



Joseph E. Kernan
Governor

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Commissioner

December 28, 2004

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
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TO: Interested Parties / Applicant

RE: Plastech Decorating Systems, Inc / 095-17514-00044

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 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

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

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

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

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

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

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

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and

- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

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

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

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

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



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**PART 70 OPERATING PERMIT RENEWAL
OFFICE OF AIR QUALITY
and
ANDERSON OFFICE OF AIR MANAGEMENT**

**Plastech Decorating Systems, Inc.
11700 N State Road 37
Elwood, Indiana 46036**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T095-17514-00044	
Issued by: Original Signed by Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: December 28, 2004 Expiration Date: December 28, 2009

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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) and Anderson Office of Air Management. 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 plastic parts coating source.

Responsible Official:	Plant Manager
Source Address:	11700 N State Road 37, Elwood, IN, 46036
Mailing Address:	11700 N State Road 37, Elwood, IN, 46036
General Source Phone Number:	(765) 552-0851
SIC Code:	3714
County Location:	Madison
Source Location Status:	Nonattainment for ozone under the 8 hour standard Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules; Major Source, under Nonattainment NSR; Major Source, under 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:

The Spray Coating Line consisting of:

- (a) One (1) coating booth, identified as Paint Booth #1, constructed in 1986, with a maximum line speed of eighteen (18) feet per hour, equipped with an electrostatic air atomization spray application system and a waterwash particulate matter overspray control system, exhausting at three (3) stacks identified as E1A, E1B, and E1C;
- (b) One (1) coating booth, identified as Paint Booth #2, constructed in 1986, with a maximum line speed of eighteen (18) feet per hour, equipped with an electrostatic disk atomization spray application system and a waterwash particulate matter overspray control system, exhausting at three (3) stacks identified as E2A, E2B, and E2C;
- (c) One (1) coating booth, identified as Paint Booth #3, constructed in 1999, with a maximum line speed of eighteen (18) feet per hour, equipped with an electrostatic air atomization spray application system, and a waterwash particulate matter overspray control system, exhausting at three (3) stacks identified as E3A, E3B, and E3C;
- (d) One (1) coating booth, identified as Paint Booth #4, constructed in 1989, with a maximum line speed of eighteen (18) feet per hour, equipped with an electrostatic air atomization spray application system, and a waterwash particulate matter overspray control system, exhausting at two (2) stacks identified as E4A and E4B;
- (e) One (1) coating booth, identified as Paint Booth #5, constructed in 1989, with a maximum line speed of eighteen (18) feet per hour, equipped with an electrostatic disk atomization spray application system and a waterwash particulate matter overspray control system, exhausting at two (2) stacks identified as E5A and E5B; and

- (f) One (1) coating booth, identified as Paint Booth #6, constructed in 1986, to be utilized for parts inspection.
- (g) One (1) natural gas direct fired Bake Oven, constructed in 1986, rated at 10.5 MMBtu/hr.

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) One (1) plastic automotive door claddings surface coating process, with a maximum throughput rate of 70 racks per hour, including:(The surface coating both is subject to 40 CFR 52 and 326 IAC. The other units in the coating process are not specifically regulated.)
 - (1) One (1) surface coating booth, constructed in 2001, with PM/PM10 emissions controlled by a dry filter system, with emissions exhausted through Stack CE1,
 - (2) One (1) 3.40 MMBtu/hr natural gas fired air make-up unit, constructed in 2001, and
 - (3) One (1) 0.55 MMBtu/hr natural gas fired drying oven, constructed in 2001, with emissions exhausted through Stack CO-1.
- (b) Coating materials test booth, constructed in 1986.(The Coating materials test booth is subject to a PSD synthetic minor limit.)
- (c) One (1) Burnoff Oven, constructed in 1986, cleaning used paint racks.(The Burnoff Oven is subject 326 IAC 4-2, 326 IAC 9-1, and 40 CFR 52, Subpart P.)

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); and
- (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 issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

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

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

B.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, and Anderson Office of Air Management, within a reasonable time, any information that IDEM, OAQ, and Anderson Office of Air Management may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, Anderson Office of Air Management copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

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

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

- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted 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

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

and

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and Anderson Office of Air Management on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, and Anderson Office of Air Management may require to determine the compliance status of the source.

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

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1), (3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the PMPs, including any required record keeping as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, and Anderson Office of Air Management upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, and Anderson Office of Air Management. IDEM, OAQ, and Anderson Office of Air Management may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

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

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

and

Telephone Number: 765-648-6158 (ask for Anderson Office of Air Management)
Facsimile Number: 765-648-5924

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

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

and

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

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

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

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, and Anderson Office of Air Management may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, and Anderson Office of Air Management by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

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

- (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, or Anderson Office of Air Management 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, or Anderson Office of Air Management 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, or Anderson Office of Air Management has issued the modification. [326 IAC 2-7-12(b)(8)]

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) deletedby 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 Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

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

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

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

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

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

B.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 Anderson Office of Air Management and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

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

and

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

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
 - (1) A timely renewal application is one that is:

- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and Anderson Office of Air Management on or before the date it is due.
- (2) If IDEM, OAQ, and Anderson Office of Air Management, 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, and Anderson Office of Air Management, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, and Anderson Office of Air Management, any additional information identified as being needed to process the application.
 - (d) **United States Environmental Protection Agency Authority** [326 IAC 2-7-8(e)]
If IDEM, OAQ, and Anderson Office of Air Management 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

and

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

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

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) 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

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

and

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

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

- (5) The Permittee maintains records on-site 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, and Anderson Office of Air Management in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
- (1) A brief description of the change within the source;
 - (2) The date on which the change will occur;
 - (3) Any change in emissions; and
 - (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade 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 the requirements of 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] [IC 13-17-3-2] [IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, Anderson Office of Air Management, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and 13-30-3-1, utilize any

photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.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
- and
- Anderson Office of Air Management
120 East 8th Street
P.O. Box 2100
Anderson, Indiana 46011
- The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, or Anderson Office of Air Management within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, or Anderson Office of Air Management, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section (BLT)), to determine the appropriate permit fee.

B.24 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314]

Notwithstanding the conditions of this permit that state specific methods that may be used to demonstrate compliance with, or a violation of, applicable requirements, any person (including the Permittee) may also use other credible evidence to demonstrate compliance with, or a violation of, any term or condition of this permit.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 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 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

and

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

- (f) Demolition and renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

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

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

- (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

and

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

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

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

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

and

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

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

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

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

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

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.

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

C.12 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

and

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

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

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

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

C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

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

C.14 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 shall be submitted to IDEM, OAQ, and Anderson Office of Air Management 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 timeframe 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, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall be considered deviation 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, in accordance with Section D, 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.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]
-
- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

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

The statement must be submitted to:

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

and

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

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

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

C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required monitoring data, reports and support information required by this Permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or Anderson Office of Air Management makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or Anderson Office of Air Management within a reasonable time.

- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

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

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

and

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

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and Anderson Office of Air Management on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.19 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)]:

- (a) The Spray Coating Line consisting of:
- (1) One (1) coating booth, identified as Paint Booth #1, constructed in 1986, with a maximum line speed of eighteen (18) feet per hour, equipped with an electrostatic air atomization spray application system and a waterwash particulate matter overspray control system, exhausting at three (3) stacks identified as E1A, E1B, and E1C;
 - (2) One (1) coating booth, identified as Paint Booth #2, constructed in 1986, with a maximum line speed of eighteen (18) feet per hour, equipped with an electrostatic disk atomization spray application system and a waterwash particulate matter overspray control system, exhausting at three (3) stacks identified as E2A, E2B, and E2C;
 - (3) One (1) coating booth, identified as Paint Booth #3, constructed in 1999, with a maximum line speed of eighteen (18) feet per hour, equipped with an electrostatic air atomization spray application system, and a waterwash particulate matter overspray control system, exhausting at three (3) stacks identified as E3A, E3B, and E3C;
 - (4) One (1) coating booth, identified as Paint Booth #4, constructed in 1989, with a maximum line speed of eighteen (18) feet per hour, equipped with an electrostatic air atomization spray application system, and a waterwash particulate matter overspray control system, exhausting at two (2) stacks identified as E4A and E4B;
 - (5) One (1) coating booth, identified as Paint Booth #5, constructed in 1989, with a maximum line speed of eighteen (18) feet per hour, equipped with an electrostatic disk atomization spray application system and a waterwash particulate matter overspray control system, exhausting at two (2) stacks identified as E5A and E5B; and
 - (6) One (1) coating booth, identified as Paint Booth #6, constructed in 1986, to be utilized for parts inspection.
 - (7) One (1) natural gas direct fired Bake Oven, constructed in 1986, rated at 10.5 MMBtu/hr.
- (b) The Coating material test booth, constructed in 1986.

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

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

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

Pursuant to the Air Pollution Control Board approval on March 5, 1986; which was incorporated by reference into PC (48) 1605, issued on May 21, 1986; which was included in PC (48) 1820, issued December 1, 1989; which was revised, through enhanced new source review, by T 095-6536-00044, issued October 9, 1998; which was amended by AA 095-10019-00044, issued on April 22, 1999; and 326 IAC 8-1-6 (New Facilities: General Reduction Requirements), the best available control technology (BACT) for the Spray Coating Line shall be as follows:

- (a) The surface coating applied to all plastic parts in any Spray Coating Line booth shall utilize an electrostatic spray application system.

- (b) The total volatile organic compound (VOC) input usage to the Spray Coating Line (Paint Booths #1 - 5), including solvent usage, minus the VOC in coating materials or cleanup solvents shipped out to be recycled, shall be limited to 241.0 tons per twelve (12) consecutive month period.
- (c) The VOC content of any coating applied shall be limited to 6.5 pounds per gallon, less water.

D.1.2 PSD Minor Limit [326 IAC 2-2]

Pursuant to PC (48) 1605, issued on May 21, 1986; which was revised by PC (48) 1820, issued December 1, 1989; which was revised, through enhanced new source review, by T 095-6536-00044, issued October 9, 1998; which was amended by AA 095-10019-00044, issued on April 22, 1999; and amended by this permit, the VOC usage, minus the VOC in coating materials or cleanup solvents shipped out to be recycled, at units, Spray Coating Line and the Coating material test booth, shall be limited to less than 236.4 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

This usage limit is required to limit the potential to emit of VOC to less than 250 tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.1.3 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to T095-6536-00044, issued on October 9, 1998 and 40 CFR 52 Subpart P, the PM from the Spray Coating Line shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

D.1.4 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the Spray Coating Line shall be controlled by a waterwash system, and the Permittee shall operate the control device in accordance with manufacturer's specifications. This requirement to operate the control is not federally enforceable.

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 facilities and any control devices.

D.1.6 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 2 to 40 CFR Part 63, Subpart PPPP] [40 CFR 63.4501]

- (a) The provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart PPPP.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

D.1.7 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products [40 CFR Part 63, Subpart PPPP] [40 CFR 63.4481] [40 CFR 63.4482]

- (a) The provisions of 40 CFR Part 63, Subpart PPPP (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/plastic/plasticpg.html>. Pursuant to 40 CFR 63.4483(b), the Permittee must comply with these requirements on and after April 19, 2007 or accept and meet enforceable HAP emissions limits below the major source threshold prior to April 19, 2007.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.
- (c) The following emissions units comprise the affected source that is subject to 40 CFR 63, Subpart PPPP:
 - (1) All coating operations as defined in 40 CFR 63.4581;
 - (2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
 - (3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and
 - (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.
- (d) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.4581, and are applicable to the affected source.

