb/MMBtu when combusting No. 6 fuel oil, and shall not exceed 0.5 lb/MMBtu when combusting No. 2 fuel oil.
- (b) from Boiler 004 shall not exceed 0.5 lb/MMBtu when combusting No. 2 fuel oil,
- (c) from Boiler 005 shall not exceed 0.5 lb/MMBtu when combusting No. 2 fuel oil.

D.1.4 Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), particulate matter (PM) emissions from the 240, 228, and 228 million BTU/hour boilers, 003, 004, and 005, shall be limited as follows:

- (a) Boiler 003 shall be limited to 0.26 pound per million BTU heat input.

- (b) Boiler 004 shall be limited to 0.22 pound per million BTU heat input.
- (c) Boiler 005 shall be limited to 0.20 pound per million BTU heat input.

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

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these boilers.

Compliance Determination Requirements

D.1.6 Sulfur Content Compliance [326 IAC 7-2-1]

Pursuant to 326 IAC 7-2-1, the Permittee shall demonstrate that the fuel oil sulfur content does not exceed 0.5 pounds per million Btu by:

- (a) Fuel sampling and analysis data shall be collected pursuant to procedures specified in 326 IAC 3-7-4 for oil combustion, and this data may be used to determine compliance or noncompliance with the emission limitations contained in 326 IAC 7-1-1. Computation of calculated sulfur dioxide emission rates from fuel sampling and analysis data shall be based on AP-42 emission factors. Fuel sampling and analysis data shall be collected as follows:
 - (1) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
 - (2) If a partially empty tank is refilled, a new sample and analysis would be required upon filling, or
- (b) Compliance or noncompliance with the emission limitation specified in 326 IAC 7-1.1 may be determined by conducting a stack test for sulfur dioxide emissions from the boilers, using 40 CFR 60, Appendix A, Method 6, 6A, 6C, or 8, in accordance with the procedures in 326 IAC 3-6, or
- (c) Upon written notification of a facility owner or operator to the department, continuous emission monitoring data collected and reported pursuant to 326 IAC 3-5 may be used as the means for determining compliance.
- (d) A determination of noncompliance by any of the methods specified in (a), (b), or (c) above shall not be refuted by evidence of compliance pursuant to the other methods.

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

D.1.7 Continuous Emission Monitoring

- (a) Pursuant to 326 IAC 2-2, 326 IAC 3-5, and 326 IAC 12, the Permittee shall continuously monitor and record the following parameters to demonstrate compliance with the Conditions D.1.1, D.1.2, and D.1.3:
 - (1) nitrogen oxide concentration for Boilers 004 and 005,
 - (2) sulfur dioxide concentration for Boilers 004 and 005, and
 - (3) opacity for Boilers 004 and 005.

All monitors shall be installed such that emissions from Boiler 003 do not interfere with the readings for Boilers 004 and 005.

- (b) The continuous monitoring systems have been installed and operational prior to conducting the performance tests. A monitoring protocol has been performed in accordance with the applicable procedures under 40 CFR 60, Appendix B, Performance Specification 1 and 326 IAC 3-5.
- (c) The Permittee shall record the output of the system and shall perform the required record keeping, pursuant to 326 IAC 3-5-6, and reporting, pursuant to 326 IAC 3-5-7.
- (d) In instances of CEM downtime, compliance with the NO_x and SO₂ emission limits established in Conditions D.1.1, D.1.2 and D.1.3 shall be determined by the use of the appropriate AP42 emission factors. Compliance with the particulate emission limits contained in Conditions D.1.2 and D.1.4 shall be determined using the appropriate emission factors, or by burning clean fuels such as natural gas, landfill gas or distillate fuel oil.

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

D.1.8 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1, D.1.2, and D.1.3, 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 NO_x, SO₂, and opacity emission limits established in Conditions D.1.1, D.1.2, and D.1.3.
 - (1) Calendar dates covered in the compliance determination period;
 - (2) The Permittee shall record the output of the continuous monitoring systems on Boilers 004 and 005 and shall perform the required record keeping, pursuant to 326 IAC 3-5-6.
 - (3) The Permittee shall calculate emissions from Boiler 003 based on appropriate emission factors contained in U.S. EPA publication AP-42, "Compilation of Air Pollutant Emission Factors."
- (b) The Permittee shall keep records of heat input for each of the boilers.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.9 Reporting Requirements

- (a) 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).
- (b) The Permittee shall certify, on the form provided, that natural gas was fired in the boiler at all times during each quarter. Alternatively, the Permittee shall report the number of days during which an alternate fuel was burned during each quarter.
- (c) The Permittee shall submit CEM reporting requirements pursuant to 326 IAC 3-5-5(e).

SECTION D.2

FACILITY OPERATION CONDITIONS

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

One (1) ELPO prime coating system, identified as 006, using natural gas thermal incinerators identified as #1 through #3 on the drying ovens as VOC control, and exhausting to stack 02,

Miscellaneous sealers/adhesives/additives/solvents, identified as 009, using no controls, and exhausting to stacks 07 and 08,

One (1) final repair operation, identified as 012, using no control, and exhausting to stack 06 and spot repair stalls,

One (1) maintenance paint operation, identified as 013, using no control, and exhausting to stack 10,

One (1) gasoline fill operation, identified as 014, using a natural gas afterburner with a maximum capacity of 0.15 MMBtu/hr as VOC control, and exhausting to stack 12.

(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 NSPS Performance Standards for Automobile and Light Duty Truck Manufacturers [40 CFR 60.392, Subpart MM]

Pursuant to 40 CFR 60.392, Subpart MM (Performance Standards for Automobile and Light Duty Truck Manufacturers), the VOC emissions from the ELPO prime coating system, 006, shall not exceed 0.17 kg/l of applied coating solids.

D.2.2 PSD BACT Limits [326 IAC 2-2] [40 CFR 52.21]

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration), total VOC usage shall be limited such that the source's VOC potential to emit does not exceed 3,204 tons per twelve consecutive month period.

D.2.3 Automobile and Light Duty Truck Coating Operations [326 IAC 8-2-2]

Pursuant to 326 IAC 8-2-2 (Automobile and Light Duty Truck Coating Operations), the volatile organic compound (VOC) content of coatings applied to automobile and light duty truck bodies, hoods, door, cargo boxes, fenders, and grill openings shall be limited as follows:

- (a) the prime coating ELPO system, 006, is limited to 1.9 lb VOC/gallon (0.23 kg/l) less water.
- (b) the final repair system, 012, is limited to 4.8 lb/gallon (0.58 kg/l) of VOC less water.

D.2.4 Miscellaneous Metal Coating Operations [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator:

- (a) for the miscellaneous sealers and adhesives portion of source 009 shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air or air dried coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.2.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities, 006, and their control devices.

Compliance Determination Requirements

D.2.6 Volatile Organic Compounds Emissions

- (a) Compliance with Condition D.2.1 shall be determined within 30 days of the end of each month based on 40 CFR 60, Subpart MM, §60.393(c).
- (b) Compliance with Condition D.2.2 shall be determined within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

D.2.7 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11] [326 IAC 2-2] [40 CFR 52.21]

The following facilities are required to stack test, when the incinerator abatement credit is used to show compliance with Condition D.2.1 and D.2.2, as follows:

- (a) for one (1) of the thermal incinerators, #1 - #3, controlling the ELPO emissions, a stack test for capture and destruction efficiency shall be performed every two and one-half (2 ½) years, testing on an incinerator shall not be repeated until each one has been tested.

D.2.8 VOC Controls

The thermal incinerators #1 - #3 for the ELPO prime system shall be in operation at all times the processes that they are controlling are in operation, if the abatement credit is used to show compliance with Conditions D.2.1 and D.2.2.

D.2.9 VOC Control Requirements for the Thermal Incinerators #1 - #3 [326 IAC 2-2] [40 CFR 52.21][40 CFR 60, Subpart MM]

The following requirements are only necessary if the VOC reduction credit for the incinerators is used to show compliance with the emission limits:

- (a) The temperature measurement device shall be installed in the firebox.
- (b) A continuous monitoring system on the VOC control devices for measuring operating temperature shall be calibrated, maintained, and operated according to accepted practice and manufacturer's specifications. The device shall have an accuracy of ± 0.75 percent of the temperature being measured expressed in degrees Celsius or ± 0.25 ° C.
- (c) The output of this system shall be recorded at least once every 15 minutes during production operation.

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

D.2.10 Record Keeping Requirements

- (a) To document compliance with Conditions D.2.1, D.2.2, D.2.3, D.2.4, and D.2.9, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.2.1, D.2.2, D.2.3, and D.2.4.
 - (1) The monthly volume weighted average mass of VOC emitted per volume of applied coating solids for the prime coat as specified in 40 CFR 60, Subpart MM, Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations.

- (2) The monthly VOC usage and VOC content of each of the following materials. Records may include purchase orders, invoices, and material safety data sheets (MSDS) as necessary to verify the type and amount used.
 - (A) ELPO coating additions
 - (B) Miscellaneous sealers, adhesives and solvents
 - (C) Final repair coatings and reducing solvents
 - (D) Maintenance coatings
 - (3) The weight of VOCs emitted for each month;
 - (4) The temperature records for the ELPO thermal incinerator if abatement credits are used to determine compliance, the temperature used to demonstrate compliance during the most recent compliance stack test, and every three hour period during which the average thermal incinerator temperature was more than 28 °C lower (more than 50.4 °F lower) than the temperature used to demonstrate compliance during the most recent compliance stack test.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.11 Reporting Requirements

- (a) A quarterly summary of the information to document compliance with Conditions D.2.2 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).
- (b) Pursuant to 40 CFR 60.395(c), the Permittee shall submit a calendar quarterly report of any instances where compliance with 40 CFR 60.392 was to be achieved through the use of thermal incineration and there were periods of excess emissions. For the purpose of reports under 40 CFR 60.7, periods of excess emissions shall be determined as all 3-hour periods during which the average temperature measured is more than 28 °C lower (more than 50.4 °F lower) than the average temperature during the most recent test at which the destruction efficiency was determined. If no such periods occur, the Permittee shall submit a negative report.

SECTION D.3 FACILITY OPERATION CONDITIONS

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

One (1) topcoat electrostatic/air atomized system, identified as 008, using ten (10) natural gas fired catalytic oxidizers identified as #1 - #10 on the drying ovens as VOC control, with maximum capacity of the oxidizers #1 - #7 being 7.5 MMBtu/hr each, and the maximum capacity of oxidizers #8 - #10 being 9.5 MMBtu/hr each, and using water wash as PM control, and exhausting to stack 04.

(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 NSPS Performance Standards for Automobile and Light Duty Truck Manufacturers [40 CFR 60.392, Subpart MM]

Pursuant to 40 CFR 60.392, Subpart MM (Performance Standards for Automobile and Light Duty Truck Manufacturers), the VOC emissions from the topcoat system, 008, shall not exceed 1.47 kg/l of applied coating solids.

D.3.2 PSD BACT Limits [326 IAC 2-2] [40 CFR 52.21]

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration), total VOC usage shall be limited such that the source's VOC potential to emit does not exceed 3,204 tons per twelve consecutive month period.

D.3.3 Automobile and Light Duty Truck Coating Operations [326 IAC 8-2-2]

Pursuant to 326 IAC 8-2-2 (Automobile and Light Duty Truck Coating Operations), the volatile organic compound (VOC) content of coatings applied to automobile and light duty truck bodies, hoods, door, cargo boxes, fenders, and grill openings shall be limited as follows:

- (a) the topcoat system, 008, are limited to 15.1 lb VOC/gallon of applied coating solids, as determined by the EPA "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations" (EPA-450/3-88-018 December 1988) and any subsequent revisions or 2.8 pounds of VOC/gallon (0.34 kg/l) of coating less water delivered to the applicator.

