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

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(317) 232-8603
(800) 451-6027
www.in.gov/idem

Part 70 Operating Permit Renewal
OFFICE OF AIR QUALITY

The Braun Corporation
623 W. 11th Street
Winamac, Indiana 46996

(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 131-17702-00017	
Issued by:	Issuance Date:
Nisha Sizemore, Chief Permits Branch Office of Air Quality	Expiration Date:

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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 motor vehicle conversion plant.

Source Address:	623 W. 11th Street, Winamac, Indiana 46996
Mailing Address:	623 W. 11th Street, Winamac, Indiana 46996
General Source Phone Number:	219-946-6153
SIC Code:	3711
County Location:	Pulaski
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD Minor 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:

Twelve (12) surface coating facilities and assembly areas in Plant 4, described as follows:

(a) One (1) manufacturing line, identified as EnterVan Line No. 1, constructed in 1993, consisting of the following:

(1) One (1) assembly area, identified as Enter/Assem. No. 1, exhausting inside, utilizing dry filters for particulate control, capacity: 18.0 vans per day. This facility operates independently of all other assembly areas.

(2) Refinishing surface coating operations, identified as Enter/Ref. No. 1, consisting of one (1) primer booth and two (2) paint booths, identified as Paint Booth #1 and Paint Booth #2, exhausting through Stack/Vent ID Enter 1, utilizing dry filters for particulate control, capacity: 18.0 vans per day. This facility operates independently of all other refinishing surface coating facilities.

(3) One (1) undercoating area, identified as Enter/Un. No. 1, exhausting inside, utilizing dry filters for particulate control, capacity: 18.0 vans per day. This facility operates independently of all other undercoating areas.

(b) One (1) manufacturing line, identified as EnterVan Line No. 2, constructed in 1993, consisting of the following:

(1) One (1) assembly area, identified as Enter/Assem. No. 2, exhausting inside, utilizing dry filters for particulate control, capacity: 18.0 vans per day. This facility operates independently of all other assembly areas.

(2) Refinishing surface coating operations, identified as Enter/Ref. No. 2, consisting of one (1) paint booth and one (1) primer booth, exhausting through Stack/Vent ID Enter 2, utilizing dry filters for particulate control, capacity: 18.0 vans per day. This facility operates independently of all other refinishing surface coating facilities.

(3) One (1) undercoating area, identified as Enter/Un. No. 2, exhausting inside, utilizing dry filters for particulate control, capacity: 18.0 vans per day. This facility operates independently of all other undercoating areas.

(c) One (1) manufacturing line, identified as Bus/ParaTransit Van Line No. 1, constructed in 1993, consisting of the following:

(1) One (1) assembly area, identified as Para/Assem. No. 1, exhausting inside, utilizing dry filters for particulate control, capacity: 12.0 vans per day. This facility operates independently of all other assembly areas.

(2) One (1) refinishing surface coating booth, identified as Para/Ref. 1, exhausting through Stack/Vent ID Para 1, utilizing dry filters for particulate control, capacity: 12.0 vans per day. This facility operates independently of all other refinishing surface coating facilities.

(3) One (1) undercoating area, identified as Para/Un. No. 1, exhausting inside, utilizing dry filters for particulate control, capacity: 12.0 vans per day. This facility operates independently of all other undercoating areas.

(d) One (1) manufacturing line, identified as Bus/ParaTransit Van Line No. 2, constructed in 1993, consisting of the following:

(1) One (1) assembly area, identified as Para/Assem. No. 2, exhausting inside, utilizing dry filters for particulate control, capacity: 12.0 vans per day. This facility operates independently of all other assembly areas.

(2) One (1) refinishing surface coating booth, identified as Para/Ref. 2, exhausting through Stack/Vent ID Para 2, utilizing dry filters for particulate control, capacity: 12.0 vans per day. This facility operates independently of all other refinishing surface coating facilities.

(3) One (1) undercoating area, identified as Para/Un. No. 2, exhausting inside, utilizing dry filters for particulate control, capacity: 12.0 vans per day. This facility operates independently of all other undercoating areas.

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

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

(a) Two (2) cold cleaner degreasing operations using solvent that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2] [326 IAC 8-3-5]

(b) One (1) natural gas-fired burn-off oven at Plant 3, equipped with two (2) burners, constructed in 1991, burning powder coating off of racks, capacity: 8.0 pounds powder coat per hour, heat input capacity: 1.56 million British thermal units per hour. [326 IAC 4-2-2] [326 IAC 9-1-2]

(c) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

(d) The following surface coating operations:

(1) Touch-Up Booth No. 1 at Plant 4. [326 IAC 2-2]

(2) Touch-Up Booth No. 2 at Plant 4. [326 IAC 2-2]

(3) Powder Coating at Plant 3. [326 IAC 2-2]

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

(a) This permit, T 131-17702-00017, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by the "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) The "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
MC 61-53 IGCN 1003
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: 317-233-0178 (ask for Compliance Section)
Facsimile Number: 317-233-6865

(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
MC 61-53 IGCN 1003
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 compliance with any applicable requirements as of the date of permit issuance, provided that either

the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

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

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

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

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

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

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

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

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

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

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

(a) All terms and conditions of permits established prior to T 131-17702-00017 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

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

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

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

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

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

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

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

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

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

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

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

(1) That this permit contains a material mistake.

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

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

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

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

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

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

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

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

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

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

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) 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
MC 61-53 IGCN 1003
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)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

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

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

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

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

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

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

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

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

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

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

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

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

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

(3) Any change in emissions; and

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

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

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

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

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

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

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

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1] [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.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

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

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

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

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

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

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

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

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(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 two hundred sixty (260) linear feet on pipes or one hundred sixty (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
MC 61-52 IGCN 1003
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 seventy-five hundredths (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
MC 61-53 IGCN 1003
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
MC 61-53 IGCN 1003
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 January 5, 2000.

(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 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) Pursuant to 326 IAC 2-6-3(b)(2), starting in 2005 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

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

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

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
MC 61-50 IGCN 1003
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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

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

Stratospheric Ozone Protection

C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

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

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

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

(a) One (1) manufacturing line, identified as EnterVan Line No. 1, constructed in 1993, consisting of the following:

(1) One (1) assembly area, identified as Enter/Assem. No. 1, exhausting inside, utilizing dry filters for particulate control, capacity: 18.0 vans per day. This facility operates independently of all other assembly areas.

(2) Refinishing surface coating operations, identified as Enter/Ref. No. 1, consisting of one (1) primer booth and two (2) paint booths, identified as Paint Booth #1 and Paint Booth #2, exhausting through Stack/Vent ID Enter 1, utilizing dry filters for particulate control, capacity: 18.0 vans per day. This facility operates independently of all other refinishing surface coating facilities.

(3) One (1) undercoating area, identified as Enter/Un. No. 1, exhausting inside, utilizing dry filters for particulate control, capacity: 18.0 vans per day. This facility operates independently of all other undercoating areas.

(b) One (1) manufacturing line, identified as EnterVan Line No. 2, constructed in 1993, consisting of the following:

(1) One (1) assembly area, identified as Enter/Assem. No. 2, exhausting inside, utilizing dry filters for particulate control, capacity: 18.0 vans per day. This facility operates independently of all other assembly areas.

(2) Refinishing surface coating operations, identified as Enter/Ref. No. 2, consisting of one (1) paint booth and one (1) primer booth, exhausting through Stack/Vent ID Enter 2, utilizing dry filters for particulate control, capacity: 18.0 vans per day. This facility operates independently of all other refinishing surface coating facilities.

(3) One (1) undercoating area, identified as Enter/Un. No. 2, exhausting inside, utilizing dry filters for particulate control, capacity: 18.0 vans per day. This facility operates independently of all other undercoating areas.

(c) One (1) manufacturing line, identified as Bus/ParaTransit Van Line No. 1, constructed in 1993, consisting of the following:

(1) One (1) assembly area, identified as Para/Assem. No. 1, exhausting inside, utilizing dry filters for particulate control, capacity: 12.0 vans per day. This facility operates independently of all other assembly areas.

(2) One (1) refinishing surface coating booth, identified as Para/Ref. 1, exhausting through Stack/Vent ID Para 1, utilizing dry filters for particulate control, capacity: 12.0 vans per day. This facility operates independently of all other refinishing surface coating facilities.

(3) One (1) undercoating area, identified as Para/Un. No. 1, exhausting inside, utilizing dry filters for particulate control, capacity: 12.0 vans per day. This facility operates independently of all other undercoating areas.

Facility Description [326 IAC 2-7-5(15)]: Surface Coating Areas (continued)

(d) One (1) manufacturing line, identified as Bus/ParaTransit Van Line No. 2, constructed in 1993, consisting of the following:

(1) One (1) assembly area, identified as Para/Assem. No. 2, exhausting inside, utilizing dry filters for particulate control, capacity: 12.0 vans per day. This facility operates independently of all other assembly areas.

(2) One (1) refinishing surface coating booth, identified as Para/Ref. 2, exhausting through Stack/Vent ID Para 2, utilizing dry filters for particulate control, capacity: 12.0 vans per day. This facility operates independently of all other refinishing surface coating facilities.

(3) One (1) undercoating area, identified as Para/Un. No. 2, exhausting inside, utilizing dry filters for particulate control, capacity: 12.0 vans per day. This facility operates independently of all other undercoating areas.

