



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: December 15, 2005
RE: Bodor Corporation / 085-17682-00074
FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval – Effective Immediately

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

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

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

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

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

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

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

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

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

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

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

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



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Indianapolis, Indiana 46204-2251

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PART 70 OPERATING PERMIT RENEWAL OFFICE OF AIR QUALITY

**Bodor Corporation (dba Explorer Van Company)
U.S. 30 West and Fox Farm Road North
Warsaw, Indiana 46580**

(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 085-17682-00074 | |
| Issued by: Original Signed By: Paul Dubenetzky, Assistant Commissioner Office of Air Quality | Issuance Date: December 15, 2005 Expiration Date: December 15, 2010 |

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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 motor vehicles parts and accessories manufacturing operation.

| | |
|------------------------------|--|
| Responsible Official: | Plant Manager |
| Source Address: | U.S. 30 West and Fox Farm Road North, Warsaw, IN 46580 |
| Mailing Address: | P.O. Box 4527, Warsaw, IN 46581-4527 |
| General Source Phone Number: | 574-267-7666 |
| SIC Code: | 3714 |
| County Location: | Kosciusko |
| Source Location Status: | Not designated for Lead Attainment or unclassifiable for all other criteria pollutants |
| Source Status: | Part 70 Permit Program Minor Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act |

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

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

- (a) Woodworking activities, identified as B-34 and B-35, constructed in 1992, consisting of various woodworking equipment, with a nominal capacity of 1500 pounds per hour, using two baghouses with flow rates of 37150 cfm and 26450 cfm respectively, to control particulate emissions, and exhausting to stacks SB-34 and SB-35 respectively.
- (b) Two (2) air assisted airless wood coating spray booths, identified as B-26 and B-33, constructed in 1992, with a nominal capacity of 3 vans per hour, equipped with dry filters for overspray control and exhausting to stacks SB-26 and SB-33 respectively. In its Part-70 permit renewal application, Bodor Corporation requested that the two (2) spray booths be permitted to also coat plastic components.
- (c) Four (4) high volume low pressure wood coating spray booths, identified as B-24 and B-27, constructed in 1996, B-30/31, constructed in 1992 and modified in 1996, and B-32, constructed in 1992, with a nominal capacity of 3 vans per hour, equipped with dry filters for overspray control and exhausting to stacks SB-24, SB-27, SB-30 and SB-32.
- (d) One (1) stain dip tank, identified as B-1, constructed prior to 1996, with a nominal capacity of 30 units per hour, with no controls, and exhausting to atmosphere.
- (e) Wood gluing operations, identified as BF-1 and BF-2, constructed in 1992, with a nominal capacity of 2 vans per hour, equipped with dry filters for overspray control and exhausting to atmosphere.

- (f) One (1) air-assisted airless wood/rubber fabric gluing operations, identified as PF-1, constructed in 1986, with a nominal capacity of 7.5 vans per hour, equipped with dry filters for overspray control and exhausting to atmosphere.
- (g) One (1) high volume low pressure fiberglass and plastic primer booth, identified as I-5, constructed in 1992, with a nominal capacity of 3 vans per hour, equipped with dry filters for overspray control and exhausting to stack SI-5. In its Part-70 permit renewal application, Bodor Corporation requested that the booth and related processes to be relocated to building 'F' and be identified as F-1 and exhausting through Stack SF-1.
- (h) Three (3) high volume low pressure topcoat booths, identified as Q-3, Q-6 and Q-7, constructed in 1995, with a nominal capacity of 3 vans per hour, equipped with dry filters for overspray control and exhausting to stacks SQ-3, SQ-6 and SQ-7.
- (i) Two (2) air atomization van body repair and touch-up booths, identified as C-6 and C-7, constructed in 1986, with a nominal capacity of 35 vans per day, equipped with dry filters for overspray control and exhausting to stacks SC-6 and SC-7.
- (j) One (1) Interior Glue application, identified as AF-1, constructed in 1986, with a nominal capacity of 1 van per hour, equipped with dry filters for overspray control and exhausting to atmosphere.
- (k) One (1) glue spray booth, identified as F-1, constructed prior to 1996, that applies adhesive to plastic parts, with a nominal capacity of 0.275 gallons per hour, equipped with dry filters for overspray control and exhausting to stack SF-1. In its response to NOD #1, received by IDEM, OAQ on December 12, 2003, Bodor Corporation requested that the booth be identified as F-2 and exhausting through Stack SF-2.
- (l) Woodworking activities, identified as PF-2, constructed in 1986, consisting of various woodworking equipment, with a nominal capacity of 300 pounds per hour, using a sock filter for particulate control, and exhausting to atmosphere.

A.3 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, 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) Btu per hour.
- (b) Cold Cleaning Degreasing - Paint gun cleaners using organic solvents.
- (c) Infrared curing equipment.
- (d) Exposure chambers ("towers", "columns"), for curing of ultra-violet coatings where heat is the intended discharge.
- (e) Any operation using aqueous solutions containing less than 1% by weight VOCs excluding HAPs.
- (f) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.

- (g) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (h) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.
- (i) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks and fluid handling equipment.
- (j) Blowdown for any of the following: sight glass; boiler; compressors; pumps and cooling towers.
- (k) Stationary fire pumps.
- (l) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying and woodworking operations.
- (m) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kiloPascals measured at 38 degrees (C)).
- (n) Safety-Kleen spray gun cleaner.
- (o) Building B sanding machine.
- (p) Prep station.
- (q) Three (3) fiberglass mold presses.

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

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

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

SECTION B GENERAL CONDITIONS

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

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than July 1 of each year to:

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

and

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 and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) 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, regu-

lation 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]

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

by this permit.

- (b) All previous registrations and permits are superseded by this permit.

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

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

Indiana Department of Environmental Management
Compliance 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.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

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

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

- (1) That this permit contains a material mistake.
- (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

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

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

B.16 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4]

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

Request for renewal shall be submitted to:

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

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
 - (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
 - (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.
 - (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

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

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251
- Any such application shall be certified by the “responsible official” as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

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

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

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

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
 - (3) The changes do not result in emissions which exceed the 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.20 Source Modification Requirement [326 IAC 2-7-10.5]

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

B.21 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1] [IC 13-17-3-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ 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.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

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

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
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.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ 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.24 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. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

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

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

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

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

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

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

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

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

All required notifications shall be submitted to:

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

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

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

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

C.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 December 11, 1996.
- (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 (Emission Reporting);

- (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)]:

- (a) Two (2) air assisted airless wood and plastic coating spray booths, identified as B-26 and B-33, constructed in 1992, with a nominal capacity of 3 vans per hour, equipped with dry filters for overspray control and exhausting to stacks SB-26 and SB-33 respectively.
- (b) Four (4) high volume low pressure wood coating spray booths, identified as B-24 and B-27, constructed in 1996, B-30/31, constructed in 1992 and modified in 1996, and B-32, constructed in 1992, with a nominal capacity of 3 vans per hour, equipped with dry filters for overspray control and exhausting to stacks SB-24, SB-27, SB-30 and SB-32.
- (c) One (1) stain dip tank, identified as B-1, constructed prior to 1996, with a nominal capacity of 30 units per hour, with no controls, and exhausting to atmosphere.
- (d) Wood gluing operations, identified as BF-1 and BF-2, constructed in 1992, with a nominal capacity of 2 vans per hour, equipped with dry filters for overspray control and exhausting to atmosphere.
- (e) One (1) air-assisted airless wood/rubber fabric gluing operations, identified as PF-1, constructed in 1986, with a nominal capacity of 7.5 vans per hour, equipped with dry filter for overspray control and exhausting to atmosphere.
- (f) One (1) glue spray booth, identified as F-2, constructed prior to 1996, that applies adhesive to plastic parts, with a nominal capacity of 0.275 gallons per hour, equipped with dry filters for overspray control and exhausting to stack SF-2.
- (g) Three (3) high volume low pressure topcoat booths, identified as Q-3, Q-6 and Q-7, constructed in 1995, with a nominal capacity of 3 vans per hour, equipped with dry filters for overspray control and exhausting to stacks SQ-3, SQ-6 and SQ-7.
- (h) Two (2) air atomization van body repair and touch-up booths, identified as C-6 and C-7, constructed in 1986, with a nominal capacity of 35 vans per day, equipped with dry filters for overspray control and exhausting to stacks SC-6 and SC-7.
- (i) One (1) Interior Glue application, identified as AF-1, constructed in 1986, with a nominal capacity of 1 van per hour, equipped with dry filters for overspray control and exhausting to atmosphere.
- (j) One (1) high volume low pressure fiberglass and plastic primer booth, identified as F-1, constructed in 1992, with a nominal capacity of 3 vans per hour, equipped with dry filters for overspray control and exhausting to stack SF-1.

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

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

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

- (a) Any change or modification which may increase the potential VOC emissions from the wood/rubber fabric gluing operations, identified as PF-1, to 25 tons or more per year, shall require prior OAQ approval.
- (b) Any change or modification which may increase the potential VOC emissions from the Interior Glue application, identified as AF-1, to 25 tons or more per year, shall require prior OAQ approval.
- (c) Any change or modification which may increase the potential VOC emissions from the glue spray booth, identified as F-2, to 25 tons or more per year, shall require prior OAQ approval.
- (d) Pursuant to CP 085-2841-00037, issued on May 24, 1995, and 326 IAC 8-1-6, the high volume low pressure fiberglass and plastic primer booth, identified as F-1, shall:
 - (1) use relatively high solids, low-VOC coatings. The maximum VOC content by weight of the coatings shall not exceed 76.3% with a minimum solids content by volume of 16.2%; and
 - (2) use high-volume, low pressure (HVLP) spray applicators.

These conditions are required as a result of the BACT requirement under 326 IAC 8-1-6.

- (e) Pursuant to CP 085-4601-00037, issued on October 11, 1995, and 326 IAC 8-1-6, the three (3) high volume low pressure topcoat booths, identified as Q-3, Q-6 and Q-7, shall:
 - (1) use relatively high solids, low-VOC coatings. The maximum VOC content by weight of the coatings shall not exceed 76.3% with minimum solids content by volume of 16.2%;
 - (2) use high-volume, low pressure (HVLP) spray applicators. The HVLP gun pressure shall not exceed 10 psi; and
 - (3) record readings from the line pressure monitors on the HVLP guns on a daily basis.

These conditions are required as a result of the BACT requirement under 326 IAC 8-1-6.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

Any change or modification which may increase the potential VOC emissions from the two van body repair and touch-up booths, identified as C-6 and C-7, to 25 tons or more per year, shall require prior OAQ approval.

D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture, identified as B-26, B-33, B-24, B-27, B-30/31, B-1, BF-1 and BF-2, shall utilize one of the following application methods:

Airless Spray Application
Air Assisted Airless Spray Application
Electrostatic Spray Application
Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. 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.

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

Pursuant to 326 IAC 6-3-2(d), particulate from the operations identified as PF-1, AF-1, F-2, F-1, C-6, C-7, Q-3, Q-6, Q-7, B-26, B-33, B-24, B-27, B-30/31, B-32, BF-1, and BF-2 shall be controlled by dry particulate filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications. This requirement to operate the control is not federally enforceable.

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

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the fiberglass primer operations (F-1), fiberglass coating operations (Q-3, Q-6 and Q-7) and wood coating booth B-30/31 and any control devices.

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

D.1.7 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products [40 CFR Part 63, Subpart M] [40 CFR 63.3882] [40 CFR 63.3883] [40 CFR 63.3980]

- (a) The provisions of 40 CFR Part 63, Subpart M (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.

- (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 are 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.

D.1.8 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 2 to 40 CFR Part 63, Subpart PPPP] [40 CFR 63.4501]

- (a) The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart PPPP. The Permittee must comply with these requirements on and after the effective date of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

D.1.9 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products [40 CFR Part 63, Subpart PPPP] [40 CFR 63.4481] [40 CFR 63.4482]

- (a) The provisions of 40 CFR Part 63, Subpart PPPP (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/plastic/plasticpg.html>. Pursuant to 40 CFR 63.4483(b), the Permittee must comply with these requirements on and after the date 3 years after the effective date of 40 CFR Part 63, Subpart PPPP.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.
- (c) The following emissions units comprise the affected source that is subject to 40 CFR 63, Subpart PPPP:
 - (1) All coating operations as defined in 40 CFR 63.4581;

- (2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
 - (3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and
 - (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.
- (c) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.4581, and are applicable to the affected source.

Compliance Determination Requirements

D.1.10 Volatile Organic Compounds (VOC) [326 IAC 8-1-4(a)(3)] [326 IAC 8-1-2(a)]

Compliance with the VOC content and usage limitations contained in Conditions D.1.1(d) and D.1.1(e) 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)] [40 CFR 64]

D.1.11 Monitoring [40 CFR 64]

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters for the coating booths identified as B-24, B-26, B-27, B-30/31, B-32, B-33, BF-1, BF-2, PF-1, F-1, F-2, AF-1, Q-3, Q-6, Q-7, C-6 and C-7. To monitor the performance of the dry filters, weekly observations shall be made of the overspray while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

For the wood coating booths identified as B-24, B-26, B-27, B-30/31, B-32, and B-33, the above satisfies the requirements of 40 CFR 64.

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

D.1.12 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) Initial notification. The Permittee must submit the initial notification for 40 CFR 63, Subpart Mmmm, no later than January 2, 2005.
- (c) 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.1.13 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]

The Permittee shall submit an application for a significant permit modification to IDEM, OAQ 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 nine (9) months prior to the compliance date in 40 CFR 63, Subpart Mmmm.
- (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.1.14 Notification Requirements [40 CFR 63.4510]

- (a) General. The Permittee must submit the notifications in 40 CFR 40 CFR 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply to the affected source by the dates specified in those sections, except as provided in 40 CFR 63.4510, paragraphs (b) and (c).
- (b) Initial notification. The Permittee must submit the initial notification required by 40 CFR 63.9(b) for a new or reconstructed affected source no later than 120 days after initial startup or 120 days after the effective date of 40 CFR Part 63, Subpart Pppp, whichever is later. (For an existing affected source) the Permittee must submit the initial notification no later than 1 year after the effective date of 40 CFR Part 63, Subpart Pppp. If the Permittee is using compliance with the Automobiles and Light-Duty Trucks NESHAP (subpart Iiii of this part) under 40 CFR 63.4881(d) to constitute compliance with this subpart for the plastic part coating operations, then the Permittee must include a statement

to this effect in the initial notification and no other notifications are required under this subpart. If the Permittee is complying with another NESHAP that constitutes the predominant activity at the facility under 40 CFR 63.4481(e)(2) to constitute compliance with this subpart for the plastic coating operations, then the Permittee must include a statement to this effect in the initial notification and no other notifications are required under this subpart.

- (c) 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 63.4540, 40 CFR 63.4550, or 40 CFR 63.4560 that applies to the affected source. The notification of compliance status must contain the information specified in 40 CFR 63.4510, paragraphs (c)(1) through (11) and in 40 CFR 63.9(h).

D.1.15 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 PPPP, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.
- (b) The significant permit modification application shall be submitted no later than nine (9) months prior to the compliance date in 40 CFR 63, Subpart PPPP.
- (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.1.16 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1(d), D.1.1(e) and D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (5) shall be taken monthly and (6) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.1(d), D.1.1(e) and D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

- (1) The VOC content of each coating material and solvent used.
- (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.
 - (6) A log of daily pressure measurements from the line pressure monitors for the HVLP guns used in the three (3) high volume low pressure topcoat booths, identified as Q-3, Q-6 and Q-7.
- (b) To document compliance with Condition D.1.11, the Permittee shall maintain a log of weekly overspray observations, and daily and monthly inspections.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2 FACILITY OPERATION CONDITIONS

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

- (a) Woodworking activities, identified as B-34 and B-35, constructed in 1992, consisting of various woodworking equipment, with a nominal capacity of 1500 pounds per hour, using two baghouses with flow rates of 37150 cfm and 26450 cfm respectively, to control particulate emissions, and exhausting to stacks SB-34 and SB-35 respectively.
- (b) Woodworking activities, identified as PF-2, constructed in 1986, consisting of various wood-working equipment, with a nominal capacity of 300 pounds per hour, using a sock filter for particulate control, and exhausting to atmosphere.

(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.2.1 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

- (a) Pursuant to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes), the allowable PM emission rate from the woodworking facilities, B-34 and B-35, shall not exceed 3.38 pounds per hour when operating at a process weight rate of 1500 pounds per hour.
- (b) Pursuant to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes), the allowable PM emission rate from the woodworking facilities, PF-2, shall not exceed 1.15 pounds per hour when operating at a process weight rate of 300 pounds per hour.