D.3.4 Particulate Matter (PM) [326 IAC 6-3-2(d)] [40 CFR 52]

(a) Pursuant to 40 CFR 52 Subpart P, the particulate matter (PM) emissions from overspray shall be limited by the following:

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

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

- (2) Interpolation and extrapolation of the data for process weight rates greater than sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

- (b) Pursuant to 326 IAC 6-3-2(d), overspray shall be controlled by a dry particulate filter, water wash, or an equivalent control device. The Permittee shall operate the control device in accordance with manufacturer's specifications. The requirement to operate the control device is not federally enforceable.

D.3.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities, 008, and their control devices.

Compliance Determination Requirements

D.3.6 Volatile Organic Compounds Emissions [326 IAC 2-2] [40 CFR 52.21] [40 CFR 60, Subpart MM]

- (a) Compliance with Condition D.3.1 shall be determined within 30 days of the end of each month based on 40 CFR 60, Subpart MM, §60.393(c).
- (b) Compliance with Condition D.3.2 shall be determined within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

D.3.7 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11] [326 IAC 2-2] [40 CFR 52.21]

The following facilities are required to stack test, when the oxidizer abatement credit is used to show compliance with Condition D.3.1 and D.3.2, as follows:

- (a) for two (2) of the 7.5 MMBtu/hr catalytic oxidizers and one (1) of the 9.5 MMBtu/hr catalytic oxidizers, a test for destruction efficiency shall be performed every two and one-half (2.5) years. Testing on a catalytic oxidizer shall not be repeated until each one has been tested.

D.3.8 PM and VOC Controls [326 IAC 2-2] [40 CFR 52.21]

- (a) The water wash shall be in operation at all times the topcoat surface coating is in operation, in order to comply with 326 IAC 6-3-2(d). The requirement to operate the control device is not federally enforceable.
- (b) The catalytic oxidizers #1 - #10 for the topcoat system shall be in operation at all times the processes that they are controlling are in operation, if the abatement credit is used to show compliance with Conditions D.3.2 and D.3.3.

D.3.9 VOC Control Requirements [326 IAC 2-2] [40 CFR 52.21] [40 CFR 60, Subpart MM]

The following VOC control requirements are only necessary if the VOC reduction credit from the incinerators is used to show compliance with the emission limits:

- (a) A temperature measurement device shall be installed in the gas stream immediately before and after the catalyst bed.
- (b) A continuous monitoring system on the VOC control devices for measuring operating temperature shall be calibrated, maintained, and operated according to accepted practice and manufacturer's specifications. The device shall have an accuracy of ± 0.75 percent of the temperature being measured expressed in degrees Celsius or ± 0.25 ° C.
- (c) The output of this system shall be recorded at least every 15 minutes during production operation.

D.3.10 Monitoring [326 IAC 2-2] [40 CFR 52.21]

PM Control:

- (a) Monitor condition of the water wash system through the use of alarms on the water pumps that feed the system. Records of date of alarms and any corrective actions shall be maintained.
- (b) The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

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

D.3.11 Record Keeping Requirements

- (a) To document compliance with Conditions D.3.1, D.3.2, and D.3.3, and D.3.9, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.3.1, D.3.2, and D.3.3.
 - (1) The monthly volume weighted average mass of VOC emitted per volume of applied coating solids for the prime coat as specified in 40 CFR 60, Subpart MM, Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations.
 - (2) The monthly VOC usage and VOC content of the material used in the topcoat system. Records may include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (3) The weight of VOCs emitted for each month;
 - (4) The temperature records for the oxidizers if abatement credits are used to determine compliance, and the temperature used to demonstrate compliance during the most recent compliant stack test.
- (b) To document compliance with Condition D.3.4, the Permittee shall maintain records as required under Condition D.3.10.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.12 Reporting Requirements

- (a) A quarterly summary of the information to document compliance with Conditions D.3.2 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).
- (b) Pursuant to 40 CFR 60.395(c), the Permittee shall submit a calendar quarterly report of any instances where compliance with 40 CFR 60.392 was to be achieved through the use of catalytic incineration and there were periods of excess emissions. For the purpose of reports under 40 CFR 60.7, periods of excess emissions shall be determined as follows:

- (1) all 3-hour periods during which the average temperature measured immediately before the catalyst bed, when the coating system is operational, is more than 28 °C lower (more than 50.4 °F lower) than the average temperature immediately before the catalyst bed during the most recent test at which the destruction efficiency was determined.
- (2) all 3-hour periods during which the average temperature difference across the catalyst bed, when the coating system is operational, is less than 80% of the average temperature difference during the most recent test at which destruction efficiency was determined.

If no such periods occur, the Permittee shall submit a negative report.

SECTION D.4 FACILITY OPERATION CONDITIONS

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

One (1) primer surfacer system, identified as 010, using a natural gas fired regenerative thermal oxidizer with a maximum capacity of 16 MMBtu/hr as VOC control, and water wash as PM control, and exhausting to stack 03.

(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.4.1 NSPS Performance Standards for Automobile and Light Duty Truck Manufacturers [40 CFR 60.392, Subpart MM]

Pursuant to 40 CFR 60.392, Subpart MM (Performance Standards for Automobile and Light Duty Truck Manufacturers), the VOC emissions from the primer surfacer, 010, shall not exceed 1.40 kg/l (11.68 lb/gal) of solids applied from each guide coat operation.

D.4.2 PSD BACT Limits [326 IAC 2-2] [40 CFR 52.21]

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration), total VOC usage shall be limited such that the source's VOC potential to emit does not exceed 3,204 tons per twelve consecutive month period.

D.4.3 Particulate Matter (PM) [326 IAC 6-3-2(d)] [40 CFR 52]

(a) Pursuant to 40 CFR 52 Subpart P, the particulate matter (PM) emissions from overspray shall be limited by the following:

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

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

- (2) Interpolation and extrapolation of the data for process weight rates greater than sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

- (b) Pursuant to 326 IAC 6-3-2(d), overspray shall be controlled by a dry particulate filter, water wash, or an equivalent control device. The Permittee shall operate the control device in accordance with manufacturer's specifications. The requirement to operate the control device is not federally enforceable.

D.4.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities, 010, and their control devices.

Compliance Determination Requirements

D.4.5 Volatile Organic Compounds Emissions [326 IAC 2-2] [40 CFR 52.21] [40 CFR 60, Subpart MM]

- (a) Compliance with Condition D.4.1 shall be determined within 30 days of the end of each month based on 40 CFR 60, Subpart MM, §60.393 Performance test and compliance provisions (c)(2) for the primer surfacer, 010, which uses a capture system and a control device that destroys VOC to comply with the emission limit specified.
- (b) Compliance with Condition D.4.2 shall be determined within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

D.4.6 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11] [40 CFR 60, Subpart MM]

The following facilities are required to stack test to show compliance with Condition D.4.1 and D.4.2 as follows:

- (a) for the regenerative thermal oxidizer controlling the primer surfacer emissions, a stack test for capture and destruction efficiency shall be performed every two and one-half (2.5) years.
 - (1) In subsequent months, the Permittee shall use the most recently determined capture fraction for the performance test;
 - (2) In subsequent months, the Permittee shall use the most recently determined VOC destruction efficiency for the performance test.

D.4.7 PM and VOC Controls [326 IAC 2-2] [40 CFR 52.21] [40 CFR 60, Subpart MM]

- (a) The water wash shall be in operation at all times the primer surface coating is in operation, in order to comply with 326 IAC 6-3-2(d). The requirement to operate the control device is not federally enforceable.
- (b) The primer surfacer regenerative thermal oxidizer shall be in operation at all times the processes that it controls are in operation, in order to comply with Conditions D.4.1 and D.4.2.

D.4.8 VOC Control Requirements for the Primer Surfacer Regenerative Thermal Oxidizer [326 IAC 2-2] [40 CFR 52.21] [40 CFR 60, Subpart MM]

- (a) The temperature measurement device shall be installed in the firebox.
- (b) A continuous monitoring system on the VOC control devices for measuring operating temperature shall be calibrated, maintained, and operated according to accepted practice and manufacturer's specifications. The device shall have an accuracy of ± 0.75 percent of the temperature being measured expressed in degrees Celsius or ± 0.25 ° C.
- (c) The output of this system shall be recorded at least once every 15 minutes during production operation.

D.4.9 Monitoring [326 IAC 2-2] [40 CFR 52.21] [40 CFR 60, Subpart MM]

- (a) PM Control:
 - (1) Monitor condition of the water wash system through the use of alarms on the water pumps that feed the system. Records of dates of alarms and any corrective actions shall be maintained.

- (2) The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

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

D.4.10 Record Keeping Requirements

- (a) To document compliance with Conditions D.4.1, D.4.2, D.4.3, and D.4.8, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.4.1, D.4.2, D.4.3.
 - (1) The monthly volume weighted average mass of VOC emitted per volume of applied coating solids as specified in 40 CFR 60, Subpart MM.
 - (2) The monthly VOC usage and VOC content of each of the materials used in the primer surfacer system. Records may include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (3) The weight of VOCs emitted for each month;
 - (4) The temperature records for the primer surfacer thermal incinerator if abatement credits are used to determine compliance, the temperature used to demonstrate compliance during the most recent compliance stack test, and every three hour period during which the average thermal incinerator temperature was more than 28 °C lower (more than 50.4 °F lower) than the temperature used to demonstrate compliance during the most recent compliance stack test.
- (b) To document compliance with Condition D.4.3, the Permittee shall maintain records as required under Condition D.4.9.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.4.11 Reporting Requirements

- (a) A quarterly summary of the information to document compliance with Condition D.4.2 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).
- (b) Pursuant to 40 CFR 60.395(c), the Permittee shall submit a calendar quarterly report of any instances where compliance with 40 CFR 60.392 was to be achieved through the use of thermal incineration and there were periods of excess emissions. For the purpose of reports under 40 CFR 60.7, periods of excess emissions shall be determined as all 3-hour periods during which the average temperature measured is more than 28 °C lower (more than 50.4 °F lower) than the average temperature during the most recent test at which the destruction efficiency was determined. If no such periods occur, the Permittee shall submit a negative report.

SECTION D.5

FACILITY OPERATION CONDITIONS

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

Insignificant Activities

Storage tanks, identified as 1(solvent/thinner), 2 (solvent/thinner), 7(automatic transmission fluid), 12 (fuel oil), 13 (fuel oil), 14 (fuel oil), 15 (fuel oil), and two (2) 18,900 gallon waste purge solvent tanks.

Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

(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.5.1 New Source Performance Standards for Volatile Organic Liquid Storage Vessels [40 CFR 60, Subpart Kb]

Pursuant to 40 CFR 60, Subpart Kb, storage tanks 7, 12, 13, 14, 15, and two (2) 18,900 gallon waste purge solvent tanks, constructed after July 23, 1984, shall comply with 40 CFR 60.116b (a), (b), and (c).

D.5.2 Particulate Matter Limitations for Process Operations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the grinding facilities shall not exceed 0.551 pounds per hour when operating at a process weight rate of less than 100 pounds per hour.

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

D.5.3 Record Keeping Requirements

Pursuant to 326 IAC 12 and 40 CFR 60, Subpart Kb, storage tanks 1, 2, 7, 12, 13, 14, 15, and two (2) 18,900 gallon waste purge solvent tanks, constructed after July 23, 1984, shall comply with the following:

- (a) maintain records of the dimensions and capacities of any storage vessel with capacities between 10,567 gallons and 19,813 gallons.
- (b) maintain a record of the VOL stored, the period of storage, and the maximum true vapor pressure of the VOL during the respective storage period for storage vessels with capacities between 19,813 and 39,890 gallons, storing a liquid with a maximum true vapor pressure greater than or equal to 15 kPa.