Insignificant Activities

(a) Two (2) cold cleaner degreasing operations using solvent that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2] [326 IAC 8-3-5]

(d) The following surface coating operations:

(1) Touch-Up Booth No. 1 at Plant 4.

(2) Touch-Up Booth No. 2 at Plant 4.

(3) Powder Coating at Plant 3.

(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 8-2-9]

Pursuant to 326 IAC 8-2-9, the owner or operator shall not allow the discharge into the atmosphere VOC in excess of three and five-tenths (3.5) per gallon of coating, excluding water, as delivered to the applicator for extreme performance coatings.

D.1.2 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment of The eight (8) surface coating booths, identified as Enter/Assem. No. 1, Enter/Un. No. 1, Enter/Assem. No. 2, Enter/Un. No. 2, Para/Assem. No. 1, Para/Un. No. 1, Para/Assem. No. 2 and Para/Un. No. 2 during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

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.

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

(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 (38°C) (one hundred degrees Fahrenheit (100°F));

(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 (38°C) (one hundred degrees Fahrenheit (100°F)), 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 (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):

(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 of 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.

D.1.5 Hazardous Air Pollutants (HAPs) Limitations [40 CFR 63, Subpart MMMM]

(a) The total usage of each individual HAP at the coating operations, degreasing operations and miscellaneous solvent usage, shall be limited to less than a total of 9.63 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(b) The total usage of any combination of HAPs at the coating operations, degreasing operations and miscellaneous solvent usage, shall be limited to less than a total of 24.3 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits shall ensure that the source is an area source for HAPs, including the unrestricted potential to emit HAPs from all other facilities at the source, and shall render the requirements of the NESHAP 40 CFR 63, Subpart MMMM, not applicable to the source.

D.1.6 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the twelve (12) surface coating facilities and assembly areas, identified as Enter/Assem. No. 1, Enter/Ref. No. 1, Enter/Un. No. 1, Enter/Assem. No. 2, Enter/Ref. No. 2, Enter/Un. No. 2, Para/Assem. No. 1, Para/Ref. 1, Para/Un. No. 1, Para/Assem. No. 2, Para/Ref. 2 and Para/Un. No. 2, shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.1.7 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 twelve (12) surface coating facilities and assembly areas, identified as Enter/Assem. No. 1, Enter/Ref. No. 1, Enter/Un. No. 1, Enter/Assem. No. 2, Enter/Ref. No. 2, Enter/Un. No. 2, Para/Assem. No. 1, Para/Ref. 1, Para/Un. No. 1, Para/Assem. No. 2, Para/Ref. 2 and Para/Un. No. 2, and their control devices.

Compliance Determination Requirements

D.1.8 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.5 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.1.9 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (Enter 1, Enter 2, Para 1 and Para 2) while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

D.1.10 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1 and D.1.5, 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 and HAPs usage limits and the VOC and HAPs emission limits established in Conditions D.1.1 and D.1.5. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.

(1) The VOC and HAPs 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 individual and combined HAPs usage for each month; and

(5) The weight of individual and combined HAPs emitted for each compliance period.

(b) To document compliance with Condition D.1.9, the Permittee shall maintain a log of weekly overspray observations and monthly inspections.

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

D.1.11 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.5 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.2 FACILITY OPERATION CONDITIONS

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

(b) One (1) natural gas-fired burn-off oven at Plant 3, equipped with two (2) burners, constructed in 1991, burning powder coating off of racks, capacity: 8.0 pounds powder coat per hour, heat input capacity: 1.56 million British thermal units per hour.

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

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

D.2.1 Incinerator [326 IAC 4-2-2]

Pursuant to 326 IAC 4-2-2, the one (1) natural gas-fired burn-off oven, shall:

(a) Consist of primary and secondary chambers or the equivalent.

(b) Be equipped with a primary burner unless burning only wood products.

(c) Comply with 326 IAC 5-1 and 326 IAC 2.

(d) Be maintained, operated, and burn waste in accordance with the manufacturer's specifications or an operation and maintenance plan as specified in subsection (c).

(e) Not emit particulate matter in excess of five-tenths (0.5) pound of particulate matter per one thousand (1,000) pounds of dry exhaust gas under standard conditions corrected to fifty percent (50%) excess air for incinerators with solid waste capacity less than two hundred (200) pounds per hour.

D.2.2 Carbon Monoxide [326 IAC 9-1-2]

Pursuant to 326 IAC 9-1-2(a)(3), the Permittee shall not operate a refuse incinerator or refuse burning equipment unless the waste gas stream is burned in a direct-flame afterburner or secondary chamber.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT
CERTIFICATION

Source Name: The Braun Corporation
Source Address: 623 W. 11th Street, Winamac, Indiana 46996
Mailing Address: 623 W. 11th Street, Winamac, Indiana 46996
Part 70 Permit No.: T 131-17702-00017

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
MC61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: The Braun Corporation
Source Address: 623 W. 11th Street, Winamac, Indiana 46996
Mailing Address: 623 W. 11th Street, Winamac, Indiana 46996
Part 70 Permit No.: T 131-17702-00017

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

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

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

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

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

Part 70 Quarterly Report

Source Name:	The Braun Corporation
Source Address:	623 West 11th Street, Winamac, Indiana 46996
Mailing Address:	623 West 11th Street, Winamac, Indiana 46996
Part 70 Permit No.:	T 131-17702-00017
Facilities:	Coating operations at EnterVan Line No. 1, EnterVan Line No. 2, Bus/ParaTransit Line No. 1, Bus/ParaTransit Line No. 2, Touch Up Booth/Oven No. 1, Touch Up Booth/ Oven No. 2, and Powder Coating at Plant 3, degreasing operations and solvent usage.
Parameter:	Worst case of any individual HAP usage.
Limit:	Less than a total of 9.63 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR:_____

Month	Individual HAP Usage (tons)	Individual HAP Usage (tons)	Individual HAP Usage (tons)
	This Month	**Previous 11 Months**	**12 Month Total**

☐ No deviation occurred in this month.

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

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name:	The Braun Corporation
Source Address:	623 West 11th Street, Winamac, Indiana 46996
Mailing Address:	623 West 11th Street, Winamac, Indiana 46996
Part 70 Permit No.:	T 131-17702-00017
Facilities:	Coating operations at EnterVan Line No. 1, EnterVan Line No. 2, Bus/ParaTransit Line No. 1, Bus/ParaTransit Line No. 2, Touch Up Booth/Oven No. 1, Touch Up Booth/ Oven No. 2, and Powder Coating at Plant 3, degreasing operations and solvent usage.
Parameter:	Total combined HAPs usage.
Limit:	Less than a total of 24.3 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR:_____

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

☐ No deviation occurred in this month.

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

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: The Braun Corporation
Source Address: 623 W. 11th Street, Winamac, Indiana 46996
Mailing Address: 623 W. 11th Street, Winamac, Indiana 46996
Part 70 Permit No.: T 131-17702-00017

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

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

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

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

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

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

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

Source Background and Description

Source Name:	**The Braun Corporation**
Source Location:	**623 W. 11th Street, Winamac, Indiana 46996**
County:	**Pulaski**
SIC Code:	**3711**
Permit Renewal No.:	**T 131-17702-00017**
Permit Reviewer:	**Kyle Gregory**

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from The Braun Corporation relating to the operation of a motor vehicle conversion plant.

History

On July 14, 2003, The Braun Corporation submitted an application to the OAQ requesting to renew its operating permit. The Braun Corporation was issued a Part 70 Operating Permit, T 131-7058-00017, on April 20, 1999.

Permitted Emission Units and Pollution Control Equipment

Twelve (12) surface coating facilities and assembly areas in Plant 4, described as follows:

(a) One (1) manufacturing line, identified as EnterVan Line No. 1, constructed in 1993, consisting of the following:

(1) One (1) assembly area, identified as Enter/Assem. No. 1, exhausting inside, utilizing dry filters for particulate control, capacity: 18.0 vans per day. This facility operates independently of all other assembly areas.

(2) Refinishing surface coating operations, identified as Enter/Ref. No. 1, consisting of one (1) primer booth and two (2) paint booths, identified as Paint Booth #1 and Paint Booth #2, exhausting through Stack/Vent ID Enter 1, utilizing dry filters for particulate control, capacity: 18.0 vans per day. This facility operates independently of all other refinishing surface coating facilities.

(3) One (1) undercoating area, identified as Enter/Un. No. 1, exhausting inside, utilizing dry filters for particulate control, capacity: 18.0 vans per day. This facility operates independently of all other undercoating areas.

(b) One (1) manufacturing line, identified as EnterVan Line No. 2, constructed in 1993, consisting of the following:

(1) One (1) assembly area, identified as Enter/Assem. No. 2, exhausting inside, utilizing dry filters for particulate control, capacity: 18.0 vans per day. This facility operates independently of all other assembly areas.

(2) Refinishing surface coating operations, identified as Enter/Ref. No. 2, consisting of one (1) paint booth and one (1) primer booth, exhausting through Stack/Vent ID Enter 2, utilizing dry filters for particulate control, capacity: 18.0 vans per day. This facility operates independently of all other refinishing surface coating facilities.

(3) One (1) undercoating area, identified as Enter/Un. No. 2, exhausting inside, utilizing dry filters for particulate control, capacity: 18.0 vans per day. This facility operates independently of all other undercoating areas.

(c) One (1) manufacturing line, identified as Bus/ParaTransit Van Line No. 1, constructed in 1993, consisting of the following:

(1) One (1) assembly area, identified as Para/Assem. No. 1, exhausting inside, utilizing dry filters for particulate control, capacity: 12.0 vans per day. This facility operates independently of all other assembly areas.