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

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

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

Compliance Determination Requirements

D.2.2 Particulate Control

- (a) In order to comply with Condition D.2.1, the two baghouses and the sock filter for particulate control shall be in operation and control emissions from the woodworking facilities B-34, B-35, and PF-2 at all times that these facilities are in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

D.2.3 Visible Emissions Notations

- (a) Daily visible emission notations of the baghouse exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.2.4 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.2.5 Broken or Failed Bag Detection

- (a) For a single compartment baghouse controlling emissions from a process operated continuously, failed units and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

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

D.2.6 Record Keeping Requirements

- (a) To document compliance with Condition D.2.3, the Permittee shall maintain records of daily visible emission notations of the baghouse exhaust.
- (b) To document compliance with Condition D.2.4, the Permittee shall maintain records of the results of the inspections required under Condition D.2.4 and the dates the vents are redirected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3

FACILITY OPERATION CONDITIONS

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

Insignificant Activities:

Cold Cleaning Degreasing - Paint gun cleaners using organic solvents.

(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 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaner degreaser operations constructed after January 1, 1980, the Permittee shall:

- (a) Equip the degreaser with a cover.
- (b) Equip the cleaner with a facility for draining cleaned parts.
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner.
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases.
- (e) Provide a permanent, conspicuous label summarizing the operation requirements.
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

SECTION D.4 FACILITY OPERATION CONDITIONS

PSD Minor Limit Conditions for the entire source

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

D.4.1 PSD Minor Source Status [326 IAC 2-2]

- (a) The VOC usage at the wood/rubber fabric gluing operation, interior glue application, glue spray booth, fiberglass and plastic primer booth, topcoat booths, wood coating spray booths, stain dip tank, wood gluing operations, van body repair and touch-up booths, and the cold cleaning degreasing - paint gun cleaners, minus the VOC solvent shipped out as waste or to be recycled from those facilities, shall be limited to less than 250 tons per 12 consecutive month period, total, with compliance determined at the end of each month. This usage limit is required to limit the potential to emit of VOC to less than 250 tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.
- (b) Any change or modification from the equipment covered in this permit, which may increase VOC potential emissions to 250 tons per year, shall require a PSD permit pursuant to 326 IAC 2-2, before such change may occur.

Compliance Determination Requirements

D.4.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-4(a)(c)] [326 IAC 8-1-2(a)] [326 IAC 2-2]

- (a) The Permittee shall determine the VOC content of the combined coating material and cleanup solvents in a shipment to be recycled shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by EPA Reference Method 24 and the sampling procedures in 326 IAC 8-1-4 or other methods as approved by the Commissioner. If a shipment consists of separate containers, the Permittee shall sample each container. The testing shall be conducted in accordance with Section C- Performance Testing, except for notifying IDEM of the test.
- (b) Compliance with the VOC usage limitation contained in Condition D.4.1 shall be demonstrated within thirty (30) days of the end of each month. This shall be based on the total volatile organic compound used for the previous month, minus the VOC solvent shipped out, and adding it to previous eleven (11) - month total VOC usage, minus the VOC solvent shipped out, so as to arrive at VOC emissions for the most recent twelve (12) consecutive month period. The VOC emissions for a month can be arrived at using the following equation:

$$\text{VOC emitted} = \text{VI} - \text{SO}$$

Where:

VI = The total amount of VOC, in tons, delivered to the coating applicators or input to the processes listed in Condition D.4.1, including coatings, dilution solvents, and cleaning solvents; and

SO = The total amount of VOC, in tons, shipped out as waste or recycled, including coatings, dilution solvents, and cleaning solvents, from the processes listed in Condition D.4.1.

Record Keeping and Reporting

D.4.3 Record Keeping Requirements

- (a) To document compliance with Conditions D.4.1, 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/or the VOC emission limits established in Condition D.4.1. 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, including cleanup solvent, used.
 - (2) The amount of coating material and solvent less water used on monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (3) The amount of VOC solvent shipped out as waste or to be recycled each month. The amount for solvent shipped out shall be determined based upon information from the waste collector, recycler, and/or source;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted (VOC used, minus the VOC solvent shipped out as waste or to be recycled) for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.4.4 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.4.1(a) shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee requires the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Bodor Corporation (dba Explorer Van Company)
Source Address: U.S. 30 West and Fox Farm Road North, Warsaw, IN 46580
Mailing Address: P.O. Box 4527, Warsaw, IN 46581-4527
Part 70 Permit No.: 085-17682-00074

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: Bodor Corporation (dba Explorer Van Company)
Source Address: U.S. 30 West and Fox Farm Road North, Warsaw, IN 46580
Mailing Address: P.O. Box 4527, Warsaw, IN 46581-4527
Part 70 Permit No.: 085-17682-00074

This form consists of 2 pages

Page 1 of 2

- This is an emergency as defined in 326 IAC 2-7-1(12)
- 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
 - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

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

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

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

Page 2 of 2

| |
|---|
| Date/Time Emergency started: |
| Date/Time Emergency was corrected: |
| Was the facility being properly operated at the time of the emergency? Y N |
| Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other: |
| Estimated amount of pollutant(s) emitted during emergency: |
| Describe the steps taken to mitigate the problem: |
| Describe the corrective actions/response steps taken: |
| Describe the measures taken to minimize emissions: |
| If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value: |

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

Part 70 Quarterly Report

Source Name: Bodor Corporation (dba Explorer Van Company)
 Source Address: U.S. 30 and Fox Farm Road North, Warsaw, IN 46580
 Mailing Address: P.O. Box 4527, Warsaw, IN 46581-4527
 Part 70 Permit No.: T085-17682-00051
 Facility: Entire Source
 Parameter: VOC Emitted (The total weight of VOC used, minus the VOC solvent shipped out as waste or to be recycled), VOC emitted = VI - SO
 Limit: Less than 250 tons per 12 consecutive month period, total, with compliance determined at the end of each month

YEAR:

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

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

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

Attach a signed certification to complete this report.

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

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

Source Name: Bodor Corporation (dba Explorer Van Company)
 Source Address: U.S. 30 West and Fox Farm Road North, Warsaw, IN 46580
 Mailing Address: P.O. Box 4527, Warsaw, IN 46581-4527
 Part 70 Permit No.: 085-17682-00074

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

Page 1 of 2

| | |
|---|-------------------------------|
| <p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p> | |
| <input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD. | |
| <input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD | |
| 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: | Bodor Corporation (dba Explorer Van Company) |
| Source Location: | U.S. 30 West and Fox Farm Road North, Warsaw, IN 46580 |
| County: | Kosciusko |
| SIC Code: | 3714 |
| Operation Permit No.: | T085-7436-00074 |
| Operation Permit Issuance Date: | March 18, 1999 |
| Permit Renewal No.: | 085-17682-00074 |
| Permit Reviewer: | Ghassan Shalabi |

The Office of Air Quality (OAQ) has reviewed a Part 70 application from Bodor Corporation (dba Explorer Van Company) relating to the motor vehicles part and accessories operations.

Permitted Emission Units and Pollution Control Equipment

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

- (a) Woodworking activities, identified as B-34 and B-35, constructed in 1992, consisting of various woodworking equipment, with a nominal capacity of 1500 pounds per hour, using two baghouses with flow rates of 37150 cfm and 26450 cfm respectively, to control particulate emissions, and exhausting to stacks SB-34 and SB-35 respectively.
- (b) Two (2) air assisted airless wood coating spray booths, identified as B-26 and B-33, constructed in 1992, with a nominal capacity of 3 vans per hour, equipped with dry filters for overspray control and exhausting to stacks SB-26 and SB-33 respectively. In its Part-70 permit renewal application, Bodor Corporation requested that the two spray booth to be permitted to also coat plastic components.
- (c) Four high volume low pressure wood coating spray booths, identified as B-24, B-27, B-31, constructed in 1996 and B-30 and B-32, constructed in 1992, with a nominal capacity of 3 vans per hour, equipped with dry filters for overspray control and exhausting to stacks SB-24, SB-27, SB-30 and SB-32.
- (d) One (1) stain dip tank, identified as B-1, constructed prior to 1996, with a nominal capacity of 30 units per hour, with no controls, and exhausting to atmosphere.
- (e) Wood gluing operations, identified as BF-1 and BF-2, constructed in 1992, with a nominal capacity of 2 vans per hour, equipped with dry filters for overspray control and exhausting to atmosphere.
- (f) One (1) air-assisted airless wood/rubber fabric gluing operations, identified as PF-1, constructed in 1986, with a nominal capacity of 7.5 vans per hour, equipped with dry filter for overspray control and exhausting to atmosphere.
- (g) Fiberglass operations, consisting of two (2) spray-up booths identified as I-19 and I-23 and one (1) gel coat booth, identified as I-15, constructed in 1992, with a nominal

- capacity of 3 vans per hour, equipped with dry filters for overspray control and exhausting to stacks SI-15, SI-19 and SI-23 respectively.
- (h) One (1) high volume low pressure fiberglass and plastic primer booth, identified as I-5, constructed in 1992, with a nominal capacity of 3 vans per hour, equipped with dry filters for overspray control and exhausting to stack SI-5. In its Part-70 permit renewal application, Bodor Corporation requested that the booth and related processes to be relocated to building 'F' and be identified as F-1 and exhausting through Stack SF-1.
 - (i) Three (3) high volume low pressure topcoat booths, identified as Q-3, Q-6 and Q-7, constructed in 1995, with a nominal capacity of 3 vans per hour, equipped with dry filters for overspray control and exhausting to stacks SQ-3, SQ-6 and SQ-7.
 - (j) Two (2) air atomization van body repair and touch-up booths, identified as C-6 and C-7, constructed in 1986, with a nominal capacity of 35 vans per day, equipped with dry filters for overspray control and exhausting to stacks SC-6 and SC-7.
 - (k) One (1) Interior Glue application, identified as AF-1, constructed in 1986, with a nominal capacity of 1 van per hour, equipped with dry filters for overspray control and exhausting to atmosphere.
 - (l) One (1) glue spray booth, identified as F-1, constructed prior to 1996, that applies adhesive to plastic parts, with a nominal capacity of 0.275 gallons per hour, equipped with dry filters for overspray control and exhausting to stack SF-1. In its response to NOD #1, received by IDEM, OAQ on December 12, 2003, Bodor Corporation requested that the booth be identified as F-2 and exhausting through Stack SF-2.
 - (m) Woodworking activities, identified as PF-2, constructed in 1986, consisting of various woodworking equipment, with a nominal capacity of 300 pounds per hour, using a sock filter for particulate control, and exhausting to atmosphere.

Unpermitted Emission Units and Pollution Control Equipment

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

Insignificant Activities

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (b) Cold Cleaning Degreasing - Paint gun cleaners using organic solvents (326 IAC 8-3-5).
- (c) Infrared curing equipment.
- (d) Exposure chambers ("towers", columns"), for curing of ultra-violet coatings where heat is the intended discharge.
- (e) Any operation using aqueous solutions containing less than 1% by weight VOCs excluding HAPs.
- (f) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.

- (g) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (h) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.
- (i) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks and fluid handling equipment.
- (j) Blowdown for any of the following: sight glass; boiler; compressors; pumps and cooling towers.
- (k) Stationary fire pumps.
- (l) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying and woodworking operations.
- (m) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees (C)).
- (n) Safety-Kleen spray gun cleaner.
- (o) Building B sanding machine.
- (p) Prep station.
- (q) Three (3) fiberglass mold presses.

Existing Approvals

The source has constructed or has been operating under the following previous approvals:

- (a) T085-7436-00074, issued on March 18, 1999.
- (b) T085-13347-00074, issued on January 14, 2001.

All conditions from previous approvals were incorporated into this permit except the following:

- (a) T085-7436-00074, issued on March 18, 1999

Condition C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

The total source potential to emit volatile organic compounds is limited to less than 250 tons per year. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.

Reason not incorporated: In order to add record keeping and reporting requirements, a new section, which ensures federal enforceability, was added as section D.4 to include these requirements as follows:

~~Condition C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]~~

~~The total source potential to emit volatile organic compounds is limited to less than 250 tons per year. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.~~

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

D.4.1 PSD Minor Source Status [326 IAC 2-2]

- (a) **The wood/rubber fabric gluing operation, interior glue application, glue spray booth, fiberglass operations, fiberglass and plastic primer booth, topcoat booths, wood coating spray booths, stain dip tank, wood gluing operations, van body repair and touch-up booths, and the cold cleaning degreasing - paint gun cleaners shall use less than 250 tons of VOC, including coatings, dilution solvents and cleaning solvents per 12 consecutive month period with compliance determined at the end of each month. This usage limit is required to limit the potential to emit of VOC to less than 250 tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.**
- (b) **Any change or modification from the equipment covered in this permit, which may increase VOC potential emissions to 250 tons per year, shall require PSD permit pursuant to 326 IAC 2-2, before such changes are made.**

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

D.4.2 Record Keeping Requirements

- (a) **To document compliance with Conditions D.4.1, 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/or the VOC emission limits established in Condition D.4.1. 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) **All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.**

D.4.3 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.4.1 (a) shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee requires the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) T085-7436-00074, issued on March 18, 1999

D.1.4 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the PM from the operations identified as PF-1, AF-1, F-1, I-19, I-23, I-15, I-5, Q-3, Q-6, Q-7, B-26, B-33, B-24, B-27, B-30/31, BF-1 and BF-2 shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

Reason not incorporated: The condition did not include the high volume low pressure wood coating spray booth identified as B-32, the two (2) air atomization van body repair and touch-up booths, identified as C-6 and C-7 or the grinding and machining operations. Also, on June 12, 2002, revisions to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) became effective; this rule was previously referred to as 326 IAC 6-3 (Process Operations). As of the date this permit is being issued these revisions have not been approved by EPA into the Indiana State Implementation Plan (SIP). Therefore, condition D.1.4 is changed and a new condition was added as D.1.5 as follows:

D.1.4 7 Particulate Matter (PM) [~~326 IAC 6-3-2(c)~~] [40 CFR 52, Subpart P]

Pursuant to ~~326 IAC 6-3-2(c)~~ **40 CFR 52, Subpart P**, the PM from the operations identified as PF-1, AF-1, F-1, I-19, I-23, I-15, I-5, **C-6, C-7**, Q-3, Q-6, Q-7, B-26, B-33, B-24, B-27, B-30/31, **B-32, the grinding and machining operations**, BF-1 and BF-2 shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

D.1.8 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the operations identified as PF-1, AF-1, F-2, I-19, I-23, I-15, F-1, C-6, C-7, Q-3, Q-6, Q-7, B-26, B-33, B-24, B-27, B-30/31, B-32, BF-1, and BF-2 shall be controlled by dry particulate filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications. This requirement to operate the control is not federally enforceable.

- (c) T085-7436-00074, issued on March 18, 1999

D.1.10 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters for the fiberglass operations and wood coating booth identified as B-30/31. To monitor the performance of the dry filters, weekly observations shall be made of the overspray 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.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an overspray emission, evidence of overspray emission, or other abnormal 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.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Reason not incorporated: The monitoring requirements for the wood coating booths needed to be revised to reflect the applicability of 40 CFR 64. Also, IDEM has revised the monitoring requirement for the fiberglass and follows:

D.1.14 18 Monitoring [40 CFR 64]

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters for the fiberglass operations and wood coating booths identified as **B-24, B-26, B-27, B-30/31, B-32, and B-33**. To monitor the performance of the dry filters, weekly observations shall be made of the overspray while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (b) ~~Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an overspray emission, evidence of overspray emission, or other abnormal 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.~~

Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan

- Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

For the wood coating booths identified as B-24, B-26, B-27, B-30/31, B-32, and B-33, the above satisfies the requirements of 40 CFR 64.

D.1.19 Monitoring

- (a) **Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters for the fiberglass operations. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.**
- (b) **Monthly inspections shall be performed of the particulate emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.**
- (c) **Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.**

- (d) T085-7436-00074, issued on March 18, 1999

D.1.11 Record Keeping Requirements

- (a) To document compliance with Conditions C.1, D.1.1 (d) and D.1.1 (e) the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (5) shall be taken monthly and (6) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1 (d) and D.1.1 (e).

Reason not incorporated: To show compliance with condition D.1.2, condition D.1.11 is changed as follows:

D.1.14 17 Record Keeping Requirements

- (a) To document compliance with Conditions ~~C.1~~, D.1.1 (d) ~~and~~ , D.1.1 (e) ~~and~~ D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (5) shall be taken monthly and (6) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1 (d) ~~and~~ , D.1.1 (e) ~~and~~ **D.1.2**. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

- (e) T085-7436-00074, issued on March 18, 1999

Condition D.1.12 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions C.1, D.1.1 (d) and D.1.1 (e) 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.