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

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: General Motors Corporation
Source Address: 12200 Lafayette Center Road, Roanoke, IN 46783
Mailing Address: 12200 Lafayette Center Road, Roanoke, IN 46783
Part 70 Permit No.: T003-5959-00036

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:

Date:

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

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: General Motors Corporation
Source Address: 12200 Lafayette Center Road, Roanoke, IN 46783
Mailing Address: 12200 Lafayette Center Road, Roanoke, IN 46783
Part 70 Permit No.: T003-5959-00036

This form consists of 2 pages

Page 1 of 2

- 9** This is an emergency as defined in 326 IAC 2-7-1(12)
- C** The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
 - C** The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

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 Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , 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

PART 70 OPERATING PERMIT NATURAL GAS FIRED BOILER CERTIFICATION

Source Name: General Motors Corporation
Source Address: 12200 Lafayette Center Road, Roanoke, IN 46783
Mailing Address: 12200 Lafayette Center Road, Roanoke, IN 46783
Part 70 Permit No.: T003-5959-00036

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.		
<u>Report period</u>		
Beginning: _____		
Ending: _____		
<u>Boiler Affected</u>	<u>Alternate Fuel</u>	<u>Days burning alternate fuel</u>
		<u>From</u> <u>To</u>

<i>(can omit identification of boiler affected if only one gas boiler at this plant)</i>		

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.	
Signature: _____	
Printed Name: _____	
Title/Position: _____	
Date: _____	

A certification by the responsible official as defined by 326 IAC 2-7-1(34) is not required for this report.

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

Part 70 Quarterly Report

Source Name: General Motors Corporation
Source Address: 12200 Lafayette Center Road, Roanoke, IN 46783
Mailing Address: 12200 Lafayette Center Road, Roanoke, IN 46783
Part 70 Permit No.: T003-5959-00036
Facility: Boiler 003
Parameter: PM emissions (when burning natural gas)
Limit: 16 tons per 12 consecutive month period

YEAR: _____

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

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

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: General Motors Corporation
Source Address: 12200 Lafayette Center Road, Roanoke, IN 46783
Mailing Address: 12200 Lafayette Center Road, Roanoke, IN 46783
Part 70 Permit No.: T003-5959-00036
Facility: Boiler 003
Parameter: PM emissions (when burning No. 2 and No.6 fuel oils)
Limit: 59 tons per 12 consecutive month period

YEAR: _____

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

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

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: General Motors Corporation
Source Address: 12200 Lafayette Center Road, Roanoke, IN 46783
Mailing Address: 12200 Lafayette Center Road, Roanoke, IN 46783
Part 70 Permit No.: T003-5959-00036
Facility: Boiler 004
Parameter: No. 2 fuel oil usage (Fuel Oil Sulfur Content Limit 0.49%)
Limit: 1.1 million gallons per 12 consecutive month period

YEAR: _____

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

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

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: General Motors Corporation
Source Address: 12200 Lafayette Center Road, Roanoke, IN 46783
Mailing Address: 12200 Lafayette Center Road, Roanoke, IN 46783
Part 70 Permit No.: T003-5959-00036
Facility: Boiler 005
Parameter: No. 2 fuel oil usage (Fuel Oil Sulfur Content Limit 0.49%)
Limit: 3.2 million gallons per 12 consecutive month period

YEAR: _____

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

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

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: General Motors Corporation
Source Address: 12200 Lafayette Center Road, Roanoke, IN 46783
Mailing Address: 12200 Lafayette Center Road, Roanoke, IN 46783
Part 70 Permit No.: T003-5959-00036
Facility: Entire Source
Parameter: VOC
Limit: 3,204 tons per consecutive 12 month period

YEAR: _____

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

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

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

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

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

Source Name: General Motors Corporation
Source Address: 12200 Lafayette Center Road, Roanoke, IN 46783
Mailing Address: 12200 Lafayette Center Road, Roanoke, IN 46783
Part 70 Permit No.: T003-5959-00036

Months: _____ to _____ Year: _____

Page 1 of 2

<p>This report is an affirmation that the source has met all the requirements stated in this permit. 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. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do 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>	
<p><input checked="" type="radio"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.</p>	
<p><input checked="" type="radio"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD</p>	
<p>Permit Requirement (specify permit condition #)</p>	
<p>Date of Deviation:</p>	<p>Duration of Deviation:</p>
<p>Number of Deviations:</p>	
<p>Probable Cause of Deviation:</p>	
<p>Response Steps Taken:</p>	
<p>Permit Requirement (specify permit condition #)</p>	
<p>Date of Deviation:</p>	<p>Duration of Deviation:</p>
<p>Number of Deviations:</p>	
<p>Probable Cause of Deviation:</p>	
<p>Response Steps Taken:</p>	

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

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document (TSD) for a Significant Permit Modification to a Part 70 Operating Permit

Source Background and Description

Source Name:	General Motors Corporation - Truck Group
Source Location:	12200 Lafayette Center Rd, Roanoke IN 46783-9628
County:	Allen
SIC Code:	3711
Operation Permit No.:	003-5959-00036
Operation Permit Issuance Date:	June 24, 2002
Revision No.:	003-17476-00036
Permit Reviewer:	Allen R. Davidson

On September 23, 2003, the Office of Air Quality (OAQ) had a notice published in the *Fort Wayne Journal Gazette* stating that General Motors Corporation - Truck Group made application to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Significant Permit Modification to a Part 70 Permit, requesting changes in permit language regarding the New Source Performance Standards. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

George Kioultzopoulos and Mike Zielke, both of General Motors Corporation, submitted comments on the proposed permit modification. The summary of the comments and OAQ responses are as follows:

Comment 1:

In Condition C.1, the correct citation is 326 IAC 6-3-2 (e) for the manufacturing processes at the facility. The citation included in the draft permit is 326 IAC 6-3-2(c), which incorrectly refers to catalytic cracking towers. There are no catalytic cracking towers at the facility. GM requests that IDEM correct the citation.

Response 1:

Rule changes have made the original version of Condition C.1 obsolete. Condition C.1 has been updated to the most recent version, as follows:

C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) **Pounds per Hour [40 CFR 50 Subpart P] [326 IAC 6-3-2]** ~~pounds per hour~~
~~[326 IAC 6-3-2(c)]~~

(a) Pursuant to **40 CFR 52 Subpart P 326 IAC 6-3-2(e)**, the allowable particulate matter emissions ~~rate~~ from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

(b) 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. This condition is not federally enforceable.

Comment 2:

Condition D.1.3 needs to be revised to reflect the fuels that are used at the facility. Indeed, if finalized this draft permit revision would not address the issue raised in GM's appeal and would actually make the permit term worse.

GM requested that Section D.1.3(a) be revised as follows: "from Boiler 003 shall not exceed 1.6 lb/MM Btu when combusting No. 6 fuel oil, or 0.5 lb/MMBtu when combusting No. 2 fuel oil." Instead of making this change, IDEM has proposed the following change to the provision: "from Boiler 003 shall not exceed 1.6 lb/MMBtu when combusting No. 6 fuel oil."

Thus, rather than correcting the typographical error, the proposed revision would apparently restrict the facility to firing only No. 6 fuel oil. Not only would this change fail to resolve the concern raised in our appeal, IDEM does not have the authority to impose this condition.

Response 2:

Part 70 Permit 003-5959-00036 was originally drafted with Boiler 003 authorized to use natural gas, #2 fuel oil, and #6 fuel oil. Comments addressed during the public comment period resulted in the deletion of #2 fuel oil and the addition of landfill gas in the final permit.

OAQ will amend the permit to include the use of #2 fuel oil once again, as follows:

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

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

- (a) Facility-wide natural gas usage, including combustion units described as follows:
- (1) One (1) natural gas/**No. 2 or No. 6 fuel** oil /landfill gas fired boiler, identified as 003, constructed in 1968 and relocated to the source in August 1985, with a maximum capacity of 240 MMBtu/hr, using low excess air as control, and exhausting to stack 01,
 - (2) One (1) natural gas/No.2 fuel oil fired boiler, identified as 004, constructed in April 1992, with a maximum capacity of 228 MMBtu/hr for natural gas, and 220 MMBtu/hr for No. 2 fuel oil, using low NO_x burners and flue gas recirculation as control, and exhausting to stack 01,
 - (3) One (1) natural gas/No. 2 fuel oil fired boiler, identified as 005, constructed in March, 1993, with a maximum capacity of 228 MMBtu/hr for natural gas, and 220 MMBtu/hr for No. 2 fuel oil, using low NO_x burners and flue gas recirculation as control, and exhausting to stack 01,
 - (4) Space heaters and process heaters using natural gas, identified as 007, with capacities from 10 to 100 MMBtu/hr, using no control, and exhausting to various stacks denoted as stack 13, and twenty (20) natural gas fired burners identified as MOD 1 through MOD 10 air supply house burners (each mod air supply house contains two burners) with emissions exhausted through their respective booth stacks denoted as SO4, each burner is rated at 12.6 MMBtu per hour.

[Items (b) through (h) remain unchanged.]

D.1.3 SO₂ Emission Limits [326 IAC 7-1.1-2]

Pursuant to 326 IAC 7-1.1-2, SO₂ emissions:

- (a) from Boiler 003 shall not exceed 1.6 lb/MMBtu when combusting No. 6 fuel oil, **and shall not exceed 0.5 lb/MMBtu when combusting No. 2 fuel oil.**
- (b) from Boiler 004 shall not exceed 0.5 lb/MMBtu when combusting No. 2 fuel oil,
- (c) from Boiler 005 shall not exceed 0.5 lb/MMBtu when combusting No. 2 fuel oil.

Also, the facility description in Section D.1 will be amended as follows:

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

Facility-wide natural gas usage, including combustion units described as follows:

- (a) One (1) natural gas/**No. 2 or No. 6 fuel** oil/landfill gas fired boiler, identified as 003, constructed in 1968 and relocated to the source in August 1985, with a maximum capacity of 240 MMBtu/hr, using low excess air as control, and exhausting to stack 01,
- (b) One (1) natural gas/No.2 fuel oil fired boiler, identified as 004, with a maximum capacity of 228 MMBtu/hr for natural gas, and 220 MMBtu/hr for No. 2 fuel oil, using low NO_x burners and flue gas recirculation as control, and exhausting to stack 01, (constructed in April, 1992)
- (c) One (1) natural gas/No. 2 fuel oil fired boiler, identified as 005, with a maximum capacity of 228 MMBtu/hr for natural gas, and 220 MMBtu/hr for No. 2 fuel oil, using low NO_x burners and flue gas recirculation as control, and exhausting to stack 01, (constructed in March, 1993)
- (d) Space heaters and process heaters using natural gas, identified as 007, with capacities from 10 to 100 MMBtu/hr, using no control, and exhausting to various stacks denoted as stack 13, and twenty (20) natural gas fired burners identified as MOD 1 through MOD 10 air supply house burners (each mod air supply house contains two burners) with emissions exhausted through their respective booth stacks denoted as SO4, each burner is rated at 12.6 MMBtu per hour.

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

OAQ has authority to correct errors under 326 IAC 2-7-9(a)(3) and in Condition B.16 in Part 70 Permit 003-5959-00036.

Comment 3a:

Continuous monitoring for Boiler 003 is not contained in any previous permit or applicable requirement, and Boiler 003 is not subject to NSPS monitoring.

