INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

TO: Interested Parties / Applicant

DATE: February 24, 2006

RE: Trelleborg Automotive / 103-17554-00021

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 impractible 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.

Enclosures
FNTVOP.dot 1/10/05

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PART 70 OPERATING PERMIT RENEWAL
OFFICE OF AIR QUALITY

Trelleborg Automotive Peru Division
2935 West 100 North
Peru, Indiana 46970-9032

(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.: T 103-17554-00021	
Original signed by: Paul Dubenetzky, Assistant Commissioner Office of Air Quality	Issuance Date: February 24, 2006 Expiration Date: February 24, 2011

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary rubber automotive products manufacturing source.

Responsible Official:	Plant Manager
Source Address:	2935 West 100 North, Peru, Indiana 46970-9032
Mailing Address:	2935 West 100 North, Peru, Indiana 46970-9032
General Source Phone Number:	(765) 472-5404
SIC Code:	3069
County Location:	Miami
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD; Major Source, Section 112 of the Clean Air Act

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

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

(a) One (1) rubber/metal coating operation, identified as EU-001, constructed in 1991 and 1998, consisting of:

(1) One (1) rollcoater, exhausting to stack S114, maximum capacity: 3,600 parts per hour.

(2) One (1) high volume, low pressure (HVLP) primer spray booth, equipped with dry filters for overspray control and exhausting to stack S1, maximum capacity: 1,800 parts per hour.

(3) One (1) high volume, low pressure (HVLP) adhesive spray booth, equipped with dry filters for overspray control and exhausting to stack S2, maximum capacity: 1,800 parts per hour.

(4) Three (3) electric infrared ovens, each exhausting to one (1) stack (S114, S1, or S2).

(b) One (1) rubber/metal coating operation, identified as EU-002, constructed in 1991 and 1993, consisting of two (2) rollcoater lines, identified as Link Line #1 and Link Line #2, exhausting to stack S105, maximum capacity: 515 parts per hour, each.

(c) One (1) rubber/metal coating operation, identified as EU-003, constructed in 1991, consisting of two (2) air atomized spray booths, identified as Booth #1 and Booth #2, using dry filters for overspray control, each exhausting to one (1) stack (S102 and S103, respectively), maximum capacity: 250 parts per hour, total.

(d) One (1) spray booth, identified as Paasche spray booth, constructed in 2004, using high-volume, low-pressure (HVLP) spray applicators, equipped with dry filters for particulate control, exhausting to Stack 10, maximum capacity: 3,300 parts per hour. The parts are made of both rubber and metal, but are less than fifty percent (50%) metal.

(e) One (1) cryogenic deflasher, constructed in 1997, maximum capacity: 2,200 pounds per hour of rubber parts.

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):

Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, including:

One (1) natural gas-fired boiler, constructed after September 21, 1983, heat input capacity: 1.67 million British thermal units per hour. [326 IAC 6-2-4]

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] [326 IAC 2-7-4(a)(1)(D)] [IC 13-15-3-6(a)]

(a) This permit, T 103-17554-00021, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

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

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

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

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

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

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

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

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

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

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

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

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

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted 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
Indianapolis, Indiana 46204-2251

and

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

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

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

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

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

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain 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) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

Facsimile Number: 317-233-5967

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

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

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

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

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

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

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ, 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, 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, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

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

(g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

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

(a) All terms and conditions of permits established prior to T 103-17554-00021 and issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised under 326 IAC 2-7-10.5, or

(3) deleted under 326 IAC 2-7-10.5.

(b) Provided that all terms and conditions are accurately reflected in this combined permit, all previous registrations and permits are superseded by this Part 70 operating permit.

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

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

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

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

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

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

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

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

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

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

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

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

(b) A timely renewal application is one that is:

(1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

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

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

(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) Pursuant to 326 IAC 2-7-11(b) and 326 IAC 2-7-12(a), administrative Part 70 permit amendments and permit modifications for purposes of the acid rain portion of a Part 70 permit shall be governed by regulations promulgated under Title IV of the Clean Air Act. [40 CFR 72]

(c) Any application requesting an amendment or modification of this permit shall be submitted to:

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

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) 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)]

(e) 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.19 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.20 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 limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

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

and

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

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

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

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

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

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

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

(e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification

requirements of part (a) of this condition do not apply.

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

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

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-17-3-2] [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, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

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

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

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

(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 Opacity [326 IAC 5-1]

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

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

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

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

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

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

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

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

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

C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

The Permittee shall comply with the applicable requirements of 326 IAC 14-10, 326 IAC 18, and 40 CFR 61.140.

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

C.7 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
Indianapolis, Indiana 46204-2251

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

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ, not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the 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.8 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.9 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
Indianapolis, Indiana 46204-2251

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.10 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.11 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

(a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on June 11, 1997.

(b) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.12 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

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

C.13 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

(2) review of operation and maintenance procedures and records;

(3) inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall maintain the following records:

(1) monitoring data;

(2) monitor performance data, if applicable; and

(3) corrective actions taken.

C.14 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.15 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) In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2007 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

(1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);

(2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

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

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, on or before the date it is due.

C.16 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 makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner 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.17 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
Indianapolis, Indiana 46204-2251

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.18 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)]: Surface Coating

(a) One (1) rubber/metal coating operation, identified as EU-001, constructed in 1991 and 1998, consisting of:

(1) One (1) rollcoater, exhausting to stack S114, maximum capacity: 3,600 parts per hour.

(2) One (1) high volume, low pressure (HVLP) primer spray booth, equipped with dry filters for overspray control and exhausting to stack S1, maximum capacity: 1,800 parts per hour.

(3) One (1) high volume, low pressure (HVLP) adhesive spray booth, equipped with dry filters for overspray control and exhausting to stack S2, maximum capacity: 1,800 parts per hour.

(4) Three (3) electric infrared ovens, each exhausting to one (1) stack (S114, S1, or S2).

(b) One (1) rubber/metal coating operation, identified as EU-002, constructed in 1991 and 1993, consisting of two (2) rollcoater lines, identified as Link Line #1 and Link Line #2, exhausting to stack S105, maximum capacity: 515 parts per hour, each.

(c) One (1) rubber/metal coating operation, identified as EU-003, constructed in 1991, consisting of two (2) air atomized spray booths, identified as Booth #1 and Booth #2, using dry filters for overspray control, each exhausting to one (1) stack (S102 and S103, respectively), maximum capacity: 250 parts per hour, total.

(d) One (1) spray booth, identified as Paasche spray booth, constructed in 2004, using high-volume, low-pressure (HVLP) spray applicators, equipped with dry filters for particulate control, exhausting to Stack 10, maximum capacity: 3,300 parts per hour. The parts are made of both rubber and metal, but are less than fifty percent (50%) metal.