Compliance Determination Requirements

D.1.8 Volatile Organic Compounds (VOC) [326 IAC 8-1-4(a)(c)] [326 IAC 8-1-2(a)] [326 IAC 2-2]

- (a) Compliance with the VOC content and usage limitations contained in conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, and Anderson Office of Air Management reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.
- (b) The Permittee shall determine the VOC content of the combined coating material and cleanup solvents in a shipment to be recycled shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by EPA Reference Method 24 and the sampling procedures in 326 IAC 8-1-4 or other methods as approved by the Commissioner. If a shipment consists of separate containers, the Permittee shall sample each container. The testing shall be conducted in accordance with Section C- Performance Testing, except for notifying IDEM of the test in paragraph (a), all of paragraph (b), and all of paragraph (c).
- (c) Compliance with the VOC usage limitations contained in conditions D.1.1 and D.1.2 shall be demonstrated within 30 days of the end of each month. This shall be based on the total volatile organic compound used for the previous month, minus the VOC solvent shipped out to be recycled, and adding it to previous 11 months total VOC usage, minus the VOC solvent shipped out to be recycled, so as to arrive at VOC emissions for the most recent twelve (12) consecutive month period.

- (1) For the limit in condition D.1.1, the VOC emissions for a month can be arrived at using the following equation:

$$VOC\ emitted = SCL - SR$$

Where

SCL = The total amount of VOC, in tons, delivered to the coating applicators, including coatings, dilution solvents, and cleaning solvents, on the Spray Coating Line; and

SR = The total amount of VOC, in tons, shipped out to be recycled, including coatings, dilution solvents, and cleaning solvents, from the Spray Coating Line and the Coatings material test booth.

- (2) For the limit in condition D.1.2, the VOC emissions for a month can be arrived at using the following equation:

$$VOC\ emitted = SCL + CM - SR$$

Where

SCL = The total amount of VOC, in tons, delivered to the coating applicators, including coatings, dilution solvents, and cleaning solvents, on the Spray Coating Line;

CM = The total amount of VOC, in tons, delivered to the coating applicators, including coatings, dilution solvents, and cleaning solvents, on the Coatings material test booth; and

SR = The total amount of VOC, in tons, shipped out to be recycled, including coatings, dilution solvents, and cleaning solvents, from the Spray Coating Line and the Coatings material test booth.

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

D.1.9 Monitoring [40 CFR 64]

- (a) Daily inspections shall be performed to verify the integrity of the particle collection waterwash systems. To monitor the performance of the waterwash systems, weekly observations shall be made of the overspray from the surface coating booth stacks (E1A, E1B, and E1C; E2A, E2B, and E2C; E3A, E3B, and E3C; E4A and E4B; and E5A and E5B) while one or more of the booths are in operation. 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 deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for the units shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. 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 deviation from this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Compliance with this condition satisfies CAM.

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

D.1.10 Record Keeping Requirements

- (a) To document compliance with conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC content limit established in condition D.1.1 and D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The VOC content of each coating material and solvent used:
 - (A) less water; and
 - (B) including water.
 - (2) The amount of coating material and solvent used on monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (3) The cleanup solvent usage for each month;
 - (4) The amount of VOC solvent shipped out to be recycled each month. Records shall include weight of coating material and cleaning solvent in each shipment, VOC content test results, so necessary to verify the type and amount recycled.
 - (5) The total VOC usage for each month; and
 - (6) The weight of VOCs usage, minus the VOC solvent shipped out to be recycled, for each compliance period.
- (b) To document compliance with condition D.1.9, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.11 Reporting Requirements

A quarterly summary of the information to document compliance with conditions D.1.1 and D.1.2 shall be submitted to the addresses 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).

D.1.12 Notification Requirements [40 CFR 63.4510]

- (a) To comply with conditions D.1.6 and D.1.7, the Permittee shall submit:
- (1) The notifications in 40 CFR 40 CFR 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply by the dates specified in those sections, except as provided in paragraphs (b) and (c) of 40 CFR 63.4510.
 - (2) The initial notification no later than April 19, 2005.

- (3) The notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR 63.4540, 40 CFR 63.4550, or 40 CFR 63.4560 that applies to affected source. The notification of compliance status must contain the information specified in 40 CFR 63.4510, paragraphs (c)(1) through (11) and in 40 CFR 63.9(h).
- (b) The notifications required by paragraph (a) 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
- and
- United States Environmental Protection Agency, Region V
Director, Air and Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604-3590
- and
- Anderson Office of Air Management
120 East 8th Street
P.O. Box 2100
Anderson, Indiana 46011
- (c) The notifications require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

D.1.13 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]

The Permittee shall submit an application for a significant permit modification to IDEM, OAQ and Anderson Office of Air Management to include information regarding which compliance option or options will be chosen in the Title V permit.

- (a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Part 70 permit:
- (1) The applicable requirements of 40 CFR 63, Subpart P, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard; or
- (2) Enforceable HAP emissions limits below the major source threshold, including all compliance determination, compliance monitoring, record keeping, and reporting needed.
- (b) The significant permit modification application shall be submitted no later than July 19, 2006.
- (c) The significant permit modification 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

and

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

SECTION D.2 FACILITY OPERATION CONDITIONS

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

One (1) plastic automotive door claddings surface coating process, with a maximum throughput rate of 70 racks per hour, including:

- (a) One (1) surface coating booth, constructed in 2001, with PM/PM10 emissions controlled by a dry filter system, with emissions exhausted through Stack CE1,
- (b) One (1) 3.40 MMBtu/hr natural gas fired air make-up unit, constructed in 2001, and
- (c) One (1) 0.55 MMBtu/hr natural gas fired drying oven, constructed in 2001, with emissions exhausted through Stack CO-1.

(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 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to MPM095-14419-00044, issued on July 16, 2001 and 40 CFR 52 Subpart P, the PM from the plastic automotive door claddings surface coating process shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

D.2.2 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the plastic automotive door claddings surface coating process shall be controlled by a waterwash system and the Permittee shall operate the control device in accordance with manufacturer's specifications. This requirement to operate the control is not federally enforceable.

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

D.2.4 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 2 to 40 CFR Part 63, Subpart PPPP] [40 CFR 63.4501]

- (a) The provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart PPPP.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

D.2.5 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products [40 CFR Part 63, Subpart PPPP] [40 CFR 63.4481] [40 CFR 63.4482]

- (a) The provisions of 40 CFR Part 63, Subpart PPPP (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/plastic/plasticpg.html>. Pursuant to 40 CFR 63.4483(b), the Permittee must comply with these requirements on and after April 19, 2007 or accept and meet enforceable HAP emissions limits below the major source threshold prior to April 19, 2007.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.
- (c) The following emissions units comprise the affected source that is subject to 40 CFR 63, Subpart PPPP:
 - (1) All coating operations as defined in 40 CFR 63.4581;
 - (2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
 - (3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and
 - (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.
- (d) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.4581, and are applicable to the affected source.

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

D.2.6 Monitoring [40 CFR 64]

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the dry filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack (CE-1) while the booth is in operation. 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 deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. 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 deviation from this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Compliance with this condition satisfies CAM.

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

D.2.7 Record Keeping Requirements

- (a) To document compliance with condition D.2.6, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.8 Notification Requirements [40 CFR 63.4510]

- (a) To comply with conditions D.2.4 and D.2.5, the Permittee shall submit:
 - (1) The notifications in 40 CFR 40 CFR 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply by the dates specified in those sections, except as provided in paragraphs (b) and (c) of this section.
 - (2) The initial notification no later than April 19, 2005.
 - (3) The notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR 63.4540, 40 CFR 63.4550, or 40 CFR 63.4560 that applies to affected source. The notification of compliance status must contain the information specified in 40 CFR 63.4510, paragraphs (c)(1) through (11) and in 40 CFR 63.9(h).

- (b) The notifications required by paragraph (a) 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

and

United States Environmental Protection Agency, Region V
Director, Air and Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

and

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

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

D.2.9 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]

The Permittee shall submit an application for a significant permit modification to IDEM, OAQ and Anderson Office of Air Management to include information regarding which compliance option or options will be chosen in the Title V permit.

- (a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Part 70 permit:
 - (1) The applicable requirements of 40 CFR 63, Subpart PPPP, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard; or
 - (2) Enforceable HAP emissions limits below the major source threshold, including all compliance determination, compliance monitoring, record keeping, and reporting needed.
- (b) The significant permit modification application shall be submitted no later July 19, 2006.
- (c) The significant permit modification 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

and

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

SECTION D.3 FACILITY OPERATION CONDITIONS

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

One (1) Burnoff Oven, constructed in 1986, cleaning used paint racks.

(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 Incinerators [326 IAC 4-2-2]

Pursuant to 326 IAC 4-2-2 (Incinerators):

- (a) The Burnoff Oven, shall comply with the following requirements:
 - (1) Consist of primary and secondary chambers or the equivalent.
 - (2) Comply with 326 IAC 5-1 and 326 IAC 2.
 - (3) Be maintained, operated, and burn waste in accordance with the manufacturer's specifications or an operation and maintenance plan as specified in paragraph (b).
 - (4) Not emit particulate matter in excess of three-tenths (0.3) pound of particulate matter per one thousand (1,000) pounds of dry exhaust gas under standard conditions corrected to fifty percent (50%) excess air
 - (5) If any of the requirements of paragraphs (1) through (4) are not met, then the Permittee shall stop charging the incinerator until adjustments are made that address the underlying cause of the deviation.
- (b) The Permittee, when developing an operation and maintenance plan pursuant to paragraph (a)(3), must comply with the following:
 - (1) The operation and maintenance plan must be designed to meet the particulate matter emission limitation specified in paragraph (a)(4) and include the following:
 - (A) Procedures for receiving, handling, and charging waste.
 - (B) Procedures for incinerator startup and shutdown.
 - (C) Procedures for responding to a malfunction.
 - (D) Procedures for maintaining proper combustion air supply levels.
 - (E) Procedures for operating the incinerator and associated air pollution control systems.
 - (F) Procedures for handling ash.
 - (G) A list of wastes that can be burned in the incinerator.
 - (2) The Permittee shall review the plan before initial implementation of the operation and maintenance plan and annually thereafter.

- (3) The operation and maintenance plan must be readily accessible to incinerator operators.
- (c) The Permittee must make the manufacturer's specifications or the operation and maintenance plan available to the department upon request.

This condition is not federally enforceable.

D.3.2 Incinerators [40 CFR 52 Subpart P (Indiana SIP)]

Pursuant to 40 CFR 52, Subpart P, the Burnoff Oven shall:

- (a) Consist of primary and secondary chambers or the equivalent.
- (b) Comply with 326 IAC 5-1 and 326 IAC 2.
- (c) Be maintained properly as specified by the manufacturer and approved by the commissioner.
- (d) Be operated according to the manufacturer's recommendations and only burn waste approved by the commissioner.
- (e) Comply with other state and/or local rules or ordinances regarding installation and operation of incinerators.
- (f) Be operated so that emissions of hazardous material including, but not limited to, viable pathogenic bacteria, dangerous chemicals or gases, or noxious odors are prevented.
- (g) Not emit particulate matter in excess of three-tenths (0.3) pounds of particulate matter per one thousand (1,000) pounds of dry exhaust gas at standard conditions corrected to fifty percent (50%) excess air.
- (h) Not create a nuisance or a fire hazard.
- (i) If any of the above result, the burning shall be terminated immediately.

D.3.3 Carbon Monoxide [326 IAC 9-1]

Pursuant to 326 IAC 9-1 (Carbon Monoxide), emissions of carbon monoxide shall be limited as follows:

- (a) The Permittee shall not operate the Burnoff Oven unless the waste gas stream is burned in one (1) of the following:
 - (1) Direct-flame afterburner.
 - (2) Secondary chamber.
- (b) Alternatives to the carbon monoxide control methods specified in paragraph (a) may only be used if submitted as an amendment to the state implementation plan (SIP) and approved by U.S. EPA.

This condition is not federally enforceable.

D.3.4 Carbon Monoxide [40 CFR 52 Subpart P (Indiana SIP)]

Pursuant to 40 CFR 52, Subpart P, emissions of carbon monoxide shall be limited to the following:

The Permittee shall not cause or allow the discharge of carbon monoxide from the Burnoff Oven, unless the waste gas stream is burned in a direct-flame afterburner.