Comment 3b:

In the almost 20 years that Boiler No. 3 has been located at this facility, through numerous inspections, not one IDEM representative has ever suggested that [Construction Permit PSD (02) 1575] should be interpreted to require continuous monitoring for Boiler No. 003.

Comment 3c:

When the separate operation permit was issued for Boiler No. 003 in 1986, it extracted the applicable terms from the construction permit [PSD (02) 1575]. Indeed, it explicitly indicated the conditions that it was adopting from the construction permit, thereby making a determination of which requirements contained in the construction permit were applicable to Boiler No. 003.

Continuous monitoring requirements were not among them. This determination validates our reading of Section IV, Condition 1(f) of the construction permit as only applying to the fluidized bed boilers.

Response 3:

Although Boiler 003 is not subject to New Source Performance Standards (NSPS) Subpart Db, continuous monitoring was required by a previous permit, Construction Permit PSD (02) 1575, issued on November 30, 1984.

An amendment to Construction Permit PSD (02) 1575, issued on August 13, 1985, removed the opacity monitoring requirement for Boiler 003 "unless excessive visible emission violations ... are documented." Thus, if the monitors for Boilers 001 and 002 showed opacity readings in excess of NSPS limits, and General Motors attempted to blame Boiler 003, then the opacity monitoring requirement would be reinstated for Boiler 003. The NO_x and SO₂ monitoring requirements remained at that time.

NO_x and SO₂ monitoring requirements would remain until the issuance of Operation Permits 35-12-90-0143 and 35-12-90-0144 on December 10, 1986. Those operation permits, which applied to Boilers 001 and 002 respectively, would state that the monitoring requirements relate only to Boilers 001 and 002.

Comment 4a:

IDEM determined on page 2 of the construction permit [PSD (02) 1575] that SO₂ emissions from Boiler 003 "are not significant."

Response 4b:

The full context of the statement appears in Construction Permit PSD (02) 1575, Section 1 "Findings" as follows:

An existing oil/gas-fired boiler, located in another General Motors plant, will be moved to this new truck assembly facility for installation. This relocated oil/gas-fired boiler will primarily use natural gas; thus SO₂ emissions from this boiler are not significant. As a secondary preference, depending on price and availability, a (one percent sulfur content) No. 6 oil will be used.

The findings by the Indiana Air Pollution Control Board drew the conclusion based on the presumption that natural gas will be the primary fuel used. The potential to emit sulfur dioxide from Boiler 003, according to the same permit, was 0.6 tons per year for natural gas combustion and 1156 tons per year from fuel oil combustion. However, there are no federally enforceable conditions in the permit expressly limiting fuel oil combustion for Boiler 003. For this reason, OAQ considers the potential to emit sulfur dioxide to be significant for Boiler 003.

Comment 5:

It would be inconsistent to conclude that a continuous monitor is needed to monitor SO₂ from Boiler No. 003, particularly where there is not even an applicable emission limitation.

Response 5:

Pursuant to 326 IAC 7-1.1-2, sulfur dioxide emissions from Boiler 003 shall not exceed 1.6 pounds per million Btu heat input when combusting No. 6 fuel oil, and shall not exceed 0.5 pounds per million Btu heat input when combusting No. 2 fuel oil.

Comment 6a:

Although the draft permit modification does remove the continuous opacity requirement, which was inadvertently included in the originally-issued Title V Permit, it does not remove the requirement to continuously monitor NO_x and SO₂ for Boiler 003.

Comment 6b:

After construction of the fluidized bed boilers, it was found that the coal-fired fluidized bed boiler technology was not capable of providing the steam demand for the plant and these boilers were removed. In their place, two natural gas fired boilers were issued construction and operating permits along with new limitations.

Response 6:

The nitrogen oxide and sulfur dioxide monitoring requirements were not removed during the draft of SPM 003-17476-00036 due to conflicts with 326 IAC 3-5-1(c)(2)(B)(ii)(BB) and (c)(2)(C)(ii)(BB). The rule reads as follows:

- (2) Fossil fuel-fired steam generators of greater than one hundred million (100,000,000) Btu per hour heat input capacity shall monitor the following:
 - (B) Sulfur dioxide (SO₂) under the following conditions:
 - (i) SO₂ pollution control equipment has been installed.
 - (ii) A monitor is required to determine compliance with either of the following:
 - (AA) 326 IAC 12.
 - (BB) A construction permit required under 326 IAC 2.
 - (C) Nitrogen oxide (NO_x) under the following conditions:
 - (i) NO_x pollution control equipment has been installed.
 - (ii) A monitor is required to determine compliance with either of the following:
 - (AA) 326 IAC 12.
 - (BB) A construction permit required under 326 IAC 2.

Upon further review, OAQ has determined the following:

- (a) NO_x and SO₂ monitors for Boiler 003 are no longer required to determine compliance with Construction Permit PSD (02) 1575.
- (b) NO_x and SO₂ monitors for Boiler 003 are not required to determine compliance with 326 IAC 12 directly, since 326 IAC 12 is not applicable to Boiler 003.
- (c) Opacity, NO_x and SO₂ monitors are directly required to determine compliance with 326 IAC 12 for Boilers 004 and Boiler 005. However, emissions from Boiler 003 are exhausted through the same stack used by Boilers 004 and Boiler 005.

- (d) There are two methods to ensure that Boilers 004 and Boiler 005 are in compliance with 326 IAC 12:
- (1) If the emissions from Boiler 003, 004 and 005 combine before they are monitored, then all boilers must be subjected to the most stringent requirement applicable to any individual boiler. This includes the monitoring requirements.
 - (2) If the emissions from Boiler 003, 004 and 005 are monitored before they combine, then the boilers only need a federally enforceable condition requiring that emissions are monitored before they combine.

General Motors has indicated that Boilers 004 and 005 have independent monitoring systems, and are monitored in the exhaust flue before emissions combine with Boiler 003 in the exhaust stack. Therefore, Condition D.1.7 will be amended as follows:

D.1.7 Continuous Emission Monitoring

- (a) Pursuant to 326 IAC 2-2, 326 IAC 3-5, and 326 IAC 12, the Permittee shall continuously monitor and record the following parameters to demonstrate compliance with the Conditions D.1.1, D.1.2, and D.1.3:
- (1) nitrogen oxide concentration for Boilers ~~003~~, 004 and 005,
 - (2) sulfur dioxide concentration for Boilers ~~003~~, 004 and 005, and
 - (3) opacity for Boilers 004 and 005.
- ~~Opacity~~ **All** monitors shall be installed such that ~~visible~~ emissions from Boiler 003 do not interfere with the readings for Boilers 004 and 005.
- (b) The continuous monitoring systems have been installed and operational prior to conducting the performance tests. A monitoring protocol has been performed in accordance with the applicable procedures under 40 CFR 60, Appendix B, Performance Specification 1 and 326 IAC 3-5.
- (c) The Permittee shall record the output of the system and shall perform the required record keeping, pursuant to 326 IAC 3-5-6, and reporting, pursuant to 326 IAC 3-5-7.
- (d) In instances of CEM downtime, compliance with the NO_x and SO₂ emission limits established in Conditions D.1.1, D.1.2 and D.1.3 shall be determined by the use of the appropriate AP42 emission factors. Compliance with the particulate emission limits contained in Conditions D.1.2 and D.1.4 shall be determined using the appropriate emission factors, or by burning clean fuels such as natural gas, landfill gas or distillate fuel oil.

The need for a federally enforceable condition requiring that emissions are monitored before the emissions combine is explained further in this addendum.

Comment 7:

In Condition D.1.2(a)(3), the permit states that the limit for Boiler No. 3 for NO_x when burning natural gas is 0.098 lb/MMBtu. This condition was inadvertently copied from the limitations for boilers 4 and 5. The correct limitation for natural gas is 0.2 lb/MMBtu. This condition should read as follows: "NO_x emissions shall not exceed 0.2 lb/MMBtu when combusting natural gas or 0.3 lb/MMBtu when combusting fuel oil. These limits are considered PSD BACT for the facility."

Response 7:

For PSD BACT, Construction Permit PSD (02) 1575 imposed a NO_x limit of 0.2 lb/MMBtu for natural gas combustion on Boiler 003. With a federally enforceable condition requiring that NO_x emissions are monitored before they combine, there is no need for Boiler 003 to be subject to the same NO_x limit as Boilers 004 and 005. Condition D.1.2 has been revised as follows:

D.1.2 Prevention of Significant Deterioration (PSD) Best Available Control Technology (BACT) Limits [326 IAC 2-2] [40 CFR 52.21]

Pursuant to 326 IAC 2-2-3 PSD BACT:

(a) for Boiler 003:

- (1) PM emissions from Boiler 003 shall not exceed 0.015 lb/MMBtu when combusting natural gas, and shall not exceed 0.056 lb/MMBtu when combusting fuel oil. Compliance with these limits shall satisfy the requirements of 326 IAC 6-2-4.
- (2) PM emissions shall not exceed 16 tons per year from the combustion of natural gas, and shall not exceed 59 tons per year from the combustion of fuel oil.
- (3) NO_x emissions shall not exceed ~~0.098~~ **0.2** lb/MMBtu when combusting natural gas, and shall not exceed 0.3 lb/MMBtu when combusting fuel oil. These limits are considered PSD BACT for this ~~facility~~ **emission unit**.

(b) for Boiler 004:

- (1) No. 2 fuel consumption shall not exceed 1.1 million gallons and this, with a fuel sulfur content of 0.49% shall in effect limit SO₂ emissions to less than 40 tons per 12 consecutive month period. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) do not apply.
- (2) NO_x emissions shall not exceed 0.098 lb/MMBtu input from the combustion of natural gas and shall not exceed 0.13 lb/MMBtu input from the combustion of No. 2 fuel oil. Fuel gas recirculation and low NO_x burners are considered PSD BACT for this ~~facility~~ **emission unit**.

(c) for Boiler 005:

- (1) No. 2 fuel consumption shall not exceed 3.2 million gallons, and with an average heat content of 140,000 Btu/gallons, based on a 12 month rolling average, this fuel input limit shall, in effect, limit NO_x emissions to less than 40 tons per consecutive 12 month period. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) do not apply.
 - (2) NO_x emissions shall not exceed 0.098 lb/MMBtu from the combustion of natural gas and shall not exceed 0.13 lb/MMBtu from the combustion of No. 2 fuel oil.
-

Comment 8a:

As a final point on the Boiler 003 monitoring issue, we do not understand the statement, "Opacity monitors shall be installed such that visible emissions from Boiler 003 do not interfere with the readings for Boilers 004 and 005." The three boilers exhaust through a stack that contains separate flues (e.g., one flue for each boiler). There are two CEMS. One is in the flue for Boiler No. 004 and one is in the flue for Boiler No. 005. Thus, there is no mixing of the Boiler No. 003 emissions with the other boilers emissions until after the point at which the COMS take their measurements.

Comment 8b:

Accordingly, the referenced statement should be removed from this condition because it only creates confusion and serves no compliance purpose under the permit.

Response 8:

If the opacity monitors are installed in such a manner as described, then the opacity monitors will be in compliance with the requirement. If the NO_x and SO₂ monitors are also installed in such a manner, then General Motors will be in compliance with the revised version of the requirement.