(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]

(a) Pursuant to 326 IAC 8-1-6 (New facilities; General reduction requirements) and CP 103-9550-00021, issued on June 29, 1998, the best available control technology (BACT) for the one (1) primer spray booth and one (1) adhesive spray booth, both identified as part of EU-001, is the following:

(1) The Permittee shall apply all coatings using a spray gun with HVLP or air atomization spray applicators. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

(2) All operators shall be trained on proper application, cleanup and equipment use.

(3) Storage containers - when such containers are used for VOC or HAPs or VOC and HAP containing materials, they shall be kept covered when not in use.

The HVLP spray equipment and the work practices listed above shall be used at all times that the primer spray booth and adhesive spray booth are in operation. The total amount of VOC delivered to the applicators in the prmer spray booth and the adhesive spray booth shall not exceed 30.1 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month.

(b) Any change or modification that increases the potential VOC emissions from the one (1) rollcoater, also part of EU-001, to 25 tons per year or more may make the facility subject to 326 IAC 8-1-6, and shall require prior IDEM, OAQ, approval.

(c) Any change or modification that increases the potential VOC emissions from either of the two (2) separate lines (Link Line #1 and Link Line #2) at the one (1) rubber and metal coating operation, identified as EU-002, to 25 tons per year or more may make that line subject to 326 IAC 8-1-6, and shall require prior IDEM, OAQ, approval.

(d) Any change or modification that increases the potential VOC emissions from one (1) rubber and metal coating operation, identified as EU-003, to 25 tons per year or more may make the facility subject to 326 IAC 8-1-6, and shall require prior IDEM, OAQ, approval.

(e) Any change or modification that increases the potential VOC emissions from one (1) Paasche spray booth to 25 tons per year or more may make the facility subject to 326 IAC 8-1-6, and shall require prior IDEM, OAQ, approval.

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

Pursuant to 326 IAC 2-4.1-1 (New Source Toxics Control) and CP 103-9550-00021, issued on June 29, 1998, the maximum achievable control technology (MACT) for one (1) primer spray booth and one (1) adhesive spray booth, both identified as part of EU-001, is the following:

(a) The Permittee will apply all coatings using a spray gun with HVLP or air atomization spray applicators. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

(b) All operators will be trained on proper application, cleanup and equipment use.

(c) Storage containers - when such containers are used for VOC or HAPs or VOC and HAP containing materials, they will be kept covered when not in use.

The HVLP spray equipment and the work practices listed above shall be used at all times that the primer spray booth and adhesive spray booth are in operation.

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

Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating at the one (1) primer spray booth and one (1) adhesive spray booth, which are part of EU-001, and the two (2) air atomized spray booths (EU-003) shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

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

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the one (1) primer spray booth and one (1) adhesive spray booth, which are part of EU-001, and the two (2) air atomized spray booths (EU-003) and their control devices.

D.1.5 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 2 to 40 CFR Part 63, Subpart MMMM] [40 CFR 63.3901]

(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 MMMM. The Permittee must comply with these requirements on and after January 2, 2004.

(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, except as otherwise provided in this condition. The permit shield applies to Condition D.1.11, Notification Requirements.

D.1.6 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products [40 CFR Part 63, Subpart MMMM] [40 CFR 63.3882] [40 CFR 63.3883] [40 CFR 63.3980]

(a) The provisions of 40 CFR Part 63, Subpart MMMM (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal 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/misc/miscpg.html. Pursuant to 40 CFR 63.3883(b), the Permittee must comply with these requirements on and after January 2, 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, except as otherwise provided in this condition. The permit shield applies to Condition D.1.11, Notification Requirements.

(c) The affected source is the collection of all of the items listed in 40 CFR 63.3882, paragraphs (b)(1) through (4) that are used for surface coating of miscellaneous metal parts and products within each subcategory as defined in 40 CFR 63.3881(a), paragraphs (2) through (6).

(1) All coating operations as defined in 40 CFR 63.3981;

(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 is defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.3980, and are applicable to the affected source.

Compliance Determination Requirements

D.1.7 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

Compliance with the VOC usage limitation contained in Condition D.1.1 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, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326

IAC 8-1-4.

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

D.1.8 Monitoring

The Permittee shall implement an operator-training program.

(a) All spray booth operators or employees that perform maintenance at the facilities listed in EU-001 and EU-003 shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within 60 days of the date of permit issuance. All new operators shall be trained upon hiring or transfer.

(b) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within 1 hour for inspection by IDEM.

(c) All operators shall be given refresher training annually.

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

D.1.9 Record Keeping Requirements

(a) To document compliance with Condition D.1.1(a), the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits for the one (1) primer spray booth and one (1) adhesive spray booth, both identified as part of EU-001, established in Condition D.1.1. 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.

(2) The amount of coating material and solvent less water 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 total VOC usage for each month; and

(5) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Condition D.1.9, the Permittee shall maintain a copy of the operator-training program, and training records.

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

D.1.10 Notification Requirements [40 CFR 63.3910]

(a) General. The Permittee must submit the applicable notifications in 40 CFR Part 63, Sections 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) by the dates specified in those sections, except as provided in 40 CFR 63.3910, paragraphs (b) and (c).

(b) Notification of compliance status. 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 Part 63, Sections 63.3940, 63.3950, or 63.3960 that applies to the affected source. The notification of compliance status must contain the information specified in 40 CFR 63.3910(c), paragraphs (1) through (11) and any additional information specified in 40 CFR 63.9(h).

D.1.11 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 to include information regarding which compliance option or options will be chosen in the Part 70 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 the applicable requirements of 40 CFR 63, Subpart MMMM, 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.

(b) The significant permit modification application shall be submitted no later than April 2, 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
Indianapolis, Indiana 46204-2251

D.1.12 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1(a) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.2 FACILITY OPERATION CONDITIONS

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

(e) One (1) cryogenic deflasher, constructed in 1997, maximum capacity: 2,200 pounds per hour of rubber parts.

(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 [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the cryogenic deflasher shall not exceed 4.37 pounds per hour, when operating at a process weight rate of 2,200 pounds per hour hour.

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

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

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

SECTION D.3 FACILITY OPERATION CONDITIONS

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

Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, including:

One (1) natural gas-fired boiler, constructed after September 21, 1983, heat input capacity: 1.67 million British thermal units per hour. [326 IAC 6-2-4]

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

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

D.3.1 Particulate [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4, for Q less than 10 MMBtu/hr, Pt shall not exceed 0.6. Therefore, the particulate from the one (1) boiler shall not exceed 0.6 pound per million British thermal units.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Trelleborg Automotive Peru Division
Source Address: 2935 West 100 North, Peru, Indiana 46970-9032
Mailing Address: 2935 West 100 North, Peru, Indiana 46970-9032
Part 70 Permit No.: T 103-17554-00021

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
Indianapolis, Indiana 46204-2251
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Trelleborg Automotive Peru Division
Source Address: 2935 West 100 North, Peru, Indiana 46970-9032
Mailing Address: 2935 West 100 North, Peru, Indiana 46970-9032
Part 70 Permit No.: T 103-17554-00021

This form consists of 2 pages **Page 1 of 2**

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

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

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

Part 70 Quarterly Report

Source Name: Trelleborg Automotive Peru Division
Source Address: 2935 West 100 North, Peru, Indiana 46970-9032
Mailing Address: 2935 West 100 North, Peru, Indiana 46970-9032
Part 70 Permit No.: T 103-17554-00021
Facilities: One (1) primer spray booth and one (1) adhesive spray booth, both identified as part of EU-001
Parameter: VOC usage
Limit: 30.1 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month.