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

D.3.5 Reporting Requirements [326 IAC 4-2-2]

The Permittee shall notify the department, in writing, thirty (30) days after the operation and maintenance plan is initially developed pursuant to condition D.3.1 (b). The notice shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit. The notice submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

This condition is not federally enforceable.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

And ANDERSON OFFICE OF AIR MANAGEMENT

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Plastech Decorating Systems, Inc.
Source Address: 11700 N State Road 37, Elwood, Indiana, 46036
Mailing Address: 11700 N State Road 37, Elwood, Indiana, 46036
Part 70 Permit No.: T095-17514-00044

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

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

And ANDERSON OFFICE OF AIR MANAGEMENT

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Plastech Decorating Systems, Inc.
Source Address: 11700 N State Road 37, Elwood, Indiana, 46036
Mailing Address: 11700 N State Road 37, Elwood, Indiana, 46036
Part 70 Permit No.: T095-17514-00044

This form consists of 2 pages

Page 1 of 2

<p>9 This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none">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); andC The Permittee must submit notice in writing or by facsimile within two (2) working 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
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
And ANDERSON OFFICE OF AIR MANAGEMENT**

Part 70 Quarterly Report

Source Name: Plastech Decorating Systems, Inc.
Source Address: 11700 N State Road 37, Elwood, Indiana, 46036
Mailing Address: 11700 N State Road 37, Elwood, Indiana, 46036
Part 70 Permit No.: T095-17514-00044
Facility: Spray Coating Line(Paint Booths #1-5)
Parameter: Total VOC input usage, including solvent usage, minus VOC solvent shipped out to be recycled
Limit: 241.0 tons per twelve (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.

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

Part 70 Quarterly Report

Source Name: Plastech Decorating Systems, Inc.
Source Address: 11700 N State Road 37, Elwood, Indiana, 46036
Mailing Address: 11700 N State Road 37, Elwood, Indiana, 46036
Part 70 Permit No.: T095-17514-00044
Facility: Spray Coating Line and the Coating material test booth
Parameter: Total VOC usage, minus VOC solvent shipped out to be recycled
Limit: 236.4 tons per twelve (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
 And ANDERSON OFFICE OF AIR MANAGEMENT**

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

Source Name: Plastech Decorating Systems, Inc.
 Source Address: 11700 N State Road 37, Elwood, Indiana, 46036
 Mailing Address: 11700 N State Road 37, Elwood, Indiana, 46036
 Part 70 Permit No.: T095-17514-00044

Months: _____ **to** _____ **Year:** _____

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

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

Source Background and Description

Source Name:	Plastech Decorating Systems, Inc.
Source Location:	11700 N State Road 37, Elwood, Indiana, 46036
County:	Madison
SIC Code:	3714
Operation Permit No.:	T 095-6536-00044
Operation Permit Issuance Date:	10/9/1998
Permit Renewal No.:	T 095-17514-00044
Permit Reviewer:	Jed D. Wolkins

The Office of Air Quality (OAQ) has reviewed a Part 70 permit application from Plastech Decorating Systems, Inc. (Plastech) relating to the operation of a plastic parts coating source.

Permitted Emission Units and Pollution Control Equipment

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

The Spray Coating Line consisting of:

- (a) One (1) coating booth, identified as Paint Booth #1, constructed in 1986, with a maximum line speed of eighteen (18) feet per hour, equipped with an electrostatic air atomization spray application system and a waterwash particulate matter overspray control system, exhausting at three (3) stacks identified as E1A, E1B, and E1C;
- (b) One (1) coating booth, identified as Paint Booth #2, constructed in 1986, with a maximum line speed of eighteen (18) feet per hour, equipped with an electrostatic disk atomization spray application system and a waterwash particulate matter overspray control system, exhausting at three (3) stacks identified as E2A, E2B, and E2C;
- (c) One (1) coating booth, identified as Paint Booth #3, constructed in 1999, with a maximum line speed of eighteen (18) feet per hour, equipped with an electrostatic air atomization spray application system, and a waterwash particulate matter overspray control system, exhausting at three (3) stacks identified as E3A, E3B, and E3C;
- (d) One (1) coating booth, identified as Paint Booth #4, constructed in 1989, with a maximum line speed of eighteen (18) feet per hour, equipped with an electrostatic air atomization spray application system, and a waterwash particulate matter overspray control system, exhausting at two (2) stacks identified as E4A and E4B;
- (e) One (1) coating booth, identified as Paint Booth #5, constructed in 1989 with a maximum line speed of eighteen (18) feet per hour, equipped with an electrostatic disk atomization spray application system and a waterwash particulate matter overspray control system, exhausting at two (2) stacks identified as E5A and E5B; and

- (f) One (1) coating booth, identified as Paint Booth #6, constructed in 1986, to be utilized for parts inspection.
- (g) One (1) natural gas direct fired Bake Oven, constructed in 1986, rated at 10.5 MMBtu/hr.

Insignificant Activities

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

- (a) Miscellaneous natural gas direct fired heat combustion units, also considered as insignificant activities, as follows:
 - (1) Air make-up unit no. 1 (AMU-1), rated at 4.0 MMBtu/hr;
 - (2) AMU-2, rated at 4.0 MMBtu/hr;
 - (3) AMU-3, rated at 4.0 MMBtu/hr;
 - (4) AMU-4, rated at 3.25 MMBtu/hr (Note: this unit has been taken out of service);
 - (5) AMU-5, rated at 1.0 MMBtu/hr (Note: the previous AMU-5 identification has been changed to PMR2);
 - (6) AMU-7, rated at 3.75 MMBtu/hr (Note: the previous AMU-7 identification has been changed to HBO);
 - (7) Dry-off oven AMU-8, rated at 7.0 MMBtu/hr (Note: the previous AMU-8 identification has been changed to reflect two (2) separate combustion zones as S1CB (5.0 MMBtu/hr) and DOOS (2.0 MMBtu/hr));
 - (8) AMU-9, rated at 2.5 MMBtu/hr (Note: the previous AMU-9 identification has been changed to HCTS); and
 - (9) Heater flash tunnel AMU-10 rated at 1.0 MMBtu/hr (Note: the previous AMU-10 identification has been changed to HFTR).
- (b) One (1) plastic automotive door claddings surface coating process, with a maximum throughput rate of 70 racks per hour, including:
 - (1) One (1) surface coating booth, constructed in 2001, with PM/PM10 emissions controlled by a dry filter system, with emissions exhausted through Stack CE1,
 - (2) One (1) 3.40 MMBtu/hr natural gas fired air make-up unit, constructed in 2001, and
 - (3) One (1) 0.55 MMBtu/hr natural gas fired drying oven, constructed in 2001, with emissions exhausted through Stack CO-1.
- (c) Coating materials test booth, constructed in 1986.

- (d) Injection Molding Shop, consisting of the following separate units. The emission from the Resin Material Handling and Distribution System is insignificant under 326 IAC 2-7-1(21)(G)(xiv)(DD). OAQ has determined the Grinding Operations have negligible emissions. These are not grinders in by normally used definition. The Grinding Operations snap defective molded parts in to quarter inch diameter pieces. The potential emissions of each remaining unit are less than five (5) pounds of PM and PM10 per hour, three (3) pounds of VOC per hour, one (1) ton of any single HAP per year, and two and a half tons of the combination of all HAPs per year.
- (1) Six (6) 1500 ton injection molding machines;
 - (2) One (1) 1000 ton injection molding machine;
 - (3) One (1) 720 ton injection molding machine;
 - (4) Two (2) 150 ton injection molding machines;
 - (5) One (1) Resin Material Handling and Distribution System including three (3) outdoor plastic resin pellet storage silos;
 - (6) Two (2) Grinding Operations, recycling defective molded parts into useable form;
 - (7) One (1) Closed Cooling water System; and
 - (8) Mold Rust Protection and Cleaning.
- (e) One (1) Burnoff Oven, constructed in 1986, cleaning used paint racks.
- (f) One (1) Mask Washer cleaning masks used on the plastic automotive door claddings surface coating process using only acetone.

Unit Name Changes

On October 1, 1998, Plastech bought the source from Paint and Assembly Corporation (PAC). At that time the Spray Coating Line consisted of the following: (The booths will be listed by their order in the Spray Coating Line.)

- (a) Booth 1 exhausting to stacks E1A, E1B, and E1C;
- (b) Booth 2 exhausting to stacks E2A, E2B, and E2C;
- (c) Booth 3 exhausting to stacks E3A and E3B;
- (d) Booth 4 exhausting to stacks E4A and E4B;
- (e) Booth 5, just used for inspection, exhausting to stacks E5; and
- (f) The Bake Oven.

On October 9, 1998, TV 095-6536-00044 was issued for the source. The permit also approved the construction of two (2) new booths, identified as the Adhesion Promoter Booth and the Primer Booth, and one (1) bake oven onto the existing Spray Coating Line. On April 22, 1999, AA 095-10019-00044 was issued approving changes to the planned modification; and, On May 1, 1999, Plastech added one (1) booth between existing Booths 2 and 3. The existing Booth 1 switched from coating basecoat on adhesion promoter and primer. The new booth applied basecoat. The bake oven was not built. The booths were then referred to as:

- (a) Adhesion Promoter/Primer Booth (formerly Booth 1);
- (b) Booth 1 (formerly Booth 2);
- (c) Booth 2 (the new booth);
- (d) Booth 3 (name unchanged);
- (e) Booth 4 (name unchanged); and
- (f) Booth 5(name unchanged).

On January 10, 2003, IDEM, OAQ received an application for the renewal of the Permittee's TV. The application contained several different conflicting and erroneous references to what comprised the Spray Coatiing Line. The Permittee was sent a Notice of Deficiency (NOD) asking for clarification on what comprises the Spray Coating Line. The first response to the NOD was received June 3, 2003 and contained the following identifications. (These identifications are also being used throughout this TSD and the TV 095-17514-00044.)

- (a) Booth 1 exhausting to stacks E1A, E1B, and E1C (formerly Adhesion Promoter/Primer Booth (formerly Booth 1));
- (b) Booth 2 exhausting to stacks E2A, E2B, and E2C (formerly Booth 1 (formerly Booth 2));
- (c) Booth 3 exhausting to stacks E3A and E3B (formerly Booth 2 (the new booth added May 1, 1999));
- (d) Booth 4 exhausting to stacks E4A and E4B (formerly Booth 3);
- (e) Booth 5 exhausting to stacks E5A and E5B (formerly Booth 4);
- (f) Booth 6, just used for inspection, exhausting to stacks E6 (formerly Booth 5); and
- (g) The Bake Oven.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) TV 095-6536-00044, issued on 10/9/1998;
- (b) AA 095-10019-00044, issued on 4/22/1999;
- (c) RO 095-13388-00044, issued on 1/30/2002; and
- (d) MPM 095-14419-00044, issued on 7/16/2001.

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

The following terms and conditions from previous approvals have been revised in this Part 70 permit: Conditions have been renumbered as necessary. (The **bold** language is new language that has been added, and the language with a ~~line through it~~ has been removed.)

- (a) Condition B.9 Compliance with Permit Conditions
- ~~(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:~~
- ~~(1) Enforcement action;~~
 - ~~(2) Permit termination, revocation and reissuance or modification; or for~~
 - ~~(3) Denial of a permit renewal application.~~
- ~~(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.~~

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.

Reason revised: IDEM, OAQ has decided to move the provision that is required by 326 IAC 2-7-5(6) from B.9 to the front of the permit. The added language is intended to remain bold. Here the added language is **double bolded**. The language has been updated to match current rules.