(2) One (1) refinishing surface coating booth, identified as Para/Ref. 1, exhausting through Stack/Vent ID Para 1, utilizing dry filters for particulate control, capacity: 12.0 vans per day. This facility operates independently of all other refinishing surface coating facilities.

(3) One (1) undercoating area, identified as Para/Un. No. 1, exhausting inside, utilizing dry filters for particulate control, capacity: 12.0 vans per day. This facility operates independently of all other undercoating areas.

(d) One (1) manufacturing line, identified as Bus/ParaTransit Van Line No. 2, constructed in 1993, consisting of the following:

(1) One (1) assembly area, identified as Para/Assem. No. 2, exhausting inside, utilizing dry filters for particulate control, capacity: 12.0 vans per day. This facility operates independently of all other assembly areas.

(2) One (1) refinishing surface coating booth, identified as Para/Ref. 2, exhausting through Stack/Vent ID Para 2, utilizing dry filters for particulate control, capacity: 12.0 vans per day. This facility operates independently of all other refinishing surface coating facilities.

(3) One (1) undercoating area, identified as Para/Un. No. 2, exhausting inside, utilizing dry filters for particulate control, capacity: 12.0 vans per day. This facility operates independently of all other undercoating areas.

Insignificant Activities

(a) Two (2) cold cleaner degreasing operations using solvent that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2] [326 IAC 8-3-5]

(b) The following welding operations, total combined capacity: 59 pounds of weld wire or rod per hour:

(1) EnterVan Line No. 1 welding operations at Plant 4.

(2) EnterVan Line No. 2 welding operations at Plant 4.

(3) Bus/ParaTransit Van Line No. 1 welding operations at Plant 4.

(4) Bus/ParaTransit Van Line No. 2 welding operations at Plant 4.

(5) Axle/Door welding operations at Plant 4.

(6) Welding operations at Plant 3.

(c) The following natural gas-fired facilities, total heat input capacity: 45.56 million British thermal units per hour:

(1) One (1) natural gas-fired Touch-Up Oven No. 1 at Plant 4, heat input capacity: 1.00 million British thermal units per hour.

(2) One (1) natural gas-fired Touch-Up Oven No. 2 at Plant 4, heat input capacity: 1.00 million British thermal units per hour.

(3) One (1) natural gas-fired Powder Coating Oven at plant 3, heat input capacity: 2.00 million British thermal units per hour.

(4) One (1) natural gas-fired burn-off oven at Plant 3, equipped with two (2) burners, constructed in 1991, burning powder coating off of racks, capacity: 8.0 pounds powder coat per hour, heat input capacity: 1.56 million British thermal units per hour.

(5) Space heaters, each with natural gas-fired combustion of less than ten million (10,000,000) Btu per hour, total heat input capacity: 26.0 million British thermal units per hour.

(6) Eight (8) natural gas-fired prep/prime/paint ovens, heat input capacity: 1.00 million British thermal units per hour, each.

(7) Three (3) natural gas-fired paint ovens, heat input capacity: 2.00 million British thermal units per hour, each.

(d) The following surface coating operations:

(1) Touch-Up Booth No. 1 at Plant 4.

(2) Touch-Up Booth No. 2 at Plant 4.

(3) Powder Coating at Plant 3.

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

(f) Combustion unit(s) flame safety purging on startup.

(g) Machining where an aqueous cutting coolant continuously floods the machining interface. The aqueous cutting coolant does not contain VOC or HAPs.

(h) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

(i) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(j) The following equipment related to manufacturing activities not resulting in the emission of HAPs:

(1) Soldering operations, capacity: 50 pounds solder per month.

(2) Brazing and cutting operations for small scale maintenance activities only, utilizing oxyacetylene torches.

(3) Laser cutting operations.

(k) VOC and HAP storage tanks with capacity less than or equal to 1,000 gallons and annual throughput less than 12,000 gallons.

(l) VOC and HAP vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

Existing Approvals

Since the issuance of the **Part 70 Operating Permit T 131-7058-00017** on April 20, 1999, the source has constructed or has been operating under the following approvals as well:

(a) First Significant Source Modification No. 131-10831-00017 issued on August 2, 1999;

(b) First Administrative Amendment 131-11117-00017, issued on September 14, 1999;

(c) Second Administrative Amendment 131-12100-00017, issued on April 20, 2000;

(d) Second Significant Source Modification 131-11788-00017, issued on June 7, 2000;

(e) First Significant Permit Modification 131-12887-00017, issued on May 7, 2001;

(f) First Reopening 131-13456-00017, issued on November 11, 2001;

(g) Second Significant Permit Modification 131-14480-00017, issued on May 10, 2002;

(h) First Minor Source Modification 131-17766-00017, issued on November 17, 2003;

(i) First Minor Permit Modification 131-18143-00017, issued on January 13, 2004, and

(j) Third Significant Permit Modification 131-23199-00017, issued on December 27, 2006.

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

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

(a) Condition D.1.1.

D.1.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM emissions from the Enter/Assem. No. 1, Enter/Ref. No. 1, Enter/Un. No. 1, Enter/ Assem. No. 2, Enter/Ref. No. 2, Enter/Un. No. 2, Para/Assem. No. 1, Para/Ref. No. 1, Para/Un. No. 1 Para/Assem. No. 2, Para/Ref. No. 2, and Para/Un. No. 2 surface coating areas 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:

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

Reason not incorporated:

This condition set a pound per hour particulate limit for the paint booths. Revisions to 326 IAC 6-3 were effective June 12, 2002 and approved into the Indiana State Implementation Plan (SIP) on September 23, 2005. Those revisions created a new requirement for surface coating operations. The revised rule requires surface coating operations to use a control device rather than meet a pound per hour emission limit.

(b) Condition D.1.5.

D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

During the period within 90 days after the issuance of the Part 70 Operating Permit T 131-7058-00017, in order to demonstrate compliance with Condition D.1.1, the Permittee shall perform PM testing of one (1) EnterVan line and One (1) Bus/ParaTransit Van line utilizing methods as approved by the Commissioner.

This PM test needs to be performed on the Bus/ParaTransit Van line while a bus is being painted and also while a paratransit van is being painted.

The owner or operator may use existing compliance stack test data to satisfy the testing requirements of this Condition provided said test results are deemed acceptable by the Office of Air Quality.

Should the owner or operator change any “as applied” coating applied at any unit subject to the requirements of Condition D.1.1 such that the solids content of said coating exceeds the levels utilized in the most recent accepted compliance stack tests, the owner or operator shall schedule and perform new compliance stack tests utilizing the methodologies specified in this Condition, and demonstrate compliance with the requirements of Condition D.1.1 before any such change in coating is made.

The compliance stack tests required in this Condition shall be performed no later than five (5) years from the date of the most recent previous valid compliance demonstration, with said testing being conducted in accordance with Section C - Performance Testing.

Reason not incorporated:

The stack testing requirement in Condition D.1.5 is no longer needed to show compliance with Condition D.1.1, which has also been removed.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (^{0}F)
Enter 1	Enter/Ref. No. 1	30.5	2.50	11,700	68
Enter 2	Enter/Ref. No. 2	30.5	2.50	11,700	68
Para 1	Para/Ref. 1	31.5	4.51	29,300	68
Para 2	Para/Ref. 2	31.5	4.51	29,300	68
Touch Up No. 1	Touch Up No. 1	30.5	2.00	9,000	100
Touch Up No. 2	Touch Up No. 2	30.5	2.00	9,000	100

Emission Calculations

See Appendix A of this document for detailed emission calculations (pages 1 through 16).

County Attainment Status

The source is located in Pulaski County

Pollutant	Status
PM_{10}	attainment
$PM_{2.5}$	attainment
SO_2	attainment
NO_X	attainment
8-hour Ozone	attainment
CO	attainment
Lead	attainment

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

(b) Volatile organic compounds (VOC) and nitrogen oxides (NO_X) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC emissions and NO_X emissions are considered when evaluating the rule applicability relating to ozone. Pulaski County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NO_X emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.

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

(d) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.

(e) 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 emissions are not counted toward determination of PSD applicability.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	tons/year
PM	97.5
PM_{10}	98.7
SO_2	0.164
VOC	223
CO	16.8
NO_X	20.1

HAPs	tons/year
Ethyl Benzene	2.13
Glycol Ether	3.42
Hexane	2.41
MIBK	4.90
Toluene	14.1
Xylene	24.3
Manganese	0.233
Total	52.3

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of volatile organic compounds (VOC) is equal to or greater than one hundred (100) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all other criteria pollutants are less than one hundred (<100) tons per year.

(c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(d) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-7, fugitive emissions are not counted toward the determination of Part 70 applicability.

Actual Emissions

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

Pollutant	Actual Emissions (tons/year)
$PM_{2.5}$	6
PM_{10}	7
SO_2	0
VOC	38
CO	0
NO_X	0
HAP (Lead)	0.01

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.