Reason not incorporated: condition C.1 was deleted as explained previously, and the limits specified in Conditions D.1.1 (d)(1) and D.1.1 (e)(1) are content limits and not an annual limits. Therefore, record keeping is sufficient to determine compliance with conditions D.1.1 (d)(1) and D.1.1 (e)(1). Therefore, condition D.1.12 is deleted as follows:

~~D.1.12 Reporting Requirements~~

~~A quarterly summary of the information to document compliance with Conditions C.1, D.1.1(d) and D.1.1(e) 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.~~

(f) T085-7436-00074, issued on March 18, 1999

Reason not incorporated: 326 IAC 8-3-2 (Cold Cleaner Operations) applies to the cold cleaning operations because it was constructed after January 1, 1980. All the requirements of 326 IAC 8-3-2 are included in 326 IAC 8-3-5. Therefore, condition D.3.1 was changed as follows:

D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-5][**326 IAC 8-3-2**]

Enforcement Issue

There are no enforcement actions pending.

Recommendation

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

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

An administratively complete Part 70 permit renewal application for the purposes of this review was received on June 17, 2003. Additional information was received on December 12, 2003.

Emission Calculations

The calculations submitted by the applicant have been verified and found to be accurate and correct. These calculations are provided in Appendix A of this document (2 pages).

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 March 18, 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.

| Process/ emission unit | Potential to Emit (tons/year) | | | | | | |
|------------------------------|---------------------------------------|--|------------------|------------------|------------------|---------------------|--------------------|
| | PM | PM-10 | SO ₂ | VOC | CO | NO _x | HAPs |
| Insignificant Activities | | | | 3 | | | |
| Source | Greater than 100, less than 250 | Greater than 100, less than 250 | Less than 100 | Less than 247 | Less than 100 | Less than 100 | Greater than 25 |
| Total PTE | Greater than 100, less than 250 | Greater than 100, less than 250 | Less than 100 | Less than 250 | Less than 100 | Less than 100 | Greater than 25 |

- (a) The potential to emit of PM10 and VOC are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit of Xylene, Toluene, and Styrene are equal to or greater than ten (10) tons per year and unrestricted potential emissions 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 | 0 |
| PM-10 | 3 |
| SO ₂ | 0 |
| VOC | 31 |
| CO | 0 |
| NO _x | 0 |
| HAP (specify) | Not available |

County Attainment Status

The source is located in Kosciusko County.

| Pollutant | Status |
|-----------------|---------------------------|
| PM-10 | unclassifiable |
| SO ₂ | attainment |
| NO ₂ | unclassifiable/attainment |
| Ozone | unclassifiable/attainment |
| CO | unclassifiable/attainment |
| Lead | not designated |

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Kosciusko County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (b) Kosciusko County has not been designated for Lead and has been classified as unclassifiable or attainment for PM10, SO2, NO2, Ozone, and CO. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 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.

Part 70 Permit Conditions

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

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

Federal Rule Applicability

- (a) This source does involve a pollutant-specific emissions unit as defined in 40 CFR 64.1 for PM:
 - (1) with the potential to emit before controls equal to or greater than the major source threshold for PM,
 - (2) that is subject to an emission limitation or standard for PM, and

- (3) uses a control device as defined in 40CFR Part 64.1 to comply with that emission limitation or standard.

Therefore, the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are applicable to this source.

- (b) The Wood Surface Coating operation (B-24,B-26, B-27, B-30/31, B-32, and B-33) is not a "large unit" as described in 40 CFR 64.5. Therefore, the owner or operator has submitted a CAM plan pursuant to 40 CFR 64 as part of the Part 70 renewal application on June 17, 2003.
- (c) Bodor Corporation (dba Explorer Van Company) is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.390, Subpart MM), because the source is not considered an assembly plant. There are no other New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (d) Bodor Corporation (dba Explorer Van Company) is not subject to the National Emission Standards for Hazardous Air Pollutants, 40 CFR 63.460 Subpart T because they do not use any solvent containing the following as a cleaning or drying agent in the Cold Cleaner Degreasing - paint gun cleaners using organic solvent:
- (1) perchloroethylene
 - (2) trichloroethylene
 - (3) 1,1,1-trichloroethane
 - (4) carbon tetrachloride
 - (5) chloroform
 - (6) methylene chloride
- (e) Bodor Corporation (dba Explorer Van Company) is not subject to the National Emission Standards for Hazardous Air Pollutants, 40 CFR 63.800 Subpart JJ because the wood products utilized in the van conversions are not manufactured as described by the following Standard Industrial Classification codes: 2434, 2511, 2512, 2517, 2519, 2521, 2531, 2541, 2599 or 5712.
- (f) Bodor Corporation (dba Explorer Van Company) is subject to the National Emission Standards for Hazardous Air Pollutants for Miscellaneous Metal Parts & Products Surface Coating, 326 IAC 20, (40 CFR 63, Subpart MMMM) because it is a major source of HAPs and has a metal parts and products surface coating operation. A copy of this rule is available on the US EPA Toxic Website at <http://www.epa.gov/ttn/atw/misc/miscpg.html>. Pursuant to 40 CFR 63.4483(b), the Permittee must comply with these requirements on and after the date 3 year after the effective date of 40 CFR 63, Subpart MMMM. 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.
- (g) Bodor Corporation (dba Explorer Van Company) is subject to the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products, 326 IAC 20, (40 CFR 63, Subpart PPPP) because it is a major source of HAPs and has a plastic parts and products surface coating operation. A copy of this rule is available on the US EPA Toxic Website at <http://www.epa.gov/ttn/atw/mcan/mcanpg.html>. Pursuant to 40 CFR 63.4483(b), the Permittee must comply with these requirements on and after the date 3 year after the effective date of 40 CFR 63, Subpart PPPP. 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.

- (h) The reinforced plastic composites production operations are subject to the National Emission Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production, 40 CFR 63, Subpart WWWW because it is a major source of HAPs and has a reinforced plastic composites production operation. A copy of the MACT is currently available on the U.S. EPA website, <http://www.epa.gov/ttn/atw/rpc/rpcpg.html>.

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 WWWW.

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 nine months prior to the compliance date for the MACT, April 21, 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. In addition, pursuant to 40 CFR 63, Subpart WWWW, the Permittee shall submit:

- (1) An Initial Notification containing the information specified in 40 CFR 63.9(b)(2) no later than August 19, 2003.
- (2) If complying with organic HAP emissions limit averaging provisions, the Permittee shall submit a Notification of Compliance Status, containing the information specified in 40 CFR 63.9(h), no later than May 21, 2007.
- (3) If complying with organic HAP content limits, application equipment requirements, or organic HAP emissions limit other than organic HAP emissions limit averaging, the Permittee shall submit a Notification of Compliance Status, containing the information specified in 40 CFR 63.9(h), no later than May 21, 2006.
- (4) If complying by using an add-on control device, the Permittee shall submit:
 - (A) A notification of intent to conduct a performance test as specified in 40 CFR 63.9(e), at least 60 calendar days before the performance test is scheduled to begin.
 - (B) A notification of the date for the CMS performance evaluation, if required, as specified in 40 CFR 63.9(g), by the date of submission of the notification of intent to conduct a performance test.
 - (C) A Notification of Compliance Status as specified in 40 CFR 63.9(h), no later than 60 calendar days after the completion of the add-on control device performance test and CMS performance evaluation.

State Rule Applicability – Entire Source

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

The source has submitted an Emergency Reduction Plan (ERP) on December 11, 1996. The ERP has been verified to fulfill the requirements of 326 IAC 1-5-2 (Emergency Reduction Plans).

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

The source has submitted a Preventive Maintenance Plan (PMP) on December 11, 1996. This PMP has been verified to fulfill the requirements of 326 IAC 1-6-3 (Preventive Maintenance Plan).

326 IAC 2-2 (Prevention of Significant Deterioration)

The source was constructed after August 07, 1977. The source is not a major stationary source because it is not one of the 28 listed categories and because the VOC emissions are limited to less than 250 tons per year. Pursuant to T085-7436-00074, issued on March 18, 1999 and revised through this Part 70 operating permit renewal (see the existing approvals section of this tsd) the wood/rubber fabric gluing operation, interior glue application, glue spray booth, fiberglass operations, fiberglass and plastic primer booth, topcoat booths, wood coating spray booths, stain dip tank, wood gluing operations, van body repair and touch-up booths, and the cold cleaning degreasing - paint gun cleaners shall use less than 250 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period with compliance determined at the end of each month. This usage limit is required to limit the potential to emit of VOC to less than 250 tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

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

The wood and plastic surface coating and the fiberglass and plastic surface coating operations will emit more than 10 tons per year of a single HAP or 25 tons per year of a combination of HAPs. The source was constructed prior to July 27, 1997. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting) because it has the potential to emit more than one hundred (100) tons per year of PM10 and VOC. This statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6-3 and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period identified in 326 IAC 2-6.

326 IAC 5-1 (Opacity Limitations)

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

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

326 IAC 20-25 (Emissions from Reinforced Plastics Composites Fabricating Emission Units)

This source is subject to 326 IAC 20-25 (Emissions from Reinforced Plastics Composites Fabricating Emission Units) because of the following:

- (a) The source is a major source of HAPs
- (b) The source manufactures reinforced plastic composites, parts, or products
- (c) The source has an emission unit where resins and gel coats that contain Styrene are applied and cured using open molding process.
- (d) The source has actual emissions of Styrene equal to or greater than 3 tons per year.

Therefore, the following shall apply:

- (A) Pursuant to 326 IAC 20-25-3, the owners or operators of the fiberglass operation shall comply with the provisions of the rule on or after January 1, 2002, including:
- (a) The total HAP monomer content of the following materials shall be limited based on the application method used and the products produced as specified in the following table:

| Fiber Reinforced Plastics Composites Products Except Watercraft | HAP Monomer Content, Weight Percent |
|---|-------------------------------------|
| Resin, Manual or Mechanical Application | |
| Production-Specialty Products | 48* |
| Production-Noncorrosion Resistant Unfilled | 35* |
| Production-Noncorrosion Resistant Filled (35% by weight) | 38 |
| Production, Noncorrosion Resistant, Applied to Thermoformed Thermoplastic Sheet | 42 |
| Production, Class I, Flame and Smoke Shrinkage Controlled | 60* |
| Tooling | 52 |
| Tooling | 43 |
| Gel Coat Application | |
| Production-Pigmented | 37 |
| Clear Production | 44 |
| Tooling | 45 |
| Production-Pigmented, subject to ANSI ^a standards | 45 |
| Production-Clear, subject to ANSI ^a standards | 50 |

^a American National Standards Institute.

* Categories that must use mechanical nonatomized application technology or manual application as stated in subsection (c).

Compliance with these HAP monomer content limits shall be demonstrated on a monthly basis. If all of the resins and gel coats used during a month meet the specified HAP monomer content limits, then maintaining records of content and usage as specified under Condition D.1.27 is sufficient for demonstrating compliance with the HAP monomer content limits.

Compliance with the limitations contained in this condition may be demonstrated using monthly emission averaging within each resin or gel coat application category listed in subsection(b) by the use of resins or gel coats with HAP monomer contents lower than the limits specified, and/or additional emission reduction techniques approved by IDEM, OAQ.

Examples of emission reduction techniques include, but are not limited to, using nonatomized application to apply resins or gelcoats within a category that does not require nonatomized application, lower monomer content resins and gel coats, vapor suppression, vacuum bagging, or installing a control device. This is allowed to meet the HAP monomer content limits for resins and gel coats within each category, and shall be calculated on an equivalent emissions mass basis monthly to demonstrate compliance as shown below:

For Averaging within a category:

$$Em_A \leq (M_R * E_a)$$

Where:

M_R = Total monthly mass of material within each category

E_a = Emission factor for each material based on allowable monomer content and allowable application method for each category.

Em_A = Actual monthly emissions from all materials used within a category based on material specific emission factors, emission reduction techniques and emission controls

Units: mass = tons

emission factor = lbs of monomer per ton of resin or gel coat

emissions = lbs of monomer

Note: Fillers may not be included when averaging.

- (b) The following categories of materials in subsection (a) shall be applied using mechanical nonatomized application technology or manual application:
- (1) Production noncorrosion resistant, unfilled resins from all sources.
 - (2) Production, specialty product resins from all sources.
 - (3) Tooling resins used in the manufacture of watercraft.
 - (4) Production resin used for Class I flame and smoke products.

Nonatomized application equipment means the devices where resin or gel coat material does any of the following:

- (1) Flows from the applicator, in a steady state in a observable coherent flow, without droplets, for a minimum distance of three (3) inches from the applicator orifices such as flow coaters, flow choppers, and fluid impingement equipment.
- (2) Is mechanically dispensed within or on to a paint roller applicator such as pressure fed rollers.
- (3) Is deposited on fiber reinforcement moving through a resin or gel coat bath such as resin impregnators.

Nonatomized spray application technology includes flow coaters, flow choppers, pressure-fed rollers, fluid impingement, or other non-spray applications of a design and specifications approved by IDEM, OAQ.

Filled resins are resins containing greater than or equal to thirty-five percent (35%) by weight inert filler material, such as silica micro-spheres or micro-balloons, added to alter the density or other physical properties of the resin. The term "inert filler" does not include pigments.

- (c) Unless specified in subsection (b), gel coat application and mechanical application of resins shall be by any of the following spray technologies:
- (1) Nonatomized application technology.
 - (2) Air-assisted airless.
 - (3) Airless.
 - (4) High volume, low pressure (HVLP).

- (5) Equivalent emission reduction technologies to subdivisions (2) through (4).
- (d) The following cleaning operation standards for resin and gel coat application equipment shall apply:
 - (1) For routine flushing of resin and gel coat application equipment such as spray guns, flow coaters, brushes, rollers, and squeegees, a cleaning solvent shall contain no HAPs. This emission standard does not apply to solvents used for removing cured resin or gel coat from application equipment.
 - (2) A source must store HAP containing solvents used for removing cured resin or gel coat in containers with covers. The covers must have no visible gaps and must be in place at all times, except when equipment is placed in or removed from the container.
 - (3) Recycled cleaning solvents that contain less than or equal to five percent (5%) HAP by weight are considered to contain no HAP for the purposes of this subsection.
- (B) Pursuant to 326 IAC 20-25-4, the following work practice standards shall be implemented:
 - (a) Non-atomizing spray equipment shall not be operated at pressures that atomize the material during the application process.
 - (b) Except for mixing containers as described in item (g), HAP containing materials shall be kept in a closed container when not in use.
 - (c) Solvents sprayed during cleanup and resin changes shall be directed into solvent collection containers.
 - (d) Solvent collection containers shall be kept closed when not in use.
 - (e) Clean-up rags with solvent shall be stored in closed containers.
 - (f) Closed containers shall be used for the storage of the following:
 - (1) All production and tooling resins that contain HAPs.
 - (2) All production and tooling gel coats that contain HAPs.
 - (3) Waste resins and gel coats that contain HAPs.
 - (4) Cleaning materials, including waste cleaning materials.
 - (5) Other materials that contain HAPs.
 - (g) All resin and gel coat mixing containers with a capacity equal to or greater than fifty-five (55) gallons must have a cover with no visible gaps in place at all times except when material is being added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container.
- (C) Pursuant to 326 IAC 20-25-8, all new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and spray-like applications (for

example, those applications that could result in excess emissions if performed improperly) shall be trained according to the following schedule:

- (a) All personnel hired after March 7, 2001 shall be trained within fifteen (15) days of hiring.
 - (b) All personnel hired before March 7, 2001 shall be trained or evaluated by a supervisor within thirty (30) days of the start of operation.
 - (c) To ensure training goals listed in subsection (b) are maintained, all personnel shall be given refresher training annually.
 - (d) Personnel who have been trained by another owner or operator subject to 326 IAC 20-25 are exempt from subdivision (a) if written documentation that the employee's training is current is provided to the new employer.
 - (e) If the result of an evaluation shows that training is needed, such training shall occur within fifteen (15) days of the evaluation.
 - (f) The lesson plans shall cover, for the initial and refresher training, at a minimum, all of the following topics:
 - (1) Appropriate application techniques.
 - (2) Appropriate equipment cleaning procedures.
 - (3) Appropriate equipment setup and adjustment to minimize material usage and overspray.
 - (g) The owner or operator shall maintain the following training records on site and available for inspection and review:
 - (1) A copy of the current training program.
 - (2) A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training. Records of prior training programs and
- (D) Compliance with the HAP monomer content limitations in Condition D.1.4 shall be determined by one of the following:
- (1) The manufacturer's certified product data sheet.
 - (2) The manufacturer's material safety data sheet.
 - (3) Sampling and analysis, using any of the following test methods, as applicable:
 - (A) 40 CFR 60, Method 24, Appendix A (July 1, 1998)*, shall be used to measure the total volatile HAP and volatile organic compound (VOC) content of resins and gel coats. Method 24 may be modified for measuring the volatile HAP content of resins or gel coats to require that the procedure be performed on uncatalyzed resin or gel coat samples.
 - (B) 40 CFR 63, Method 311, Appendix A (July 1, 1998)*, shall be used to measure HAP content in resins and gel coats by direct injection into a gas chromatograph.