(b) SECTION D.1 FACILITY OPERATION CONDITIONS

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

- (a) **The Spray Coating Line consisting of:**
- (1) One (1) coating booth, identified as Paint Booth #1, **constructed in 1986, coating a maximum of 3,000 plastic parts with a maximum line speed of eighteen (18) feet** per hour, equipped with an electrostatic air atomization spray application system and a waterwash particulate matter overspray control system, exhausting at three (3) stacks identified as E1A, E1B, and E1C;
 - (2) One (1) coating booth, identified as Paint Booth #2, **constructed in 1986, coating a maximum of 3,000 plastic parts with a maximum line speed of eighteen (18) feet** per hour, equipped with an electrostatic **air disk** atomization spray application system and a waterwash particulate matter overspray control system, exhausting at three (3) stacks identified as E2A, E2B, and E2C;
 - (3) One (1) coating booth, identified as Paint Booth #3, **constructed in 1999, coating a maximum of 3,000 plastic parts with a maximum line speed of eighteen (18) feet**

per hour, equipped with an electrostatic air atomization spray application system, and a waterwash particulate matter overspray control system, exhausting at ~~two (2)~~ **three (3)** stacks identified as E3A, and E3B, **and E3C**;

- (4) One (1) coating booth, identified as Paint Booth #4, **constructed in 1989, coating a maximum of 3,000 plastic parts with a maximum line speed of eighteen (18) feet** per hour, equipped with an electrostatic air atomization spray application system, and a waterwash particulate matter overspray control system, exhausting at two (2) stacks identified as E4A and E4B;
- (5) One (1) coating booth, identified as the ~~Adhesion Promoter/Primer Booth~~ **Paint Booth #5, constructed in 1989, coating a maximum of 3,000 plastic parts with a maximum line speed of eighteen (18) feet** per hour, equipped with an electrostatic air ~~atomization spray application system or air assisted airless~~ **disk atomization** spray application system and a waterwash particulate matter overspray control system, exhausting at two (2) stacks identified as ~~ADB1A and ADB1B~~ **E5A and E5B**; and
- (6) One (1) coating booth, identified as Paint Booth ~~#56, constructed in 1986, to be utilized for parts inspection. and touch-up, equipped with an electrostatic air atomization spray application system and a waterwash particulate matter overspray control system, exhausting at three (3) stacks identified as PB1A, PB1B, and PB1C.~~
- (7) **One (1) natural gas direct fired Bake Oven, constructed in 1986, rated at 10.5 MMBtu/hr.**

~~and the following specifically regulated insignificant activity, as defined in 326 IAC 2-7-1(21):~~

- (~~ab~~) The Coating material test booth

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

Reason revised: The maximum production rate has been switched from parts to line speed because the line speed is closely related to emissions produced. The Permittee can paint more smaller parts while the emissions are unaffected.

The application method listed for booths #2 and #5 (previously #4) has been changed to electrostatic disk air atomization. This is what the source has been using. This type of system meets the BACT requirement. This does not represent a modification to the source.

The description of the application system, controls, and stacks has been removed from booth #6 because these item are not in place.

The Bake Oven has been added to the description because it is part of the Spray Coating Line.

IDEM has decided to add the year of construction to the description.

The last sentence has been added to clearly state that the descriptive box is not enforceable. Section A.2 has been likewise updated.

- (b) Condition D.1.1 Volatile Organic Compounds (VOC)
Pursuant to **the Air Pollution Control Broad approval on March 5, 1986; which was incorporated by reference into PC (48) 1605, issued on May 21, 1986; which was included in PC (48) 1820, issued December 1, 1989; which was revised, through**

enhanced new source review, by T 095-6536-00044, issued October 9, 1998; which was amended by AA 095-10019-00044, issued on April 22, 1999; and 326 IAC 8-1-6 (New Facilities: General Reduction Requirements), the best available control technology (BACT) for the Spray Coating Line shall be as follows:

- (a) The surface coating applied to all plastic parts in any Spray Coating Line booth shall utilize an electrostatic spray application system.
- (b) The total volatile organic compound (VOC) input usage to the Spray Coating Line (i.e., ~~Paint Booths 1-5 and the Adhesion Promoter/Primer Booth~~ **Paint Booths #1 - 5**), including solvent usage, minus the VOC solvent shipped out **to be recycled**, shall be limited to 241.0 tons per twelve (12) consecutive month period.
- (c) The VOC content of any coating applied shall be limited to 6.5 pounds per gallon, less water.

Reason revised: All previous permits that have affected the condition have been cited. The units in the Spray Coating Line have been renamed as stated above. The allowance to subtract out VOC solvent shipped out has always intended to just cover VOC solvent shipped out to be recycled. This has now been stated.

- (c) Condition D.1.2 PSD Minor Limit
~~The total volatile organic compound (VOC) input usage to source-wide surface coating (i.e., the Spray Coating Line inclusive of Paint Booth No. 1-5 and the Adhesion Promoter/Primer Booth; and the coating materials test booth, including solvent~~ **Pursuant to PC (48) 1605, issued on May 21, 1986; which was revised by PC (48) 1820, issued December 1, 1989; which was revised, through enhanced new source review, by T 095-6536-00044, issued October 9, 1998; which was amended by AA 095-10019-00044, issued on April 22, 1999; and amended by this permit, the VOC usage, minus the VOC solvent shipped out to be recycled, at units, Spray Coating Line and the Coating material test booth, shall be limited to 247.7 less than 236.4 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.**

~~This input limitation is equivalent to source-wide VOC emissions of~~ **This usage limit is required to limit the potential to emit of VOC to less than 250 tons per 12 consecutive month period. And compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.**

Reason revised: All previous permits that have affected the condition have been cited. The units in the Spray Coating Line have been renamed as stated above. The allowance to subtract out VOC solvent shipped out has always intended to just cover VOC solvent shipped out to be recycled. This has now been stated. The limit has been lowered to 236.4 due to increase potential emissions elsewhere at the source. The condition has been updated to current IDEM implementation practices.

- (d) Condition D.1.3 Particulate Matter (PM)
~~Pursuant to 326 IAC 6-3-2, T095-6536-00044, issued on October 9, 1998 and 40 CFR 52 Subpart P,~~ the PM from the Spray Coating Line shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

or

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

$$E = 55.0 P^{0.44} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

Reason revised: 326 IAC 6-3-2 has been amended. The Spray Coating Line is no longer subject to limits above per 326 6-3-2. The Spray Coating Line is subject to the above limits by 40 CFR 52 Subpart P and the original TV. They are now cited. The limit required by 326 IAC 6-3-2 has been add in condition D.1.4.

The last paragraph as been removed since the source operates under sixty thousand (60,000) pound per hour.

- (e) Condition D.1.68 Volatile Organic Compounds (VOC)
Compliance with the VOC content and usage limitations contained in ~~e~~Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) ~~using formulation data supplied by the coating manufacturer~~ **by preparing or obtaining from the manufacturer the copies of the “as supplied” and “as applied” VOC data sheets.** IDEM, OAQ, and Anderson Office of Air Management reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.7 VOC Emissions

~~Compliance with Conditions D.1.1(b)~~ **In addition, compliance with the VOC usage limitations contained in conditions D.1.1 and D.1.2 shall be demonstrated at within 30 days of the end of each month. This shall be based on the total volatile organic compound used for the previous month, minus the VOC solvent shipped out to be recycled, and adding it to previous 11 months total VOC usage, minus the VOC solvent usage shipped out to be recycled, so as to arrive at VOC emissions for the most recent 12 consecutive month period.**

- (a) **For the limit in condition D.1.1 the, the VOC emissions for a month can be arrived at using the following equation:**

$$VOC\ emitted = SCL - SR$$

Where

SCL = The total amount of VOC, in tons, delivered to the coating applicators, including coatings, dilution solvents, and cleaning solvents, on the Spray Coating Line; and

SR = The total amount of VOC, in tons, shipped out to be recycled, including coatings, dilution solvents, and cleaning solvents, from the Spray Coating Line and the Coatings material test booth.

- (b) **For the limit in condition D.1.2 the, the VOC emissions for a month can be arrived at using the following equation:**

$$VOC\ emitted = SCL + CM - SR$$

Where

SCL = The total amount of VOC, in tons, delivered to the coating applicators, including coatings, dilution solvents, and cleaning solvents, on the Spray Coating Line;

CM = The total amount of VOC, in tons, delivered to the coating applicators, including coatings, dilution solvents, and cleaning solvents, on the Coatings material test booth; and

SR = The total amount of VOC, in tons, shipped out to be recycled, including coatings, dilution solvents, and cleaning solvents, from the Spray Coating Line and the Coatings material test booth.

Reason revised: The two conditions have been combined, since they both determine compliance for the same conditions. The first paragraph sets the requirements for data used in the second paragraph.

The requirement to demonstrate compliance has been moved to 30 days after the end of each month. This length of time is consistent with IDEM implication, allows time for gathering and reduction of data, and still ensures compliance.

The equations for determining monthly emissions have been added. This addition ensures consistent emission determinations. The equations are necessary to allow for the discounting of recycled solvent.

- (f) D.1.9 Monitoring
- (a) Daily inspections shall be performed to verify the integrity of the particle collection waterwash systems. To monitor the performance of the waterwash systems, ~~daily~~ **weekly** observations shall be made of the overspray from the surface coating booth stacks (E1A, E1B, and E1C; E2A, E2B, and E2C; E3A, ~~and~~ E3B, ~~and~~ **E3C**; E4A and E4B; ~~ADB1A and ADB1B;~~ and ~~PB1A, PB1B and PB1C~~ and **E5A and E5B**) while one or more of the booths are in operation. 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~~ **Response Plan - Preparation, Implementation, Records, and Reports**, shall be considered a ~~violation of~~ **deviation from** this permit.
- (b) ~~Weekly~~ **Monthly** inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for the units shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. 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~~ **Response Plan - Preparation, Implementation, Records, and Reports**, shall be considered a ~~violation of~~ **deviation from** this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Compliance with this condition satisfies CAM.

Reason revised: Referenced stacks have been renamed to match the rest permit.

Daily observations of the overspray have been changed to weekly, and weekly inspections of coating emissions have been changed to monthly, as requested by the Permittee. The reduced frequency of the monitoring still meets the requirements to monitor per 326 IAC 2-7-5.

The referenced section C condition has been changed to match the rest of the permit.

The failure to take response steps has been changed to a "deviation from" from a "violation of" to match condition C.14. This change does not change how IDEM will respond to a failure to take response steps.

The Permittee is now subject to CAM. This condition satisfies CAM and that statement has been added.

(g) Condition D.1.10 Record Keeping Requirements

(a) To document compliance with ~~C~~ conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly, ~~except for item (5) which shall be daily,~~ and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission **content** limits established in ~~C~~ condition D.1.1 and D.1.2. **Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.**

(1) ~~The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;~~

The VOC content of each coating material and solvent used:

(A) less water; and

(B) including water.

(2) ~~The amount of coating material and solvent used on monthly basis.~~

(A) **Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.**

(B) **Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.**

~~(2) A log of the dates of use;~~

~~(3) The volume weighted VOC content of the coatings used each month;~~

~~(4) The cleanup solvent usage for each month;~~

(4) **The amount of VOC solvent shipped out to be recycled each month. The amount for solvent recycling shall be determined based upon information from the recycler and/or source;**

(5) ~~The total VOC input usage for each month;~~ **and**

(6) **The weight of VOCs usage, minus the VOC solvent shipped out to be recycled, for each compliance period.**

- (b) To document compliance with ~~Conditions D.1.8 and~~ **condition D.1.9**, the Permittee shall maintain a log of ~~daily~~ **weekly** overspray observations, daily and ~~weekly~~ **monthly** inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Reason revised: The record keeping for VOC has been updated to match the VOC limits in D.1.1 and D.1.2. Records of the solvent recycled have been added. The record are required 30 days after the end of each month to match condition D.1.8. In paragraph (a), the reference to item (5) being taken daily has been removed as this was an error. The record keeping for monitoring has been changed to match condition D.1.9.

- (h) **Condition D.1.11 Reporting Requirements**
A quarterly summary of the information to document compliance with ~~C~~ **conditions D.1.1 and D.1.2** shall be submitted to the addresses 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).**

Reason Revised: The last sentence was added to clearly state the report does need to be certified by the "responsible official."