YEAR:

Month	VOC Usage (tons)	VOC Usage (tons)	VOC Usage (tons)
	This Month	Previous 11 Months	12 Month Total

☐ No deviation occurred in this month.

☐ Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Trelleborg Automotive Peru Division
Source Address: 2935 West 100 North, Peru, Indiana 46970-9032
Mailing Address: 2935 West 100 North, Peru, Indiana 46970-9032
Part 70 Permit No.: T 103-17554-00021

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

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".

☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

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:	
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

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

Source Background and Description

Source Name:	**Trelleborg Automotive Peru Division**
Source Location:	**2935 West 100 North, Peru, Indiana 46970-9032**
County:	**Miami**
SIC Code:	**3069**
Operation Permit No.:	**T 103-7638-00021**
Operation Permit Issuance Date:	**June 30, 1999**
Permit Renewal No.:	**T 103-17554-00021**
Permit Reviewer:	**CarrieAnn Paukowits**

The Office of Air Quality (OAQ) has reviewed a Part 70 Operating Permit Renewal application from Trelleborg Automotive Peru Division relating to the operation of a rubber automotive products manufacturing source.

Permitted Emission Units and Pollution Control Equipment

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

(a) One (1) rubber/metal coating operation, identified as EU-001, constructed in 1991 and 1998, consisting of:

(1) One (1) rollcoater, exhausting to stack S114, maximum capacity: 3,600 parts per hour.

(2) One (1) high volume, low pressure (HVLP) primer spray booth, equipped with dry filters for overspray control and exhausting to stack S1, maximum capacity: 1,800 parts per hour.

(3) One (1) high volume, low pressure (HVLP) adhesive spray booth, equipped with dry filters for overspray control and exhausting to stack S2, maximum capacity: 1,800 parts per hour.

(4) Three (3) electric infrared ovens, each exhausting to one (1) stack (S114, S1, or S2).

(b) One (1) rubber/metal coating operation, identified as EU-002, constructed in 1991 and 1993, consisting of two (2) rollcoater lines, identified as Link Line #1 and Link Line #2, exhausting to stack S105, maximum capacity: 515 parts per hour, each.

(c) One (1) rubber/metal coating operation, identified as EU-003, constructed in 1991, consisting of two (2) air atomized spray booths, identified as Booth #1 and Booth #2, using dry filters for overspray control, each exhausting to one (1) stack (S102 and S103, respectively), maximum capacity: 250 parts per hour, total.

(d) One (1) spray booth, identified as Paasche spray booth, constructed in 2004, using high-volume, low-pressure (HVLP) spray applicators, equipped with dry filters for particulate

control, exhausting to Stack 10, maximum capacity: 3,300 parts per hour. The parts are made of both rubber and metal, but are less than fifty percent (50%) metal.

(e) One (1) cryogenic deflasher, constructed in 1997, maximum capacity: 2,200 pounds per hour of rubber parts.

Unpermitted Emission Units and Pollution Control Equipment

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

New Emission Units and Pollution Control Equipment Receiving Advanced Source Modification Approval

There are no proposed emission units during this review process.

Insignificant Activities

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

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, including:

(1) One (1) natural gas-fired boiler, constructed after September 21, 1983, heat input capacity: 1.67 million British thermal units per hour. [326 IAC 6-2-4]

(2) Six (6) natural gas-fired air makeup units, heat input capacity: 5.0 million British thermal units per hour, each.

(3) One (1) natural gas-fired infratrol oven, heat input capacity: 1.2 million British thermal units per hour.

(b) Six (6) injection molding presses, two (2) identified as 22 and one (1) each identified as 7016, 23, 2, and 017, capacity: 60 pounds of uncured rubber per hour, each.

(c) Thirty-eight (38) transfer-type molding presses, capacity: 60 pounds of uncured rubber per hour, each.

(d) Nineteen (19) 300-ton injection molding presses, capacity: 53 pounds of uncured rubber per hour, each.

(e) Two (2) injection rubber molding presses, identified as WR-1 and WR-2, constructed in 2002, capacity: 79.6 pounds per hour, each.

(f) Sixteen (16) Sanyu rubber presses used to manufacture rubber antivibration components, capacity: 875 pounds of uncured rubber per hour, total.

(g) One (1) 800-ton rubber injection molding press, capacity: 79.6 pounds of rubber per hour.

(h) One (1) pre-cure and one (1) post-cure infrared oven.

(i) One (1) CT120 Assembly, capacity: 118 parts per hour and 2 pounds per month of adhesive.

(j) One (1) fluid bushing process, capacity: 360 parts per hour and 55 gallons per month of solvents.

(k) Combustion source flame safety purging upon startup.

(l) The following VOC and HAP storage containers:

(1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.

(2) Vessels storing lubricating oil, hydraulic oils, machining oils, and machining fluids.

(m) Application of oils, greases lubricants or other nonvolatile materials applied as temporary protective coatings.

(n) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

Existing Approvals

The source has been operating under the previous Part 70 Operating Permit, 103-7638-00021, issued on June 30, 1999, and the following amendments and modifications:

(a) First Administrative Amendment 103-12247-00021, issued on October 3, 2000;

(b) First Minor Permit Modification 103-14336-00021, issued on July 26, 2001;

(c) First Reopening 103-13423-00021, issued on February 6, 2002;

(d) Second Administrative Amendment 103-15982-00021, issued on October 30, 2002;

(e) Third Administrative Amendment 103-16644-00021, issued on January 21, 2003;

(f) Fourth Administrative Amendment 103-17816-00021, issued on September 3, 2003;

(g) First Minor Source Modification 103-18054-00021, issued on January 23, 2004; and

(h) First Significant Permit Modification 103-18267-00021, issued on March 5, 2004.

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 proposed 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 Operating Permit:

Condition D.1.8 from 103-7638-00021, issued on June 30, 1999:

Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (S1, S2, S102, and S103)

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, shall be considered a violation of this permit. 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 the 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, shall be considered a violation of this permit. Additional inspection and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Reason revised: The compliance monitoring for the surface coating lines has been revised as part of the appeal resolution, Cause No. 99-A-J-2360. The revised condition is presented in the "Compliance Requirements" section of this document.

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

(a) The following requirements of 326 IAC 6-3-2 (Process Operations)

(1) Condition D.2.1 from 103-7638-00021, issued on June 30, 1999:

Pursuant to 326 IAC 6-3-2 (Process Operations), the particulate matter (PM) from the one (1) cryogenic deflasher, the one (1) carbon black handling system and the one (1) Shaw Mixer shall be limited to 4.37 pounds per hour, 5.97 pounds per hour, and 5.97 pounds per hour respectively.