- (4) An alternate method approved by IDEM, OAQ.
- (E) Record Keeping Requirements
 - (a) To document compliance with Condition D.1.4, the Permittee shall maintain records that are complete and sufficient to establish compliance with the HAP monomer content limits. Records maintained shall be taken monthly. Examples of such records include but are not limited to:
 - (1) The usage by weight and monomer content of each resin and gel coat used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS), manufacturer's certified product data sheets, and calculations necessary to verify the type, amount used, and HAP content of each resin or gel coat;
 - (2) A log of the dates of use;
 - (3) Method of application and other emission reduction techniques for each resin and gel coat used;
 - (4) Monthly calculations demonstrating compliance on an equivalent emissions mass basis if non-compliant resins or gel coats are used during that month.
 - (b) To document compliance with Condition D.1.6, the Permittee shall maintain the following training records:
 - (1) A copy of the current training program.
 - (2) A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training. Records of prior training programs and former personnel are not required to be maintained.
 - (c) To document compliance with Conditions D.1.7 and D.1.19, the Permittee shall maintain a log of monthly overspray observations, daily inspections of the filters, and those additional inspections prescribed by the Preventive Maintenance Plan.
 - (d) To document compliance with Condition D.1.20, the Permittee shall maintain records of weekly visible emission notations of the fiberglass operations' stack exhaust.
 - (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.
- (F) Reporting Requirements

On or after January 1, 2002, sources using monthly emissions averaging pursuant to 326 IAC 20-25-3(h)(2) and Condition D.1.4(a) shall submit a quarterly summary report and supporting calculations pursuant to 326 IAC 20-25-7(c). The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

State Rule Applicability – Individual Facilities

326 IAC 6-3-2 (Process Operations)

On June 12, 2002, revisions to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) became effective; this rule was previously referred to as 326 IAC 6-3(Process Operations). As of the date this permit is being issued these revisions have not been approved by EPA into the Indiana State Implementation Plan (SIP); therefore, the following requirement from the previous version of 326 IAC 6-3 (Process Operations) which has been approved into the SIP will remain applicable requirement until the revisions to 326 IAC 6-3 are approved into the SIP and the condition is modified in a subsequent permit action.

- (a) Pursuant to 326 IAC 6-3, the particulate matter (PM) from the woodworking activities, B-34, B-35, and PF-2, shall be limited by the following:

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

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

$$E = 4.10(0.75)^{0.67} \quad E = 3.38 \text{ lbs/hr for B-34 and B-35} \\ E = 4.10(0.15)^{0.67} \quad E = 1.15 \text{ lbs/hr for PF-2}$$

The baghouses and the sock filter shall be in operation at all times the woodworking activities, B-34, B-35, and PF-2 are in operation, in order to comply with this limit.

- (b) Pursuant to 40 CFR 52 Subpart P, the particulate matter (PM) from the spray booths PF-1, AF-1, F-2, I-19, I-23, I-15, F-1, C-6, C-7, Q-3, Q-6, Q-7, B-26, B-33, B-24, B-27, B-30/B-31, B-32, the grinding and machining operations, BF-1 and BF-2 shall be limited by the following:

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

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

Under the rule revision, the particulate matter overspray from the spray booths shall be controlled by a dry filter, and the Permittee shall operate these control devices in accordance with the manufacturer's specifications.

- (d) 326 IAC 6-3-2 (Process Operations) does not apply to dip tank B-01 because it does not emit particulate. Also, this rule does not apply to the air atomization repair and touchup booths, identified as C-6 and C-7 because they are exempt pursuant to 326 IAC 6-3-1.
- (e) 326 IAC 6-3-2 (Process Operations) does not apply to the grinding and machining operations because the potential emissions of this operation are less than 0.551 lb/hr. However, Pursuant to 40 CFR 52 Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

326 IAC 8-1-6 (BACT)

- (a) The potential VOC emissions from the glue spray booth, F-2, are less than 25 tons/yr. Therefore, 326 IAC 8-1-6 does not apply.
- (b) The potential VOC emissions from the interior glue application, AF-1, are less than 25 tons per year. Therefore, 326 IAC 8-1-6 does not apply.

- (c) The potential VOC emissions from the glue spray booth, PF-1, are less than 25 tons per year. Therefore, 326 IAC 8-1-6 does not apply.
- (d) Pursuant to CP 085-2841-00037, issued on May 24, 1995, the fiberglass operations, F-1, I-15, I-19 and I-23, were subject to 326 IAC 8-1-6. A Best Available Control Technology (BACT) was presented by the source. The BACT options specified in the permit are:
 - (1) the use of relatively high solids, low-VOC coatings. The maximum VOC content by weight of the coatings shall not exceed 76.3% with minimum solids content by volume of 16.2%.
 - (2) the use of high-volume, low pressure (HVLP) spray applicator.
- (e) Pursuant to CP 085-4601-00037, issued on October 11, 1995, the fiberglass coating operations, Q-3, Q-6 and Q-7, were subject to 326 IAC 8-1-6. A Best Available Control Technology (BACT) was presented by the source. The BACT options specified in the permit are:
 - (1) the use of relatively high solids, low-VOC coatings. The maximum VOC content by weight of the coatings shall not exceed 76.3% with minimum solids content by volume of 16.2%.
 - (2) use of high-volume, low pressure (HVLP) spray applicator. The HVLP gun pressure shall not exceed 10 psi.
 - (3) readings from the line pressure monitors on the HVLP guns shall be taken on a daily basis

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

The two spray booths that coat miscellaneous metal parts, C-6 and C-7, were both constructed prior to July 1, 1990 and each booth has potential VOC emission less than 25 tons per year. Therefore, pursuant to 326 IAC 8-2-9, the surface coating emission limitations for miscellaneous metal coating operations do not apply.

Any change or modification which may increase the potential VOC emissions to 25 tons per year or more from spray booths C-6 and C-7 must be approved by the Office of Air Quality (OAQ) before such change may occur.

326 IAC 8-2-12 (Surface Coating emission limitations: wood furniture and cabinet coating)

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coatings applied to the wood components at spray booths, B-24, B-26, B-27, B-30/31, B-32 and B-33, at dip tank, B-1 and wood gluing operations, BF-1 and BF-2, shall utilize one or more of the following application methods:

- Airless Spray Application
- Air-Assisted Spray Application
- Electrostatic Spray Application
- Electrostatic Bell or Disc Application
- Heated Airless Spray Application
- Roller Coating
- Brush or Wipe Application
- Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. 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.

Based on information submitted, Bodor Corporation (dba Explorer Van Company), Inc. uses air-assisted airless spray applications, HVLP equipment, brush or wipe applications and dip-and-drain applications for wood coating and, therefore, is in compliance with this requirement.

326 IAC 8-3-2 (Volatile Organic Compounds (VOC))

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

326 IAC 8-3-5 (Cold cleaner degreaser operation and control)

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:

- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38OC) (one hundred degrees Fahrenheit (100OF));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38OC) (one hundred degrees Fahrenheit (100OF)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
- (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

- (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38OC) (one hundred degrees Fahrenheit (100OF)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9OC) (one hundred twenty degrees Fahrenheit (120OF)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:
 - (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

Compliance Requirements

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

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

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

1. The fiberglass operations and wood coating booths have applicable compliance monitoring conditions as specified below:
 - (a) Daily inspections shall be performed to verify the placement, integrity and particle

loading of the filters for the fiberglass operations and wood coating booths identified as B-24, B-26, B-27, B-30/31, B-32, and B-33. To monitor the performance of the dry filters, weekly observations shall be made of the overspray while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

For the wood coating booths identified as B-24, B-26, B-27, B-30/31, B-32, and B-33, the above satisfies the requirements of 40 CFR 64.

2. The fiberglass operations have the following applicable compliance monitoring conditions:

- (a) Monitoring:
 - (i) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
 - (ii) Monthly inspections shall be performed of the particulate emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
 - (iii) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.
- (b) Visible Emissions Notations
 - (i) Weekly visible emission notations of the fiberglass facilities' stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
 - (ii) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

- (iii) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
 - (iv) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
 - (v) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
3. The woodworking activities have applicable compliance monitoring conditions as specified below:
- (a) Visible Emissions Notations
 - (i) Daily visible emission notations of the baghouse exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
 - (ii) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
 - (iii) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
 - (iv) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
 - (v) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
 - (b) Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.
 - (c) Broken or Failed Bag Detection

In the event that bag failure has been observed:

 - (i) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall

be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

- (ii) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

These monitoring conditions are necessary to ensure compliance with 326 IAC 6-3.

Conclusion

The operation of this motor vehicles part and accessories operations shall be subject to the conditions of this Part 70 permit **085-17682-00074**.

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

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

| | |
|------------------------------|--|
| Source Name: | Bodor Corporation (dba Explorer Van Company) |
| Source Location: | US 30 West and Fox Farm Road North, Warsaw, Indiana 46580 |
| County: | Kosciusko |
| SIC Code: | 3714 |
| Operation Permit No.: | T 085-17682-00074 |
| Permit Reviewer: | CarrieAnn Paukowits |

On March 23, 2004, the Office of Air Quality (OAQ) had a notice published in the Times Union, Warsaw, Indiana, stating that Bodor Corporation (dba Explorer Van Company) had applied for a Part 70 Operating Permit Renewal to operate a motor vehicle parts and accessories manufacturing source with dry filters and sock filters for control. The notice also stated that OAQ proposed to issue a Part 70 Operating Permit Renewal for this operation and provided information on how the public could review the proposed Part 70 Operating Permit Renewal 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 Renewal should be issued as proposed.

On April 20, 2004, Robert D. Waugaman of Bruce Carter Associates, on behalf of Bodor Corporation (dba Explorer Van Company) 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:

Please correct the last sentence of A.2(b) as follows: "In its Part 70 permit renewal application, Bodor Corporation requested that the two spray booths ~~to~~ be permitted to also coat plastic components."

Response 1:

Condition A.2(b) has been corrected as follows:

- (b) Two (2) air assisted airless wood coating spray booths, identified as B-26 and B-33, constructed in 1992, with a nominal capacity of 3 vans per hour, equipped with dry filters for overspray control and exhausting to stacks SB-26 and SB-33 respectively. In its Part-70 permit renewal application, Bodor Corporation requested that the two **(2)** spray booths ~~to~~ be permitted to also coat plastic components.

Comment 2:

In A.2(c) there are five booths listed but the condition states "four...booths". Previously, booths B-31 and B-30 were listed as one booth, B-30/31. Please correct here and in Section D.1 facility description (b).

Response 2:

Item (c) in Section A.2 and item (b) in the Facility Description box of Section D.1, which are identical, have been revised as follows:

- (c) Four **(4)** high volume low pressure wood coating spray booths, identified as B-24 **and** B-27, **constructed in 1996**, B-30/31, constructed in **1992 and modified in 1996**, and B-30 and B-32, constructed in 1992, with a nominal capacity of 3 vans per hour, equipped with dry filters for overspray control and exhausting to stacks SB-24, SB-27, SB-30 and SB-32.

Comment 3:

All gun cleaning units have been changed to Safety-Kleen gun cleaner systems. Please remove insignificant activity A.3(b), "Cold Cleaning Degreasing – Paint gun cleaners using organic solvents" and the related Section D.3.

Response 3:

These Safety-Kleen gun cleaner systems will still use some VOC and they still meet the definition of a cold cleaner degreaser pursuant to 326 IAC 1-2-18.5 "...a tank containing organic solvent at a temperature below the boiling point of the solvent which is used to spray, brush, flush, or immerse an article for the purpose of cleaning or degreasing the article." Therefore, the cleaner systems are still subject to the requirements of 326 IAC 8-3, Organic Solvent Degreasing Operations. However, these cold cleaners, constructed after July 1, 1990 in Kosciusko County, have remote solvent reservoirs. Thus, the requirements of 326 IAC 8-3-5 are not applicable. The cold cleaners are still subject to the requirements of 326 IAC 8-3-2 since they were constructed after January 1, 1980. Condition D.3.1 has been revised as follows:

D.3.1 Volatile Organic Compounds (VOC) ~~[326 IAC 8-3-5]~~[326 IAC 8-3-2]

~~(a)~~ Pursuant to 326 IAC ~~8-3-5(a)~~ **8-3-2** (Cold Cleaner Degreaser Operations and Control), for cold cleaner degreaser operations ~~without remote solvent reservoirs~~ constructed after July 1, 1990 **January 1, 1980**, the Permittee shall ensure ~~that the following control equipment requirements are met:~~

~~(1)(a)~~ Equip the degreaser with a cover. ~~The cover must be designed so that it can be easily operated with one (1) hand if:~~

~~(A) — The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38OC) (one hundred degrees Fahrenheit (100OF));~~

~~(B) — The solvent is agitated; or~~

~~(C) — The solvent is heated.~~

~~(2)(b)~~ Equip the degreaser **cleaner** with a facility for draining cleaned articles **parts**. ~~If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38OC) (one hundred degrees Fahrenheit (100OF)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.~~

~~(3) — Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).~~

- ~~(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.~~
- ~~(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three tenths (4.3) kiloPascals (thirty two (32) millimeters of mercury or six tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38OC) (one hundred degrees Fahrenheit (100OF)), or if the solvent is heated to a temperature greater than forty-eight and nine tenths degrees Celsius (48.9OC) (one hundred twenty degrees Fahrenheit (120OF)):~~
- ~~(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.~~
- ~~(B) A water cover when solvent is used is insoluble in, and heavier than, water.~~
- ~~(C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.~~
- ~~(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:~~
- ~~(1)(c) Close the **degreaser** cover whenever articles **parts** are not being handled in the degreaser cleaner.~~
- ~~(2)(d) Drain cleaned articles **parts** for at least fifteen (15) seconds or until dripping ceases.~~
- ~~(e) **Provide a permanent, conspicuous label summarizing the operation requirements.**~~
- ~~(3)(f) Store waste solvent only in covered containers and ~~prohibit the not disposal dispose or transfer of waste solvent or transfer it to another party, in any such a manner in which that greater than twenty percent (20%) of the waste solvent (by weight) could can evaporate into the atmosphere.~~~~

Comment 4:

Condition B.9(a) requires that the Annual Compliance Certification be "submitted in letter form" while IDEM's own guidance suggests that a table format be used. Please revise this condition by removing the phrase "in letter form."

Response 4:

Condition B.9 has been revised as follows:

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

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted ~~in letter form~~ no later than July 1 of each year to:

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

Comment 5:

After further review, it was determined that the fiberglass operations referenced in A.2(g) and Section D.1(f) are no longer on site. Please remove these units from the facility descriptions. Also, the following related conditions should be removed from the permit: Conditions D.1.4 Emission Standards for Reinforced Plastics Composites Fabricating, D.1.5 Work Practice Standards for Reinforced Plastic Composites Fabrication, D.1.6 Operator Training for Reinforced Plastic Composites Fabrication, D.1.10 Hazardous Air Pollutants (HAP) and Volatile Organic Compounds (VOC), D.1.15 General Provisions Relating to NESHAP, D.1.16 National Emissions Standards for Hazardous Air Pollutants for Reinforced Plastic Composites, D.1.19 Monitoring, D.1.20 Visible Emissions Notations, D.1.25 National Emissions Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production – Notification Requirements, and D.1.26 Requirement to Submit a Significant Permit Modification Application. In addition, the following conditions should be modified as indicated by strikeout to remove references and requirements relating to the fiberglass operations:

D.1.7 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to 40 CFR 52 Subpart P, the PM from the operations identified as PF-1, AF-1, F-2, ~~I-19, I-23, I-15~~, F-1, C-6, C-7, Q-3, Q-6, Q-7, B-26, B-33, B-24, B-27, B-30/B-31, B-32, the grinding and machining operations, BF-1, and BF-2 shall not exceed the pound per hour emission rate established as E in the following formula:

D.1.9 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 **any control devices associated with the fiberglass operations** (~~I-19, I-23, I-15 and F-1~~), fiberglass coating operations (**F-1, Q-3, Q-6 and Q-7**) and wood coating booth B-30/31 **and any control devices**. *[Comment 6 changes were incorporated in above.]*

D.1.1(d) should be modified as it relates to booths I-19, I-23 and I-15 (booth F-1 and related conditions should be retained)

(d) Pursuant to CP 085-2841-00037, issued on May 24, 1995, and 326 IAC 8-1-6, ~~the fiberglass operations, consisting of two (2) spray-up booths identified as I-19 and I-23, and one (1) gel coat booth, identified as I-15~~ and the high volume low pressure fiberglass and plastic primer booth, identified as F-1 shall:

- (1) use relatively high solids, low-VOC coatings. The maximum VOC content by weight of the coatings shall not exceed 76.3% with a minimum solids content by volume of 16.2%; and
- (2) use high-volume, low pressure (HVLP) spray applicators.