(i) **SECTION D.2 FACILITY OPERATION CONDITIONS**

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

One (1) plastic automotive door claddings surface coating process, with a maximum throughput rate of ~~60 units~~ **70 racks** per hour, including:

- (a) One (1) surface coating booth, **constructed in 2001**, with PM/PM10 emissions controlled by a dry filter system, with emissions exhausted through Stack CE1,
- (b) One (1) 3.40 MMBtu/hr natural gas fired air make-up unit, **constructed in 2001**, and
- (c) One (1) 0.55 MMBtu/hr natural gas fired drying oven, **constructed in 2001**, with emissions exhausted through Stack CO-1.

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

Reason revised: The maximum production rate has been switched from units to number of racks because the number is closely related to emissions produced. The Permittee can paint more smaller parts while the emissions are unaffected.

IDEM has decided to add the year of construction to the description.

The last sentence has been added to clearly state that the descriptive box is not enforceable. Section A.3 has been likewise updated.

- (j) Condition D.32.1 Particulate Matter (PM)
Pursuant to ~~326 IAC 6-3-2~~ **MPM095-14419-00044, issued on July 16, 2001 and 40 CFR 52 Subpart P**, the ~~particulate matter (PM) overspray~~ from the plastic automotive door claddings surface coating process ~~shall be determined utilizing~~ **not exceed the pound per hour emission rate established as E** in the following formula:

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

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

where ~~P = Process Weight Rate, tons/hr~~
~~E = rate of Emission Rate in pounds per hour, lb PM/hr;~~ and
P = process weight rate in tons per hour

Reason revised: 326 IAC 6-3-2 has been amended. The Spray Coating Line is no longer subject to limits above per 326 6-3-2. The Spray Coating Line is subject to the above limits by 40 CFR 52 Subpart P and the original TV. They are now cited. The limit required by 326 IAC 6-3-2 has been add in condition D.1.4. The condition has been changed to correctly state that the equation is an emission limit and not an emission determination.

- (k) Condition D.3.42.6 Monitoring
- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the **dry** filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack **(CE-1)** while the ~~claddings surface coating process~~ **booth** is in operation. 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~~ **Response Plan - Preparation, Implementation, Records, and Reports**, shall be considered a ~~violation of~~ **deviation from** this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. 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~~ **Response Plan - Preparation, Implementation, Records, and Reports**, shall be considered a ~~violation of~~ **deviation from** this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Compliance with this condition satisfies CAM.

Reason revised: The referenced section C condition has been changed to match the rest of the permit.

The failure to take response steps has been changed to a "deviation from" from a "violation of" to match condition C.14. This change does not change how IDEM will respond to a failure to take response steps.

The Permittee is now subject to CAM. This condition satisfies CAM and that statement has been added.

- (I) Condition D.3.52.7 Monitoring
- (a) To document compliance with ~~Condition D.3.42.6~~, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Reason revised: The condition has been changed to reference the monitoring condition. The monitoring condition should have been referenced initially.

The following terms and conditions from previous approvals have been determined no longer applicable; therefore, were not incorporated into this Part 70 permit:

- (a) All construction conditions from all previously issued permits. Specifically, all of pervious Section D.2. The individual conditions will not be listed here.

Reason not incorporated: The construction approval could be revoked after eighteen months. IDEM is removing the approval now. All units constructed under the approval were correctly permitted and are permitted to operate. Any facilities that were previously approved for construction but have not yet been constructed would need new pre-construction approval before beginning construction.

- (b) Condition B.15 Multiple Exceedances:
Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

Reason not incorporated: This condition has been removed because 326 IAC 2-7-5(1)(E) has been repealed, because it conflicted with 40 CFR 70.6(a)(6).

- (c) Condition B.27 Enhanced New Source Review:
The requirements of the construction permit rules in 326 IAC 2 are satisfied by this permit for any previously unpermitted facilities and facilities to be constructed within eighteen (18) months after the date of issuance of this permit, as listed in Sections A.2 and A.3.

Reason not incorporated: This permit is just a Title V renewal. There are no unpermitted facilities or facilities to be constructed. The original Title V did need this condition, as it was a construction permit.

- (d) Condition C.1 Major Source
Pursuant to A095-5819-00044, issued May 23, 1996, the total source emissions of volatile organic compounds (VOC) shall be limited to less than 250 tons per 365 consecutive day period. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.

Reason not incorporated: Madison County has been declared nonattainment for the eight hour ozone standard. Otherwise, this condition is not necessary. The limits in the individual D Sections limit the source below PSD levels for VOC under the one hour ozone standard and set the PTE level of VOCs in regards to Nonattainment NSR for the eight hour standard.

- (e) Condition C.8 Stack Height
(a) 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.

Reason not incorporated: While the Permittee is subject to 326 IAC 1-7, all stacks are exempt from the requirements of the rule. Therefore, the condition is not necessary.

- (f) Condition C.11 Compliance Schedule
The Permittee:
(a) Has certified that all facilities at this source are in compliance with all applicable requirements; and
(b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
(c) Will comply with such applicable requirements that become effective during the term of this permit.

Reason not incorporated: This condition was removed from the permit because it is an application requirement, not a permit requirement.

- (g) Condition C.19 Monitoring Data Availability
(a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
(b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
(c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
(d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
(e) At its discretion, IDEM and Anderson Office of Air Management may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
(f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

Reason not incorporated :The condition, except has noted below, has been combined with condition C - Compliance Response Plan - Preparation, Implementation, Records, and Reports.

Paragraph (e) has been specifically removed. IDEM and Anderson Office of Air Management may use enforcement discretion, but neither can create an exemption through the permit.

- (h) **Condition D.1.5 Testing Requirements**
The Permittee is not required to test these facilities by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the volatile organic compound limits specified in Conditions D.1.1 and D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Reason not incorporated: Condition C.9 Compliance Requirements states the above condition for the entire source. Repeating the condition for this facility is unnecessary.

- (i) **Condition D.1.8 Particulate Matter (PM)**
The waterwash for PM control shall be in operation at all times when Spray Coating Line booths are in operation.

Reason not incorporated: 326 IAC 6-3 has been revised. The rule now requires particulate from the surface coating to be controlled by a dry particulate filter, waterwash, or an equivalent control device, and operated in accordance with manufacturer's specifications. The new condition D.1.4 states this requirement.

- (j) **Condition D.3.3 Particulate Matter (PM)**
In order to comply with Condition D.3.1, the PM control shall be in operation and controlling emissions at all times the automotive claddings surface coating process is in operation.

Reason not incorporated: 326 IAC 6-3 has been revised. The rule now requires particulate from the surface coating to be controlled by a dry particulate filter, waterwash, or an equivalent control device, and operated in accordance with manufacturer's specifications. The new condition D.2.2 states this requirement.

Air Pollution Control Justification as an Integral Part of the Process

The company has submitted the following justification such that the inlet filters and the vacuum valves each be considered as an integral part of the Resin Material Handling and Distribution System:

- (a) The inlet filters provide protection for the vacuum pumps. The vacuum pumps provide the negative pressure to move the resin. Without the inlet filter, the vacuum pumps would be damaged and would no longer operate.
- (b) The vacuum valves' primary purpose is to drop the resin out of the air stream to the destination. The process can not operate without the vacuum valves.

IDEM, OAQ has evaluated the justifications and agreed that the inlet filters and the vacuum valves will be considered as an integral part of the Resin Material Handling and Distribution System. Therefore, the permitting level will be determined using the potential to emit after the inlet filters and the vacuum valves.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

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

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

An administratively complete Part 70 permit application for the purposes of this review was received on January 10, 2003. Additional information was received on June 3, 2003; June 30, 2003; July 17, 2003; June 30, 2003; and September 17, 2003 .

A notice of completeness letter was mailed to the source on April 11, 2003. The notice of completeness was combined with the first notice of deficiency.

Emission Calculations

See Appendix A, pages 1 through 10, of this document for detailed emissions

Potential To Emit After Issuance

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

The source was issued a Part 70 Operating Permit on October 9, 1998. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of the original Part 70 operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/facility	Potential to Emit (tons/year)							
	PM	PM-10	SO ₂	VOC	CO	NO _x	Single HAP	All HAPs
Spray Coating Line	10.2	10.2	-	<236.4*	-	-	319.3	432.4
Bake Oven for Spray Coating Line	0.1	0.3	<0.1	0.3	3.9	4.6	<0.1	<0.1
Plastic Automotive Door Cladding Surface Coating	0.1	0.1	-	8.1	-	-	0.9	1.3
Natural Gas Sources for Plastic Automotive Door Cladding Surface Coating	<0.1	0.1	<0.1	0.1	1.5	1.7	<0.1	<0.1
Injection Molding Shop	3.9	3.9	-	3.9	-	-	0.2	0.3
Burnoff Oven	0.1	0.4	<0.1	0.1	0.9	1.1	<0.1	<0.1
Other Natural Gas Sources	0.3	1.4	0.1	1.0	15.1	18.0	0.3	0.3
Total Emissions	14.8	16.4	0.4	<250.0	21.4	25.4	320.9	434.6

* The limit on the emissions from the Spray Coating Line includes the emission from the coating materials test booth.

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC and PM-10 are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater than ten (10) tons per year and the unrestricted potential emissions (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) **Fugitive Emissions**
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2001 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	1
PM-10	1
SO ₂	0
VOC	185
CO	4
NO _x	6
HAP	Not Reported

County Attainment Status

The source is located in Madison County.

Pollutant	Status
PM-10	attainment, maintenance attainment, or unclassifiable
SO ₂	attainment, maintenance attainment, or unclassifiable
NO ₂	attainment, maintenance attainment, or unclassifiable
1 hour Ozone	attainment, maintenance attainment, or unclassifiable
8 hour Ozone	Basic non-attainment
CO	attainment, maintenance attainment, or unclassifiable
Lead	attainment, maintenance attainment, or unclassifiable

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. Madison County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for nonattainment new source review.

- (b) Madison County has been classified as attainment or unclassifiable for PM-10, SO₂, NO_x, CO, and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Part 70 Permit Conditions

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

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

Federal Rule Applicability

- (a) New Source Performance Standards
There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) included in the permit for this source.
 - (1) The Burnoff Oven does not burn solid waste, as defined in Subpart E. Therefore, the requirements of the New Source Performance Standards for Incinerators, 40 CFR 60, Subpart E, are not included in this permit.
 - (2) The Burnoff Oven does not burn municipal waste, as defined in Subpart Ea. The dried paint comes from a manufacturing process. Therefore, the requirements of the New Source Performance Standards for Municipal Waste Combustors for Which Construction is Commenced After December 20, 1989 and on or Before September 20, 1994, 40 CFR 60, Subpart Ea, are not included in this permit.
 - (3) The Burnoff Oven does not burn municipal waste, as defined in Subpart Eb. The dried paint comes from a manufacturing process. Therefore, the requirements of the New Source Performance Standards for Municipal Waste Combustors for Which Construction is Commenced After September 20, 1994 or for Which Modification or Reconstruction is Commenced After June 19, 1996, 40 CFR 60, Subpart Eb, are not included in this permit.
 - (4) The Burnoff Oven does not burn hospital/medical/infectious waste, as defined in Subpart Ec. Therefore, the requirements of the New Source Performance Standards for Hospital/Medical/Infectious Waste Incinerators for Which Construction is Commenced After June 20, 1996, 40 CFR 60, Subpart Ec, are not included in this permit.
 - (5) The Burnoff Oven does not burn municipal waste, as defined in Subpart AAAA. The dried paint comes from a manufacturing process. Therefore, the requirements of the New Source Performance Standards for Small Municipal Waste Combustion Units for Which Construction is Commenced After August 30,

1999 or for Which Modification or Reconstruction is Commenced After June 6, 2001, 40 CFR 60, Subpart AAAA, are not included in this permit.