(2) Condition D.1.2 from 103-7638-00021, issued on June 30, 1999:

Pursuant to 326 IAC 6-3-2 (Process Operations), the particulate matter (PM) from the one (1) primer spray booth, the one (1) adhesive spray booth (two of the facilities identified as EU-001) and the two (2) air atomized spray booths (EU-003) shall be limited by the following: 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: $E = 4.10\ P^{0.67}$, where E = rate of emission in pounds per hour and P = process weight rate in tons per hour.

Reason not incorporated:

The 326 IAC 6-3 revisions that became effective on June 12, 2002, were approved into the State Implementation Plan on September 23, 2005. These rules replace the previous version of 326 IAC 6-3 (Process Operations) that had been part of the SIP; therefore, the requirements of the previous version of 326 IAC 6-3-2 are no longer applicable to this source. The cryogenic deflasher is subject to the requirements of the new version of the rule, and those requirements are incorporated into this permit. The requirements for the carbon black handling system and the Shaw Mixer are not included in this permit because the carbon black handling system and the Shaw Mixer have been removed from this source. The surface coating operations are now subject to the requirements of 326 IAC 6-3-2(d) as shown under the *State Rule Applicability - Individual Facilities* section of this permit.

(b) Condition D.4.1 from First Minor Permit Modification 103-14336-00021, issued on July 26, 2001 and First Significant Permit Modification 103-18267-00021, issued on March 5, 2004:

The one (1) dip coater and the one (1) spray booth are not subject to 326 IAC 8-2-9 since the volatile organic compound (VOC) emissions are each less than 15 pounds per day before controls. Any change or modification which increases the VOC emissions to 15 pounds per day or more from either facility must be approved by the Office of Air Quality (OAQ) before such change may occur.

Reason not incorporated:

Pursuant to 326 IAC 8-2-9(a), the requirements of that rule are applicable to large and small farm machinery, small household appliances, office equipment, industrial machinery, and any other industrial category which coats metal parts or products under the Standard Industrial Classification Code of major groups #33, #34, #35, #36, #37, #38, and #39. This source is in the major SIC group #30, for rubber and miscellaneous plastic products. The facilities at this source coat rubber products with adhesive and attach the products to metal. The majority of the material coated is rubber. Therefore, the requirements of 326 IAC 8-2-9 are not applicable. In addition, the dip coater has been removed from this source.

(c) All construction conditions from all previously issued permits.

Reason not incorporated: All facilities previously permitted have already been constructed; therefore, the construction conditions are no longer necessary as part of the operating permit. Any facilities that were previously permitted but have not yet been constructed would need new pre-construction approval before beginning construction.

(d) Condition C.14 from 103-7638-00021, issued on June 30, 1999, Compliance Response Plan - Failure to Take Response Steps

Reason not incorporated: IDEM has reconsidered the requirement to develop and follow a Compliance Response Plan. The Permittee will still be required to take reasonable response steps when a compliance monitoring parameter is determined to be out of range or abnormal. Replacing the requirement to develop and follow a Compliance Response Plan with a requirement to take reasonable response steps will ensure that the control equipment is returned to proper operation as soon as practicable, while still allowing the Permittee the flexibility to respond to situations that were not anticipated.

(e) Conditions D.1.9(b) from 103-7638-00021, issued on June 30, 1999, the requirement to maintain records of additional inspections prescribed by the Preventive Maintenance Plan.

Reason not incorporated: IDEM has determined that the Permittee is not required to keep records of all preventive maintenance. However, where the Permittee seeks to demonstrate that an emergency has occurred, the Permittee must provide, upon request, records of preventive maintenance in order to establish that the lack of proper maintenance did not cause or contribute to the deviation.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 Operating 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 Operating Permit renewal application for the purposes of this review was received on February 13, 2003. Additional information was received on October 25, 2004.

Emission Calculations

See Appendix A of this document for detailed emission calculations. Since the total potential emissions from insignificant activities are considerable, the emissions from insignificant activites are calculated on pages 3 through 5 of TSD Appendix A.

The emissions from cryogenic deflashing were provided by the applicant and are as follows:

(2,200 lbs of rubber/hr x 1 ton/2,000 lbs) x 1.55 lbs PM/ton of rubber = 1.705 lbs/hr
1.705 lbs/hr x 8,760 hrs/yr x 1 ton/2,000 lbs = 7.47 tons/yr of PM and PM_{10} (PM = PM_{10})
The emission factor of 1.55 lbs PM/ton of rubber was published by the Ohio EPA in RACM 2-495.

Potential to Emit of the Source

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

The source was issued a Part 70 Operating Permit on June 30, 1999. 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.

	Potential To Emit (tons/yr)						
Process/Emission Unit	**PM**	**PM_{10}**	**SO_2**	**VOC**	**CO**	**NO_x**	**HAPs**
One (1) rubber/metal coating operation (EU-001)	1.83	1.83	0.00	39.7	0.00	0.00	20.2 individual 41.0 total
One (1) rubber/metal coating operation (EU-002)	0.00	0.00	0.00	20.5	0.00	0.00	0.00

	Potential To Emit (tons/yr)						
Process/Emission Unit	**PM**	**PM_{10}**	**SO_2**	**VOC**	**CO**	**NO_x**	**HAPs**
One (1) rubber/metal coating operation (EU-003)	0.68	0.68	0.00	4.24	0.00	0.00	6.82 individual 6.82 total
One (1) spray booth (Paasche spray booth)	0.02	0.02	0.00	0.32	0.00	0.00	0.10 individual 0.10 total
One (1) cryogenic deflasher	7.47	7.47	0.00	0.00	0.00	0.00	0.00
Insignificant Activities	0.274	1.09	0.086	38.9	12.1	14.4	9.18 individual 10.8 total
Total Emissions	10.3	11.1	0.086	104	12.1	14.4	20.2 individual 58.7 total

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC are equal to or greater than one hundred (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 potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. 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 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

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

Pollutant	Actual Emissions (tons/year)
PM	Not reported
PM_{10}	Not reported
SO_2	Not reported
VOC	18
CO	Not reported
NO_x	Not reported
HAPs	Not reported

County Attainment Status

The source is located in Miami County.

Pollutant	Status
$PM_{2.5}$	attainment
PM_{10}	attainment
SO_2	attainment
NO_2	attainment
1-Hour Ozone	attainment
8-Hour Ozone	attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) and nitrogen oxides (NO_X) 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 NO_X emissions are considered when evaluating the rule applicability relating to ozone. Miami County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_X emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability - Entire Source section of this document.

(b) Miami County has been classified as unclassifiable or attainment for $PM_{2.5}$. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for $PM_{2.5}$ emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for $PM_{2.5}$ emissions, it has directed states to regulate PM_{10} emissions as a surrogate for $PM_{2.5}$ emissions. See the State Rule Applicability - Entire Source section of this document.