These conditions are required as a result of the BACT requirement under 326 IAC 8-1-6.

D.1.27 Record Keeping Requirements should be modified as follows to remove references to the fiberglass operations:

D.1.27 Record Keeping Requirements

(a) To document compliance with Conditions ~~D.1.1(d)~~, D.1.1(e) and D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (5) shall be taken monthly and (6) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition ~~D.1.1(d)~~, D.1.1(e) and D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

- (1) The VOC content of each coating material and solvent used.
- (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.

- (6) A log of daily pressure measurements from the line pressure monitors for the HVLP guns used in the three (3) high volume low pressure topcoat booths, identified as Q-3, Q-6 and Q-7.
- ~~(b) To document compliance with Condition D.1.4, the Permittee shall maintain records that are complete and sufficient to establish compliance with the HAP monomer content limits. Records maintained shall be taken monthly. Examples of such records include but are not limited to:~~
- ~~(1) The usage by weight and monomer content of each resin and gel coat used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS), manufacturer's certified product data sheets, and calculations necessary to verify the type, amount used, and HAP content of each resin or gel coat;~~
- ~~(2) A log of the dates of use;~~
- ~~(3) Method of application and other emission reduction techniques for each resin and gel coat used;~~
- ~~(4) Monthly calculations demonstrating compliance on an equivalent emissions mass basis if non-compliant resins or gel coats are used during that month.~~
- ~~(c) To document compliance with Condition D.1.6, the Permittee shall maintain the following training records:~~
- ~~(1) A copy of the current training program.~~
- ~~(2) A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training. Records of prior training programs and former personnel are not required to be maintained.~~
- (d) To document compliance with Condition D.1.18, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- ~~(e) To document compliance with Conditions D.1.7 and D.1.19, the Permittee shall maintain a log of monthly overspray observations, daily inspections of the filters, and those additional inspections prescribed by the Preventive Maintenance Plan.~~
- ~~(f) To document compliance with Condition D.1.20, the Permittee shall maintain records of weekly visible emission notations of the fiberglass operations' stack exhaust.~~
- (g) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Should IDEM OAQ not agree to the changes in Comment 13 above, Bodor Corporation requests the following additional changes:

Please make the following changes to Condition D.1.15 so it is consistent with other similar conditions, D.1.11 and D.1.13. Add the reference of 40 CFR 63.5925 and change subparagraph (a).

Condition D.1.18 specifies monitoring requirements for the wood coating booths while Conditions D.1.19 and D.1.20 specify monitoring requirements for the fiberglass operations. The requirements are almost identical with the exception of the weekly observations or visible emission notations. Condition D.1.18(a) states in one sentence the weekly observation requirements for the wood coating

booths as follows: "To monitor the performance of the dry filters, weekly observations shall be made of the overspray while one or more of the booths are in operation." Condition D.1.20 on the other hand, lists five (5) subparagraphs for monitoring the same parameter of the fiberglass operation. Bodor Corporation requests that Condition D.1.20 be deleted and the requirements of Condition D.1.19 be combined with Condition D.1.18 for simplification.

Condition D.1.27(b)(2) requires "A log of the dates of use" while the underlying requirements, Conditions D.1.4 and D.1.27(b), require monthly records. Please change this condition, D.1.27(b)(2), to "A log of the month of use."

Response 5:

Since the fiberglass operations have been removed, this source no longer performs fiberglass reinforced plastics composites manufacturing. The fiberglass reinforced plastics composites manufacturing operations and all the conditions applicable only to those operations have been removed from the permit.

In addition, 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. Condition D.1.7, which contained the requirements of the previous version of the rule, has been removed. Under the rule revision, the grinding and machining operations are exempt from the requirements of 326 IAC 6-3-2, pursuant to 326 IAC 6-3-1(b)(14), because the unrestricted PM emissions are less than 0.551 pounds per hour. The coating operations are subject to the requirements of 326 IAC 6-3-2(d), which are covered in Condition D.1.8 (now D.1.4). The remainder of Section D.1 has been renumbered accordingly. Thus, references to conditions in Section D.1 have been revised.

Some of the remaining coating facilities which are subject to the revised version of 326 IAC 6-3 were not specifically included in Condition D.1.18 (now D.1.11). All coating facilities subject to 326 IAC 6-3 have been added to the monitoring condition.

Note that Condition D.1.21 (now D.1.12) is further changed in Response 10, and Conditions D.1.22 and D.1.24 are further changed in Response 11.

Therefore, the following changes have been made to Sections A.2 and D.1:

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) Woodworking activities, identified as B-34 and B-35, constructed in 1992, consisting of various woodworking equipment, with a nominal capacity of 1500 pounds per hour, using two baghouses with flow rates of 37150 cfm and 26450 cfm respectively, to control particulate emissions, and exhausting to stacks SB-34 and SB-35 respectively.
- (b) Two (2) air assisted airless wood coating spray booths, identified as B-26 and B-33, constructed in 1992, with a nominal capacity of 3 vans per hour, equipped with dry filters for overspray control and exhausting to stacks SB-26 and SB-33 respectively. In its Part-70 permit renewal application, Bodor Corporation requested that the two spray booths ~~to~~ be permitted to also coat plastic components.
- (c) Four (4) high volume low pressure wood coating spray booths, identified as B-24 **and** B-27, **constructed in 1996**, B-30/31, constructed in **1992 and modified in 1996**, ~~and B-30 and B-32~~, constructed in 1992, with a nominal capacity of 3 vans per hour, equipped with dry filters for overspray control and exhausting to stacks SB-24, SB-27, SB-30 and SB-32.

- (d) One (1) stain dip tank, identified as B-1, constructed prior to 1996, with a nominal capacity of 30 units per hour, with no controls, and exhausting to atmosphere.
- (e) Wood gluing operations, identified as BF-1 and BF-2, constructed in 1992, with a nominal capacity of 2 vans per hour, equipped with dry filters for overspray control and exhausting to atmosphere.
- (f) One (1) air-assisted airless wood/rubber fabric gluing operations, identified as PF-1, constructed in 1986, with a nominal capacity of 7.5 vans per hour, equipped with dry filters for overspray control and exhausting to atmosphere.
- ~~(g) Fiberglass operations, consisting of two (2) spray up booths identified as I-19 and I-23 and one (1) gel coat booth, identified as I-15, constructed in 1992, with a nominal capacity of 3 vans per hour, equipped with dry filters for overspray control and exhausting to stacks SI-15, SI-19 and SI-23 respectively.~~
- ~~(h)~~(g) One (1) high volume low pressure fiberglass and plastic primer booth, identified as I-5, constructed in 1992, with a nominal capacity of 3 vans per hour, equipped with dry filters for overspray control and exhausting to stack SI-5. In its Part-70 permit renewal application, Bodor Corporation requested that the booth and related processes to be relocated to building 'F' and be identified as F-1 and exhausting through Stack SF-1.
- ~~(i)~~(h) Three (3) high volume low pressure topcoat booths, identified as Q-3, Q-6 and Q-7, constructed in 1995, with a nominal capacity of 3 vans per hour, equipped with dry filters for overspray control and exhausting to stacks SQ-3, SQ-6 and SQ-7.
- ~~(j)~~(i) Two (2) air atomization van body repair and touch-up booths, identified as C-6 and C-7, constructed in 1986, with a nominal capacity of 35 vans per day, equipped with dry filters for overspray control and exhausting to stacks SC-6 and SC-7.
- ~~(k)~~(j) One (1) Interior Glue application, identified as AF-1, constructed in 1986, with a nominal capacity of 1 van per hour, equipped with dry filters for overspray control and exhausting to atmosphere.
- ~~(l)~~(k) One (1) glue spray booth, identified as F-1, constructed prior to 1996, that applies adhesive to plastic parts, with a nominal capacity of 0.275 gallons per hour, equipped with dry filters for overspray control and exhausting to stack SF-1. In its response to NOD #1, received by IDEM, OAQ on December 12, 2003, Bodor Corporation requested that the booth be identified as F-2 and exhausting through Stack SF-2.
- ~~(m)~~(l) Woodworking activities, identified as PF-2, constructed in 1986, consisting of various woodworking equipment, with a nominal capacity of 300 pounds per hour, using a sock filter for particulate control, and exhausting to atmosphere.

SECTION D.1

FACILITY OPERATION CONDITIONS

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

- (a) Two (2) air assisted airless wood and plastic coating spray booths, identified as B-26 and B-33, constructed in 1992, with a nominal capacity of 3 vans per hour, equipped with dry filters for overspray control and exhausting to stacks SB-26 and SB-33 respectively.
- (b) Four (4) high volume low pressure wood coating spray booths, identified as B-24 and B-27, **constructed in 1996**, B-30/31, constructed in **1992 and modified in 1996**, and ~~B-30~~ and B-32, constructed in 1992, with a nominal capacity of 3 vans per hour, equipped with dry filters for overspray control and exhausting to stacks SB-24, SB-27, SB-30 and SB-32.
- (c) One (1) stain dip tank, identified as B-1, constructed prior to 1996, with a nominal capacity of 30 units per hour, with no controls, and exhausting to atmosphere.
- (d) Wood gluing operations, identified as BF-1 and BF-2, constructed in 1992, with a nominal capacity of 2 vans per hour, equipped with dry filters for overspray control and exhausting to atmosphere.
- (e) One (1) air-assisted airless wood/rubber fabric gluing operations, identified as PF-1, constructed in 1986, with a nominal capacity of 7.5 vans per hour, equipped with dry filter for overspray control and exhausting to atmosphere.
- ~~(f) Fiberglass operations, consisting of two (2) spray up booths identified as I-19 and I-23, and one (1) gel coat booth, identified as I-15, constructed in 1992, with a nominal capacity of 3 vans per hour, equipped with dry filters for overspray control and exhausting to stacks SI-15, SI-19 and SI-23 respectively.~~
- ~~(g)~~(f) One (1) glue spray booth, identified as F-2, constructed prior to 1996, that applies adhesive to plastic parts, with a nominal capacity of 0.275 gallons per hour, equipped with dry filters for overspray control and exhausting to stack SF-2.
- ~~(h)~~(g) Three (3) high volume low pressure topcoat booths, identified as Q-3, Q-6 and Q-7, constructed in 1995, with a nominal capacity of 3 vans per hour, equipped with dry filters for overspray control and exhausting to stacks SQ-3, SQ-6 and SQ-7.
- ~~(i)~~(h) Two (2) air atomization van body repair and touch-up booths, identified as C-6 and C-7, constructed in 1986, with a nominal capacity of 35 vans per day, equipped with dry filters for overspray control and exhausting to stacks SC-6 and SC-7.
- ~~(j)~~(i) One (1) Interior Glue application, identified as AF-1, constructed in 1986, with a nominal capacity of 1 van per hour, equipped with dry filters for overspray control and exhausting to atmosphere.
- ~~(k)~~(j) One (1) high volume low pressure fiberglass and plastic primer booth, identified as F-1, constructed in 1992, with a nominal capacity of 3 vans per hour, equipped with dry filters for overspray control and exhausting to stack SF-1.

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

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

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

- (a) Any change or modification which may increase the potential VOC emissions from the wood/rubber fabric gluing operations, identified as PF-1, to 25 tons or more per year, shall require prior OAQ approval. Compliance with this limit renders the requirement of 326 IAC 8-1-6 not applicable.
- (b) Any change or modification which may increase the potential VOC emissions from the Interior Glue application, identified as AF-1, to 25 tons or more per year, shall require prior OAQ approval. Compliance with this limit renders the requirement of 326 IAC 8-1-6 not applicable.
- (c) Any change or modification which may increase the potential VOC emissions from the glue spray booth, identified as F-2, to 25 tons or more per year, shall require prior OAQ approval. Compliance with this limit renders the requirement of 326 IAC 8-1-6 not applicable.
- (d) Pursuant to CP 085-2841-00037, issued on May 24, 1995, and 326 IAC 8-1-6, ~~the fiberglass operations, consisting of two (2) spray-up booths identified as I-19 and I-23, and one (1) gel coat booth, identified as I-15~~ and the high volume low pressure fiberglass and plastic primer booth, identified as F-1 shall:
 - (1) use relatively high solids, low-VOC coatings. The maximum VOC content by weight of the coatings shall not exceed 76.3% with a minimum solids content by volume of 16.2%; and
 - (2) use high-volume, low pressure (HVLP) spray applicators.

These conditions are required as a result of the BACT requirement under 326 IAC 8-1-6.

- (e) Pursuant to CP 085-4601-00037, issued on October 11, 1995, and 326 IAC 8-1-6, the three (3) high volume low pressure topcoat booths, identified as Q-3, Q-6 and Q-7, shall:
 - (1) use relatively high solids, low-VOC coatings. The maximum VOC content by weight of the coatings shall not exceed 76.3% with minimum solids content by volume of 16.2%;
 - (2) use high-volume, low pressure (HVLP) spray applicators. The HVLP gun pressure shall not exceed 10 psi; and
 - (3) record readings from the line pressure monitors on the HVLP guns on a daily basis.

These conditions are required as a result of the BACT requirement under 326 IAC 8-1-6.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

Any change or modification which may increase the potential VOC emissions from the two van body repair and touch-up booths, identified as C-6 and C-7, to 25 tons or more per year, shall require prior OAQ approval. Compliance with this limit renders the requirement of 326 IAC 8-2-9 not applicable.

D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture, identified as B-26, B-33, B-24, B-27, B-30/31, B-1, BF-1 and BF-2, shall utilize one of the following application methods:

- Airless Spray Application
- Air Assisted Airless Spray Application
- Electrostatic Spray Application
- Electrostatic Bell or Disc Application
- Heated Airless Spray Application
- Roller Coating
- Brush or Wipe Application
- Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. 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.

D.1.4 Emissions Standards for Reinforced Plastics Composites Fabricating [326 IAC 20-25-3]

Pursuant to 326 IAC 20-25-3, the owners or operators of the fiberglass operation shall comply with the provisions of the rule on or after January 1, 2002, including:

- (a) The total HAP monomer content of the following materials shall be limited based on the application method used and the products produced as specified in the following table:

| Fiber Reinforced Plastics Composites Products Except Watercraft | HAP Monomer Content, Weight Percent |
|--|-------------------------------------|
| Resin, Manual or Mechanical Application | |
| — Production Specialty Products | 48* |
| — Production Noncorrosion Resistant Unfilled | 35* |
| — Production Noncorrosion Resistant Filled (≤35% by weight) | 38 |
| — Production, Noncorrosion Resistant, Applied to Thermoformed Thermoplastic Sheet | 42 |
| — Production, Class I, Flame and Smoke | 60* |
| — Shrinkage Controlled | 52 |
| — Tooling | 43 |
| Gel Coat Application | |
| — Production Pigmented | 37 |
| — Clear Production | 44 |
| — Tooling | 45 |
| — Production Pigmented, subject to ANSI ^a standards | 45 |
| — Production Clear, subject to ANSI ^a standards | 50 |

^aAmerican National Standards Institute.

* Categories that must use mechanical nonatomized application technology or manual application as stated in subsection (c).

Compliance with these HAP monomer content limits shall be demonstrated on a monthly basis. If all of the resins and gel coats used during a month meet the specified HAP monomer content limits, then maintaining records of content and usage as specified under Condition D.1.27 is sufficient for demonstrating compliance with the HAP monomer content limits.

Compliance with the limitations contained in this condition may be demonstrated using monthly emission averaging within each resin or gel coat application category listed in subsection (b) by

~~the use of resins or gel coats with HAP monomer contents lower than the limits specified, and/or additional emission reduction techniques approved by IDEM, OAQ.~~

Examples of emission reduction techniques include, but are not limited to, using nonatomized application to apply resins or gelcoats within a category that does not require nonatomized application, lower monomer content resins and gel coats, vapor suppression, vacuum bagging, or installing a control device. This is allowed to meet the HAP monomer content limits for resins and gel coats within each category, and shall be calculated on an equivalent emissions mass basis monthly to demonstrate compliance as shown below:

For Averaging within a category:

$$Em_A \leq (M_R * E_a)$$

Where: _____

M_R = Total monthly mass of material within each category
_____ E_a = Emission factor for each material based on allowable monomer content and allowable application method for each category.

Em_A = Actual monthly emissions from all materials used within a category based on material specific emission factors, emission reduction techniques and emission controls
Units: mass = tons
emission factor = lbs of monomer per ton of resin or gel coat
emissions = lbs of monomer

Note: Fillers may not be included when averaging.