The purpose of the requirement is to establish a federally enforceable condition which prevents scenarios where General Motors could evade NSPS and other monitoring requirements by rendering the monitors ineffective for determining compliance. For example:

1. Boilers 004 and 005 have opacity limits of 20% per 6-minute average, except for one 6-minute period per hour of not more than 27% opacity. Boiler 003 has an opacity limit of 40% per 6-minute average. If emissions from Boilers 003, 004 and 005 combined before they were monitored, General Motors could allege that all opacity monitor readings between 27% and 40% were attributable to Boiler 003.
2. Boilers 004 and 005 have NO_x limits of 0.098 lb/MMBtu when burning natural gas and 0.13 lb/MMBtu when burning #2 fuel oil. Boiler 003 has a NO_x limit of 0.20 lb/MMBtu when burning natural gas and 0.30 lb/MMBtu when burning fuel oil. If emissions from Boilers 003, 004 and 005 combined before they were monitored, General Motors could allege that all NO_x monitor readings between 0.098 and 0.20 lb/MMBtu were attributable to Boiler 003 when burning natural gas. Also, General Motors could allege that all NO_x monitor readings between 0.013 and 0.30 lb/MMBtu were attributable to Boiler 003 when burning fuel oil.
3. Boilers 004 and 005 have sulfur dioxide limits of 0.5 lb/MMBtu when burning #2 fuel oil. Boiler 003 has a sulfur dioxide limit of 1.6 lb/MMBtu when burning #6 fuel oil. If emissions from Boiler 003, 004 and 005 combined before they were monitored, General Motors could allege that all SO₂ monitor readings between 0.5 and 1.6 lb/MMBtu were attributable to Boiler 003 at any time where Boiler 003 burned #6 fuel oil.

OAQ found no indications that General Motors has evaded or attempted to evade compliance in this manner. Nonetheless, it is the intent of OAQ to ensure that the monitoring requirements of 326 IAC 3 and 326 IAC 12 are not rendered ineffective for determining compliance. The federally enforceable requirement will remain in the permit.

Comment 9a:

In Condition D.1.8(a), IDEM should modify the first sentence as follows: "To document compliance with conditions D.1.1, D.1.2 and D.1.3 for boiler 004 and boiler 005, the Permittee shall maintain records in accordance with (1) and (2) below."

Comment 9b:

IDEM should add a new D.1.8(b) to read "To document compliance with Conditions D.1.2(a) and D.1.3(a) for Boiler 003, the Permittee shall use appropriate (e.g. AP-42 emission factors) or burn clean fuels such as natural gas, landfill gas, or distillate fuel oil." Also, change the old (b) and (c) to (d) and (e).

Response 9:

With a federally enforceable condition requiring that emissions are monitored before they combine and with Boiler 003 not required to perform continuous monitoring, Boiler 003 is not subject to the record keeping requirements of 326 IAC 3-5-6. Some records must be kept for Boiler 003, regardless of the fuels used for the compliance determination period, for purposes of complying with 326 IAC 2-6, 326 IAC 3-5-7 and 326 IAC 7-2. Condition D.1.8 has been revised as follows:

D.1.8 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1, D.1.2, and D.1.3, the Permittee shall maintain records in accordance with (1) through ~~(2)~~ **(3)** below. Records maintained for (1) through ~~(2)~~ **(3)** shall be taken monthly and shall be complete and sufficient to establish compliance with the NO_x, SO₂, and opacity emission limits established in Conditions D.1.1, D.1.2, and D.1.3.
- (1) Calendar dates covered in the compliance determination period;
- (2) The Permittee shall record the output of the continuous monitoring systems **on Boilers 004 and 005** and shall perform the required record keeping, pursuant to 326 IAC 3-5-6.
- (3) **The Permittee shall calculate emissions from Boiler 003 based on appropriate emission factors contained in U.S. EPA publication AP-42, "Compilation of Air Pollutant Emission Factors."**
- (b) The Permittee shall keep records of heat input for each of the boilers.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.
-

Comment 10:

The conditions correctly refer to a temperature requirement of 28°C below the most recent performance test result but incorrectly convert 28°C to 50°F. The correct conversion is 82°F as shown in the calculation below:

$$\begin{aligned} ^\circ\text{F} &= 9/5 \text{ C} + 32 \\ (82^\circ\text{F}) &= 9/5 (28^\circ\text{C}) + 32 \end{aligned}$$

Response 10:

40 CFR 60.395(c)(1) and (2) read as follows:

- (1) For thermal incinerators, every three-hour period shall be reported during which the average temperature measured is more than 28 °C less than the average temperature during the most recent control device performance test at which the destruction efficiency was determined as specified under §60.393.
- (2) For catalytic incinerators, every three-hour period shall be reported during which the average temperature immediately before the catalyst bed, when the coating system is operational, is more than 28 °C less than the average temperature immediately before the catalyst bed during the most recent control device performance test at which destruction efficiency was determined as specified under §60.393. In addition, every three-hour period shall be reported each quarter during which the average temperature difference across the catalyst bed when the coating system is operational is less than 80 percent of the average temperature difference of the device during the most recent control device performance test at which destruction efficiency was determined as specified under §60.393.

The words "more than" or "less than" indicate a relative temperature difference. The example provided by General Motors is accurate for converting a single temperature, but not accurate for converting relative temperature changes. This is because the "+ 32" element of the equation must be done to two temperatures, then subtraction must take place, negating the addition.

For example, suppose "Temperature A" is the average temperature immediately before the catalyst bed during the most recent test at which the destruction efficiency was determined, and is 328°C. Periods of excess emissions would be defined as all 3-hour periods during which the average temperature measured immediately before the catalyst bed is more than 28°C lower than Temperature A. Thus, when Temperature A is 328°C, Temperature B would be 300°C.

Temperature A	Temperature B
= 9/5 C + 32	= 9/5 C + 32
= 9/5 (328°C) + 32	= 9/5 (300°C) + 32
= 622.4°F	= 572.0°F

Difference between Temperature A and Temperature B = (622.4 - 572.0) = 50.4°F.

When the relative difference between any two temperatures is 28°C, then it is also always 50.4°F. For the General Motors example, Temperature A is 28°C and Temperature B would be 0°C:

Temperature A	Temperature B
= 9/5 C + 32	= 9/5 C + 32
= 9/5 (28°C) + 32	= 9/5 (0°C) + 32
= 82.4°F	= 32.0°F

Difference between Temperature A and Temperature B = (82.4 - 32.0) = 50.4°F.

All instances of "more than 50°F lower" in the permit will be revised to read "more than 50.4 °F lower" since it is the correct temperature difference as expressed on the Fahrenheit scale. The change is illustrated later in this addendum.

Comment 11:

Condition D.3.7(a) should be changed to reflect an accurate description of the control device as was done in other conditions, as follows:

"for two (2) of the catalytic oxidizers on ovens #1 - #7, and one (1) of the catalytic oxidizers on ovens #8-#10, controlling the topcoat emissions, a stack test of the destruction efficiency of the catalytic oxidizer shall be performed every two and one-half (2.5) years. Testing on a catalytic oxidizer shall not be repeated until each one has been tested."

Response 11:

The proposed change would create inaccuracy since the facility description box in Section D.3 was changed to identify the catalytic oxidizers as #1 through #10, not the drying ovens as #1 through #10. Condition D.3.7 has been revised as follows:

D.3.7 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11] [326 IAC 2-2] [40 CFR 52.21]

The following facilities are required to stack test, when the oxidizer abatement credit is used to show compliance with Condition D.3.1 and D.3.2, as follows:

- (a) for two (2) of the **7.5 MMBtu/hr** catalytic oxidizers #1-#7, and one (1) of the **9.5 MMBtu/hr** catalytic oxidizers #8-#10, controlling the topcoat emissions, a stack test for destruction efficiency shall be performed every two and one-half (2.5) years. Testing on a catalytic oxidizer shall not be repeated until each one has been tested.

Comment 12:

In Condition D.3.11(a)(4), the phrase "(at least once every 15 minutes)" should be added after the word "records" on the first line.

Response 12:

The proposed change would create an apparent contradiction. Since the word "continuous" is already defined elsewhere in the permit, the word can be deleted from this particular condition and two other conditions. The permit has been revised as follows:

D.2.10 Record Keeping Requirements

- (a) To document compliance with Conditions D.2.1, D.2.2, D.2.3, D.2.4, and D.2.9, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.2.1, D.2.2, D.2.3, and D.2.4.
- (1) The monthly volume weighted average mass of VOC emitted per volume of applied coating solids for the prime coat as specified in 40 CFR 60, Subpart MM, Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations.
- (2) The monthly VOC usage and VOC content of each of the following materials. Records may include purchase orders, invoices, and material safety data sheets (MSDS) as necessary to verify the type and amount used.
- (A) ELPO coating additions
- (B) Miscellaneous sealers, adhesives and solvents

- (C) Final repair coatings and reducing solvents
 - (D) Maintenance coatings
 - (3) The weight of VOCs emitted for each month;
 - (4) The ~~continuous~~ temperature records (~~at least one record for every 15 minutes of operation~~) for the ELPO thermal incinerator if abatement credits are used to determine compliance, the temperature used to demonstrate compliance during the most recent compliance stack test, and every three hour period during which the average thermal incinerator temperature was more than 28 °C lower (more than ~~50°F~~ **50.4** °F lower) than the temperature used to demonstrate compliance during the most recent compliance stack test.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.11 Record Keeping Requirements

- (a) To document compliance with Conditions D.3.1, D.3.2, and D.3.3, and D.3.9, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.3.1, D.3.2, and D.3.3.
- (1) The monthly volume weighted average mass of VOC emitted per volume of applied coating solids for the prime coat as specified in 40 CFR 60, Subpart MM, Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations.
 - (2) The monthly VOC usage and VOC content of the material used in the topcoat system. Records may include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (3) The weight of VOCs emitted for each month;
 - (4) The ~~continuous~~ temperature records for the oxidizers if abatement credits are used to determine compliance, and the temperature used to demonstrate compliance during the most recent compliant stack test.
- (b) To document compliance with Condition D.3.4, the Permittee shall maintain records as required under Condition D.3.10.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.4.10 Record Keeping Requirements

- (a) To document compliance with Conditions D.4.1, D.4.2, D.4.3, and D.4.8, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.4.1, D.4.2, D.4.3.
- (1) The monthly volume weighted average mass of VOC emitted per volume of applied coating solids as specified in 40 CFR 60, Subpart MM.

- (2) The monthly VOC usage and VOC content of each of the materials used in the primer surfacer system. Records may include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (3) The weight of VOCs emitted for each month;
 - (4) The ~~continuous~~ temperature records (~~at least one record for every 15 minutes of operation~~) for the primer surfacer thermal incinerator if abatement credits are used to determine compliance, the temperature used to demonstrate compliance during the most recent compliance stack test, and every three hour period during which the average thermal incinerator temperature was more than 28 °C lower (more than ~~50°F~~ **50.4 °F** lower) than the temperature used to demonstrate compliance during the most recent compliance stack test.
- (b) To document compliance with Condition D.4.3, the Permittee shall maintain records as required under Condition D.4.9.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Comment 13:

General Motors also requests that appropriate changes be made in the Technical Support Document to reflect the requested changes in the above comments.

Response 13:

Changes to the TSD are addressed in this addendum. The changes are also acknowledged for the TSD, however, OAQ does not adjust the TSD directly. The original TSD is preserved as a historical record of the initial review when the permit went to public notice.

In addition to the changes that were listed previously, the responsible official has been changed to read "Catherine Clegg" in Condition A.1. All instances of "MM Btu" have been changed to read "MMBtu" in the permit. Condition B.8 is now considered to be obsolete; it has been deleted from the permit:

~~B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]~~

- ~~(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provision of this permit is grounds for:~~
- ~~(1) Enforcement action;~~
 - ~~(2) Permit termination, revocation and reissuance, or modification; or~~
 - ~~(3) Denial of a permit renewal application.~~
- ~~(b) Noncompliance with any provisions of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.~~
- ~~(c) 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.~~

- ~~(d) 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.~~

(Conditions subsequent to Condition B.8 have been renumbered.)