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this Part 70 permit renewal, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

	Potential to Emit (tons/year)						
Process/Emission Unit	**PM**	**PM_{10}**	**SO_2**	**VOC**	**CO**	**NO_X**	**HAPs**
EnterVan Line No. 1	14.0	14.0	0.00	56.4	0.00	0.00	less than 9.63 individual and less than 24.3 total
EnterVan Line No. 2	13.5	13.5	0.00	47.5	0.00	0.00	
Bus/Para Transit Van Line No. 1	8.91	8.91	0.00	51.0	0.00	0.00	
Bus/Para Transit Van Line No. 2	8.91	8.91	0.00	51.0	0.00	0.00	
Degreasing Operations	0.00	0.00	0.00	11.6	0.00	0.00	
Natural Gas Combustion	0.379	1.52	0.120	1.10	16.8	20.0	0.377
Welding Operations	5.45	5.45	0.00	0.00	0.00	0.00	0.233
Burn-off Oven	0.123	0.123	0.00	0.053	0.175	0.053	0.00
Total	**51.7**	**52.9**	**0.164**	**224**	**16.8**	**20.1**	**less than 9.9 individual and less than 24.9 total**
Major Source Threshold	**250**	**250**	**250**	**250**	**250**	**250**	**10/25**

(a) This existing stationary source is not major for PSD because the emissions of each criteria pollutant are less than two hundred fifty (<250) tons per year, and it is not one of the twenty-eight (28) listed source categories.

(b) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, fugitive emissions are not counted toward the determination of PSD applicability.

Federal Rule Applicability

(a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to each pollutant-specific emission unit that meets the following criteria:

(1) has a potential to emit before controls equal to or greater than the major source threshold for the pollutant involved;

(2) is subject to an emission limitation or standard for that pollutant; and

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

The following table is used to identify the applicability of each of the criteria, under 40 CFR 64.1, to each existing emission unit and specified pollutant subject to CAM:

Emission Unit	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	Major Source Threshold (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
PM_{10}							
EnterVan Line No. 1	Y	Y	28.1	14.0	100	N	N
EnterVan Line No. 2	Y	Y	26.9	13.5	100	N	N
Bus/Para Transit Van Line No. 1	Y	Y	17.8	8.9	100	N	N
Bus/Para Transit Van Line No. 2	Y	Y	17.8	8.9	100	N	N
Volatile Organic Compounds (VOC)							
EnterVan Line No. 1	N	Y	56.4	56.4	100	N	N
EnterVan Line No. 2	N	Y	47.5	47.5	100	N	N
Bus/Para Transit Van Line No. 1	N	Y	51.0	51.0	100	N	N
Bus/Para Transit Van Line No. 2	N	Y	51.0	51.0	100	N	N
Hazardous Air Pollutants (HAPs)							
EnterVan Line No. 1	N	N	17.6	17.6	10 individual 25 total	N	N
EnterVan Line No. 2	N	N	12.3	12.3	10 individual 25 total	N	N
Bus/Para Transit Van Line No. 1	N	N	9.96	9.96	10 individual 25 total	N	N
Bus/Para Transit Van Line No. 2	N	N	9.96	9.96	10 individual 25 total	N	N

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are not applicable to any of the existing units as part of this Part 70 Permit Renewal.

(b) The requirements of the New Source Performance Standard, 326 IAC 12 (40 CFR 60.50, Subpart E), Standards of Performance for Incinerators are not included in the permit for this source. The one (1) natural gas-fired burn-off oven has a charging rate of less than 50 tons per day.

(c) The requirements of the New Source Performance Standard for Automobile and Light Duty Truck Surface Coating Operations, 40 CFR 60.310, Subpart MM, are not included in the permit for this source because this source does not assemble automobile or light-duty trucks. The modifies vehicles that have already been assembled.

(d) The requirements of the New Source Performance Standard, 326 IAC 12 (40 CFR 60.1000, Subpart AAAA), Standards of Performance for Small Municipal Waste Combustion Units for Which Construction is Commenced After August 30, 1999 or for Which Modification or Reconstruction is Commenced After June 6, 2001 are not included in the permit for this source. The one (1) natural gas-fired burn-off oven is not considered a municipal waste combustor.

(e) The requirements of the New Source Performance Standard, 326 IAC 12 (40 CFR 60.1000, Subpart BBBB), Emission Guidelines and Compliance Times for Small Municipal Waste Combustion Units Constructed on or Before August 30, 1999 are not included in the permit for this source. The one (1) natural gas-fired burn-off oven was constructed before August 30, 1999 and has not been modified or reconstructed after June 6, 2001.

(f) The requirements of the New Source Performance Standard, 326 IAC 12 (40 CFR 60.2000, Subpart CCCC), standards of Performance for Commercial and Industrial Solid Waste Incineration Units for Which Construction Is Commenced After November 30, 1999 or for Which Modification or Reconstruction Is Commenced on or After June 1, 2001 are not included in the permit for this source. The one (1) natural gas-fired burn-off oven was constructed before November 30, 1999 and has not been modified or reconstructed after June 1, 2001.

(g) The requirements of the New Source Performance Standard, 326 IAC 12 (40 CFR 60.2500, Subpart DDDD), Emissions Guidelines and Compliance Times for Commercial and Industrial Solid Waste Incineration Units that Commenced Construction On or Before November 30, 1999 are not included in the permit for this source. The one (1) natural gas-fired burn-off oven is defined as a rack, part, or drum reclamation units and is one of the exempt categories of units listed in 40 CFR 60.2555.

(h) The requirements of the New Source Performance Standard, 326 IAC 12 (40 CFR 60.2880, Subpart EEEE), standards of Performance for Other Solid Waste Incineration Units for Which Construction is Commenced After December 9, 2004, or for Which Modification or Reconstruction is Commenced on or After June 16, 2006 are not included for the permit for this source. The one (1) natural gas-fired burn-off oven was constructed before December 9, 2004 and has not been modified or reconstructed after June 16, 2006.

(i) The requirements of the National Emission Standards for Hazardous Air Pollutants from Hazardous Waste Combustors, 40 CFR 63, Subpart EEE, are not included in the permit for this source. The one (1) natural gas-fired burn-off oven does not burn hazardous waste as defined in 40 CFR 261.3.

(j) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Automobiles and Light-Duty Trucks, Subpart IIII, are not included in the permit for this source because this source has been limited to an area source of HAPs pursuant to SPM 131-23199-00017, issued on December 27, 2006.

(k) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Miscellaneous Metal Parts and Products, Subpart MMMM, are not included in the permit for this source because this source has been limited to an area source of HAPs pursuant to SPM 131-23199-00017, issued on December 27, 2006.

(l) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Plastic Parts and Products, Subpart PPPP, are not

included in the permit for this source because this source has been limited to an area source of HAPs pursuant to SPM 131-23199-00017, issued on December 27, 2006.

State Rule Applicability - Entire Source

326 IAC 1-5-2 (Emergency Reduction Plans)
The source has submitted an Emergency Reduction Plan (ERP) on January 5, 2000. The ERP has been verified to fulfill the requirements of 326 IAC 1-5-2 (Emergency Reduction Plans).

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))
The unrestricted potential emissions of each attainment criteria pollutant are less than two hundred-fifty (250) tons per year. Therefore, this source, which is not one of the twenty-eight (28) listed source categories, is a minor source pursuant to 326 IAC 2-2, PSD.

326 IAC 2-4.1 (New Source Toxics Control)
The operation of the twelve (12) surface coating facilities and assembly areas, identified as Enter/Assem. No. 1, Enter/Ref. No. 1, Enter/Un. No. 1, Enter/Assem. No. 2, Enter/Ref. No. 2, Enter/Un. No. 2, Para/Assem. No. 1, Para/Ref. 1, Para/Un. No. 1, Para/Assem. No. 2, Para/Ref. 2 and Para/Un. No. 2, will emit less than 10 tons per year of a single HAP and less than 25 tons per year of a combination of HAPs. This source has been limited to an area source of HAPs pursuant to SPM 131-23199-00017, issued on December 27, 2006. 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 is required to have an operating permit under 326 IAC 2-7, Part 70 program. Pursuant to this rule, the Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. In accordance with the compliance schedule specified in 326 IAC 2-6-3(b), an emission statement must be submitted triennially by July 1 beginning in 2004 and every 3 years after. Therefore, the next emission statement for this source must be submitted by July 1, 2007. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

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

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

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

326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source 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.

State Rule Applicability – Individual Facilities

326 IAC 4-2-2 (Incinerators)
Pursuant to 326 IAC 1-2-34, an incinerator is defined as an engineered apparatus that burns waste substances with controls on combustion factors including, but not limited to, temperature,

retention time, and air. The one (1) natural gas-fired burn-off oven burns waste paint off of parts. Therefore, it is considered an incinerator and is subject to the requirements of 326 IAC 4-2. Pursuant to 326 IAC 4-2(a), all incinerators shall:

(a) Consist of primary and secondary chambers or the equivalent.

(b) Be equipped with a primary burner unless burning only wood products.

(c) Comply with 326 IAC 5-1 and 326 IAC 2.

(d) Be maintained, operated, and burn waste in accordance with the manufacturer's specifications or an operation and maintenance plan as specified in subsection (c).

(e) Not emit particulate matter in excess of five-tenths (0.5) pound of particulate matter per one thousand (1,000) pounds of dry exhaust gas under standard conditions corrected to fifty percent (50%) excess air for incinerators with solid waste capacity less than two hundred (200) pounds per hour.

If any of the requirements of subdivisions (a) through (e) are not met, then the owner or operator shall stop charging the incinerator until adjustments are made that address the underlying cause of the deviation.