- (6) The Burnoff Oven does burn solid waste, as defined in Subpart CCCC. However, the Burnoff Oven is a part reclamation unit and a rack reclamation unit. Therefore, the requirements of the New Source Performance Standards for Commercial and Industrial Solid Waste Incineration Units for Which Construction Is Commenced After November 30, 1999 or for Which Modification or Reconstruction Is Commenced on or After June 1, 2001, 40 CFR 60, Subpart CCCC, are not included in this permit.

(b) National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (1) The Burnoff Oven does not burn hazardous waste. Therefore, the requirements of the National Emission Standards for Hazardous Air Pollutants from Hazardous Waste Combustors, 40 CFR 63, Subpart EEE, are not included in this permit.
- (2) The Spray Coating Line and the plastic automotive door claddings surface coating process are subject to the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products, 40 CFR 63, Subpart PPPP. A copy of the signed version of the MACT is currently available on the U.S. EPA website, <http://www.epa.gov/ttn/atw/plastic/plasticpg.html>. Pursuant to 40 CFR 63.4483(b), the Permittee must comply with these requirements on and after April 19, 2007 except as noted below.

The provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart PPPP. The Permittee must comply with these requirements on and after April 19, 2004.

The following emissions units comprise the affected source that is subject to 40 CFR 63, Subpart PPPP:

- (A) All coating operations as defined in 40 CFR 63.4581;
- (B) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
- (C) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and
- (D) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.

Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.4581, and are applicable to the affected source.

This rule has a future compliance date; therefore, the specific details of the rule and how the Permittee will demonstrate compliance are not provided in the permit. The Permittee shall submit an application for a significant permit modification prior to July 19, 2006 that will specify the option or options for the emission limitations and standards and methods for determining compliance chosen by the Permittee or accept and meet an enforceable HAP emissions limit below the major source threshold prior to April 19, 2007. At that time, IDEM, OAQ will include the specific details of the rule and how the Permittee will demonstrate compliance. In addition, pursuant to 40 CFR 63, Subpart PPPP, the Permittee shall submit:

- (A) The Permittee must submit the notifications in 40 CFR 40 CFR 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply by the dates specified in those sections, except as provided in paragraphs (b) and (c) of 40 CFR 63.4510.
 - (B) The Permittee must submit the initial notification no later than April 19, 2005.
 - (C) The Permittee must submit the notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR 63.4540, 40 CFR 63.4550, or 40 CFR 63.4560 that applies to affected source. The notification of compliance status must contain the information specified in 40 CFR 63.4510, paragraphs (c)(1) through (11) and in 40 CFR 63.9(h).
- (c) MACT Hammer
The requirements of Section 112(j) of the Clean Air Act (40 CFR Part 63.50 through 63.56) are not included in the permit for this source because the source does not include one or more units that belong to one or more source categories still affected by the Section 112(j) MACT Hammer date of May 15, 2002.
- (d) Compliance Assurance Monitoring (CAM)
This source does have a pollutant-specific emissions unit as defined in 40 CFR 64.1 for PM:
- (1) with the potential to emit before controls equal to or greater than the major source threshold for PM;
 - (2) that is subject to an emission limitation or standard for PM; and
 - (3) uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard.

Therefore, the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are applicable to the Spray Coating Line.

The source has submitted a CAM application. After further discussion with the source, IDEM is approving the following CAM:

- (a) Daily inspections of the waterwash system;
- (b) Weekly observations for overspray from the stacks; and
- (c) Monthly roof and ground inspections.

The monitoring is further described in Compliance Requirements at the end of this document.

State Rule Applicability - Entire Source

326 IAC 1-5-2 (Emergency Reduction Plans)

The source has not submitted an Emergency Reduction Plan. The source shall submit an Emergency Reduction Plan within ninety (90) days of issuance of the permit.

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

- (a) If required by specific condition(s) in Section D of the permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the PMPs, including any required record keeping as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, and the Anderson Office of Air Management upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, and the Anderson Office of Air Management. IDEM, OAQ, and the Anderson Office of Air Management may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

326 IAC 1-7-3 (a) (Actual Stack Height Provisions)

The current stacks at the source are exempt from the provisions of 326 IAC 1-7-3 (a), since each stack has less than twenty-five (25) tons per year of potential emissions (after controls) of PM and SO₂.

326 IAC 2-1.1-5

The IDEM can not issue a registration, permit, modification approval, or operating permit revision that would allow a source to cause or contribute to a violation of the National Ambient Air Quality Standards (NAAQS). Therefore, Permittee is subject to Nonattainment New Source Review pursuant to the Clean Air Act for the 8 hour ozone standard.

326 IAC 2-2 (Prevention of Significant Deterioration)

The total source potential emissions of PM-10, SO₂, NO_x, CO, and Lead are less than 250 tons per year. The source is not one of the 28 listed sources. The source was constructed prior to 1987. The source has not conducted any modifications to trigger PSD and is currently considered a minor PSD source. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) are not included in the permit for the source.

326 IAC 2-4.1 (New Source toxics control)

The source is a major source of HAPs and was constructed before 1997. The Permittee as not reconstructed the source nor constructed any new major sources of HAPs, as defined by 40 CFR 63.41, at the source. Therefore, the requirements of 326 IAC 2-4.1 are not included in the permit for the source.

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 VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and 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 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (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 - Individual Facilities

326 IAC 4-2 (Incinerators)

The Burnoff Oven is an incinerator. The Permittee uses the Burnoff Oven to burn dried paint off equipment. The Burnoff Oven does not burn wood. The Burnoff Oven has a secondary chamber, also known as an afterburner.

- (a) Burnoff Oven, shall comply with the following requirements:
 - (1) Consist of primary and secondary chambers or the equivalent.
 - (2) Comply with 326 IAC 5-1 and 326 IAC 2.
 - (3) Be maintained, operated, and burn waste in accordance with the manufacturer's specifications or an operation and maintenance plan as specified in paragraph (b).
 - (4) Not emit particulate matter in excess of three-tenths (0.3) pound of particulate matter per one thousand (1,000) pounds of dry exhaust gas under standard conditions corrected to fifty percent (50%) excess air
 - (5) If any of the requirements of paragraphs (1) through (4) are not met, then the Permittee shall stop charging the incinerator until adjustments are made that address the underlying cause of the deviation.
- (b) The Permittee, when developing an operation and maintenance plan pursuant to paragraph (a)(3), must comply with the following:
 - (1) The operation and maintenance plan must be designed to meet the particulate matter emission limitation specified in paragraph (a)(4) and include the following:
 - (A) Procedures for receiving, handling, and charging waste.
 - (B) Procedures for incinerator startup and shutdown.
 - (C) Procedures for responding to a malfunction.

- (D) Procedures for maintaining proper combustion air supply levels.
 - (E) Procedures for operating the incinerator and associated air pollution control systems.
 - (F) Procedures for handling ash.
 - (G) A list of wastes that can be burned in the incinerator.
- (2) The Permittee shall review the plan before initial implementation of the operation and maintenance plan and annually thereafter.
 - (3) The operation and maintenance plan must be readily accessible to incinerator operators.
- (c) The Permittee must make the manufacturer's specifications or the operation and maintenance plan available to the department upon request.
 - (d) The Permittee shall notify the department, in writing, thirty (30) days after the operation and maintenance plan is initially developed pursuant to paragraph a(3). The notice shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit. The notice submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

The pervious permits failed to include the requirements of 326 IAC 4-2. However, the Burnoff Oven is subject to the requirements.

40 CFR 52 Subpart P (Indiana SIP)

The Burnoff Oven is an incinerator. The Permittee uses the Burnoff Oven to burn dried paint off equipment. The Burnoff Oven does not burn wood. The Burnoff Oven has a secondary chamber, also known as an afterburner.

Pursuant to 40 CFR 52, Subpart P, the Burnoff Oven shall:

- (a) Consist of primary and secondary chambers or the equivalent.
- (b) Comply with 326 IAC 5-1 and 326 IAC 2.
- (c) Be maintained properly as specified by the manufacturer and approved by the commissioner.
- (d) Be operated according to the manufacturer's recommendations and only burn waste approved by the commissioner.
- (e) Comply with other state and/or local rules or ordinances regarding installation and operation of incinerators.
- (f) Be operated so that emissions of hazardous material including, but not limited to, viable pathogenic bacteria, dangerous chemicals or gases, or noxious odors are prevented.
- (g) Not emit particulate matter in excess of three-tenths (0.3) pounds of particulate matter per one thousand (1,000) pounds of dry exhaust gas at standard conditions corrected to fifty percent (50%) excess air.
- (h) Not create a nuisance or a fire hazard.
- (i) If any of the above result, the burning shall be terminated immediately.

The pervious permits failed to include the requirements of 40 CFR 52, Subpart P. However, the Burnoff Oven is subject to the requirements.

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate matter (PM) from the injection molding machines, the Resin Material Handling and Distribution System, the Grinding Operations and the Burnoff Oven are exempt from the requirements of this rule because these units have potential PM emissions of less than five hundred fifty-one thousandths (0.551) pounds per hour.

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

Pursuant to 326 IAC 6-3-2(d), particulate from the Spray Coating Line shall be controlled by waterwash system. The plastic automotive door claddings surface coating process shall be controlled by dry filters. The Permittee shall operate the control devices in accordance with manufacturer's specifications.

40 CFR 52 Subpart P (Indiana SIP).

Pursuant to 40 CFR Part 52 Subpart P, the particulate matter (PM) from the Spray Coating Line and plastic automotive door claddings surface coating process shall be limited by the following:

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

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

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

Pursuant to the Air Pollution Control Broad approval on March 5, 1986; which was incorporated by reference into PC (48) 1605, issued on May 21, 1986; which was included in PC (48) 1820, issued December 1, 1989; which was revised, through enhanced new source review, by T 095-6536-00044, issued October 9, 1998; which was amended by AA 095-10019-00044, issued on April 22, 1999; and 326 IAC 8-1-6 (New Facilities: General Reduction Requirements), the best available control technology (BACT) for the Spray Coating Line shall be as follows:

- (a) The surface coating applied to all plastic parts in any Spray Coating Line booth shall utilize an electrostatic spray application system.
- (b) The total volatile organic compound (VOC) input usage to the Spray Coating Line (Paint Booths #1 - 5), including solvent usage, minus the VOC solvent shipped out to be recycled, shall be limited to 241.0 tons per twelve (12) consecutive month period.
- (c) The VOC content of any coating applied shall be limited to 6.5 pounds per gallon, less water.

The original construction permits listed a transfer efficiency as part of the BACT limit. The transfer efficiency would have been used to limit the amount of VOC emitted. The BACT limit also required the total VOCs usage be limited to 241 tons per twelve (12) consecutive month period. Therefore, the transfer efficiency was not necessary and overly restrictive. The TV 095-6536-00044, issued October 9, 1998, correctly removed the transfer efficiency from the BACT limit. However, the TSD nor the permit stated that the BACT limit had been revised. IDEM, OAQ is hereby recognizing the removal of the transfer efficiency as appropriate and not an oversight. The booth numeration has been updated to what the Permittee currently calls the booths.

Pursuant to MPM 095-14419-00044, issued on 7/16/2001, and 326 IAC 8-1-6 (New Facilities: General Reduction Requirements), the plastic automotive door claddings surface coating process as its potential emissions are less than twenty-five (25) tons per year.

AA 095-5819-00044 is not referenced because the amendment stated a limit for the original four booths to avoid 326 IAC 8-1-6 and then list the BACT pursuant to 326 IAC 8-1-6 for the four booths. This language was not carried on in any other permit.

326 IAC 9-1 (Carbon Monoxide)

The Burnoff Oven is refuse incineration equipment. The Permittee uses the Burnoff Oven to burn dried paint off equipment. The Burnoff Oven has a secondary chamber, also known as an afterburner.