(c) Miami County has been classified as attainment or unclassifiable in Indiana for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability - Entire Source section of this document.

Part 70 Operating 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 Operating Permits.

(b) Monitoring and related record keeping requirements which assure that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

(a) This source does not involve a pollutant-specific emissions unit as defined in 40 CFR 64.1 for VOC:

(1) with the potential to emit before controls equal to or greater than the major source threshold for VOC,

(2) that is subject to an emission limitation or standard for VOC, 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 not applicable to this source.

(b) The requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c, Subpart Dc), are not included in the permit for the one (1) 1.67 mmBtu/hr natural gas fired boiler because the heat input capacity is less than ten (10) million British thermal units per hour.

(c) The requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.540), Subpart BBB, are not included in the permit for this source because the source does not manufacture rubber tires.

(d) The requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.5980), Subpart XXXX, are not included in the permit for this source because the source does not manufacture rubber tires.

(e) The miscellaneous metal parts surface coating operations at this source are subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 14, (40 CFR Part 63, Subpart MMMM), Surface Coating of Miscellaneous Metal Parts and Products. This source is considered an existing affected source pursuant to 40 CFR 63.3882. This rule is available on the US EPA Air Toxics Website at http://www.epa.gov/ttn/atw/misc/miscpg.html.

Pursuant to 40 CFR 63.3883(b), the Permittee must comply with these requirements on and after January 2, 2007.

The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the affected source described in this section except when otherwise specified in 40 CFR 63 Subpart MMMM.

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 no later than April 2, 2006, that will specify the option or options for the emission limitations and standards and methods for determining compliance chosen by the Permittee. At that time, IDEM, OAQ will include the specific details of the rule and how the Permittee will demonstrate compliance.

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 the permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 only applies to Condition D.1.11, of the permit, Notification Requirements.

The affected source is the collection of all of the items listed in 40 CFR 63.3882, paragraphs (b)(1) through (4) that are used for surface coating of miscellaneous metal parts and products within each subcategory as defined in 40 CFR 63.3881(a), paragraphs (2) through (6).

(1) All coating operations as defined in 40 CFR 63.3981;

(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.

In addition, pursuant to 40 CFR 63, Subpart MMMM, the Permittee shall submit a Notification of Compliance Status containing the information required by 40 CFR 63.9(h) in accordance with 40 CFR 63.3910(c). The Notification of Compliance Status must be submitted no later than 30 calendar days following the end of the initial compliance period described in 40 CFR 63.3940, 40 CFR 63.3950, or 40 CFR 63.3960 that applies to your affected source.

State Rule Applicability – Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

The unrestricted potential emissions of each criteria pollutant are less than 250 tons per year from this source, which was constructed after August 7, 1977, is located in an attainment county, and is not in one (1) of the twenty-eight (28) listed source categories. Therefore, this source is not a major source pursuant to 326 IAC 2-2, and the requirements of 326 IAC 2-2, PSD, are not applicable.

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

(a) The one (1) primer spray booth and one (1) adhesive spray booth, both identified as part of EU-001, were constructed after July 27, 1997, are considered one (1) facility and have potential individual HAP emissions greater than 10 tons per year and total HAP emissions greater than 25 tons per year. Therefore, the one (1) primer spray booth and one (1) adhesive spray booth, both identified as part of EU-001, are subject to the requirements of 326 IAC 2-4.1-1, previously 326 IAC 2-1-3.4. Pursuant to CP 103-9550-00021, issued on June 29, 1998, the maximum achievable control technology (MACT) for this facility is the following:

(1) The Permittee will apply all coatings using a spray gun with HVLP or air atomization spray applicators. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

(2) All operators will be trained on proper application, cleanup and equipment use.

(3) Storage containers - when such containers are used for VOC or HAPs or VOC and HAP containing materials, they will be kept covered when not in use.

The HVLP spray equipment and the work practices listed above shall be used at all times that the primer spray booth and adhesive spray booth are in operation.

(b) All other facilities at this source will emit less than ten (10) tons per year of a single HAP or twenty-five (25) tons per year of a combination of HAPs, each. Therefore, 326 IAC 2-4.1 does not apply to those facilities.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting) because it is required to have an operating permit pursuant to 326 IAC 2-7, Part 70. In accordance with the compliance schedule in 326 IAC 2-6-3, an emission statement must be submitted by July 1. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 5-1 (Opacity Limitations)

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

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

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

State Rule Applicability – Individual Facilities

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

The one (1) insignificant boiler, constructed after September 21, 1983, must comply with the PM emission limitations of 326 IAC 6-2-4. This limitation is based on the following equation given in 326 IAC 6-2-4:

$$Pt = 1.09 / Q^{0.26}$$

where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu) heat input

Q = Total source maximum operating capacity rating in million British thermal units per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

$Pt = 1.09 / (1.67)^{0.26} = 0.95$ lb/MMBtu

Pursuant to 326 IAC 6-2-4, for Q less than 10 MMBtu/hr, Pt shall not exceed 0.6. Therefore, the particulate from the one (1) boiler shall not exceed 0.6 pound per million British thermal units.

Based on AP-42, the potential to emit PM from the boiler is:

1.90 lb/MMCF x 1MMCF/1,000 MMBtu = 0.0019 lb/MMBtu

Therefore, the one (1) insignificant boiler will comply with this rule.

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

(a) Pursuant to T 103-7638-00021, issued on June 30, 1999, and 326 IAC 6-3-2, the particulate from the cryogenic deflasher shall not exceed 4.37 pounds per hour, when operating at a process weight rate of 2,200 pounds per hour. The PM emissions from the cryogenic deflasher are 1.705 pounds per hour. Therefore, the cryogenic deflasher will comply with this rule.

This limitation is based upon 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:

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

(b) Pursuant to 326 IAC 6-3-2(d), particulate from the one (1) primer spray booth and one (1) adhesive spray booth, which are part of EU-001, and the two (2) air atomized spray booths (EU-003) shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

(c) Pursuant to 326 IAC 6-3-1(b)(6), roll coating operations are exempt from the requirements of 326 IAC 6-3-2. Therefore, the one (1) rubber/metal coating operation, identified as EU-002, consisting of two (2) rollcoater lines, are not subject to 326 IAC 6-3-2.

(d) Pursuant to 326 IAC 6-3-1(b)(15), the requirements of 326 IAC 6-3-2 are not applicable to the one (1) Paasche spray booth, since the booth uses less than five (5) gallons of coating per day. Any change or modification at the one (1) Paasche spray booth that increases the coating usage to five (5) gallons per day or more shall cause the booth to become subject to 326 IAC 6-3-2(d) and shall require prior IDEM, OAQ, approval.