(b) ~~The following categories of materials in subsection (a) shall be applied using mechanical nonatomized application technology or manual application:~~

- ~~(1) Production noncorrosion resistant, unfilled resins from all sources.~~
- ~~(2) Production, specialty product resins from all sources.~~
- ~~(3) Tooling resins used in the manufacture of watercraft.~~
- ~~(4) Production resin used for Class I flame and smoke products.~~

~~Nonatomized application equipment means the devices where resin or gel coat material does any of the following:~~

- ~~(1) Flows from the applicator, in a steady state in a observable coherent flow, without droplets, for a minimum distance of three (3) inches from the applicator orifices such as flow coaters, flow choppers, and fluid impingement equipment.~~
- ~~(2) Is mechanically dispensed within or on to a paint roller applicator such as pressure fed rollers.~~
- ~~(3) Is deposited on fiber reinforcement moving through a resin or gel coat bath such as resin impregnators.~~

~~Nonatomized spray application technology includes flow coaters, flow choppers, pressure-fed rollers, fluid impingement, or other non-spray applications of a design and specifications approved by IDEM, OAQ.~~

~~Filled resins are resins containing greater than or equal to thirty-five percent (35%) by~~

~~weight inert filler material, such as silica micro-spheres or micro-balloons, added to alter the density or other physical properties of the resin. The term "inert filler" does not include pigments.~~

- ~~(c) Unless specified in subsection (b), gel coat application and mechanical application of resins shall be by any of the following spray technologies:~~
- ~~(1) Nonatomized application technology.~~
 - ~~(2) Air-assisted airless.~~
 - ~~(3) Airless.~~
 - ~~(4) High volume, low pressure (HVLP).~~
 - ~~(5) Equivalent emission reduction technologies to subdivisions (2) through (4).~~
- ~~(d) The following cleaning operation standards for resin and gel coat application equipment shall apply:~~
- ~~(1) For routine flushing of resin and gel coat application equipment such as spray guns, flow coaters, brushes, rollers, and squeegees, a cleaning solvent shall contain no HAPs. This emission standard does not apply to solvents used for removing cured resin or gel coat from application equipment.~~
 - ~~(2) A source must store HAP containing solvents used for removing cured resin or gel coat in containers with covers. The covers must have no visible gaps and must be in place at all times, except when equipment is placed in or removed from the container.~~
 - ~~(3) Recycled cleaning solvents that contain less than or equal to five percent (5%) HAP by weight are considered to contain no HAP for the purposes of this subsection.~~

~~D.1.5 Work Practice Standards for Reinforced Plastic Composites Fabrication [326 IAC 20-25-4]~~

~~Pursuant to 326 IAC 20-25-4, the following work practice standards shall be implemented:~~

- ~~(a) Non-atomizing spray equipment shall not be operated at pressures that atomize the material during the application process.~~
- ~~(b) Except for mixing containers as described in item (g), HAP containing materials shall be kept in a closed container when not in use.~~
- ~~(c) Solvents sprayed during cleanup and resin changes shall be directed into solvent collection containers.~~
- ~~(d) Solvent collection containers shall be kept closed when not in use.~~
- ~~(e) Clean-up rags with solvent shall be stored in closed containers.~~
- ~~(f) Closed containers shall be used for the storage of the following:~~
 - ~~(1) All production and tooling resins that contain HAPs.~~
 - ~~(2) All production and tooling gel coats that contain HAPs.~~
 - ~~(3) Waste resins and gel coats that contain HAPs.~~
 - ~~(4) Cleaning materials, including waste cleaning materials.~~

~~(5) — Other materials that contain HAPs.~~

~~(g) — All resin and gel coat mixing containers with a capacity equal to or greater than fifty-five (55) gallons must have a cover with no visible gaps in place at all times except when material is being added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container.~~

~~D.1.6 — Operator Training for Reinforced Plastic Composites Fabrication [326 IAC 20-25-8]~~

~~Pursuant to 326 IAC 20-25-8, all new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and spray-like applications (for example, those applications that could result in excess emissions if performed improperly) shall be trained according to the following schedule:~~

- ~~(a) — All personnel hired after March 7, 2001 shall be trained within fifteen (15) days of hiring.~~
- ~~(b) — All personnel hired before March 7, 2001 shall be trained or evaluated by a supervisor within thirty (30) days of the start of operation.~~
- ~~(c) — To ensure training goals listed in subsection (b) are maintained, all personnel shall be given refresher training annually.~~
- ~~(d) — Personnel who have been trained by another owner or operator subject to 326 IAC 20-25 are exempt from subdivision (a) if written documentation that the employee's training is current is provided to the new employer.~~
- ~~(e) — If the result of an evaluation shows that training is needed, such training shall occur within fifteen (15) days of the evaluation.~~
- ~~(f) — The lesson plans shall cover, for the initial and refresher training, at a minimum, all of the following topics:
 - ~~(1) — Appropriate application techniques.~~
 - ~~(2) — Appropriate equipment cleaning procedures.~~
 - ~~(3) — Appropriate equipment setup and adjustment to minimize material usage and overspray.~~~~
- ~~(g) — The owner or operator shall maintain the following training records on-site and available for inspection and review:
 - ~~(1) — A copy of the current training program.~~
 - ~~(2) — A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training. Records of prior training programs and~~~~

~~D.1.7 — Particulate Matter (PM) [40 CFR 52 Subpart P]~~

~~Pursuant to 40 CFR 52 Subpart P, the PM from the operations identified as PF-1, AF-1, F-2, I-19, I-23, I-15, F-1, C-6, C-7, Q-3, Q-6, Q-7, B-26, B-33, B-24, B-27, B-30/B-31, B-32, the grinding and machining operations, BF-1, and BF-2 shall not exceed the pound per hour emission rate established as E in the following formula:~~

~~Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour~~

~~shall be accomplished by use of the equation:~~

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

D.1.84 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the operations identified as PF-1, AF-1, F-2, ~~I-19, I-23, I-15,~~ F-1, C-6, C-7, Q-3, Q-6, Q-7, B-26, B-33, B-24, B-27, B-30/31, B-32, BF-1, and BF-2 shall be controlled by dry particulate filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications. This requirement to operate the control is not federally enforceable.

D.1.95 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 fiberglass **primer** operations (~~I-19, I-23, I-15~~ and F-1), fiberglass coating operations (Q-3, Q-6 and Q-7) and wood coating booth B-30/31 and any control devices.

~~**D.1.10** Hazardous Air Pollutants (HAP) and Volatile Organic Compounds (VOC)~~

~~Compliance with the HAP monomer content limitations in Condition D.1.4 shall be determined by one of the following:~~

- ~~(1) The manufacturer's certified product data sheet.~~
- ~~(2) The manufacturer's material safety data sheet.~~
- ~~(3) Sampling and analysis, using any of the following test methods, as applicable:
 - ~~(A) 40 CFR 60, Method 24, Appendix A (July 1, 1998)*, shall be used to measure the total volatile HAP and volatile organic compound (VOC) content of resins and gel coats. Method 24 may be modified for measuring the volatile HAP content of resins or gel coats to require that the procedure be performed on uncatalyzed resin or gel coat samples.~~
 - ~~(B) 40 CFR 63, Method 311, Appendix A (July 1, 1998)*, shall be used to measure HAP content in resins and gel coats by direct injection into a gas chromatograph.~~~~
- ~~(4) An alternate method approved by IDEM, OAQ.~~

D.1.416 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 2 to 40 CFR Part 63, Subpart M] [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 M. 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.

~~**D.1.427** National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products [40 CFR Part 63, Subpart M] [40 CFR 63.3882] [40 CFR 63.3883] [40 CFR 63.3980]~~

- ~~(a) The provisions of 40 CFR Part 63, Subpart M (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.
- (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 are 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.

D.1.438 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 2 to 40 CFR Part 63, Subpart P] [40 CFR 63.4501]

- (a) The provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart P. The Permittee must comply with these requirements on and after the effective date of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

D.1.449 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products [40 CFR Part 63, Subpart P] [40 CFR 63.4481] [40 CFR 63.4482]

- (a) The provisions of 40 CFR Part 63, Subpart P (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/plastic/plasticpg.html>. Pursuant to 40 CFR 63.4483(b), the Permittee must comply with these requirements on and after the date 3 years after the effective date of 40 CFR Part 63, Subpart P.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

- (c) The following emissions units comprise the affected source that is subject to 40 CFR 63, Subpart PPPP:
- (1) All coating operations as defined in 40 CFR 63.4581;
 - (2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
 - (3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and
 - (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.
- (d) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.4581, and are applicable to the affected source.

~~D.1.15 General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A]~~

- ~~(a) The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the reinforced plastic composites production affected source described in 40 CFR 63.5790(b), except when otherwise specified in 40 CFR 63 Subpart WWWW.~~
- ~~(b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.~~

~~D.1.16 National Emissions Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production [40 CFR Part 63.5805, Subpart WWWW]~~

- ~~(a) The reinforced plastic composites production affected source is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Reinforced Plastic Composites Production, (40 CFR 63, Subpart WWWW), effective April 21, 2003. Pursuant to this rule, the Permittee must comply with Subpart WWWW by April 21, 2006, or accept and meet an enforceable HAP emissions limit below the major source threshold prior to April 21, 2006. 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.~~
- ~~(b) The following emissions units comprise the affected source that is subject to 40 CFR 63, Subpart WWWW:~~
- ~~(1) Two (2) Spray-up booths, identified as I-19 and I-23; and~~
 - ~~(2) One (1) gel coat booth, identified as I-15.~~
- ~~(c) The definitions of 40 CFR 63, Subpart WWWW at 40 CFR 63.5935 are applicable to the affected source.~~

Compliance Determination Requirements

~~D.1.170 Volatile Organic Compounds (VOC) [326 IAC 8-1-4(a)(3)] [326 IAC 8-1-2(a)]~~

~~Compliance with the VOC content and usage limitations contained in Conditions D.1.1(d) and D.1.1(e) 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)] [40 CFR 64]

D.1.181 Monitoring [40 CFR 64]

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters for the wood coating booths identified as B-24, B-26, B-27, B-30/31, B-32, and B-33, **BF-1, BF-2, PF-1, F-1, F-2, AF-1, Q-3, Q-6, Q-7, C-6 and C-7**. To monitor the performance of the dry filters, weekly observations shall be made of the overspray while one or more of the booths are in operation. ~~The Compliance Response Plan shall be followed whenever~~ **If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances.** Failure to take response steps in accordance with Section C - Compliance Monitoring Plan ~~Failure to Take Response Steps~~ **Response to Excursions or Exceedances**, shall be considered a violation of **deviation** from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. ~~The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for w~~**When there is** a noticeable change in overspray emissions, or **when** evidence of overspray emissions is observed, **the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances.** ~~The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step.~~ Failure to take response steps in accordance with Section C - Compliance Monitoring Plan ~~Failure to Take Response Steps~~ **Response to Excursions or Exceedances**, shall be considered a violation of **deviation** from this permit.
- (c) ~~Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.~~

For the wood coating booths identified as B-24, B-26, B-27, B-30/31, B-32, and B-33, the above satisfies the requirements of 40 CFR 64.

D.1.19 Monitoring

- (a) ~~Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters for the fiberglass operations. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.~~
- (b) ~~Monthly inspections shall be performed of the particulate emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.~~
- (c) ~~Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.~~

~~D.1.20~~ Visible Emissions Notations

- ~~(a) Weekly visible emission notations of the fiberglass facilities' stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.~~
- ~~(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.~~
- ~~(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.~~
- ~~(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.~~
- ~~(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.~~

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

~~D.1.212~~ 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) Initial notification. The Permittee must submit the initial notification no later than January 2, 2005.
- (c) 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.1.2213~~ 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 M, 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, P. O. Box 6015
Indianapolis, Indiana ~~46206-6015~~ **46204-2251**

D.1.2314 Notification Requirements [40 CFR 63.4510]

- (a) General. The Permittee must submit the notifications in 40 CFR 40 CFR 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply to the affected source by the dates specified in those sections, except as provided in 40 CFR 63.4510, paragraphs (b) and (c).
- (b) Initial notification. The Permittee must submit the initial notification required by 40 CFR 63.9(b) for a new or reconstructed affected source no later than 120 days after initial startup or 120 days after the effective date of 40 CFR Part 63, Subpart PPPP, whichever is later. (For an existing affected source) the Permittee must submit the initial notification no later than 1 year after the effective date of 40 CFR Part 63, Subpart PPPP. If the Permittee is using compliance with the Automobiles and Light-Duty Trucks NESHAP (subpart IIII of this part) under 40 CFR 63.4881(d) to constitute compliance with this subpart for the plastic part coating operations, then the Permittee must include a statement to this effect in the initial notification and no other notifications are required under this subpart. If the Permittee is complying with another NESHAP that constitutes the predominant activity at the facility under 40 CFR 63.4481(e)(2) to constitute compliance with this subpart for the plastic coating operations, then the Permittee must include a statement to this effect in the initial notification and no other notifications are required under this subpart.
- (c) 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 63.4540, 40 CFR 63.4550, or 40 CFR 63.4560 that applies to the affected source. The notification of compliance status must contain the information specified in 40 CFR 63.4510, paragraphs (c)(1) through (11) and in 40 CFR 63.9(h).

D.1.2415 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 PPPP, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.
- (b) The significant permit modification application shall be submitted no later than twenty-seven months after the effective date of 40 CFR 63, Subpart PPPP.
- (c) The significant permit modification application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana ~~46206-6015~~ **46204-2251**

D.1.25 National Emissions Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production - Notification Requirements [40 CFR 63, Subpart WWWW]

- ~~(a) Pursuant to 40 CFR 63.5905, the Permittee shall submit all of the notifications in Table 13 of~~

~~40 CFR 63, Subpart WWWW that apply to the affected source and chosen compliance method by the dates specified. These notifications include, but are not limited to, the following:~~

- ~~(1) An Initial Notification containing the information specified in 40 CFR 63.9(b)(2) no later than August 19, 2003.~~
- ~~(2) If complying with organic HAP emissions limit averaging provisions, the Permittee shall submit a Notification of Compliance Status, containing the information specified in 40 CFR 63.9(h), no later than May 21, 2007.~~
- ~~(3) If complying with organic HAP content limits, application equipment requirements, or organic HAP emissions limit other than organic HAP emissions limit averaging, the Permittee shall submit a Notification of Compliance Status, containing the information specified in 40 CFR 63.9(h), no later than May 21, 2006.~~
- ~~(4) If complying by using an add-on control device, the Permittee shall submit:
 - ~~(A) A notification of intent to conduct a performance test as specified in 40 CFR 63.9(e), at least 60 calendar days before the performance test is scheduled to begin.~~
 - ~~(B) A notification of the date for the CMS performance evaluation, if required, as specified in 40 CFR 63.9(g), by the date of submission of the notification of intent to conduct a performance test.~~
 - ~~(C) A Notification of Compliance Status as specified in 40 CFR 63.9(h), no later than 60 calendar days after the completion of the add-on control device performance test and CMS performance evaluation.~~~~

~~(b) The notifications required by paragraph (a) shall be submitted to:~~

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

~~and~~

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

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

D.1.26 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 WWWW, 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 nine months before April 21, 2006.~~

~~(c) The significant permit modification application shall be submitted to:~~

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

D.1.216 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1(d), D.1.1(e) and D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (5) shall be taken monthly and (6) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.1(d), D.1.1(e) and D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

(1) The VOC content of each coating material and solvent used.

(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.

(6) A log of daily pressure measurements from the line pressure monitors for the HVLP guns used in the three (3) high volume low pressure topcoat booths, identified as Q-3, Q-6 and Q-7.