Pursuant to 326 IAC 9-1 (Carbon Monoxide), emissions of carbon monoxide shall be limited as follows:

- (a) The Permittee shall not operate the Burnoff Oven unless the waste gas stream is burned in one (1) of the following:
 - (1) Direct-flame afterburner.
 - (2) Secondary chamber.
- (b) Alternatives to the carbon monoxide control methods specified in paragraph (a) may only be used if submitted as an amendment to the state implementation plan (SIP) and approved by U.S. EPA.

The previous permits failed to include the requirements of 326 IAC 9-1. However, the Burnoff Oven is subject to the requirements.

40 CFR 52 Subpart P (Indiana SIP)

The Burnoff Oven is refuse incineration equipment. The Permittee uses the Burnoff Oven to burn dried paint off equipment. The Burnoff Oven has a secondary chamber, also known as an afterburner.

Pursuant to 40 CFR 52, Subpart P, emissions of carbon monoxide shall be limited to the following:

The Permittee shall not cause or allow the discharge of carbon monoxide from the Burnoff Oven, unless the waste gas stream is burned in a direct-flame afterburner.

The previous permits failed to include the requirements of 40 CFR 52, Subpart P. However, the Burnoff Oven is subject to the requirements.

Testing Requirements

The PM emission from the Burnoff Oven are calculated as follows:

$$\text{Burnoff Oven PM} = \frac{\text{PM lbs / hr} * \text{correction for 1000 lbs of air}}{\text{natural gas usage} * \text{Fd of natural gas} * \text{density of air} * \text{correction to 50 \% excess air}}$$

$$\text{Burnoff Oven PM} = \frac{0.03 \text{ lbs / hr} * 1000}{2.4 \text{ mmbtu / hr} * 8710 \text{ scf / mmbtu} * 0.075 \text{ lbs / scf} * 1.5}$$

$$\text{Burnoff Oven PM} = \frac{0.01 \text{ lbs of PM}}{1000 \text{ lbs of air @ 50 \% excess air}}$$

The Burnoff Oven will comply with the emission limit of three-tenths (0.3) pound of particulate matter per one thousand (1,000) pounds of dry exhaust gas under standard conditions corrected to fifty percent (50%) excess air. The Burnoff Oven will not be required to test.

Compliance Requirements

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

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

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

- (a) The Spray Coating Line has applicable compliance monitoring conditions as specified below:
 - (1) Daily inspections shall be performed to verify the integrity of the particle collection waterwash systems. To monitor the performance of the waterwash systems, weekly observations shall be made of the overspray from the surface coating booth stacks (E1A, E1B, and E1C; E2A, E2B, and E2C; E3A, E3B, and E3C; E4A and E4B; and E5A and E5B) while one or more of the booths are in operation. 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 deviation from this permit.
 - (2) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for the units shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. 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 deviation from this permit.
 - (3) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the waterwash systems for the Spray Coating Line must operate properly to ensure compliance with 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-7 (Part 70). Compliance with this monitoring satisfies CAM.

- (b) The plastic automotive door claddings surface coating process has applicable compliance monitoring conditions as specified below:

- (1) Daily inspections shall be performed to verify the placement, integrity and particle loading of the dry filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack (CE-1) while the booth is in operation. 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 deviation from this permit.
- (2) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. 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 deviation from this permit.
- (3) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

Conclusion

The operation of this plastic parts coating source shall be subject to the conditions of the attached proposed **Part 70 Permit No. T095-17514-00044**.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for a Part 70 Operating Permit Renewal

Source Name:	Plastech Decorating Systems, Inc.
Source Location:	11700 N State Road 37, Elwood, Indiana, 46036
County:	Madison
SIC Code:	3714
Operation Permit No.:	T 095-6536-00044
Operation Permit Issuance Date:	10/9/1998
Permit Renewal No.:	T 095-17514-00044
Permit Reviewer:	Jed D. Wolkins

On September 2, 2004, the Office of Air Quality (OAQ) had a notice published in the Herald Bulletin, Anderson, Indiana, stating that Plastech Decorating Systems, Inc. had applied for a Part 70 Operating Permit to operate a plastic parts coating source. 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.

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

The term "solvent" has been changed to "coating materials or cleanup solvents" since both can be and are recycled. The term "solvent" can mean a pure liquid VOC. This is not the intent of the provision. Any VOC not emitted, that can be properly documented, is valid for inclusion in the limit.

IDEM has decided to specifically require EPA reference method 24 for the VOC recycling. This is necessary to ensure the limits in conditions D.1.1 and D.1.2 are enforceable as a practical matter.

IDEM does not believe it is necessary to require the Permittee to submit a protocol, give notice, or submit a report. Therefore, those requirements of condition C.8 are being waived for the VOC recycling.

The record keeping has been revised to match the rest of the revisions for recycling. All of these changes are noted below.

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

Pursuant to the Air Pollution Control Broad approval on March 5, 1986; which was incorporated by reference into PC (48) 1605, issued on May 21, 1986; which was included in PC (48) 1820, issued December 1, 1989; which was revised, through enhanced new source review, by T 095-6536-00044, issued October 9, 1998; which was amended by AA 095-10019-00044, issued on April 22, 1999; and 326 IAC 8-1-6 (New Facilities: General Reduction Requirements), the best available control technology (BACT) for the Spray Coating Line shall be as follows:

- (a) The surface coating applied to all plastic parts in any Spray Coating Line booth shall utilize an electrostatic spray application system.
- (b) The total volatile organic compound (VOC) input usage to the Spray Coating Line (Paint Booths #1 - 5), including solvent usage, minus the VOC ~~solvent~~ **in coating materials or cleanup solvents shipped out to be recycled**, shall be limited to 241.0 tons per twelve (12) consecutive month period.

- (c) The VOC content of any coating applied shall be limited to 6.5 pounds per gallon, less water.

D.1.2 PSD Minor Limit [326 IAC 2-2]

Pursuant to PC (48) 1605, issued on May 21, 1986; which was revised by PC (48) 1820, issued December 1, 1989; which was revised, through enhanced new source review, by T 095-6536-00044, issued October 9, 1998; which was amended by AA 095-10019-00044, issued on April 22, 1999; and amended by this permit, the VOC usage, minus the VOC solvent in coating materials or cleanup solvents shipped out to be recycled, at units, Spray Coating Line and the Coating material test booth, shall be limited to less than 236.4 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

This usage limit is required to limit the potential to emit of VOC to less than 250 tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.1.8 Volatile Organic Compounds (VOC) [326 IAC 8-1-4(a)(c)] [326 IAC 8-1-2(a)] [326 IAC 2-2]

- (a) Compliance with the VOC content and usage limitations contained in conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, and Anderson Office of Air Management reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.
- (b) **The Permittee shall determine the VOC content of the combined coating material and cleanup solvents in a shipment to be recycled shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by EPA Reference Method 24 and the sampling procedures in 326 IAC 8-1-4 or other methods as approved by the Commissioner. If a shipment consists of separate containers, the Permittee shall sample each container. The testing shall be conducted in accordance with Section C- Performance Testing, except for notifying IDEM of the test in paragraph (a), all of paragraph (b), and all of paragraph (c).**
- (c) ~~In addition,~~ Compliance with the VOC usage limitations contained in conditions D.1.1 and D.1.2 shall be demonstrated within 30 days of the end of each month. This shall be based on the total volatile organic compound used for the previous month, minus the VOC solvent shipped out to be recycled, and adding it to previous 11 months total VOC usage, minus the VOC solvent shipped out to be recycled, so as to arrive at VOC emissions for the most recent twelve (12) consecutive month period.

- (a1) For the limit in condition D.1.1, the VOC emissions for a month can be arrived at using the following equation:

$$VOC\ emitted = SCL - SR$$

Where

SCL = The total amount of VOC, in tons, delivered to the coating applicators, including coatings, dilution solvents, and cleaning solvents, on the Spray Coating Line; and

SR = The total amount of VOC, in tons, shipped out to be recycled, including coatings, dilution solvents, and cleaning solvents, from the Spray Coating Line and the Coatings material test booth.

- (b2) For the limit in condition D.1.2, the VOC emissions for a month can be arrived at using the following equation:

$$VOC\ emitted = SCL + CM - SR$$

Where

SCL = The total amount of VOC, in tons, delivered to the coating applicators, including coatings, dilution solvents, and cleaning solvents, on the Spray Coating Line;

CM = The total amount of VOC, in tons, delivered to the coating applicators, including coatings, dilution solvents, and cleaning solvents, on the Coatings material test booth; and

SR = The total amount of VOC, in tons, shipped out to be recycled, including coatings, dilution solvents, and cleaning solvents, from the Spray Coating Line and the Coatings material test booth.

D.1.10 Record Keeping Requirements

- (a) To document compliance with conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC content limit established in condition D.1.1 and D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The VOC content of each coating material and solvent used:
- (A) less water; and
- (B) including water.
- (2) The amount of coating material and solvent used on monthly basis.
- (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
- (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
- (3) The cleanup solvent usage for each month;
- (4) The amount of VOC solvent shipped out to be recycled each month. ~~The amount for solvent recycling shall be determined based upon information from the recycler and/or source;~~ **Records shall include weight of coating material and cleaning solvent in each shipment, VOC content test results, so necessary to verify the type and amount recycled.**
- (5) The total VOC usage for each month; and
- (6) The weight of VOCs usage, minus the VOC solvent shipped out to be recycled, for each compliance period.
- (b) To document compliance with condition D.1.9, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

No other comments were made.

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

Company Name: Plastech Decorating Systems
Address City IN Zip: 11700 N State Road 37
TV: 095-17514-00044
Reviewer: Jed D. Wolkins
Date: 7/28/03

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Spray Coating Line																
H.S. Adpro	7.9	76.27%	0.0%	76.3%	0.0%	16.50%	0.00201	4480.000	6.025	6.03	54.38	1305.08	238.18	53.36	36.5171515	28%
Silver Birch Met. Basecoat	8.3	54.09%	0.0%	54.1%	0.0%	37.20%	0.00444	4480.000	4.511	4.51	89.65	2151.69	392.68	249.97	12.126629	25%
Clearcoat	8.4	44.31%	0.0%	44.3%	0.0%	49.21%	0.00384	4480.000	3.708	3.71	63.85	1532.36	279.66	207.42	7.53487096	41%
Plastic Automotive Door Cladding Surface Coating																
Med Dk Neutral Metallic	8.4	51.22%	0.01%	51.2%	0.01%	40.00%	0.00684	60.000	4.28	4.28	1.75	42.09	7.68	4.76	10.6900875	35%
Silver Birch Met. Basecoat	8.3	54.09%	0.0%	54.1%	0.0%	37.20%	0.00684	60.000	4.51	4.51	1.85	44.43	8.11	4.47	12.126629	35%

State Potential Emissions

Add worst case coating to all solvents

211.49 5075.66 926.31 519.98

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: Plastech Decorating Systems
Address City IN Zip: 11700 N State Road 37
TV: 095-17514-00044
Reviewer: Jed D. Wolkins
Date: 7/29/03

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Methyl Isobutyl Ketone	Weight % Toluene	Weight % Naphthalene	Weight % Ethyl Benzene	Weight % Glycol Ethers	Weight % Methyl Ethyl Ketone	Weight % Xylene	Methyl Isobutyl Ketone Emissions (ton/yr)	Toluene Emissions (ton/yr)	Naphthalene Emissions (tons/yr)	Ethyl Benzene Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Methyl Ethyl Ketone Emissions (ton/yr)	Xylene Emissions (ton/yr)
Spray Coating Line																	
H.S. Adpro	7.9	0.00201	4480.000	0.00%	9.27%	0.92%	4.21%	4.23%	0.78%	23.93%	0.00	28.95	2.87	13.15	13.21	2.44	74.73
Oxford White	10.5	0.00444	4480.000	0.73%	0.57%	0.00%	0.39%	0.00%	1.02%	2.30%	6.70	5.23	0.00	3.58	0.00	9.37	21.12
Clearcoat	8.4	0.00384	4480.000	0.00%	0.00%	0.00%	0.62%	3.76%	0.00%	35.39%	0.00	0.00	0.00	3.91	23.74	0.00	223.41
Plastic Automotive Door Cladding Surface Coating																	
Med Dk Neutral Metallic	8.4	0.00684	60.000	0.00%	5.64%	0.00%	0.43%	0.00%	0.00%	2.38%	0.00	0.85	0.00	0.06	0.00	0.00	0.36