326 IAC 8-1-6 (New facilities; General reduction requirements)

(a) The one (1) primer spray booth and one (1) adhesive spray booth, both identified as part of EU-001, were constructed after January 1, 1980, are considered one (1) facility and have potential VOC emissions greater than 25 tons per year, total. The facility is not subject to any other rule under 326 IAC 8. Therefore, the one (1) primer spray booth and one (1) adhesive spray booth, both identified as part of EU-001, are subject to the requirements of 326 IAC 8-1-6. Pursuant to CP 103-9550-00021, issued on June 29, 1998, the best available control technology (BACT) for the facility is the following:

(1) The Permittee will apply all coatings using a spray gun with HVLP or air atomization spray applicators. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

(2) All operators will be trained on proper application, cleanup and equipment use.

(3) Storage containers - when such containers are used for VOC or HAPs or VOC and HAP containing materials, they will be kept covered when not in use.

The HVLP spray equipment and the work practices listed above shall be used at all times that the primer spray booth and adhesive spray booth are in operation. The total amount of VOC delivered to the applicators in the prmer spray booth and the adhesive spray booth shall not exceed 30.1 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(b) The one (1) rollcoater, also part of EU-001, was previously determined to be a separate facility from the one (1) primer spray booth and the one (1) adhesive spray booth, both identified as part of EU-001. The potential VOC emissions from the one (1) rollcoater are less than 25 tons per year. Therefore, the requirements of 326 IAC 8-1-6 are not applicable.

(c) The one (1) rubber and metal coating operation, identified as EU-002, constructed after January 1, 1980, consists of two (2) separate lines (Link Line #1 and Link Line #2), which are considered separate facilities. Each line has potential VOC emissions less than 25 tons per year. Therefore, the requirements of 326 IAC 8-1-6 are not applicable.

(d) The one (1) rubber and metal coating operation, identified as EU-003, constructed after January 1, 1980, has potential VOC emissions less than 25 tons per year. Therefore, the reuqirements of 326 IAC 8-1-6 are not applicable.

(e) The one (1) Paasche spray booth, constructed after January 1, 1980, has potential VOC emissons less than 25 tons per year. Therefore, the requirements of 326 IAC 8-1-6 are not applicable.

(f) Each insignificant molding press is a separate facility and the potential VOC emissions from each are less than 25 tons per year. Therefore, the requirements of 326 IAC 8-1-6 are not applicable to any of the molding presses.

(g) Any change or modification that increases the potential VOC emissions from the one (1) roll coater at EU-001, either of the two (2) separate lines (Link Line #1 and Link Line #2) at the one (1) rubber and metal coating operation, identified as EU-002, the one (1) rubber and metal coating operation, identified as EU-003, the one (1) Paasche spray booth, or any of the insignificant molding presses to 25 tons per year or more may make that facility subject to 326 IAC 8-1-6, and shall require prior IDEM, OAQ, approval.

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

Pursuant to 326 IAC 8-2-9(a), the requirements of that rule are applicable to large and small farm machinery, small household appliances, office equipment, industrial machinery, and any other industrial category which coats metal parts or products under the Standard Industrial Classification Code of major groups #33, #34, #35, #36, #37, #38, and #39. This source is in the major SIC group #30, for rubber and miscellaneous plastic products. The facilities at this source coat rubber products with adhesive and attach the products to metal. The majority of the material coated is rubber. Therefore, the requirements of 326 IAC 8-2-9 are not applicable.

326 IAC 8-6 (Organic Solvent Emissions Limitations)

This source was constructed after January 1, 1980. Therefore, the requirements of 326 IAC 8-6 are not applicable.

Testing Requirements

There are still no applicable stack testing requirements.

Compliance Requirements

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

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance

Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the approporiate corrective actions within a specific time period.

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

During the appeal resolution (103-16611-00021), the applicant and IDEM, OAQ, agreed to the following compliance monitoring conditions. The two (2) spray booths at EU-001, and the two (2) spray booths at EU-003, have applicable compliance monitoring conditions as specified below:

The Permittee shall implement an operator-training program.

(a) All spray booth operators or employees that perform maintenance at the facilities listed in EU-001 and EU-003 shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within 60 days of the date of permit issuance. All new operators shall be trained upon hiring or transfer.

(b) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within 1 hour for inspection by IDEM.

(c) All operators shall be given refresher training annually.

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

Conclusion

The operation of this rubber automotive products manufacturing source shall be subject to the conditions of this Part 70 Operating Permit T 103-17554-00021.

Indiana Department of Environmental Management
Office of Air Quality

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

Source Name: **Trelleborg Automotive Peru Division**
Source Location: **2935 West 100 North, Peru, Indiana 46970-9032**
County: **Miami**
SIC Code: **3069**
Operation Permit No.: **T 103-17554-00021**
Permit Reviewer: **CarrieAnn Paukowits**

On November 15, 2005, the Office of Air Quality (OAQ) had a notice published in the Peru Tribune, Peru, Indiana, stating that Trelleborg Automotive Peru Division had applied for a Part 70 Operating Permit Renewal to continue to operate stationary rubber automotive products manufacturing source with dry filters as control. The notice also stated that OAQ proposed to issue a Part 70 Operating Permit for this operation and provided information on how the public could review the proposed Part 70 Operating 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 Part 70 Operating Permit should be issued as proposed.

On December 15, 2005, Guinn P. Doyle of Barnes & Thornburg, on behalf of Trelleborg Automotive Peru Division, submitted comments on the proposed Part 70 Operating Permit. The comments are as follows (The permit language, if changed, has deleted language as ~~strikeouts~~ and new language **bolded.**):

Comment 1:

Condition B.13 – Prior Permits Superseded
Permit Condition B.13(b) provides that all permit terms and conditions of all previous registrations and permits are superseded by the Part 70 permit only if all terms and conditions are "accurately reflected" in the Part 70 permit. This condition subjects the Permittee to potential enforcement for violating permit terms or conditions in previous registrations or permits in the event IDEM has not accurately incorporated those terms or conditions in the Part 70 permit renewal. Because IDEM is the Part 70 permit renewal issuer and IDEM issued all previous registrations and permits, it should be IDEMs responsibility to ensure that all terms and conditions from previous registrations and permits are accurately reflected in the Part 70 permit renewal. Therefore, Condition B.13(b) should be stricken.

Response 1:

U.S. EPA, Region V, has requested that all Part 70 Operating Permits contain the language in Condition B.13. While the language in Condition B.13 subjects the Permittee to potential enforcement for violating previous registrations and permits, it also protects the Permittee from a Title V permit enforcement action based on any conditions that may have been erroneously "tightened up" by the Title V permit renewal. All changes in applicable emission limitations and standards are described in the "Existing Approvals" section of the Technical Support Document. Ultimately, the Permittee's responsibility to include all requirements applicable to the Permittee in the Part 70 permit application as per 326 IAC 2-7-4 and to request clarification for any conditions from previous approvals that are not included in the Title V permit renewal. Therefore, there are no changes to Condition B.13.