~~(b) To document compliance with Condition D.1.4, the Permittee shall maintain records that are complete and sufficient to establish compliance with the HAP monomer content limits. Records maintained shall be taken monthly. Examples of such records include but are not limited to:~~

~~(1) The usage by weight and monomer content of each resin and gel coat used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS), manufacturer's certified product data sheets, and calculations necessary to verify the type, amount used, and HAP content of each resin or gel coat;~~

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

~~(3) Method of application and other emission reduction techniques for each resin and gel coat used;~~

- ~~(4) Monthly calculations demonstrating compliance on an equivalent emissions mass basis if non-compliant resins or gel coats are used during that month.~~
- ~~(e) To document compliance with Condition D.1.6, the Permittee shall maintain the following training records:~~
- ~~(1) A copy of the current training program.~~
- ~~(2) A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training. Records of prior training programs and former personnel are not required to be maintained.~~
- ~~(d)(b) To document compliance with Condition D.1.181, the Permittee shall maintain a log of weekly overspray observations, and daily and monthly inspections, and these additional inspections prescribed by the Preventive Maintenance Plan.~~
- ~~(e) To document compliance with Conditions D.1.7 and D.1.19, the Permittee shall maintain a log of monthly overspray observations, daily inspections of the filters, and those additional inspections prescribed by the Preventive Maintenance Plan.~~
- ~~(f) To document compliance with Condition D.1.20, the Permittee shall maintain records of weekly visible emission notations of the fiberglass operations' stack exhaust.~~
- ~~(g)(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.~~

D.1.28 Reporting Requirements

~~On or after January 1, 2002, sources using monthly emissions averaging pursuant to 326 IAC 20-25-3(h)(2) and Condition D.1.4(a) shall submit a quarterly summary report and supporting calculations pursuant to 326 IAC 20-25-7(c). The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

Comment 6:

Condition D.1.9 requires a Preventive Maintenance Plan for the listed facilities and any control devices while the underlying rule, 326 IAC 1-6-3, Preventive Maintenance Plans, limits the requirement to emission control devices when requesting the "Identification of the individual(s) responsible for inspecting, maintaining and repairing emission control devices" be included in the Preventive Maintenance Plan. Please revise this condition as follows:

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for **any control devices associated with** the fiberglass operations (I-19, I-23, I-15 and F-1), fiberglass coating operations (Q-3, Q-6 and Q-7) and wood coating booth B-30/31 ~~and any control devices.~~

Response 6:

The Preventive Maintenance Plan rule, 326 IAC 1-6-3, sets out the requirements for:

- (1) Identification of the individuals responsible for inspecting, maintaining and repairing the emission control equipment (326 IAC 1-6-3(a)(1)),
- (2) 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

- (3) 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. Pursuant to 326 IAC 1-6-3(b), as deemed necessary by the commissioner, any person operating a facility required to obtain a permit under 326 IAC 2-7 shall comply with the requirements of subsection 326 IAC 1-6-3(a). Therefore, Condition D.1.9 (now D.1.6) shall remain unchanged.

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. Therefore, IDEM has deleted paragraph (b) of Section B – Preventive Maintenance, amended the Section B – Emergency Provisions condition, and revised Condition D.1.18 (now D.1.11) the record keeping requirements in Condition D.1.27 (now D.1.16). Conditions D.1.18 (now D.1.11 and D.1.27 (now D.1.16) are revised as shown in Response 5. Conditions B.10 and B.11 are revised as follows:

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

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- ~~(b) The Permittee shall implement the PMPs, including any required record keeping as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.~~
- ~~(c)~~(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 does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).
- ~~(d)~~(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 ~~46206~~ **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.

Comment 7:

The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the reinforced plastic composites production affected source described in 40 CFR 63.5790(b), except when otherwise specified in **Table 15** to 40 CFR 63 Subpart WWWW.

Response 7:

Condition D.1.15 has been removed as indicated in Response 5.

Comment 8:

Condition D.1.17, Volatile Organic Compounds, was changed from the previous permit which allowed the source to determine compliance with VOC limits by "using formulation data supplied by the coating manufacturer" to the requirement of "preparing or obtaining from the manufacturer the copies of the 'as supplied' and 'as applied' VOC data sheets." It is unnecessary and overburdensome to require the source to obtain or prepare two (2) IDEM OAQ forms for each material affected by Conditions D.1.1(d) and D.1.1(e) when there are other alternatives available. The source already is required to track VOC emissions by other conditions of this permit and a minor addition to the method of calculating the emissions could include the solids content by volume as well as the VOC content by weight, which would be needed to calculate emissions anyway. These calculations are based on "formulation data supplied by the coating manufacturer" and should not require another level of paper work that would have no net positive environmental impact. Please revise this condition to read as follows:

Compliance with the VOC content and usage limitations contained in Conditions D.1.1(d) and D.1.1(e) 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.~~ **using formulation data supplied by the coating manufacturer.** IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4

Response 8:

When a permit application is submitted for a surface coating operation, the applicant is required to submit "as supplied" and "as applied" VOC data sheets that are based on the coating manufacturer's data. Since a source may change its coatings after initial permit application submittal, IDEM, OAQ, does not feel that it is burdensome or unreasonable for the source to maintain such VOC data sheets

upon coating changes. This requirement will ensure that all coatings are appropriately documented based on vendor data, and that the source can readily demonstrate continued compliance with relevant VOC usage and/or emission limitations based on such data. Therefore, there are no changes to this condition based on this comment.

Comment 9:

Condition D.1.18(b) requires monthly inspections of the stack “and the presence of overspray on the rooftops and the nearby ground.” Due to periods of snow or icy weather the rooftops become unsafe for employee access. Bodor Corporation requests that Condition D.1.18(b) be modified by adding the phrase “weather permitting” at the end of the first sentence. Should Condition D.1.18 not be removed as requested, Condition D.1.19(b) should be likewise modified by adding the phrase “weather permitting” at the end of the first sentence.

Response 9:

Condition D.1.19 has been removed from the permit, as indicated in Response 5. IDEM, OAQ, agrees that rooftops should not be inspected in hazardous weather. Records should indicate all times in which the rooftop inspections were not performed due to hazardous weather. There is no further change to the permit in response to this comment.

Comment 10:

For clarification, Condition D.1.21 should include a reference to 40 CFR 63, Subpart M in the heading and changes to subparagraph (b) to read as follows: “Initial notification. The Permittee must submit the initial notification **for 40 CFR 63, Subpart M**, no later than January 2, 2005.”

Response 10:

Condition D.1.21 (now D.1.12) has been revised as follows:

D.1.212 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) Initial notification. The Permittee must submit the initial notification **for 40 CFR 63, Subpart M**, no later than January 2, 2005.
 - (c) 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).

Comment 11:

The following similar subparagraphs should be revised so they are consistent in the way the due date is listed, D.1.22(b), D.1.24(e), and D.1.26(b). Currently there are three (3) different ways the due dates are noted, (1) no later than a given date, (2) no later than twenty-seven months after the effective date and (3) no later than nine months before a given date. Following is suggested wording: “The significant permit modification application shall be submitted no later than nine months before the compliance date of 40 CFR 63, Subpart [insert Subpart ID here].”

Response 11:

Condition D.1.26 has been removed from the permit, as indicated in Response 5. The dates in Conditions D.1.22(b) (now D.1.13(b)) and D.1.24(e) (now D.1.15(b)) are both nine (9) months prior to the compliance date of the applicable rule. Therefore, Conditions D.1.22(b) and D.1.24(e) have been revised as follows:

D.1.2213 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 **nine (9) months prior to the compliance date in 40 CFR 63, Subpart Mmmm.** ~~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, P. O. Box 6015
Indianapolis, Indiana ~~46206-6015~~ **46204-2251**

D.1.2415 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 Pppp, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.
- (b) The significant permit modification application shall be submitted no later than ~~twenty-seven months after the effective date~~ **nine (9) months prior to the compliance date of in 40 CFR 63, Subpart Pppp.**
- (c) The significant permit modification application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana ~~46206-6015~~ **46204-2251**

Comment 12:

Condition D.2.6(b) incorrectly refers to Condition D.2.5 in addition to D.2.4. Please correct this condition as follows: "To document compliance with Condition D.2.4, the Permittee shall maintain records of the results of the inspections ~~required under Condition D.2.5~~ and the dates the vents are redirected."

Response 12:

Condition D.2.6 has been corrected as follows:

D.2.6 Record Keeping Requirements

- (a) To document compliance with Condition D.2.3, the Permittee shall maintain records of daily visible emission notations of the baghouse exhaust.
- (b) To document compliance with Condition D.2.4, the Permittee shall maintain records of the results of the inspections required under Condition ~~D.2.5~~ **D.2.4** and the dates the vents are redirected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Comment 13:

Condition D.4.1(a) lists the various facilities at this source which are to be included in the less than 250 tons per year VOC limit to avoid the PSD requirements. This condition could be simplified by referring to the "source" instead of the individual facilities. In addition, this condition limits the "usage" to less than 250 tons of VOC instead of limiting the "emissions" to less than 250 tons of VOC. Since some of the VOC are shipped out as waste and not all VOC are emitted at the same rate, styrene in fiberglass operations are emitted at less than 100%, this condition should be changed to correctly limit the VOC emissions instead of the VOC usage. Following is suggested wording:

The ~~source wood/rubber fabric gluing operation, interior glue application, glue spray booth, fiberglass operations, fiberglass and plastic primer booth, topcoat booths, wood coating spray booths, stain dip tank, wood gluing operations, van body repair and touch-up booths, and the cold cleaning degreasing -paint gun cleaners~~ shall **emit** less than 250 tons of VOC, including coatings, dilution solvents and cleaning solvents per 12 consecutive month period with compliance determined at the end of each month. This ~~usage~~ **emission** limit is required to limit the potential to emit of VOC to less than 250 tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

Response 13:

The limit in this permit results in VOC emissions less than 250 tons per year from the entire source. However, the specific facilities that are limited must be stated in the permit to clarify the facilities limited and facilitate future modifications. In addition, the permit language was written because U.S. EPA requires a limit on potential to emit to be practically enforceable. In order for the VOC emission limitation to be practically enforceable, there needs to be a direct correlation between the throughput of a system and the output of a system. In most cases in regards to coating operations, the VOC input is equal to the VOC output. The OAQ believes that establishing a VOC usage value which correlates to the VOC emissions is practically enforceable since the source can use MSDS information and dilution ratios to determine the correlating VOC emissions. If this information is not established as part of the permit, either multiple stack tests must be performed or a VOC Continuous Emissions Monitoring System (CEMS) must be installed to verify compliance with such VOC limitations. However, if the Permittee can maintain records of the amount of coatings and solvents from each process shipped off-site as waste, the VOC in those coatings and solvents may be excluded from the total VOC usage. Therefore, the Section D.4 is revised as follows:

D.4.1 PSD Minor Source Status [326 IAC 2-2]

- (a) The **VOC usage at the** wood/rubber fabric gluing operation, interior glue application, glue

spray booth, ~~fiberglass operations~~, fiberglass and plastic primer booth, topcoat booths, wood coating spray booths, stain dip tank, wood gluing operations, van body repair and touch-up booths, and the cold cleaning degreasing - paint gun cleaners, **minus the VOC solvent shipped out as waste or to be recycled from those facilities**, shall be limited to use less than 250 tons of VOC, including coatings, dilution solvents and cleaning solvents per 12 consecutive month period, **total**, with compliance determined at the end of each month. This usage limit is required to limit the potential to emit of VOC to less than 250 tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

- (b) Any change or modification from the equipment covered in this permit, which may increase VOC potential emissions to 250 tons per year, shall require a PSD permit pursuant to 326 IAC 2-2, before such change may occur.

Compliance Determination Requirements

D.4.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-4(a)(c)] [326 IAC 8-1-2(a)] [326 IAC 2-2]

- (a) **The Permittee shall determine the VOC content of the combined coating material and cleanup solvents in a shipment to be recycled shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by EPA Reference Method 24 and the sampling procedures in 326 IAC 8-1-4 or other methods as approved by the Commissioner. If a shipment consists of separate containers, the Permittee shall sample each container. The testing shall be conducted in accordance with Section C- Performance Testing, except for notifying IDEM of the test.**
- (b) **Compliance with the VOC usage limitation contained in Condition D.4.1 shall be demonstrated within thirty (30) days of the end of each month. This shall be based on the total volatile organic compound used for the previous month, minus the VOC solvent shipped out, and adding it to previous eleven (11) - month total VOC usage, minus the VOC solvent shipped out, so as to arrive at VOC emissions for the most recent twelve (12) consecutive month period. The VOC emissions for a month can be arrived at using the following equation:**

$$\text{VOC emitted} = \text{VI} - \text{SO}$$

Where:

VI = The total amount of VOC, in tons, delivered to the coating applicators or input to the processes listed in Condition D.4.1, including coatings, dilution solvents, and cleaning solvents; and

SO = The total amount of VOC, in tons, shipped out as waste or recycled, including coatings, dilution solvents, and cleaning solvents, from the processes listed in Condition D.4.1.

D.4.23 Record Keeping Requirements

- (a) To document compliance with Conditions D.4.1, 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/or the VOC emission limits established in Condition D.4.1. 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, **including cleanup 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;~~
 - (3) The amount of VOC solvent shipped out as waste or to be recycled each month. The amount for solvent shipped out shall be determined based upon information from the waste collector, recycler, and/or source;**
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted (**VOC used, minus the VOC solvent shipped out as waste or to be recycled**) for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.4.34 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.4.1(a) shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee requires the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

The parameter on the quarterly report form has been revised as follows:

Parameter: **VOC Emitted (The total weight of VOC used, minus the VOC solvent shipped out as waste or to be recycled), VOC emitted = VI - SO**

Comment 14:

Condition D.4.2(a)(2)(B) requires that "Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents." This condition should be removed as it is not required to determine whether the source is in compliance with the limit of less than 250 tons of VOC per 12 consecutive month period. Likewise, Condition D.4.2(a)(3) requiring "The cleanup solvent usage for each month" should be removed since the solvent used is covered in D.4.2(a)(1) and there is no need to differentiate between cleanup solvent and solvent added to the coatings to show compliance with Condition D.4.1.

Response 14:

Condition D.4.2 has been revised as requested. See Response 13.

Upon further review, the OAQ has decided to make the following changes to the Part 70 Operating Permit (The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded**):

Change 1:

The name of the appropriate OAQ section has been corrected in Condition B.23, as follows:

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

- (a) The Permittee shall pay annual fees to IDEM, OAQ 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, ~~IM & Billing~~, **Licensing, and Training** Section), to determine the appropriate permit fee.

Change 2:

The following revisions were made to the Emission Statement condition, Condition C.16 (now C.15), to incorporate the revisions to 326 IAC 2-6 that became effective March 27, 2004. The revised rule was published in the April 1, 2004, Indiana Register.

C.165 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)] [326 IAC 2-6]

- (a) ~~The Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. This statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6-3 and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period identified in 326 IAC 2-6. The emission statement shall meet the following requirements:~~

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 ~~from the source, in compliance with listed in 326 IAC 2-6-4(a) (Emission Reporting);~~
- (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

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

Change 3:

The MACT standards for this source have been promulgated. Therefore, this source is not required to submit a Part II MACT application, and Condition C.20 has been removed as follows:

~~C.20 Application Requirements for Section 112(j) of the Clean Air Act [40 CFR 63.52(e)] [40 CFR 63.56(a)] [40 CFR 63.9(b)] [326 IAC 2-7-12]~~

~~(a) The Permittee shall submit a Part 2 Maximum Achievable Control Technology (MACT) Application in accordance with 40 CFR 63.52(e)(1). The Part 2 MACT Application shall meet the requirements of 40 CFR 63.53(b).~~

~~(b) Notwithstanding paragraph (a), the Permittee is not required to submit a Part 2 MACT Application if the Permittee no longer meets the applicability criteria of 40 CFR 63.50 by the application deadline in 40 CFR 63.52(e)(1). For example, the Permittee would not have to submit a Part 2 MACT Application if, by the application deadline:~~

~~(1) The source is no longer a major source of hazardous air pollutants, as defined in 40 CFR 63.2;~~

~~(2) The source no longer includes one or more units in an affected source category for which the U.S. EPA failed to promulgate an emission standard by May 15, 2002; or~~

~~(3) The MACT standard or standards for the affected source categories included at the source are promulgated.~~

~~(c) Notwithstanding paragraph (a), pursuant to 40 CFR 63.56(a), the Permittee shall comply with an applicable promulgated MACT standard in accordance with the schedule provided in the MACT standard if the MACT standard is promulgated prior to the Part 2 MACT Application deadline or prior to the issuance of permit with a case by case Section 112(j) MACT determination. The MACT requirements include the applicable General Provisions requirements of 40 CFR 63, Subpart A. Pursuant to 40 CFR 63.9(b), the Permittee shall submit an initial notification not later than 120 days after the effective date of the MACT, unless the MACT specifies otherwise. The initial notification shall be submitted to:~~

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

~~and~~

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

Change 4:

The third sentence on the Quarterly Deviation and Compliance Monitoring report form has been

replaced with a sentence that is consistent with the condition in Section B, Deviations from Permit Requirements and Conditions.

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. ~~Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.~~ **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".

Change 5:

A statement was added to Condition B.8, Certification, in order to clarify that the certification form may cover more than one document that is submitted, as follows:

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).

Change 6:

326 IAC 2-7-3 was added to the authority line for Condition B.16, Permit Renewal, as follows:

B.16 Permit Renewal **[326 IAC 2-7-3]**[326 IAC 2-7-4]

Change 7:

"OAQ" has been added to Condition C.8(c) (now C.7(c)) Performance Testing, as follows:

- (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.