The deleted language from the former Condition B.8 has been moved to the cover page of the permit, as follows:

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.

Also the following formatting error was corrected:

C.17 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

[Item (a) remains unchanged.]

- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
- (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - ~~(j)~~ **(3)** If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
 - ~~(k)~~ **(4)** Failure to take reasonable response steps shall constitute a violation of the permit.

[Items (c) through (f) remain unchanged.]

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Significant Permit Modification to a Part 70 Operating Permit

Source Background and Description

Source Name:	General Motors Corporation - Truck Group
Source Location:	12200 Lafayette Center Road, Roanoke, IN 46783-9628
County:	Allen
SIC Code:	3711
Operation Permit No.:	003-5959-00036
Operation Permit Issuance Date:	June 24, 2002
Application No.:	003-17476-00036
Permit Reviewer:	Allen R. Davidson

On June 30, 2003, the Office of Air Quality (OAQ) received an application from General Motors Corporation - Truck Group requesting changes in permit language regarding the New Source Performance Standards.

History

General Motors Corporation - Truck Group was issued a Part 70 permit for a motor vehicle assembly plant on June 24, 2002. That permit has been appealed.

This application is the first revision to the Part 70 permit. This revision seeks to resolve some or all of the issues brought forth in the legal appeal, as well as correct known typographical and clerical errors. The following changes are being proposed for the Part 70 permit:

- (a) Rule changes have made the original versions of Conditions B.7, D.3.4, D.3.8, D.4.3 and D.4.7 obsolete. Those conditions are being updated to the most recent versions.
- (b) Conditions D.1.1 and D.1.7 are being changed to more closely follow the New Source Performance Standards, Subpart Db. These standards apply to Boiler 004 and 005, but Boiler 003 is exempted. As a result, there is no specific opacity monitoring requirement on Boiler 003.
- (c) Conditions D.2.1, D.2.10(a)(4), D.2.11, D.3.1, D.3.11(a)(4), D.3.12, D.4.1, D.4.10(a)(4) and D.4.11 are being changed to more closely follow the New Source Performance Standards, Subpart MM. The requirements for determining periods of excess emissions were inaccurately stated in the permit. Also, there are different requirements for thermal incineration than for catalytic incineration.
- (d) Conditions D.1.2 and D.4.7(b) are being changed to correct grammatical errors.
- (e) Conditions A.2, D.1.2(a), D.1.3 are being changed to correct clerical errors. Boiler 003, which was constructed in 1968 and relocated to this source in 1985, does not use #2 or #5 fuel oil.
- (f) Conditions D.2.2, D.2.10(a), D.3.2, D.3.11(a), D.4.2 and D.4.10(a) are being changed to correct clerical errors. The phrase "VOC input" will be changed to read "VOC usage" for purposes of consistency.

The following revisions to permit language are being made:

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

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

- (a) Facility-wide natural gas usage, including combustion units described as follows:
 - (1) One (1) natural gas/No. 6 oil/landfill gas fired boiler, identified as 003, constructed in **1968 and relocated to the source in** August 1985, with a maximum capacity of 240 MM Btu/hr, using low excess air as control, and exhausting to stack 01,
 - (2) One (1) natural gas/No.2 fuel oil fired boiler, identified as 004, constructed in April 1992, with a maximum capacity of 228 MM Btu/hr for natural gas, and 220 MM Btu/hr for No. 2 fuel oil, using low NO_x burners and flue gas recirculation as control, and exhausting to stack 01,
 - (3) One (1) natural gas/No. 2 fuel oil fired boiler, identified as 005, constructed in March, 1993, with a maximum capacity of 228 MM Btu/hr for natural gas, and 220 MM Btu/hr for No. 2 fuel oil, using low NO_x burners and flue gas recirculation as control, and exhausting to stack 01,
 - (4) Space heaters and process heaters using natural gas, identified as 007, with capacities from 10 to 100 MM Btu/hr, using no control, and exhausting to various stacks denoted as stack 13, and twenty (20) natural gas fired burners identified as MOD 1 through MOD 10 air supply house burners (each mod air supply house contains two burners) with emissions exhausted through their respective booth stacks denoted as SO4, each burner is rated at 12.6 MMBtu per hour.
- (b) One (1) ELPO dipping system, identified as 006, constructed in August 1985, using natural gas thermal incinerators identified as #1 through #3 on the drying ovens as VOC control, and exhausting to stack 02,
- (c) One (1) topcoat system, identified as 008, constructed in August 1985, using **ten (10)** natural gas fired catalytic ~~oxidizers oxidizer ovens~~ identified as #1 - #10 **on the drying ovens** as VOC control, with maximum capacity of the ~~oxidizers oxidizer ovens~~ #1 - #7 being 7.5 MM Btu/hr each, and the maximum capacity of ~~oxidizers oxidizer ovens~~ #8 - #10 being 9.5 MM Btu/hr each, and **using** water wash as PM control, and exhausting to stack 04,
- (d) Miscellaneous sealers/adhesives/additives/solvents, identified as 009, constructed in August 1985, using no controls, and exhausting to stacks 07 and 08,
- (e) One (1) primer surfacer system, identified as 010, constructed in March 1994, using a natural gas fired regenerative thermal oxidizer with a maximum capacity of 16 MM Btu/hr as VOC control, and water wash as PM control, and exhausting to stack 03,
- (f) One (1) final repair operation, identified as 012, constructed in August 1985, using no control, and exhausting to stack 06 and spot repair stalls,
- (g) One (1) maintenance paint operation, identified as 013, constructed in August 1985, using no control, and exhausting to stack 10,

- (h) One (1) gasoline fill operation, identified as 014, constructed in August 1985, using a natural gas afterburner with a maximum capacity of 0.15 MM Btu/hr as VOC control, and exhausting to stack 12.

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

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

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

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

- (b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. 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, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. ~~{326 IAC 2-7-5(6)(E)}~~

- ~~(c)~~ (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.

D.1.1 New Source Performance Standards (NSPS) for Fossil-Fuel-Fired Steam Generators [40 CFR 60, Subpart Db]

- (a) Boiler 004, constructed in April, 1992, is subject to the requirements of NSPS, 326 IAC 12, (40 CFR 60.44, Subpart Db) because the boiler was constructed after the applicability date of the rule. Pursuant to 40 CFR 60.44b(a),

_____ (1) NO_x emissions from Boiler 004 shall not exceed 0.098 lb/MM Btu for natural gas and 0.13 for No. 2 fuel oil combustion. Compliance with this limit will satisfy the requirements of 40 CFR 60, Subpart Db and 326 IAC 2-2-3 (PSD BACT).

_____ (2) Opacity shall not exceed 20% for 6-min average except for one 6-min period per hour of not more than 27% opacity. The opacity standards apply at all times, except during periods of startup, shutdown, or malfunction.

_____ (3) SO₂ emissions shall not exceed 0.5 pound per million Btu heat input when burning No. 2 fuel.

- (b) Boiler 005, constructed in March, 1993, is subject to the requirements of New Source Performance Standard, 326 IAC 12, (40 CFR 60.44, Subpart Db) because the boiler was constructed after the applicability date of the rule. Pursuant to 40 CFR 60.44b,

_____ (1) NO_x emissions shall not exceed 0.098 lb/MM Btu from the combustion of natural gas or shall not exceed 0.13 lb/MM Btu from the combustion of No. 2 fuel oil. Compliance with this limit shall satisfy the requirements of 40 CFR 60, Subpart Db.

~~(2) Opacity shall not exceed 20% for 6-min average except for one 6-min period per hour of not more than 27% opacity. The opacity standards apply at all times, except during periods of startup, shutdown, or malfunction.~~

Boilers 004 and 005 are subject to the requirements of NSPS, 326 IAC 12, (40 CFR 60.44, Subpart Db) as follows:

- (a) Pursuant to 40 CFR 60.44b(a), nitrogen oxide emissions from Boilers 004 and 005 shall not exceed 0.20 pounds per million BTU when combusting natural gas or #2 fuel oil. However, the above requirement is superseded by more stringent requirements elsewhere in this permit.**
- (b) Pursuant to 40 CFR 60.43b(f), opacity from Boilers 004 and 005 shall not exceed 20% per 6-minute average except for one 6-minute period per hour of not more than 27% opacity. The opacity standards apply at all times, except during periods of startup, shutdown, or malfunction.**
- (c) Pursuant to 40 CFR 60.42b(j), sulfur dioxide emissions from Boilers 004 and 005 shall not exceed 0.5 pounds per million BTU heat input when combusting #2 fuel oil. This requirement exempts the boilers from the requirements of 40 CFR 60.42b(a).**

D.1.2 Prevention of Significant Deterioration (PSD) Best Available Control Technology (BACT) Limits [326 IAC 2-2] [40 CFR 52.21]

Pursuant to 326 IAC 2-2-3 PSD BACT:

- (a) for Boiler 003:
 - (1) PM emissions from Boiler 003 shall not exceed 0.015 lb/MM Btu when combusting natural gas, ~~or~~ **and shall not exceed** 0.056 lb/MM Btu when combusting ~~No. 2 or No. 6~~ fuel oil. Compliance with ~~this limit~~ **these limits** shall satisfy the requirements of 326 IAC 6-2-4.
 - (2) PM emissions shall not exceed 16 tons per year from the combustion of natural gas, and shall not exceed 59 tons per year from the combustion of ~~No. 2 and No. 6~~ fuel oil.
 - (3) NO_x emissions shall not exceed 0.098 lb/MM Btu when combusting natural gas, ~~or~~ **and shall not exceed** 0.3 lb/MM Btu when combusting fuel oil. These limits are considered PSD BACT for this facility.
- (b) for Boiler 004:
 - (1) No. 2 fuel consumption shall not exceed 1.1 million gallons and this, with a fuel sulfur content of 0.49 % shall in effect limit SO₂ emissions to less than 40 tons per 12 consecutive month period. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) ~~does~~ **do** not apply.
 - (2) NO_x emissions shall not exceed 0.098 lb/MM Btu input from the combustion of natural gas ~~or~~ **and** shall not exceed 0.13 lb/MM Btu input from the combustion of No. 2 fuel oil. Fuel gas recirculation and low NO_x burners are considered PSD BACT for this facility.

- (c) for Boiler 005:
- (1) No. 2 fuel consumption shall not exceed 3.2 million gallons, and with an average heat content of 140,000 Btu/gallons, based on a 12 month rolling average, this fuel input limit shall, in effect, limit NO_x emissions to less than 40 tons per consecutive 12 month period. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) do not apply.
 - (2) NO_x emissions shall not exceed 0.098 lb/MM Btu from the combustion of natural gas ~~or~~ **and** shall not exceed 0.13 lb/MM Btu from the combustion of No. 2 fuel oil.

D.1.3 SO₂ Emission Limits [326 IAC 7-1.1-2]

Pursuant to 326 IAC 7-1.1-2, SO₂ emissions:

- (a) from Boiler 003 shall not exceed 1.6 lb/MM Btu when combusting No. 6 fuel oil, ~~or 0.5 lb/MM Btu when combusting No. 5 fuel oil.~~
- (b) from Boiler 004 shall not exceed 0.5 lb/MM Btu when combusting No. 2 fuel oil,
- (c) from Boiler 005 shall not exceed 0.5 lb/MM Btu when combusting No. 2 fuel oil.