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

(a) Pursuant to 326 IAC 6-3-2(d), the dry filters for particulate control shall be operation in accordance with manufacturer's specifications and control emissions from the twelve (12) surface coating facilities and assembly areas, identified as Enter/Assem. No. 1, Enter/Ref. No. 1, Enter/Un. No. 1, Enter/Assem. No. 2, Enter/Ref. No. 2, Enter/Un. No. 2, Para/ Assem. No. 1, Para/Ref. 1, Para/Un. No. 1, Para/Assem. No. 2, Para/Ref. 2 and Para/Un. No. 2, at all times when these facilities are in operation.

(b) The surface coating facilities identified as Touch-Up Booth No. 1 and Touch-Up Booth No. 2 utilize less than 5 gallons per day of coating. Therefore, pursuant to 6-3-1(b)(15), those facilities are exempt from the requirements of 326 IAC 6-3.

(c) Pursuant to 326 IAC 6-3-1(b)(14), 326 IAC 6-3 is not applicable to all other facilities at this source because each has potential emissions less than five hundred fifty-one thousandths (0.551) pound per hour of particulate.

326 IAC 7-1.1 (Sulfur Dioxide Emissions Limitations)
All facilities at this source have a potential to emit SO_2 less than twenty-five (25) tons per year and ten (10) pounds per hour, each. Therefore, the requirements of 326 IAC 7-1 are not applicable.

326 IAC 8-1-6 (New facilities; general reduction requirements)
Each of the facilities has potential VOC emissions of less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 are not applicable.

326 IAC 8-2-2 (Automobile and light duty truck coating operations)
This source is a motor vehicle conversion plant and is not considered an automotive or light duty truck assembly plant. Therefore, the requirements of 326 IAC 8-2-2 are not applicable.

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

(a) The eight (8) surface coating booths, identified as Enter/Assem. No. 1, Enter/Un. No. 1, Enter/Assem. No. 2, Enter/Un. No. 2, Para/Assem. No. 1, Para/Un. No. 1, Para/Assem. No. 2 and Para/Un. No. 2, were constructed after January 1, 1980, have potential VOC

emissions greater than twenty-two and seven-tenths (22.7) megagrams (twenty-five (25) tons) per year and coat metal parts. Pursuant to 326 IAC 8-2-1(a)(2) and 326 IAC 8-2-9(a)(5), the eight (8) surface coating booths are subject to the requirements of 326 IAC 8-2-9. The requirements for these surface coating booths are the following:

(1) The volatile organic compound (VOC) content of the coating delivered to the applicator when coating metal substrates shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for extreme performance coatings.

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

(b) The surface coating operations at the five (5) refinishing booths identified as Enter/Ref. No. 1 Paint Booth #1, Enter/Ref. No. 1 Paint Booth #2, Enter/Ref. No. 2, Para/Ref. 1 and Para/Ref. 2, are considered automobile refinishing. Therefore, pursuant to 326 IAC 8-2-9(b)(3), the requirements of 326 IAC 8-2-9 are not applicable.

(c) The surface coating operations identified as Touch-Up Booth No. 1 and Touch-Up Booth No. 2 each have potential VOC emissions less than twenty-two and seven-tenths (22.7) megagrams (twenty-five (25) tons) per year. Therefore, the requirements of 326 IAC 8-2-9 are not applicable.

326 IAC 8-3-2 (Cold Cleaner)
The two (2) cold cleaner degreasing operations were constructed after January 1, 1980 and perform organic solvent degreasing operations. Therefore, pursuant to 326 IAC 8-3-1(a)(2), the two (2) cold cleaner degreasing operations at this source are subject to 326 IAC 8-3-2. Pursuant to 326 IAC 8-3-2, the owner or operator of a cold cleaning facility shall:

(1) equip the cleaner with a cover;

(2) equip the cleaner with a facility for draining cleaned parts;

(3) close the degreaser cover whenever parts are not being handled in the cleaner;

(4) drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(5) provide a permanent, conspicuous label summarizing the operating requirements;

(6) 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 Degrease Operation and Control)
The two (2) cold cleaner degreasing operations were constructed after July 1, 1990 and are considered cold cleaner degreaser operations without remote solvent reservoirs. Therefore, pursuant to 326 IAC 8-3-1(b)(2), the two (2) cold cleaner degreasing operations at this source are subject to 326 IAC 8-3-5. Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the Permittee shall ensure that the following control equipment requirements are met:

(a) The owner or operator of a cold cleaner degreaser facility 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 (38°C) (one hundred degrees Fahrenheit (100°F));

(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 (38°C) (one hundred degrees Fahrenheit (100°F)), 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 (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent 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) The owner or operator of a cold cleaning facility 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.

326 IAC 9 (Carbon Monoxide Emission Limitations)
The one (1) natural gas-fired burn-off oven was constructed and operating after March 21, 1972, and is considered a refuse incinerator. Therefore, pursuant to 326 IAC 9-1-1(a), the natural gas-fired burn-off oven is subject to the requirements of 326 IAC 9-1-2(a)(3). Pursuant to 326 IAC 9-1-2(a)(3), the source shall not operate a refuse incinerator or refuse burning equipment unless the waste gas stream is burned in one (1) of the following:

(1) Direct-flame afterburner.

(2) Secondary chamber.

326 IAC 10-1 (Nitrogen Oxides Control in Clark and Floyd Counties)
This source is not located in Clark or Floyd County. Therefore, the requirements of 326 IAC 10-1 are not applicable.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a 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 Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements 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:

Control	**Parameter**	**Frequency**	**Range**	**Excursions and Exceedances**
Dry Filters for , **Enter/Assem. No. 1, Enter/Ref. No. 1, Enter/Un. No. 1, Enter/Assem. No. 2, Enter/Ref. No. 2, Enter/Un. No. 2, Para/Assem. No. 1, Para/Ref. 1, Para/Un. No. 1, Para/Assem. No. 2, Para/Ref. 2 and Para/Un. No. 2**	Placement, integrity and particle loading of the filters.	Daily	Normal-Abnormal	Response Steps
	Overspray	Weekly		
	Coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground.	Monthly		

These monitoring conditions are necessary because the dry filters for the twelve (12) surface coating facilities and assembly areas, identified as Enter/Assem. No. 1, Enter/Ref. No. 1, Enter/Un. No. 1, Enter/Assem. No. 2, Enter/Ref. No. 2, Enter/Un. No. 2, Para/Assem. No. 1,

Para/Ref. 1, Para/Un. No. 1, Para/Assem. No. 2, Para/Ref. 2 and Para/Un. No. 2, must operate properly to ensure compliance with 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-7.

Recommendation

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

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

An application for the purposes of this review was received on July 14, 2003. Additional information was received on May 14, 2007.

Conclusion

The operation of this motor vehicle conversion plant shall be subject to the conditions of the attached Part 70 Operating Permit Renewal No. T 131-17702-00017.

Appendix A: Emissions Calculations
VOC and Particulate
Surface Coating Operations

Company Name: The Braun Corporation
Address City IN Zip: 623 W. 11th Street Winamac, Indiana 46996
Permit Number: T 131-17702-00017
Reviewer: Kyle Gregory
Date: October 10, 2007