Change 8:

A clarification of "calendar year" has been added to (e) of C.18 (now C.17), General Reporting Requirements, as follows:

- (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.**

Change 9:

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. The Section D conditions that refer to this condition have been revised to reflect the new condition title, and the following changes have been made to the Section C condition:

**C.143 ~~Compliance Response Plan - Preparation, Implementation, Records, and Reports~~
Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]**

- ~~(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on-site, and comprised of:~~
- ~~(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.~~
 - ~~(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.~~
- ~~(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:~~
- ~~(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or~~
 - ~~(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.~~
 - ~~(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.~~
 - ~~(4) Failure to take reasonable response steps shall be considered a deviation from the permit.~~
- ~~(c) The Permittee is not required to take any further response steps for any of the following reasons:~~
- ~~(1) A false reading occurs due to the malfunction of the monitoring equipment and~~

~~prompt action was taken to correct the monitoring equipment.~~

- ~~(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.~~
- ~~(3) An automatic measurement was taken when the process was not operating.~~
- ~~(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.~~
- ~~(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.~~
- ~~(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.~~
- (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.**

Change 10:

Condition D.2.3 has been revised as follows:

D.2.3 Visible Emissions Notations

- (a) Daily visible emission notations of the baghouse exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- ~~(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.~~
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.**

Change 11:

Paragraph (a) of the Broken or Failed Baghouse condition has been deleted. For multi-compartment baghouses, the permit will not specify what actions the Permittee needs to take in response to a broken bag. However, a requirement has been added to Condition D.2.2 requiring the Permittee to notify IDEM if a broken bag is detected and the control device will not be repaired for more than ten (10) days. This notification allows IDEM to take any appropriate actions if the emission unit will continue to operate for a long period of time while the control device is not operating in optimum condition. Since the requirements of Condition C.6 are covered by Conditions D.2.2 and D.1.5, Condition C.6 has been removed from the permit and the remainder of Section C is renumbered accordingly.

Paragraph (b) of the Broken or Failed Baghouse condition has been revised for those processes that operate in batch mode. The condition required an emission unit to be shut down immediately in case of baghouse failure. However, IDEM is aware there can be safety issues with shutting down a process in the middle of a batch. IDEM also realizes that in some situations, shutting down an

emissions unit mid-process can cause equipment damage. Therefore, since it is not always possible to shut down a process with material remaining in the equipment, IDEM has revised the condition to state that in the case of baghouse failure, the feed to the process must be shut off immediately, and the process shall be shut down as soon as practicable.

~~C.6 Operation of Equipment [326 IAC 2-7-6(6)]~~

~~Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit(s) vented to the control equipment are in operation.~~

D.2.2 Particulate Control

(a) In order to comply with Condition D.2.1, the two baghouses and the sock filter for particulate control shall be in operation and control emissions from the woodworking facilities B-34, B-35, and PF-2 at all times that these facilities are in operation.

(b) **In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.**

D.2.5 Broken or Failed Bag Detection

~~In the event that bag failure has been observed:~~

~~(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.~~

~~(b) (a) For a single compartment baghouses controlling emissions from a process operated continuously, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process shall be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).~~

(b) For a single compartment baghouses **controlling emissions from a batch process**, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or

~~triboflows, then the feed to the process failed units and the associated process will~~ **shall** be shut down immediately until the failed units ~~have~~ **has** been repaired or replaced. **The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit.** Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

Change 12:

The address of the IDEM, OAQ, has been updated in the permit, as follows:

100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46204-2251 6-6015

Change 13:

Since Conditions D.1.1(a) through (c) and D.1.2 contain requirements, but not limits, they have been revised as follows:

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

- (a) Any change or modification which may increase the potential VOC emissions from the wood/rubber fabric gluing operations, identified as PF-1, to 25 tons or more per year, shall require prior OAQ approval. ~~Compliance with this limit renders the requirement of 326 IAC 8-1-6 not applicable.~~
- (b) Any change or modification which may increase the potential VOC emissions from the Interior Glue application, identified as AF-1, to 25 tons or more per year, shall require prior OAQ approval. ~~Compliance with this limit renders the requirement of 326 IAC 8-1-6 not applicable.~~
- (c) Any change or modification which may increase the potential VOC emissions from the glue spray booth, identified as F-2, to 25 tons or more per year, shall require prior OAQ approval. ~~Compliance with this limit renders the requirement of 326 IAC 8-1-6 not applicable.~~
- (d) Pursuant to CP 085-2841-00037, issued on May 24, 1995, and 326 IAC 8-1-6, the high volume low pressure fiberglass and plastic primer booth, identified as F-1, shall:
 - (1) use relatively high solids, low-VOC coatings. The maximum VOC content by weight of the coatings shall not exceed 76.3% with a minimum solids content by volume of 16.2%; and
 - (2) use high-volume, low pressure (HVLP) spray applicators.

These conditions are required as a result of the BACT requirement under 326 IAC 8-1-6.

- (e) Pursuant to CP 085-4601-00037, issued on October 11, 1995, and 326 IAC 8-1-6, the three (3) high volume low pressure topcoat booths, identified as Q-3, Q-6 and Q-7, shall:
 - (1) use relatively high solids, low-VOC coatings. The maximum VOC content by weight of the coatings shall not exceed 76.3% with minimum solids content by volume of 16.2%;

- (2) use high-volume, low pressure (HVLP) spray applicators. The HVLP gun pressure shall not exceed 10 psi; and
- (3) record readings from the line pressure monitors on the HVLP guns on a daily basis.

These conditions are required as a result of the BACT requirement under 326 IAC 8-1-6.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

Any change or modification which may increase the potential VOC emissions from the two van body repair and touch-up booths, identified as C-6 and C-7, to 25 tons or more per year, shall require prior OAQ approval. ~~Compliance with this limit renders the requirement of 326 IAC 8-2-9 not applicable.~~

Change 14:

Indiana was required to incorporate credible evidence provisions into state rules consistent with the SIP call published by U.S. EPA in 1997 (62 FR 8314). Indiana has incorporated the credible evidence provision in 326 IAC 1-1-6. This rule is effective March 16, 2005; therefore, the condition reflecting this rule will be incorporated into your permit as follows:

B.24 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.

Change 15:

IDEM has clarified the Section B - Operational Flexibility condition as follows:

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

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the ~~emissions allowable under~~ **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, P. O. Box 6015
Indianapolis, Indiana ~~46206-6015~~ **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, ~~on a rolling five (5) year basis~~, all such changes and emissions trading **trades** that are subject to 326 IAC 2-7-20(b), (c), or (e). ~~and makes~~ **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 ~~in emissions in~~ **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.**

Change 16:

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. Condition D.1.7 has been removed as indicated in Response 5. Condition C.1 has been revised to remove (a), which contained the requirements of the previous version of 326 IAC 6-3, as follows:

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour ~~{40 CFR 52 Subpart P}~~ [326 IAC 6-3-2]

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

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

Company Nai Bodor Corporation (dba Explorer Van Company)
Address City US 30 West and Fox Farm Road North, Warsaw, IN 46580
County Kosciusko
Part 70 No.: T085-17682-00074
Reviewer: Ghassan Shalabi
Date: August 18, 2003

| Material | Density (Lb/Gal) | Weight % Volatile (H2O& Organics) | Weight % Water | Weight % Organics | Volume % Water | Volume % Non-Vol (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 |
|--|------------------|-----------------------------------|----------------|-------------------|----------------|---------------------------|-----------------------|---------------------|---|----------------------------------|-------------------------------|------------------------------|-----------------------------|------------------------------|--------------------|---------------------|
| Precat Sealer (Emission unit B-26) | 7.67 | 72.50% | 0.0% | 72.5% | 0.0% | 21.00% | 0.90000 | 3.000 | 5.56 | 5.56 | 15.01 | 360.34 | 65.76 | 6.24 | 26.48 | 75% |
| Topcoat (Emission unit B-33) | 7.78 | 69.95% | 0.0% | 70.0% | 0.0% | 22.74% | 0.70000 | 3.000 | 5.44 | 5.44 | 11.43 | 274.28 | 50.06 | 5.38 | 23.93 | 75% |
| Sadoplast Hardener (Emission unit B-24) | 7.67 | 46.71% | 0.0% | 46.7% | 0.0% | 0.00% | 0.00000 | 0.000 | 3.58 | 3.58 | 0.00 | 0.00 | 0.00 | 0.00 | ERR | 0% |
| Polyester Sealer (Emission unit B-30/31) | 8.37 | 32.30% | 0.0% | 32.3% | 0.0% | 67.00% | 2.00000 | 6.000 | 2.70 | 2.70 | 32.44 | 778.61 | 142.10 | 74.46 | 4.04 | 75% |
| Precat Sealer (Emission unit B-27) | 7.70 | 72.50% | 0.0% | 72.5% | 0.0% | 21.00% | 0.90000 | 3.000 | 5.58 | 5.58 | 15.07 | 361.75 | 66.02 | 6.26 | 26.58 | 75% |
| Reslack-Clear (B-32) | 8.81 | 41.20% | 0.0% | 41.2% | 0.0% | 58.00% | 2.00000 | 2.000 | 3.63 | 3.63 | 14.52 | 348.45 | 63.59 | 22.69 | 6.26 | 75% |
| Woodstain (B-1) | 7.36 | 98.38% | 0.0% | 98.4% | 0.0% | 2.24% | 0.01560 | 30.000 | 7.24 | 7.24 | 3.39 | 81.33 | 14.84 | 0.00 | 323.25 | 100% |
| Prem. Adhesive (Emis. Units BF-1, BF-2) | 10.80 | 3.00% | 0.0% | 3.0% | 0.0% | 25.00% | 0.09380 | 4.000 | 0.32 | 0.32 | 0.12 | 2.92 | 0.53 | 4.30 | 1.30 | 75% |
| Prem. Adhesive (Emis. Unit PF-1) | 10.80 | 3.00% | 0.0% | 3.0% | 0.0% | 25.00% | 0.06250 | 7.500 | 0.32 | 0.32 | 0.15 | 3.65 | 0.67 | 5.38 | 1.30 | 75% |
| Emerald Green (Emission units Q-6, Q-7) | 7.85 | 64.30% | 0.0% | 64.3% | 0.0% | 16.20% | 0.35170 | 4.000 | 5.05 | 5.05 | 7.10 | 170.42 | 31.10 | 4.32 | 31.16 | 75% |
| Balancer (Emission units Q-6, Q-7) | 7.26 | 71.30% | 0.0% | 71.3% | 0.0% | 7.60% | 0.23180 | 4.000 | 5.18 | 5.18 | 4.80 | 115.19 | 21.02 | 2.12 | 68.11 | 75% |
| Tint 827/J (Emission units Q-6, Q-7) | 7.99 | 67.99% | 0.0% | 68.0% | 0.0% | 24.88% | 0.04570 | 4.000 | 5.43 | 5.43 | 0.99 | 23.83 | 4.35 | 0.51 | 21.83 | 75% |
| Basemaker (Emission units Q-6, Q-7) | 6.64 | 99.83% | 0.0% | 99.8% | 0.0% | 0.12% | 0.17590 | 4.000 | 6.63 | 6.63 | 4.66 | 111.94 | 20.43 | 0.01 | 5523.93 | 75% |
| Tint 830J (Emission units Q-6, Q-7) | 8.22 | 62.91% | 0.0% | 62.9% | 0.0% | 28.48% | 0.02710 | 4.000 | 5.17 | 5.17 | 0.56 | 13.45 | 2.46 | 0.36 | 18.16 | 75% |
| Imron 6000 (emission unit Q-3) | 8.12 | 46.64% | 0.0% | 46.6% | 0.0% | 47.01% | 0.22320 | 4.000 | 3.79 | 3.79 | 3.38 | 81.15 | 14.81 | 4.24 | 8.06 | 75% |
| Activator (emission unit Q-3) | 9.00 | 25.02% | 0.0% | 25.0% | 0.0% | 69.85% | 0.06760 | 4.000 | 2.25 | 2.25 | 0.61 | 14.61 | 2.67 | 2.00 | 3.22 | 75% |
| Clearcoat (emission unit Q-3) | 8.31 | 41.10% | 0.0% | 41.1% | 0.0% | 52.40% | 0.29080 | 4.000 | 3.42 | 3.42 | 3.97 | 95.35 | 17.40 | 6.23 | 6.52 | 75% |
| Lacquer Thinner (emission unit Q-3) | 6.55 | 69.00% | 0.0% | 69.0% | 0.0% | 0.00% | 0.04300 | 4.000 | 4.52 | 4.52 | 0.78 | 18.66 | 3.40 | 0.38 | ERR | 75% |
| Premium Adhesive (Emission unit AF-1) | 10.8 | 3.00% | 0.0% | 3.0% | 0.0% | 25.00% | 0.04690 | 1.000 | 0.32 | 0.32 | 0.02 | 0.36 | 0.07 | 0.54 | 1.30 | 75% |
| Silaprene Adhesive M6587 (Emis. Unit F) | 7.16 | 71.90% | 0.00% | 71.90% | 0.00% | 28.00% | 0.27500 | 1.000 | 5.15 | 5.15 | 1.42 | 33.98 | 6.20 | 0.61 | 18.39 | 75.00% |
| Tint 801J (Emission unit C-6) | 13.31 | 27.33% | 0.0% | 27.3% | 0.0% | 49.66% | 0.03130 | 4.000 | 3.64 | 3.64 | 0.46 | 10.93 | 1.99 | 1.33 | 7.33 | 75% |
| Vinyl Enamel (Emission unit C-6) | 7.19 | 84.94% | 0.0% | 84.9% | 0.0% | 9.58% | 0.09380 | 4.000 | 6.11 | 6.11 | 2.29 | 54.99 | 10.04 | 0.44 | 63.75 | 75% |
| Clear Binder (Emission unit C-7) | 7.67 | 54.70% | 0.0% | 54.7% | 0.0% | 45.00% | 0.32130 | 0.104 | 4.20 | 4.20 | 0.14 | 3.36 | 0.61 | 0.13 | 9.32 | 75% |
| Balancer (Emission unit C-7) | 7.26 | 71.30% | 0.0% | 71.3% | 0.0% | 28.00% | 0.70330 | 0.104 | 5.18 | 5.18 | 0.38 | 9.09 | 1.66 | 0.17 | 18.49 | 75% |
| Auction Clear (Emission unit C-7) | 7.75 | 64.40% | 0.0% | 64.4% | 0.0% | 35.00% | 0.72240 | 0.104 | 4.99 | 4.99 | 0.37 | 9.00 | 1.64 | 0.23 | 14.26 | 75% |
| Pearl White Met #W8936K1 (Emission unit C) | 8.74 | 53.10% | 0.0% | 53.1% | 0.0% | 46.00% | 1.17800 | 0.104 | 4.64 | 4.64 | 0.57 | 13.65 | 2.49 | 0.55 | 10.09 | 75% |
| Pearl White Met #G8701KMA (Emission unit) | 7.53 | 62.50% | 0.0% | 62.5% | 0.0% | 37.00% | 1.23940 | 0.104 | 4.71 | 4.71 | 0.61 | 14.56 | 2.66 | 0.40 | 12.72 | 75% |

State Potential Emissions

Add worst case coating to all solvents

125.24

3005.84

548.57

149.25

METHODOLOGY

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

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

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

Total = Worst Coating + Sum of all solvents used

**Appendix A: Emission Calculations
For woodworking operations PF-2**

Company Name Bodor Corporation (dba Explorer Van)
Address City II US 30 West and Fox Farm Road North, Warsaw, IN 46580
Part 70 No. T085-17682-00074
Reviewer: Ghassan Shalabi
Date: August 18, 2003

| Process | Throughput (P) (lbs/hr) | Emission Point ID | Max. PM Conc. in Outlet from Dust Collector (C) grain/ascf | Average air flow rate (F) acfm | State Potential PM Emission | | | | Control Eff. | Emission Before Control | Allowable PM Emissions | | |
|-----------------------|-------------------------------|----------------------|---|---|-----------------------------|-----------------------------|---------|---------|-----------------|-------------------------------|------------------------|---------|---------|
| | | | | | Fugitive (FE) lbs/hr | Discharge (DE) lbs/hr | lbs/day | tons/yr | | | (E) lbs/hr | lbs/day | tons/yr |
| Woodworking (PF-2) | 300 | internal | 0.002 | 5000.0 | 0.00 | 0.09 | 2.06 | 0.38 | 0.850 | 2.50 | 1.15 | 27.60 | 5.04 |

Total 0.000 0.086 2.057 0.375 0.850 2.503 1.150 27.604 5.038

METHODOLOGY

Discharge PM emission (lbs/hr) = PM conc. (grain/cft) * flow rate (acfm)*60(min/hr)1.4286e-4(lbs/grain)

Potential PM emission (lbs/day)=(DE+FE) *24 hr/day

Allowable PM Emission (E, lbs/hr)= 4.10*P^0.67, from 326 IAC 6-3