D.1.7 Continuous Emission Monitoring

- (a) Pursuant to 326 IAC 2-2, 326 IAC 3-5, and 326 IAC 12, the Permittee shall continuously monitor and record the following parameters ~~from each boiler~~ to demonstrate compliance with the Conditions D.1.1, D.1.2, and D.1.3:

- (1) nitrogen oxide concentration **for Boilers 003, 004 and 005,**
- (2) sulfur dioxide concentration **for Boilers 003, 004 and 005,** and
- (3) opacity **for Boilers 004 and 005.**

Opacity monitors shall be installed such that visible emissions from Boiler 003 do not interfere with the readings for Boilers 004 and 005.

- (b) The continuous monitoring systems have been installed and operational prior to conducting the performance tests. A monitoring protocol has been performed in accordance with the applicable procedures under 40 CFR 60, Appendix B, Performance Specification 1 and 326 IAC 3-5.
- (c) The Permittee shall record the output of the system and shall perform the required record keeping, pursuant to 326 IAC 3-5-6, and reporting, pursuant to 326 IAC 3-5-7.
- (d) In instances of CEM downtime, compliance with the NO_x and SO₂ emission limits established in Conditions D.1.1, D.1.2 and D.1.3 shall be determined by the use of the appropriate AP42 emission factors. Compliance with the particulate emission limits contained in Conditions D.1.2 and D.1.4 shall be determined using the appropriate emission factors, or by burning clean fuels such as natural gas, landfill gas or distillate fuel oil.

D.2.1 NSPS Performance Standards for Automobile and Light Duty Truck Manufacturers [40 CFR 60.392, Subpart MM]

Pursuant to 40 CFR 60.392, Subpart MM (Performance Standards for Automobile and Light Duty Truck Manufacturers), the VOC emissions from the ELPO prime coating system, 006, shall not exceed 0.17 kg/l of applied coating solids.

D.2.2 PSD BACT Limits [326 IAC 2-2] [40 CFR 52.21]

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration), total VOC **usage** ~~input to the source's surface coating operations~~ shall be limited such that the **source's** VOC potential to emit ~~shall be limited to~~ **does not exceed** 3,204 tons per twelve consecutive month period.

D.2.10 Record Keeping Requirements

- (a) To document compliance with Conditions D.2.1, D.2.2, D.2.3, D.2.4, and D.2.9, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.2.1, D.2.2, D.2.3, and D.2.4.
- (1) The monthly volume weighted average mass of VOC emitted per volume of applied coating solids for the prime coat as specified in 40 CFR 60, Subpart MM, Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations.
 - (2) The monthly VOC ~~input~~ **usage** and VOC content of each of the following materials. Records may include purchase orders, invoices, and material safety data sheets (MSDS) as necessary to verify the type and amount used.
 - (A) ELPO coating additions
 - (B) Miscellaneous sealers, adhesives and solvents
 - (C) Final repair coatings and reducing solvents
 - (D) Maintenance coatings
 - (3) The weight of VOCs emitted for each month;
 - (4) The continuous temperature records (at least one record for every 15 minutes of operation) for the ELPO thermal incinerator if abatement credits are used to determine compliance, ~~and~~ the temperature used to demonstrate compliance during the most recent compliance stack test, and every three hour period during which the **average** thermal incinerator **temperature was** ~~felt~~ **more than 50 degrees F below 28°C lower (more than 50°F lower) than** the temperature used to demonstrate compliance during the most recent compliance stack test.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.11 Reporting Requirements

- (a) A quarterly summary of the information to document compliance with Conditions D.2.2 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).

- (b) Pursuant to 40 CFR ~~60.465(e)~~ **60.395(c)**, the Permittee shall submit a calendar quarterly report of any instances **where compliance with 40 CFR 60.392 was to be achieved through the use of thermal incineration and there were periods of excess emissions. For the purpose of reports under 40 CFR 60.7, periods of excess emissions shall be determined as all 3-hour periods during which the average temperature measured is more than 28°C lower (more than 50°F lower) than the average temperature during the most recent test at which the destruction efficiency was determined** (~~during actual coating operations~~) in excess of 3 hours during which the hourly average temperature in any thermal incinerator used to control emissions from an affected facility remains more than 28 degrees C (50 degrees F) below the latest compliant tested hourly average temperature. If no such periods occur, the Permittee shall submit a negative report.

D.3.1 NSPS Performance Standards for Automobile and Light Duty Truck Manufacturers [40 CFR 60.392, Subpart MM]

Pursuant to 40 CFR 60.392, Subpart MM (Performance Standards for Automobile and Light Duty Truck Manufacturers), the VOC emissions from the topcoat system, 008, shall not exceed 1.47 kg/l of applied coating solids.

D.3.2 PSD BACT Limits [326 IAC 2-2] [40 CFR 52.21]

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration), total VOC **usage input to the source's surface coating operations** shall be limited such that the **source's** VOC potential to emit ~~shall be limited to~~ **does not exceed** 3,204 tons per twelve consecutive month period.

D.3.4 Particulate Matter (PM) [326 IAC 6-3-2(c)(d)] [40 CFR 52]

(a) Pursuant to ~~326 IAC 6-3-2~~ **40 CFR 52 Subpart P**, the particulate matter (PM) **emissions** from **overspray** ~~the topcoat system 008~~ shall be limited by the following:

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

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

- (2) **Interpolation and extrapolation of the data for process weight rates greater than sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:**

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

(b) Pursuant to 326 IAC 6-3-2(d), **overspray shall be controlled by a dry particulate filter, water wash, or an equivalent control device. The Permittee shall operate the control device in accordance with manufacturer's specifications. The requirement to operate the control device is not federally enforceable.**

D.3.7 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11] [326 IAC 2-2] [40 CFR 52.21]

The following facilities are required to stack test, when the oxidizer abatement credit is used to show compliance with Condition D.3.1 and D.3.2, as follows:

- (a) for two (2) of the catalytic ~~oxidizers oxidizer ovens~~, #1 - #7, and one (1) of the catalytic ~~oxidizers oxidizer ovens~~, #8 - #10, controlling the topcoat emissions, a stack test for ~~control~~ **destruction** efficiency shall be performed every two and one-half (2.5) years; ~~testing. Testing~~ on a catalytic oxidizer shall not be repeated until each one has been tested.

D.3.8 PM and VOC Controls [326 IAC 2-2] [40 CFR 52.21]

- (a) The water wash shall be in operation at all times the topcoat surface coating is in operation, in order to comply with 326 IAC 6-3-2(d). **The requirement to operate the control device is not federally enforceable.**
- (b) The catalytic ~~oxidizers oxidizer ovens~~ #1 - #10 for the topcoat system shall be in operation at all times the processes that they are controlling are in operation, if the abatement credit is used to show compliance with Conditions D.3.2 and D.3.3.

D.3.9 VOC Control Requirements for the Catalytic Oxidizer ovens #1 - #10 [326 IAC 2-2] [40 CFR 52.21][40 CFR 60, Subpart MM]

The following VOC control requirements are only necessary if the VOC reduction credit from the incinerators is used to show compliance with the emission limits:

- (a) A temperature measurement device shall be installed in the gas stream immediately before and after the catalyst bed.
- (b) A continuous monitoring system on the VOC control devices for measuring operating temperature shall be calibrated, maintained, and operated according to accepted practice and manufacturer's specifications. The device shall have an accuracy of ± 0.75 percent of the temperature being measured expressed in degrees Celsius or ± 0.25 °C.
- (c) The output of this system shall be recorded at least every 15 minutes during production operation.

D.3.11 Record Keeping Requirements

- (a) To document compliance with Conditions D.3.1, D.3.2, and D.3.3, and D.3.9, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.3.1, D.3.2, and D.3.3.
 - (1) The monthly volume weighted average mass of VOC emitted per volume of applied coating solids for the prime coat as specified in 40 CFR 60, Subpart MM, Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations.
 - (2) The monthly VOC ~~input~~ **usage** and VOC content of the material used in the topcoat system. Records may include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (3) The weight of VOCs emitted for each month;
 - (4) The continuous temperature records for the ~~oxidizers oxidizer~~ if abatement credits are used to determine compliance, and the temperature used to demonstrate compliance during the most recent compliant stack test.
- (b) To document compliance with Condition D.3.4, the Permittee shall maintain records as required under Condition ~~D.3.9~~ **D.3.10**.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.12 Reporting Requirements

- (a) A quarterly summary of the information to document compliance with Conditions D.3.2 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).
- (b) Pursuant to 40 CFR ~~60.465(e)~~ **60.395(c)**, the Permittee shall submit a calendar quarterly report of any instances **where compliance with 40 CFR 60.392 was to be achieved through the use of catalytic incineration and there were periods of excess emissions. For the purpose of reports under 40 CFR 60.7, periods of excess emissions shall be determined as follows:**
- (1) **all 3-hour periods during which the average temperature measured immediately before the catalyst bed, when the coating system is operational, is more than 28°C lower (more than 50°F lower) than the average temperature immediately before the catalyst bed during the most recent test at which the destruction efficiency was determined.** (~~during actual coating operations~~) ~~in excess of 3 hours during which the hourly average temperature in any thermal incinerator used to control emissions from an affected facility remains more than 28 degrees C (50 degrees F) below the latest tested compliant hourly average temperature.~~
 - (2) **all 3-hour periods during which the average temperature difference across the catalyst bed, when the coating system is operational, is less than 80% of the average temperature difference during the most recent test at which destruction efficiency was determined.**

If no such periods occur, the Permittee shall submit a negative report.

D.4.1 NSPS Performance Standards for Automobile and Light Duty Truck Manufacturers [40 CFR 60.392, Subpart MM]

Pursuant to 40 CFR 60.392, Subpart MM (Performance Standards for Automobile and Light Duty Truck Manufacturers), the VOC emissions from the primer surfacer, 010, shall not exceed ~~44.67~~ **1.40 kg/l (11.68 lb/gal)** of solids applied from each guide coat operation.

D.4.2 PSD BACT Limits [326 IAC 2-2] [40 CFR 52.21]

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration), total VOC **usage** ~~input to the source's surface coating operations~~ shall be limited such that the **source's** VOC potential to emit ~~shall be limited to~~ **does not exceed** 3,204 tons per twelve consecutive month period.

D.4.3 Particulate Matter (PM) Limit [326 IAC 6-3-2(e)(d)] [40 CFR 52]

(a) Pursuant to ~~326 IAC 6-3-2~~ **40 CFR 52 Subpart P**, the particulate matter (PM) **emissions** from **overspray** ~~the primer surfacer 040~~ shall be limited by the following:

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

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

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

- (2) **Interpolation and extrapolation of the data for process weight rates greater than sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:**

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

- (b) **Pursuant to 326 IAC 6-3-2(d), overspray shall be controlled by a dry particulate filter, water wash, or an equivalent control device. The Permittee shall operate the control device in accordance with manufacturer's specifications. The requirement to operate the control device is not federally enforceable.**

D.4.7 PM and VOC Controls [326 IAC 2-2] [40 CFR 52.21] [40 CFR 60, Subpart MM]

- (a) The water wash shall be in operation at all times the primer surface coating is in operation, in order to comply with 326 IAC 6-3-2(d). **The requirement to operate the control device is not federally enforceable.**
- (b) The primer surfacer regenerative thermal oxidizer shall be in operation at all times the processes that ~~they are controlling~~ **it controls** are in operation, in order to comply with Conditions D.4.1 and D.4.2.