EnterVan Line #1

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Enter/Assem. No. 1																
Manus-Bond Adhesive	12.50	1.00%	0.0%	1.0%	0.0%	99.00%	1.14800	0.750	0.13	0.13	0.11	2.58	0.47	11.67	0.13	75%
Siliprene Adhesive	7.19	0.00%	0.0%	0.0%	0.0%	30.10%	0.90500	0.750	0.00	0.00	0.00	0.00	0.00	5.34	0.00	75%
WS8999 Acrysol	6.46	100.00%	0.0%	100.0%	0.0%	0.00%	0.15600	0.750	6.46	6.46	0.76	18.14	3.31	0.00	N/A	75%
Kwik Prep	7.33	99.25%	0.0%	99.3%	0.0%	0.75%	0.03200	0.750	7.28	7.28	0.17	4.19	0.76	0.00	970.00	75%
3M Green Contact Adhesive	6.58	53.10%	0.0%	53.1%	0.0%	27.20%	0.24500	0.750	3.49	3.49	0.64	15.41	2.81	0.62	12.85	75%
Subtotal											**1.68**	**40.3**	**7.36**	**17.6**		
Enter/Ref. No. 1 Primer																
Primer - K 38	12.45	32.20%	0.0%	32.2%	0.0%	67.80%	0.07290	0.750	4.01	4.01	0.22	5.26	0.96	0.51	5.91	75%
Primer - K 201	8.03	60.24%	0.0%	60.2%	0.0%	39.76%	0.01820	0.750	4.84	4.84	0.07	1.58	0.29	0.05	12.17	75%
Primer - DT 885 (Solvent)	7.12	100.00%	0.0%	100.0%	0.0%	0.00%	0.01820	0.750	7.12	7.12	0.10	2.33	0.43	0.00	N/A	75%
Sealer - DP 50 LF	11.75	35.36%	0.0%	35.4%	0.0%	64.64%	0.21000	0.750	4.15	4.15	0.65	15.71	2.87	1.31	6.43	75%
Sealer - DP 402 LF	7.75	67.20%	0.0%	67.2%	0.0%	32.80%	0.10500	0.750	5.21	5.21	0.41	9.84	1.80	0.22	15.88	75%
Seaker - DT 885 (Solvent)	7.12	100.00%	0.0%	100.0%	0.0%	0.00%	0.10500	0.750	7.12	7.12	0.56	13.46	2.46	0.00	N/A	75%
Subtotal											**2.01**	**48.2**	**8.79**	**2.08**		
Enter/Ref. No. 1 Paint																
(Paint Booth #1 and Paint Booth #2)																
Clearcoat - DCU 2042	7.91	50.98%	0.0%	51.0%	0.0%	49.02%	0.10500	0.750	4.03	4.03	0.32	7.62	1.39	0.33	8.23	75%
Clearcoat - DCX 61	8.95	16.09%	0.0%	16.1%	0.0%	83.91%	0.02600	0.750	1.44	1.44	0.03	0.67	0.12	0.16	1.72	75%
Clearcoat - DT 885	7.12	100.00%	0.0%	100.0%	0.0%	0.00%	0.02600	0.750	7.12	7.12	0.14	3.33	0.61	0.00	N/A	75%
Base Paint - DBC	8.52	77.50%	0.0%	77.5%	0.0%	22.50%	0.07900	0.750	6.60	6.60	0.39	9.39	1.71	0.12	29.35	75%
Base Paint - DT 885	7.12	100.00%	0.0%	100.0%	0.0%	0.00%	0.07900	0.750	7.12	7.12	0.42	10.12	1.85	0.00	N/A	75%
Sealer - K 36	12.61	33.61%	0.0%	33.6%	0.0%	41.02%	0.04840	0.750	4.24	4.24	0.15	3.69	0.67	0.33	10.33	75%
Sealer - DMC 903	8.38	47.32%	0.0%	47.3%	0.0%	47.00%	0.02420	0.750	3.97	3.97	0.07	1.73	0.32	0.09	8.44	75%
Sealer - DT 885	7.12	100.00%	0.0%	100.0%	0.0%	0.00%	0.02420	0.750	7.12	7.12	0.13	3.10	0.57	0.00	N/A	75%
Sealer - DCX 8	8.93	18.49%	0.0%	18.5%	0.0%	75.35%	0.01210	0.750	1.65	1.65	0.01	0.36	0.07	0.07	2.19	75%
Accesory Solvent - DTL 16	6.67	70.00%	0.0%	70.0%	0.0%	30.00%	0.03200	0.750	4.67	4.67	0.11	2.69	0.49	0.05	15.56	75%
Accessory Solvent - DX 330 Wax Remover	6.36	100.00%	0.0%	100.0%	0.0%	0.00%	0.02500	0.750	6.36	6.36	0.12	2.86	0.52	0.00	N/A	75%
Accessory Solvent - MS 100	6.74	100.00%	20.0%	80.0%	20.0%	0.00%	0.02100	0.750	6.74	5.39	0.08	2.04	0.37	0.00	N/A	75%
Accessory Solvent - DX 103	6.57	99.85%	0.0%	99.9%	0.0%	0.15%	0.00900	0.750	6.56	6.56	0.04	1.06	0.19	0.00	4373.43	75%
Subtotal Each Booth											**2.03**	**48.7**	**8.88**	**1.16**		
Subtotal Paint Booth #1 and Paint Booth #2											**4.06**	**97.3**	**17.8**	**2.33**		
Enter/Un. No. 1																
R477 Sound Shield	9.66	48.20%	2.0%	46.2%	2.0%	49.80%	1.41200	0.750	4.55	4.46	4.73	113.43	20.70	5.80	8.96	75%
AA Water Based Rust Protector	8.58	91.45%	46.0%	45.5%	46.0%	44.00%	0.10200	0.750	7.22	3.90	0.30	7.16	1.31	0.06	8.86	75%
Bond-Title 7 Rubberized UC	7.58	38.80%	0.0%	38.8%	0.0%	61.20%	0.04600	0.750	2.94	2.94	0.10	2.44	0.44	0.18	4.81	75%
Subtotal											**5.13**	**123**	**22.5**	**6.04**		

Note that the potential to emit of Paint 1 and Paint 2 was multiplied by 2 since both booths act independently of each other
All coatings are "as applied" to the applicators

PM Control Efficiency: 50.00%

Totals	**Uncontrolled:**	**12.9**	**309**	**56.4**	**28.1**
	Controlled:	**12.9**	**309**	**56.4**	**14.0**

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)

Appendix A: Emissions Calculations
VOC and Particulate
Surface Coating Operations

Company Name: The Braun Corporation
Address City IN Zip: 623 W. 11th Street Winamac, Indiana 46996
Permit Number: T 131-17702-00017
Reviewer: Kyle Gregory
Date: October 10, 2007

EnterVan Line #2

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Enter/Assem. No. 2																
Manus-Bond Adhesive	12.50	1.00%	0.0%	1.0%	0.0%	99.00%	1.14800	0.750	0.13	0.13	0.11	2.58	0.47	11.67	0.13	75%
Siliprene Adhesive	7.19	0.00%	0.0%	0.0%	0.0%	30.10%	0.90500	0.750	0.00	0.00	0.00	0.00	0.00	5.34	0.00	75%
WS8999 Acrysol	6.46	100.00%	0.0%	100.0%	0.0%	0.00%	0.15600	0.750	6.46	6.46	0.76	18.14	3.31	0.00	N/A	75%
Kwik Prep	7.33	99.25%	0.0%	99.3%	0.0%	0.75%	0.03200	0.750	7.28	7.28	0.17	4.19	0.76	0.00	970.00	75%
3M Green Contact Adhesive	6.58	53.10%	0.0%	53.1%	0.0%	27.20%	0.24500	0.750	3.49	3.49	0.64	15.41	2.81	0.62	12.85	75%
Subtotal											**1.68**	**40.3**	**7.36**	**17.6**		
Enter/Ref. No. 2 Primer																
Primer - K 38	12.45	32.20%	0.0%	32.2%	0.0%	67.80%	0.07290	0.750	4.01	4.01	0.22	5.26	0.96	0.51	5.91	75%
Primer - K 201	8.03	60.24%	0.0%	60.2%	0.0%	39.76%	0.01820	0.750	4.84	4.84	0.07	1.58	0.29	0.05	12.17	75%
Primer - DT 885 (Solvent)	7.12	100.00%	0.0%	100.0%	0.0%	0.00%	0.01820	0.750	7.12	7.12	0.10	2.33	0.43	0.00	N/A	75%
Sealer - DP 50 LF	11.75	35.36%	0.0%	35.4%	0.0%	64.64%	0.21000	0.750	4.15	4.15	0.65	15.71	2.87	1.31	6.43	75%
Sealer - DP 402 LF	7.75	67.20%	0.0%	67.2%	0.0%	32.80%	0.10500	0.750	5.21	5.21	0.41	9.84	1.80	0.22	15.88	75%
Seaker - DT 885 (Solvent)	7.12	100.00%	0.0%	100.0%	0.0%	0.00%	0.10500	0.750	7.12	7.12	0.56	13.46	2.46	0.00	N/A	75%
Subtotal											**2.01**	**48.2**	**8.79**	**2.08**		
Enter/Ref. No. 2 Paint																
Clearcoat - DCU 2042	7.91	50.98%	0.0%	51.0%	0.0%	49.02%	0.10500	0.750	4.03	4.03	0.32	7.62	1.39	0.33	8.23	75%
Clearcoat - DCX 61	8.95	16.09%	0.0%	16.1%	0.0%	83.91%	0.02600	0.750	1.44	1.44	0.03	0.67	0.12	0.16	1.72	75%
Clearcoat - DT 885	7.12	100.00%	0.0%	100.0%	0.0%	0.00%	0.02600	0.750	7.12	7.12	0.14	3.33	0.61	0.00	N/A	75%
Base Paint - DBC	8.52	77.50%	0.0%	77.5%	0.0%	22.50%	0.07900	0.750	6.60	6.60	0.39	9.39	1.71	0.12	29.35	75%
Base Paint - DT 885	7.12	100.00%	0.0%	100.0%	0.0%	0.00%	0.07900	0.750	7.12	7.12	0.42	10.12	1.85	0.00	N/A	75%
Sealer - K 36	12.61	33.61%	0.0%	33.6%	0.0%	41.02%	0.04840	0.750	4.24	4.24	0.15	3.69	0.67	0.33	10.33	75%
Sealer - DMC 903	8.38	47.32%	0.0%	47.3%	0.0%	47.00%	0.02420	0.750	3.97	3.97	0.07	1.73	0.32	0.09	8.44	75%
Sealer - DT 885	7.12	100.00%	0.0%	100.0%	0.0%	0.00%	0.02420	0.750	7.12	7.12	0.13	3.10	0.57	0.00	N/A	75%
Sealer - DCX 8	8.93	18.49%	0.0%	18.5%	0.0%	75.35%	0.01210	0.750	1.65	1.65	0.01	0.36	0.07	0.07	2.19	75%
Accesory Solvent - DTL 16	6.67	70.00%	0.0%	70.0%	0.0%	30.00%	0.03200	0.750	4.67	4.67	0.11	2.69	0.49	0.05	15.56	75%
Accessory Solvent - DX 330 Wax Remover	6.36	100.00%	0.0%	100.0%	0.0%	0.00%	0.02500	0.750	6.36	6.36	0.12	2.86	0.52	0.00	N/A	75%
Accessory Solvent - MS 100	6.74	100.00%	20.0%	80.0%	20.0%	0.00%	0.02100	0.750	6.74	5.39	0.08	2.04	0.37	0.00	N/A	75%
Accessory Solvent - DX 103	6.57	99.85%	0.0%	99.9%	0.0%	0.15%	0.00900	0.750	6.56	6.56	0.04	1.06	0.19	0.00	4373.43	75%
Subtotal											**2.03**	**48.67**	**8.88**	**1.16**		
Enter/Un. No. 2																
R477 Sound Shield	9.66	48.20%	2.0%	46.2%	2.0%	49.80%	1.41200	0.750	4.55	4.46	**4.73**	**113.4**	**20.7**	**5.80**	8.96	75%
AA Water Based Rust Protector	8.58	91.45%	46.0%	45.5%	46.0%	44.00%	0.10200	0.750	7.22	3.90	0.30	7.16	1.31	0.06	8.86	75%
Bond-Title 7 Rubberized UC	7.58	38.80%	0.0%	38.8%	0.0%	61.20%	0.04600	0.750	2.94	2.94	0.10	2.44	0.44	0.18	4.81	75%
Subtotal											**5.13**	**123.02**	**22.45**	**6.04**		