Total State Potential Emissions

6.70 35.03 2.87 20.71 36.95 11.80 319.62

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emission Calculations
VOC HAP Emission Calculations From Molding

Company Name: Plastech Decorating Systems
Address City IN Zip: 11700 N State Road 37
TV: 095-17514-00044
Reviewer: Jed D. Wolkins
Date: 7/29/03

Material	Number of Machines	Maximum Shot Size (lbs/shot)	Production rate (shots/hr)	Purge Frequency (purge/day)	Purge Quantity (shots/purge)	Weight % Usage	Weight % VOC emitted at 120 F	Weight % VOC emitted at 420 F	Weight % Single HAP emitted at 120 F	Weight % Single HAP emitted at 420 F	Weight % All HAPs emitted at 120 F	Weight % All HAPs emitted at 420 F	VOC Emissions at 120 F (tons/yr)	VOC Emissions at 420 F (tons/yr)	Single HAP Emissions at 120 F (tons/yr)	Single HAP Emissions at 420 F (tons/yr)	All HAPs Emissions at 120 F (tons/yr)	All HAPs Emissions at 420 F (tons/yr)
1500 Tons Clamp Rating																		
Polypropylene	6.0	13.20	42.00	3.00	3.00	2.00%	0.0009%	0.1550%	0.0009%	0.1550%	0.0009%	0.1550%	0.003	0.004	0.003	0.004	0.003	0.004
Thermoplastic Olefin	6.0	13.20	42.00	3.00	3.00	98.00%	0.0009%	0.1550%	0.0009%	0.0360%	0.0009%	0.0585%	0.129	0.198	0.129	0.046	0.129	0.075
1000 Tons Clamp Rating																		
Polypropylene	1.0	9.25	60.00	3.00	3.00	2.00%	0.0009%	0.1550%	0.0009%	0.1550%	0.0009%	0.1550%	0.000	0.000	0.000	0.000	0.000	0.000
Thermoplastic Olefin	1.0	9.25	60.00	3.00	3.00	98.00%	0.0009%	0.1550%	0.0009%	0.0360%	0.0009%	0.0585%	0.021	0.023	0.021	0.005	0.021	0.009
720 Tons Clamp Rating																		
Polypropylene	1.0	6.00	72.00	3.00	3.00	2.00%	0.0009%	0.1550%	0.0009%	0.1550%	0.0009%	0.1550%	0.000	0.000	0.000	0.000	0.000	0.000
Thermoplastic Olefin	1.0	6.00	72.00	3.00	3.00	98.00%	0.0009%	0.1550%	0.0009%	0.0360%	0.0009%	0.0585%	0.017	0.015	0.017	0.003	0.017	0.006
150 Tons Clamp Rating																		
Polypropylene	2.0	1.00	96.00	3.00	3.00	2.00%	0.0009%	0.1550%	0.0009%	0.1550%	0.0009%	0.1550%	0.000	0.000	0.000	0.000	0.000	0.000
Thermoplastic Olefin	2.0	1.00	96.00	3.00	3.00	98.00%	0.0009%	0.1550%	0.0009%	0.0360%	0.0009%	0.0585%	0.007	0.005	0.007	0.001	0.007	0.002

Total State Potential Emissions

0.18 0.25 0.18 0.06 0.18 0.10

METHODOLOGY

VOC emission rate at 120 F (tons/yr) = Number of Machines * Maximum Shot Size (lbs/shot) * Production Rate (shots/hr) * Weight % Usage * Weight % VOC emitted at 120 F * 8760 hrs/yr * 1 ton/2000 lbs

VOC emission rate at 420 F (tons/yr) = Number of Machines * Maximum Shot Size (lbs/shot) * Purge Frequency (purge/day) * Purge Quantity (shots/purge) * Weight % Usage * Weight % VOC emitted at 420 F * 365 days/yr * 1 ton/2000 lbs

Single HAP emission rate at 120 F (tons/yr) = Number of Machines * Maximum Shot Size (lbs/shot) * Production Rate (shots/hr) * Weight % Usage * Weight % Single HAP emitted at 120 F * 8760 hrs/yr * 1 ton/2000 lbs

Single HAP emission rate at 420 F (tons/yr) = Number of Machines * Maximum Shot Size (lbs/shot) * Purge Frequency (purge/day) * Purge Quantity (shots/purge) * Weight % Usage * Weight % Single HAP emitted at 420 F * 365 days/yr * 1 ton/2000 lbs

All HAPs emission rate at 120 F (tons/yr) = Number of Machines * Maximum Shot Size (lbs/shot) * Production Rate (shots/hr) * Weight % Usage * Weight % All HAPs emitted at 120 F * 8760 hrs/yr * 1 ton/2000 lbs

All HAPs emission rate at 420 F (tons/yr) = Number of Machines * Maximum Shot Size (lbs/shot) * Purge Frequency (purge/day) * Purge Quantity (shots/purge) * Weight % Usage * Weight % All HAPs emitted at 420 F * 365 days/yr * 1 ton/2000 lbs

Emission factors are based on data provided by the manufacturer.

Appendix A: Emission Calculations
 VOC Emission Calculations From Molding Rust Protection and Mold Cleaning

Company Name: Plastech Decorating Systems
 Address City IN Zip: 11700 N State Road 37
 TV: 095-17514-00044
 Reviewer: Jed D. Wolkins
 Date: 11/7/03

Material	Can Capacity (lbs/can)	Maximum usage rate (cans/day)	Weight % VOC	VOC Emissions (tons/yr)
Mold Surface Rust Protector	0.688	15	95%	1.79
Mold Surface Cleaner	0.624	15	100%	1.71

Total State Potential Emissions **3.50**

METHODOLOGY

VOC emission rate (tons/yr) = Can Capacity (lbs/can) * Maximum usage rate (cans/day) * Weight % VOC * 365 days/yr * 1 ton/2000 lbs

Appendix A: Emission Calculations
 PM Emission Calculations From Plastic Resin Transport

Company Name: Plastech Decorating Systems
 Address City IN Zip: 11700 N State Road 37
 TV: 095-17514-00044
 Reviewer: Jed D. Wolkins
 Date: 7/29/03

Material	Number of Machines	Maximum Shot Size (lbs/shot)	Production rate (shots/hr)	Weight % PM	Control Efficiency %	PM Emissions (lbs/hr)	PM10 Emissions (lbs/hr)	PM Emissions (tons/yr)	PM10 Emissions (tons/yr)
Transport to 1500 Tons Clamp Rating									
Resin	6.0	13.20	42.00	0.13%	98.5%	0.649	0.649	2.841	2.841
Transport to 1000 Tons Clamp Rating									
Resin	1.0	9.25	60.00	0.13%	98.5%	0.108	0.108	0.474	0.474
Transport to 720 Tons Clamp Rating									
Resin	1.0	6.00	72.00	0.13%	98.5%	0.084	0.084	0.369	0.369
Transport 150 Tons Clamp Rating									
Resin	2.0	1.00	96.00	0.13%	98.5%	0.037	0.037	0.164	0.164

Total State Potential Emissions **0.88 0.88 3.85 3.85**

METHODOLOGY

PM Emissions (lbs/hr) = Number of Machines * Maximum Shot Size (lbs/shot) * Production rate (shots/hr) * Weight % PM * 10 * (1 - Control Efficiency % / 100)

PM Emissions (tons/yr) = Number of Machines * Maximum Shot Size (lbs/shot) * Production rate (shots/hr) * Weight % PM * 10 * 8760 hrs/yr * 1 ton/2000 lbs * (1 - Control Efficiency % / 100)

The Permittee submitted emission calculations based on a material analysis. The OAQ does not normally accept PM or PM10 emission calculations based on a PM analysis of the product because this calculation method does not account for extra PM and PM10 generated by abrasion and other physical and chemical processes. The OAQ has applied an engineering factor of 10 to account for other PM generated. Since these operations are insignificant by 326 IAC 2-7-1 (21)(G)(xiv)(DD), these calculations are only needed to determine the source's PSD level and each units compliance with 326 IAC 6-3-2. The source's total PM and PM10 limited potential to emit is less the a quarter of the major level. The OAQ accepts these calculations in this case only. The control efficiency is used in the PTE calculations, since the controls are integral to the process.

PM is assumed to equal PM10.

Appendix A: Emissions Calculations
 Natural Gas Combustion Only
 MM BTU/HR <100
 Small Industrial Natural Gas Sources
 Company Name: Plastech Decorating Systems
 Address City IN Zip: 11700 N State Road 37
 TV: 095-17514-00044
 Reviewer: Jed D. Wolkins
 Date: 11/7/03

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

41

44.95

359.16

Pollutant

	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.3	1.4	0.1	18.0	1.0	15.1

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

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 7/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

See page 7 for HAPs emissions calculations.

Appendix A: Emissions Calculations
 Natural Gas Combustion Only
 MM BTU/HR <100
 Small Industrial Natural Gas Sources
 HAPs Emissions
 Company Name: Plastech Decorating Systems
 Address City IN Zip: 11700 N State Road 37
 TV: 095-17514-00044
 Reviewer: Jed D. Wolkins
 Date: 11/7/03

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 0.0021	Dichlorobenzene 0.0012	Formaldehyde 0.075	Hexane 1.8	Toluene 0.0034
Potential Emission in tons/yr	0.000377118	0.000215496	0.0134685	0.323244	0.000610572

HAPs - Metals

Emission Factor in lb/MMcf	Lead 0.0005	Cadmium 0.0011	Chromium 0.0014	Manganese 0.00038	Nickel 0.0021
Potential Emission in tons/yr	0.00009	0.00020	0.00025	0.00007	0.00038

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emissions Calculations
 Burnoff Oven
 Emissions from Combustion

Company Name: Plastech Decorating Systems
 Address City IN Zip: 11700 N State Road 37
 TV: 095-17514-00044
 Reviewer: Jed D. Wolkins
 Date: 11/7/03

Heat Input Capacity
 MMBtu/hr

Potential Throughput
 MMCF/yr

2.4

21.024

Pollutant

	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.0	0.1	0.0	1.1	0.1	0.9

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

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 7/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 9 for HAPs emissions calculations.

Appendix A: Emissions Calculations
 Burnoff Oven
 Emissions from Combustion

HAPs Emissions
 Company Name: Plastech Decorating Systems
 Address City IN Zip: 11700 N State Road 37
 TV: 095-17514-00044
 Reviewer: Jed D. Wolkins
 Date: 11/7/03

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 0.0021	Dichlorobenzene 0.0012	Formaldehyde 0.075	Hexane 1.8	Toluene 0.0034
Potential Emission in tons/yr	2.20752E-05	1.26144E-05	0.0007884	0.0189216	3.57408E-05

HAPs - Metals

Emission Factor in lb/MMcf	Lead 0.0005	Cadmium 0.0011	Chromium 0.0014	Manganese 0.00038	Nickel 0.0021
Potential Emission in tons/yr	0.00001	0.00001	0.00001	0.00000	0.00002

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.
 See Page 10 for emission from Non Combustion.

Appendix A: Emissions Calculations
Burnoff Oven
Emissions from Non Combustion

PM and PM10 Emissions
Company Name: Plastech Decorating Systems
Address City IN Zip: 11700 N State Road 37
TV: 095-17514-00044
Reviewer: Jed D. Wolkins
Date: 11/7/03

Emission Factor in lb/hr.	PM* 0.03	PM10* 0.06
Potential Emission in tons/yr	0.1	0.3

*PM emission factor is filterable PM only. PM10 emission factor is condensable and filterable PM10 combined.
PM and PM10 emissions from the paint are based on supplier data.