Comment 2:

Conditions D.1.4 – Preventive Maintenance Plan and D.1.8 – Monitoring
The requirements to have a preventive maintenance plan for units EU-001 and EU-003 was appealed by Trelleborg on the basis that a preventive maintenance plan is only required for emission control devices and that there is no preventive maintenance that can be one on facilities that control particulate emission using dry filters. It is Trelleborg's understanding that the agreed-to settlement of

the appeal was that the requirement for a preventive maintenance plan for EU-001 and EU-002 would be removed and replaced by requirements to conduct operator training for all spray-booth operators and employees that perform maintenance on EU-001 and EU-003 (see Condition D.1.8). Therefore, permit condition D.1.4 should be deleted and all subsequent permit conditions renumbered. In addition to these changes, Condition D.1.9(b) should have the reference to Condition D.1.9 corrected to read Condition D.1.8.

Response 2:

IDEM, OAQ, did not agree to remove the requirement for a Preventive Maintenance Plan. The Preventive Maintenance Plan requirement must be included in every applicable Title V permit pursuant to 326 IAC 2-7-5(13). This rule refers back to the Preventive Maintenance Plan requirement as described in 326 IAC 1-6-3. This Preventive Maintenance Plan rule sets out the requirements for:

(a) Identification of the individuals responsible for inspecting, maintaining and repairing the emission control equipment (326 IAC 1-6-3(a)(1)),

(b) The description of the items or conditions in the facility that will be inspected and the inspection schedule for said items or conditions (326 IAC 1-6-3(a)(2)), and

(c) The identification and quantification of the replacement parts for the facility which the Permittee will maintain in inventory for quick replacement (326 IAC 1-6-3(a)(3)).

It is clear from the structure of the wording in 326 IAC 1-6-3 that the PMP requirement affects the entirety of the applicable facilities. Only 326 IAC 1-6-3(a)(1) is limited, in that it requires identification of the personnel in charge of only the emission control equipment, and not any other facility equipment. 326 IAC 1-6-3(b) provides that "...as deemed necessary by the commissioner, any person operating a facility shall comply with the requirements of subsection (a) of this section."

Many types of facilities require maintenance in order to prevent excess emissions. In addition to preventive maintenance performed on the dry filters, preventive maintenance should be performed on the spray equipment and mechanical components of the coating operations to prevent equipment malfunctions leading to increased overspray and coating waste that can cause an increase in particulate or VOC emissions. Therefore, Condition D.1.4 will remain in the permit.

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

Company Name: Trelleborg Automotive Peru Division
Address City IN Zip: 2935 West 100 North, Peru, Indiana 46970-9032
Permit Number: T 103-17554
Plt ID: 103-00021
Reviewer: CarrieAnn Paukowits
Application Date: February 13, 2003

Material	Density (Lb/Gal)	Weight % Volatile (H20 & 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
EU-001																
Rollcoater (Chemlok 6887-35)	**8.2**	**73.900%**	**0.0%**	**73.9%**	**0.0%**	**15.90%**	**0.00011**	**3600**	**6.06**	**6.06**	**2.40**	**57.59**	**10.51**	**0.00**	**38.11**	**100%**
Primer Spray Booth (Chemlok 205 w/ MIBK)	**7.2**	**86.900%**	**0.0%**	**86.9%**	**0.0%**	**6.60%**	**0.00030**	**1800**	**6.29**	**6.29**	**3.40**	**81.54**	**14.88**	**0.56**	**95.33**	**75%**
Adhesive Spray Booth (Chemlok 6887-35)	**8.2**	**73.900%**	**0.0%**	**73.9%**	**0.0%**	**15.90%**	**0.00030**	**1800**	**6.06**	**6.06**	**3.27**	**78.54**	**14.33**	**1.27**	**38.11**	**75%**
EU-002																
Part A (J121)	9.20	0.10%	0.0%	0.10%	0.0%	0.0%	0.00020	515	0.009	0.009	0.001	0.023	0.004	0.00	n/a	100%
Part B (BTR 77 Ethyl Acetate)	7.52	100.00%	0.0%	100.00%	0.0%	0.0%	0.00049	515	7.52	7.52	1.90	45.54	8.31	0.00	n/a	100%
Part C (Kuratite T-100)	10.26	0.00%	0.0%	0.00%	0.0%	100.0%	0.00036	515	0.000	0.000	0.000	0.000	0.000	0.00	n/a	100%
R-T-S (Link Line #1)	**8.78**	**39.99%**	**0.00%**	**39.99%**	**0.0%**	**34.3%**	**0.00105**	**515**	**3.51**	**3.51**	**1.90**	**45.57**	**8.32**	**0.00**	**10.24**	**100%**
Part A (J121)	9.20	0.10%	0.0%	0.10%	0.0%	0.0%	0.00020	515	0.009	0.009	0.001	0.023	0.004	0.00	n/a	100%
Part B (BTR 77 Ethyl Acetate)	7.52	100.00%	0.0%	100.00%	0.0%	0.0%	0.00049	515	7.52	7.52	1.90	45.54	8.31	0.00	n/a	100%
Part C (Kuratite T-100)	10.26	0.00%	0.0%	0.00%	0.0%	100.0%	0.00036	515	0.000	0.000	0.000	0.000	0.000	0.00	n/a	100%
R-T-S (Link Line #2)	**8.78**	**39.99%**	**0.00%**	**39.99%**	**0.0%**	**34.3%**	**0.00105**	**515**	**3.51**	**3.51**	**1.90**	**45.57**	**8.32**	**0.00**	**10.24**	**100%**
EU-003																
Booth #1 (Cashew 709)	**11.3**	**99.000%**	**95.9%**	**3.1%**	**3.6%**	**0.70%**	**0.00550**	**250**	**0.36**	**0.35**	**0.48**	**11.59**	**2.12**	**0.34**	**50.18**	**50%**
Booth #2 (Cahew 709)	**11.3**	**99.000%**	**95.9%**	**3.1%**	**3.6%**	**0.70%**	**0.00550**	**250**	**0.36**	**0.35**	**0.48**	**11.59**	**2.12**	**0.34**	**50.18**	**50%**
Paasche Spray Booth																
Carco Ink SG1280	**9.2**	**80.00%**	**0.0%**	**80.0%**	**0.0%**	**18.00%**	**0.000003**	**3300**	**7.36**	**7.36**	**0.07**	**1.75**	**0.32**	**0.02**	**40.89**	**75%**

State Potential Emissions **Add worst case coating to all solvents** **Total** **13.9** **334** **60.9** **2.53**

METHODOLOGY

RTS with 3 materials

RTS Density (lbs/gal) = ((Da*Va)+(Db*Vb)+(Dc*Vc))/(Va+Vb+Vc)

RTS Weight % H2O + Organics = ((Wa*Da*Va)+(Wb*Db*Vb)+(Wc*Dc*Vc))/((Da*Va)+(Db*Vb)+(Dc*Vc))