All coatings are "as applied" to the applicators

PM Control Efficiency: 50.00%

Totals	**Uncontrolled:**	**10.8**	**260**	**47.5**	**26.9**
	Controlled:	**10.8**	**260**	**47.5**	**13.5**

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)

Appendix A: Emissions Calculations
VOC and Particulate
Surface Coating Operations

Company Name: The Braun Corporation
Address City IN Zip: 623 W. 11th Street Winamac, Indiana 46996
Permit Number: T 131-17702-00017
Reviewer: Kyle Gregory
Date: October 10, 2007

Bus/ParaTransit Van Line No. 1

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Para/Assem. No. 1																
Contact Adhesive	6.59	53.00%	0.0%	53.0%	0.0%	47.00%	1.5000	0.500	3.49	3.49	2.62	62.87	11.47	5.09	7.43	50%
RTV Sealant	8.76	5.00%	0.0%	5.0%	0.0%	95.00%	0.3130	0.500	0.44	0.44	0.07	1.65	0.30	0.00	0.46	100%
Subtotal:											**2.69**	**64.5**	**11.8**	**5.09**		
Para/Ref. 1																
DP48LF Sealer	11.90	36.15%	0.0%	36.15%	0.0%	38.81%	0.1670	0.500	4.30	4.30	0.36	8.62	1.57	1.39	11.08	50%
DP402 Catalyst	7.75	67.10%	0.0%	67.10%	0.0%	27.51%	0.0830	0.500	5.20	5.20	0.22	5.18	0.95	0.23	18.90	50%
NCT Catalyst	7.69	44.01%	0.0%	44.01%	0.0%	24.24%	0.0230	0.500	3.38	3.38	0.04	0.93	0.17	0.11	13.96	50%
NCT Primer	10.93	41.36%	0.0%	41.36%	0.0%	36.00%	0.1250	0.500	4.52	4.52	0.28	6.78	1.24	0.88	12.56	50%
DTL Thinner	6.69	80.40%	0.0%	80.40%	0.0%	0.00%	0.2500	0.500	5.38	5.38	0.67	16.14	2.94	0.36	N/A	50%
DBU Base	8.18	59.16%	0.0%	59.16%	0.0%	0.00%	0.3130	0.500	4.84	4.84	0.76	18.18	3.32	1.14	N/A	50%
DRR1170 Reducer	7.13	76.04%	0.0%	76.04%	0.0%	0.00%	0.3750	0.500	5.42	5.42	1.02	24.40	4.45	0.70	N/A	50%
DX394 Cleaner	8.07	99.74%	83.2%	16.57%	80.6%	0.21%	0.1250	0.500	6.90	1.34	0.08	2.01	0.37	0.00	636.76	50%
DAU82 Clear	7.99	51.19%	0.0%	51.19%	0.0%	41.85%	0.2500	0.500	4.09	4.09	0.51	12.27	2.24	1.07	9.77	50%
DAU Catalyst	7.83	77.14%	0.0%	77.14%	0.0%	19.42%	0.2500	0.500	6.04	6.04	0.76	18.12	3.31	0.49	31.10	50%
DT870 Reducer	6.91	100.00%	0.0%	100.00%	0.0%	0.00%	0.1250	0.500	6.91	6.91	0.43	10.37	1.89	0.00	N/A	50%
Subtotal:											**5.12**	**123**	**22.4**	**6.37**		
Para/Un. No. 1																
Black Rust Protection	7.43	40.00%	0.0%	40.0%	0.0%	53.00%	2.0000	0.625	2.97	2.97	3.72	89.16	16.27	6.10	5.61	75%
AA Water Base Rust Prot	8.17	55.00%	45.0%	10.0%	45.0%	45.00%	0.2500	0.625	1.49	0.82	0.13	3.06	0.56	0.25	1.82	90%
Subtotal:											**3.84**	**92.2**	**16.8**	**6.35**		

Note that the potential to emit of Paint 1 and Paint 2 was multiplied by 2 since both booths act independently of each other
All coatings are "as applied" to the applicators

PM Control Efficiency: 50.00%

Totals	**Uncontrolled:**	**11.7**	**280**	**51.0**	**17.8**
	Controlled:	**11.7**	**280**	**51.0**	**8.9**

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)

Appendix A: Emissions Calculations
VOC and Particulate
Surface Coating Operations

Company Name: The Braun Corporation
Address City IN Zip: 623 W. 11th Street Winamac, Indiana 46996
Permit Number: T 131-17702-00017
Reviewer: Kyle Gregory
Date: October 10, 2007

Bus/ParaTransit Van Line No. 2

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Para/Assem. No. 2																
Contact Adhesive	6.59	53.00%	0.0%	53.0%	0.0%	47.00%	1.5000	0.500	3.49	3.49	2.62	62.87	11.47	5.09	7.43	50%
RTV Sealant	8.76	5.00%	0.0%	5.0%	0.0%	95.00%	0.3130	0.500	0.44	0.44	0.07	1.65	0.30	0.00	0.46	100%
Subtotal:											**2.69**	**64.5**	**11.8**	**5.09**		
Para/Ref. 2																
DP48LF Sealer	11.90	36.15%	0.0%	36.15%	0.0%	38.81%	0.1670	0.500	4.30	4.30	0.36	8.62	1.57	1.39	11.08	50%
DP402 Catalyst	7.75	67.10%	0.0%	67.10%	0.0%	27.51%	0.0830	0.500	5.20	5.20	0.22	5.18	0.95	0.23	18.90	50%
NCT Catalyst	7.69	44.01%	0.0%	44.01%	0.0%	24.24%	0.0230	0.500	3.38	3.38	0.04	0.93	0.17	0.11	13.96	50%
NCT Primer	10.93	41.36%	0.0%	41.36%	0.0%	36.00%	0.1250	0.500	4.52	4.52	0.28	6.78	1.24	0.88	12.56	50%
DTL Thinner	6.69	80.40%	0.0%	80.40%	0.0%	0.00%	0.2500	0.500	5.38	5.38	0.67	16.14	2.94	0.36	N/A	50%
DBU Base	8.18	59.16%	0.0%	59.16%	0.0%	0.00%	0.3130	0.500	4.84	4.84	0.76	18.18	3.32	1.14	N/A	50%
DRR1170 Reducer	7.13	76.04%	0.0%	76.04%	0.0%	0.00%	0.3750	0.500	5.42	5.42	1.02	24.40	4.45	0.70	N/A	50%
DX394 Cleaner	8.07	99.74%	83.2%	16.57%	80.6%	0.21%	0.1250	0.500	6.90	1.34	0.08	2.01	0.37	0.00	636.76	50%
DAU82 Clear	7.99	51.19%	0.0%	51.19%	0.0%	41.85%	0.2500	0.500	4.09	4.09	0.51	12.27	2.24	1.07	9.77	50%
DAU Catalyst	7.83	77.14%	0.0%	77.14%	0.0%	19.42%	0.2500	0.500	6.04	6.04	0.76	18.12	3.31	0.49	31.10	50%
DT870 Reducer	6.91	100.00%	0.0%	100.00%	0.0%	0.00%	0.1250	0.500	6.91	6.91	0.43	10.37	1.89	0.00	N/A	50%
Subtotal:											**5.12**	**123**	**22.45**	**6.37**		
Para/Un. No. 2																
Black Rust Protection	7.43	40.00%	0.0%	40.0%	0.0%	53.00%	2.0000	0.625	2.97	2.97	3.72	89.16	16.27	6.10	5.61	75%
AA Water Base Rust Prot	8.17	55.00%	45.0%	10.0%	45.0%	45.00%	0.2500	0.625	1.49	0.82	0.13	3.06	0.56	0.25	1.82	90%
Subtotal:											**3.84**	**92.2**	**16.8**	**6.35**		

Note that the potential to emit of Paint 1 and Paint 2 was multiplied by 2 since both booths act independently of each other
All coatings are "as applied" to the applicators

PM Control Efficiency: 50.00%

Totals	**Uncontrolled:**	**11.7**	**280**	**51.0**	**17.8**
	Controlled:	**11.7**	**280**	**51.0**	**8.9**

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)

Appendix A: Emissions Calculations
VOC and Particulate
Surface Coating Operations

Company Name: The Braun Corporation
Address City IN Zip: 623 W. 11th Street Winamac, Indiana 46996
Permit Number: T 131-17702-00017
Reviewer: Kyle Gregory
Date: October 10, 2007