D.4.10 Record Keeping Requirements

- (a) To document compliance with Conditions D.4.1, D.4.2, D.4.3, and D.4.8, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.4.1, D.4.2, D.4.3.
- (1) ~~The monthly VOC input amount and VOC content of each of the following materials. Records may include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.~~ **The monthly volume weighted average mass of VOC emitted per volume of applied coating solids as specified in 40 CFR 60, Subpart MM.**
- (2) The monthly VOC ~~input~~ **usage** and VOC content of each of the materials used in the primer surfacer system. Records may include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
- (3) The weight of VOCs emitted for each month;
- (4) The continuous temperature records (at least one record for every 15 minutes of operation) for the primer surfacer thermal incinerator if abatement credits are used to determine compliance, the temperature used to demonstrate compliance during the most recent compliance stack test, and every three hour period during which the **average** thermal incinerator **temperature was felt** more than ~~50 degrees F below~~ **28°C lower (more than 50°F lower)** than the temperature used to demonstrate compliance during the most recent compliance stack test.
- (b) To document compliance with Condition D.4.3, the Permittee shall maintain records as required under Condition D.4.9.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.4.11 Reporting Requirements

- (a) A quarterly summary of the information to document compliance with Condition D.4.2 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).
- (b) Pursuant to 40 CFR ~~60.465(c)~~ **60.395(c)**, the Permittee shall submit a calendar quarterly report of any instances **where compliance with 40 CFR 60.392 was to be achieved through the use of thermal incineration and there were periods of excess emissions. For the purpose of reports under 40 CFR 60.7, periods of excess emissions shall be determined as all 3-hour periods during which the average temperature measured is more than 28°C lower (more than 50°F lower) than the average temperature during the most recent test at which the destruction efficiency was determined** ~~(during actual coating operations) in excess of 3 hours during which the hourly average temperature in any thermal incinerator used to control emissions from an affected facility remains more than 28 degrees C (50 degrees F) blow the latest tested compliant hourly average temperature.~~ If no such periods occur, the Permittee shall submit a negative report.

The facility description in Section D.1 is to be amended as follows:

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

Facility-wide natural gas usage, including combustion units described as follows:

- (a) One (1) natural gas/No. 6 oil/landfill gas fired boiler, identified as 003, constructed in **1968 and relocated to the source in** August 1985, with a maximum capacity of 240 MM Btu/hr, using low excess air as control, and exhausting to stack 01,
- (b) One (1) natural gas/No.2 fuel oil fired boiler, identified as 004, with a maximum capacity of 228 MM Btu/hr for natural gas, and 220 MM Btu/hr for No. 2 fuel oil, using low NO_x burners and flue gas recirculation as control, and exhausting to stack 01, (constructed in April, 1992)
- (c) One (1) natural gas/No. 2 fuel oil fired boiler, identified as 005, with a maximum capacity of 228 MM Btu/hr for natural gas, and 220 MM Btu/hr for No. 2 fuel oil, using low NO_x burners and flue gas recirculation as control, and exhausting to stack 01, (constructed in March, 1993)
- (d) Space heaters and process heaters using natural gas, identified as 007, with capacities from 10 to 100 MM Btu/hr, using no control, and exhausting to various stacks denoted as stack 13, and twenty (20) natural gas fired burners identified as MOD 1 through MOD 10 air supply house burners (each mod air supply house contains two burners) with emissions exhausted through their respective booth stacks denoted as SO4, each burner is rated at 12.6 MMBtu per hour.

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

Also, the facility description in Section D.3 is to be amended as follows:

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

One (1) topcoat electrostatic/air atomized system, identified as 008, using a **ten (10)** natural gas fired catalytic ~~oxidizers oxidizer ovens~~ identified as #1 - #10 **on the drying ovens** as VOC control, with maximum capacity of the ~~oxidizers oxidizer ovens~~ #1 - #7 being 7.5 MM Btu/hr each, and the maximum capacity of ~~oxidizers oxidizer ovens~~ #8 - #10 being 9.5 MM Btu/hr each, and **using** water wash as PM control, and exhausting to stack 04,

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

Enforcement Issues

There are no enforcement actions pending against this emission source.

Stack Summary

Stack information will not be changed as a result of this revision.

Recommendation

The staff recommends to the Commissioner that the application be approved as a significant permit modification. This recommendation is based on the following facts and conditions:

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

An application for the purposes of this review was received on June 30, 2003.

Emission Calculations

There are no emission calculations associated with this revision. The clarification of the emission limit in Condition D.4.1 is assumed to have a negligible effect on potential to emit VOC from the affected emission unit. Source potential to emit VOC shall remain limited to 3,204 tons per twelve consecutive month period.

Justification for Significant Permit Modification

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

Although this revision has no effect on source potential to emit, it involves significant changes to existing opacity monitoring requirements in the Part 70 permit for Boiler 003. As a result, this change can neither be processed as an administrative amendment under 326 IAC 2-7-11 nor as a minor permit modification under 2-7-12(b). It must be processed as a significant permit modification under 326 IAC 2-7-12(d).

County Attainment Status

The source is located in Allen County:

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

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

This revision is not a major modification for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 because the increase in potential to emit every attainment pollutant is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Federal Rule Applicability

- (a) Boiler 003, constructed in 1968 and relocated to the source in August 1985, is not subject to New Source Performance Standards (NSPS) Subpart Db, because the boiler predates the applicability of the rule. 40 CFR 60.14(e) states that relocation of an existing facility alone does not constitute a modification. The boiler was relocated from Allison Gas Turbine Division of General Motors in Indianapolis, IN.
- (b) Boiler 004, constructed in April 1992, and Boiler 005, constructed in March 1993, are subject to the requirements of New Source Performance Standard, 326 IAC 12, (40 CFR 60.44, Subpart Db) because the boiler was constructed after the applicability date of the rule.
 - (1) Pursuant to 40 CFR 60.44b(a), nitrogen oxide emissions from Boilers 004 and 005 shall not exceed 0.20 pounds per million BTU when combusting natural gas or #2 fuel oil.
 - (2) Pursuant to 40 CFR 60.43b(f), opacity from Boilers 004 and 005 shall not exceed 20% per 6-minute average except for one 6-minute period per hour of not more than 27% opacity.
 - (3) Pursuant to 40 CFR 60.42b(j), sulfur dioxide emissions from Boilers 004 and 005 shall not exceed 0.5 pounds per million BTU heat input when combusting #2 fuel oil. This requirement exempts the boilers from the requirements of 40 CFR 60.42b(a).
- (c) Pursuant to 40 CFR 60.392, Subpart MM (Performance Standards for Automobile and Light Duty Truck Manufacturers):
 - (1) VOC emissions shall not exceed 0.17 kg/l of applied coating solids from each prime coat operation.

- (2) VOC emissions shall not exceed 1.47 kg/l of applied coating solids from the top coat operation.
- (3) VOC emissions shall not exceed 1.40 kg/l of solids applied from each guide coat operation.

There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14 and 40 CFR Part 63) applicable to this source. The degreasing processes are not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), Subpart T because they do not use halogenated solvents.

State Rule Applicability - Entire Source

326 IAC 2-2-3 (Best Available Control Technology)

Pursuant to 326 IAC 2-2-3:

(a) for Boiler 003:

- (1) PM emissions from Boiler 003 shall not exceed 0.015 lb/MM Btu when combusting natural gas, or 0.056 lb/MM Btu when combusting No. 2 or No. 6 fuel oil. Compliance with this limit shall satisfy the requirements of 326 IAC 6-2-4.
- (2) PM emissions shall not exceed 16 tons per year from the combustion of natural gas, and shall not exceed 59 tons per 12 consecutive month period from the combustion of No. 2 and No. 6 fuel oil.
- (3) NO_x emissions shall not exceed 0.2 lb/MM Btu when combusting natural gas, or 0.3 lb/MM Btu when combusting fuel oil. These limits are considered PSD BACT for this facility.

(b) for Boiler 004:

- (1) No. 2 fuel consumption shall not exceed 1.1 million gallons and this, with a fuel sulfur content of 0.49 % shall in effect limit SO₂ emissions to less than 40 tons per 12 consecutive month period. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) does not apply.
- (2) NO_x emissions shall not exceed 0.098 lb/MM Btu input from the combustion of natural gas or shall not exceed 0.13 lb/MM Btu input from the combustion of No. 2 fuel oil. Fuel gas recirculation and low NO_x burners are considered PSD BACT for this facility.

(c) for Boiler 005:

- (1) No. 2 fuel consumption shall not exceed 3.2 million gallons, and with an average heat content of 140,000 Btu/gallons, based on a 12 month rolling average, NO_x emissions shall, in effect, limit NO_x emissions to less than 40 tons per consecutive 12 month period. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) does not apply.
- (2) NO_x emissions shall not exceed 0.09 lb/MM Btu from the combustion of natural gas or shall not exceed 0.13 lb/MM Btu from the combustion of No. 2 fuel oil.

- (d) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration), total VOC usage by the source's surface coating operations shall be limited such that the VOC potential to emit shall be limited to 3,204 tons per twelve consecutive month period.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants)

This source is not subject to 326 IAC 2-4.1-1 (New Source Toxics Control). The source was existing as of July 27, 1997, this revision is not classified as a reconstruction under 40 CFR 63.41, and the revision does not by itself have potential to emit 10 tons per year of any HAP or 25 tons per year of any combination of HAPs.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of pollutants specified in the rule. Pursuant to this rule, the source must annually submit an emission statement for the source. The annual statement must contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following:

- (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.

State Rule Applicability - Boilers

326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), particulate matter (PM) emissions shall be limited as follows:

- (a) Boiler 003 shall be limited to 0.26 pound PM per million BTU heat input.
- (b) Boiler 004 shall be limited to 0.22 pound PM per million BTU heat input.
- (c) Boiler 005 shall be limited to 0.20 pound PM per million BTU heat input.

326 IAC 7-1.1-2 (Sulfur Dioxide Emission Limitations)

Pursuant to 326 IAC 7-1.1-2, SO₂ emissions shall not exceed 1.6 lb/MM Btu when combusting residual fuel oil, or 0.5 lb/MM Btu when combusting distillate fuel oil.

State Rule Applicability - Surface Coating Operations

326 IAC 8-2-2 (Automobile and Light Duty Truck Coating Operations)

Pursuant to 326 IAC 8-2-2 (Automobile and Light Duty Truck Coating Operations), the volatile organic compound (VOC) emissions from coatings applied to automobile and light duty truck bodies, hoods, door, cargo boxes, fenders, and grill openings shall be limited as follows:

- (a) the prime coating ELPO system, 006, is limited to 1.9 lb VOC/gallon (0.23 kg/l) less water,
- (b) the topcoat system, 008, and the primer surfacer system, 010, are limited to 15.1 lb VOC/gallon of applied coating solids, as determined by the EPA "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations" (EPA-450/3-88-018 December 1988) and any subsequent revisions or 2.8 pounds of VOC/gallon (0.34 kg/l) of coating less water delivered to the applicator,
- (c) the final repair system, 012, is limited to 4.8 lb/gallon (0.58 kg/l) of VOC less water.

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

The miscellaneous sealers and adhesives application is subject to 326 IAC 8-2-9. Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator shall be limited to 3.5. pounds of VOC per gallon of coating less water for forced warm air or air dried coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS sheets submitted by the source, the sealers and adhesives are in compliance with this requirement.

326 IAC 6-3-2 (Particulate emission limitations, work practices, and control technologies)

This emission unit is subject to 326 IAC 6-3-2. Pursuant to 326 IAC 6-3-2, overspray shall be controlled by a dry particulate filter, water wash, or an equivalent control device. The source shall operate the control device in accordance with manufacturer's specifications.

Conclusion

The operation of these facilities shall be subject to the conditions of the attached Significant Permit Revision, No. 003-17476-00036.