All materials

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: **Trelleborg Automotive Peru Division**
Address City IN Zip: **2935 West 100 North, Peru, Indiana 46970-9032**
Permit Number: **T 103-17554**
Plt ID: **103-00021**
Reviewer: **CarrieAnn Paukowits**
Application Date: **February 13, 2003**

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylenes	Weight % MIBK	Weight % Ethylbenzene	Weight % Formaldehyd	Weight % MEK	Weight % Toluene	Weight % Glycol Ethers	Xylenes Emissions (ton/yr)	MIBK Emissions (ton/yr)	Ethylbenzene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	MEK Emissions (ton/yr)	Toluene Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Total Emissions (tons/yr)
EU-001																		
Rollcoater (Chemlok 6887-35)	8.2	0.00011	3600.000	15.00%	0.00%	3.00%	0.00%	0.00%	60.00%	0.00%	2.13	0.00	0.43	0.00	0.00	8.53	0.00	11.09
Primer Spray Booth (Chemlok 205 w/ MIBK)	7.2	0.00030	1800.000	5.48%	78.05%	1.28%	0.07%	1.01%	0.11%	0.00%	0.94	13.37	0.22	0.01	0.17	0.02	0.00	14.73
Adhesive Spray Booth (Chemlok 6887-35)	8.2	0.00030	1800.000	15.00%	0.00%	3.00%	0.00%	0.00%	60.00%	0.00%	2.91	0.00	0.58	0.00	0.00	11.64	0.00	15.13
EU-002																		
Link Line #1																		
Part A (J121)	9.20	0.00020	515.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Part B (BTR 77 Ethyl Acetate)	7.52	0.00049	515.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Part C (Kuratite T-100)	10.26	0.00036	515.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Link Line #2																		
Part A (J121)	9.20	0.00020	515.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Part B (BTR 77 Ethyl Acetate)	7.52	0.00049	515.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Part C (Kuratite T-100)	10.26	0.00036	515.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
EU-003																		
Booth #1 (Cashew 709)	11.3	0.00550	250.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	5.00%	0.00	0.00	0.00	0.00	0.00	0.00	3.41	3.41
Booth #2 (Cahew 709)	11.3	0.00550	250.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	5.00%	0.00	0.00	0.00	0.00	0.00	0.00	3.41	3.41
Paasche Spray Booth																		
Carco Ink SG1280	9.2	0.000003	3,300.00	0.00%	25.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.10	0.00	0.00	0.00	0.00	0.00	0.10
Total State Potential Emissions										**Totals:**	**5.98**	**13.5**	**1.23**	**0.012**	**0.173**	**20.2**	**6.82**	**47.9**

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
Insignificant Activities

Company Name: Trelleborg Automotive Peru Division
Address City IN Zip: 2935 West 100 North, Peru, Indiana 46970-9032
Permit Number: T 103-17554
Plt ID: 103-00021
Reviewer: CarrieAnn Paukowits
Application Date: February 13, 2003

	Rubber Throughput (lbs/hr)	VOC Emission Factor (lbs/lb rubber)	VOC (lbs/hr)	VOC (tons/yr)	Case Individual HAP Emission (lbs/lb rubber)	HAP (lbs/hr)	HAP (tons/yr)	Total HAPs Emission Factor (lbs/lb rubber)	HAPs (lbs/hr)	HAPs (tons/yr)
Platen Press Curing (19 300-ton molding presses)	1007	1.75E-03	1.762	7.72	4.40E-04	0.44	1.94	5.05E-04	0.51	2.23
Platen Press Curing (800-ton injection molding press)	79.6	1.75E-03	0.139	0.61	4.40E-04	0.04	0.15	5.05E-04	0.04	0.18
Platen Press Curing (16 Sanyu rubber presses)	875	1.75E-03	1.531	6.71	4.40E-04	0.39	1.69	5.05E-04	0.44	1.94
Platen Press Curing (38 transfer type molding presses)	2280	1.75E-03	3.990	17.48	4.40E-04	1.00	4.39	5.05E-04	1.15	5.04
Platen Press Curing (WR-1)	79.6	1.75E-03	0.139	0.61	4.40E-04	0.04	0.15	5.05E-04	0.04	0.18
Platen Press Curing (WR-2)	79.6	1.75E-03	0.139	0.61	4.40E-04	0.04	0.15	5.05E-04	0.04	0.18
Platen Press Curing (6 injection mold presses)	360	1.75E-03	0.630	2.76	4.40E-04	0.16	0.69	5.05E-04	0.18	0.80
		Totals:	8.33	36.5		2.09	9.18		2.40	10.5

Emission Factors from Tables 4.12-6, 4.12-8 and 4.12-4 of AP-42 draft Section 4.12
Emission factors are for Compound #9. Compound #9 emission factors from the RMA study were used in previous approvals. The VOC factor is slightly higher based on AP-42. The AP-42 emission factor is used here.
Worst Case individual HAP = Acetophenone

Mold release agent

Usage (gallons/day)	Density (lbs/gallon)	Usage (lbs/day)	Weight % VOC	VOC Emissions (lbs/yr)	VOC Emissions (tons/yr)
1	8.34	8.34	99.0%	3014	1.51

CT 120 Assembly

Usage (pounds per month)	Weight % VOC	VOC Emissions (lbs/yr)	VOC Emissions (tons/yr)
2	39.99%	9.60	0.005

Fluid Bushing

Usage (gallons/month)	Density (lbs/gallon)	Usage (lbs/month)	Weight % VOC	VOC Emissions (lbs/yr)	VOC Emissions (tons/yr)
55	8.67	476.85	2.0%	114	0.057

Summary

VOC Emissions (tons/yr)	Individual HAP Emissions (tons/yr)	Total HAPs Emissions (tons/yr)
38.1	9.18	10.5

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Insignificant Combustion

Company Name: Trelleborg Automotive Peru Division
Address City IN Zip: 2935 West 100 North, Peru, Indiana 46970-9032
Permit Number: T 103-17554
Plt ID: 103-00021
Reviewer: CarrieAnn Paukowits
Application Date: February 13, 2003

Total Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
32.87	288

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.90	7.60	0.600	100 **see below	5.50	84.0
Potential Emission in tons/yr	0.274	1.09	0.086	14.4	0.792	12.1

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable 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 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
See page 5 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Insignificant Combustion
HAPs Emissions

Company Name: Trelleborg Automotive Peru Division
Address City IN Zip: 2935 West 100 North, Peru, Indiana 46970-9032
Permit Number: T 103-17554
Plt ID: 103-00021
Reviewer: CarrieAnn Paukowits
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	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	0.00210	0.00120	0.07500	1.80000	0.00340
Potential Emission in tons/yr	0.0003	0.0002	0.011	0.259	0.0005

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	
Emission Factor in lb/MMcf	0.0005	0.0011	0.0014	0.0004	0.0021	**Total**
Potential Emission in tons/yr	0.00007	0.0002	0.0002	0.00005	0.0003	**0.272**

Methodology is the same as page 4.

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