Insignificant Coating Facilities

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Touch-Up Booth No. 1 (Plant #4)																
DBU Base	8.18	59.16%	0.0%	59.16%	0.0%	40.00%	0.0160	1.250	4.84	4.84	0.10	2.32	0.42	0.15	12.10	50%
DBU Reducer	7.13	76.04%	0.0%	76.04%	0.0%	25.00%	0.0160	1.250	5.42	5.42	0.11	2.60	0.47	0.07	21.69	50%
DAU Acrylic Urethane Clear	7.99	51.19%	0.0%	51.19%	0.0%	50.00%	0.0160	1.250	4.09	4.09	0.08	1.96	0.36	0.17	8.18	50%
DAU2 Catalyst	7.83	76.84%	0.0%	76.84%	0.0%	24.00%	0.0160	1.250	6.02	6.02	0.12	2.89	0.53	0.08	25.07	50%
DT870 Reducer	6.91	100.00%	0.0%	100.00%	0.0%	0.00%	0.0160	1.250	6.91	6.91	0.14	3.32	0.61	0.00	N/A	50%
Subtotal:											**0.546**	**13.1**	**2.39**	**0.471**		
Touch-Up Booth No. 2 (Plant #4)																
DBU Base	8.18	59.16%	0.0%	59.16%	0.0%	40.00%	0.0160	1.250	4.84	4.84	0.10	2.32	0.42	0.15	12.10	50%
DBU Reducer	7.13	76.04%	0.0%	76.04%	0.0%	25.00%	0.0160	1.250	5.42	5.42	0.11	2.60	0.47	0.07	21.69	50%
DAU Acrylic Urethane Clear	7.99	51.19%	0.0%	51.19%	0.0%	50.00%	0.0160	1.250	4.09	4.09	0.08	1.96	0.36	0.17	8.18	50%
DAU2 Catalyst	7.83	76.84%	0.0%	76.84%	0.0%	24.00%	0.0160	1.250	6.02	6.02	0.12	2.89	0.53	0.08	25.07	50%
DT870 Reducer	6.91	100.00%	0.0%	100.00%	0.0%	0.00%	0.0160	1.250	6.91	6.91	0.14	3.32	0.61	0.00	N/A	50%
Subtotal:											**0.546**	**13.1**	**2.39**	**0.471**		

Note that the potential to emit of Paint 1 and Paint 2 was multiplied by 2 since both booths act independently of each other
All coatings are "as applied" to the applicators

PM Control Efficiency: 50.00%

Totals	**Uncontrolled:**	**1.09**	**26.2**	**4.78**	**0.943**
	Controlled:	**1.09**	**26.2**	**4.78**	**0.471**

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)

Appendix A: Emissions Calculations
HAPs
Surface Coating Operations

Company Name: The Braun Corporation
Address City IN Zip: 623 W. 11th Street Winamac, Indiana 46996
Permit Number: T 131-17702-00017
Reviewer: Kyle Gregory
Date: October 10, 2007

EnterVan Line #1

Material	Density (lbs/gal)	Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % MIBK	Weight % Ethyl Benzene	Weight % Hexane	Weight % Glycol Ethers	Weight % Methyl Alcohol	Xylene Emissions (tons/yr)	Toluene Emissions (tons/yr)	MIBK Emissions (tons/yr)	Ethyl Benzene Emissions (tons/yr)	Hexane Emissions (tons/yr)	Glycol Ether Emissions (tons/yr)	Methyl Alcohol Emissions (tons/yr)
Enter/Assem. No. 1																	
Manus-Bond Adhesive	12.50	1.14800	0.750	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Siliprene Adhesive	7.19	0.90500	0.750	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WS8999 Acrysol	6.46	0.15600	0.750	31.00%	0.00%	0.00%	6.00%	0.00%	0.00%	0.00%	1.03	0.00	0.00	0.20	0.00	0.00	0.00
Kwik Prep	7.33	0.03200	0.750	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
3M Green Contact Adhesive	6.58	0.24500	0.750	0.00%	15.00%	0.00%	0.00%	15.00%	0.00%	0.00%	0.00	0.79	0.00	0.00	0.79	0.00	0.00
Subtotal											**1.03**	**0.79**	**0.00**	**0.20**	**0.79**	**0.00**	**0.00**
(Refinishing Coating Operations)																	
Primer Booth - Refinishing																	
Primer - K 38	12.45	0.07290	0.750	20.00%	5.00%	0.00%	5.00%	0.00%	0.00%	0.00%	0.60	0.15	0.00	0.15	0.00	0.00	0.00
Primer - K 201	8.03	0.01820	0.750	5.00%	10.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.02	0.05	0.00	0.00	0.00	0.00	0.00
Primer - DT 885 (Solvent)	7.12	0.01820	0.750	10.00%	20.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.04	0.09	0.00	0.00	0.00	0.00	0.00
Sealer - DP 50 LF	11.75	0.21000	0.750	5.00%	5.00%	5.00%	0.00%	0.00%	0.00%	0.00%	0.41	0.41	0.41	0.00	0.00	0.00	0.00
Sealer - DP 402 LF	7.75	0.10500	0.750	0.00%	5.00%	0.00%	0.00%	0.00%	40.00%	0.00%	0.00	0.13	0.00	0.00	0.00	1.07	0.00
Seaker - DT 885 (Solvent)	7.12	0.10500	0.750	10.00%	20.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.25	0.49	0.00	0.00	0.00	0.00	0.00
Subtotal											**1.31**	**1.31**	**0.41**	**0.15**	**0.00**	**1.07**	**0.00**
(Refinishing Coating Operations)																	
Paint Booth #1 and Paint Booth #2																	
Clearcoat - DCU 2042	7.91	0.10500	0.750	30.00%	0.00%	10.00%	0.00%	0.00%	0.00%	0.00%	0.82	0.00	0.27	0.00	0.00	0.00	0.00
Clearcoat - DCX 61	8.95	0.02600	0.750	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Clearcoat - DT 885	7.12	0.02600	0.750	10.00%	20.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.06	0.12	0.00	0.00	0.00	0.00	0.00
Base Paint - DBC	8.52	0.07900	0.750	20.00%	20.00%	20.00%	5.00%	0.00%	5.00%	0.00%	0.44	0.44	0.44	0.11	0.00	0.11	0.00
Base Paint - DT 885	7.12	0.07900	0.750	10.00%	20.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.18	0.37	0.00	0.00	0.00	0.00	0.00
Sealer - K 36	12.61	0.04840	0.750	20.00%	0.00%	0.00%	5.00%	0.00%	0.00%	0.00%	0.40	0.00	0.00	0.10	0.00	0.00	0.00
Sealer - DMC 903	8.38	0.02420	0.750	10.00%	45.30%	0.00%	5.00%	0.00%	0.00%	0.00%	0.07	0.30	0.00	0.03	0.00	0.00	0.00
Sealer - DT 885	7.12	0.02420	0.750	10.00%	20.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.06	0.11	0.00	0.00	0.00	0.00	0.00
Sealer - DCX 8	8.93	0.01210	0.750	0.00%	0.00%	0.00%	0.00%	0.00%	20.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.07	0.00
Accesory Solvent - DTL 16	6.67	0.03200	0.750	20.00%	30.00%	0.00%	5.00%	0.00%	0.00%	0.00%	0.14	0.21	0.00	0.04	0.00	0.00	0.00
Accessory Solvent - DX 330 Wax Remover	6.36	0.02500	0.750	0.00%	5.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.03	0.00	0.00	0.00	0.00	0.00
Accessory Solvent - MS 100	6.74	0.02100	0.750	0.00%	50.00%	0.00%	0.00%	0.00%	0.00%	20.00%	0.00	0.23	0.00	0.00	0.00	0.00	0.09
Accessory Solvent - DX 103	6.57	0.00900	0.750	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Subtotal Each Booth											**2.17**	**1.82**	**0.72**	**0.28**	**0.00**	**0.18**	**0.09**
Subtotal Paint Booth #1 and Paint Booth #2											**4.34**	**3.63**	**1.43**	**0.56**	**0.00**	**0.36**	**0.19**
Enter/Un. No. 1																	
R477 Sound Shield	9.66	1.41200	0.750	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
AA Water Based Rust Protector	8.58	0.10200	0.750	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Bond-Title 7 Rubberized UC	7.58	0.04600	0.750	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Subtotal											**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**
										Totals:	**6.68**	**5.74**	**1.84**	**0.91**	**0.79**	**1.43**	**0.19**
																Overall Total:	**17.6**

Note that the potential to emit of Paint 1 and Paint 2 was multiplied by 2 since both booths act independently of each other
All coatings are "as applied" to the applicators

METHODOLOGY

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

Appendix A: Emissions Calculations
HAPs
Surface Coating Operations

Company Name: The Braun Corporation
Address City IN Zip: 623 W. 11th Street Winamac, Indiana 46996
Permit Number: T 131-17702-00017
Reviewer: Kyle Gregory
Date: October 10, 2007

EnterVan Line #2

Material	Density (lbs/gal)	Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % MIBK	Weight % Ethyl Benzene	Weight % Hexane	Weight % Glycol Ethers	Weight % Methyl Alcohol	Xylene Emissions (tons/yr)	Toluene Emissions (tons/yr)	MIBK Emissions (tons/yr)	Ethyl Benzene Emissions (tons/yr)	Hexane Emissions (tons/yr)	Glycol Ether Emissions (tons/yr)	Methyl Alcohol Emissions (tons/yr)
Enter/Assem. No. 2																	
Manus-Bond Adhesive	12.50	1.14800	0.750	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Siliprene Adhesive	7.19	0.90500	0.750	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WS8999 Acrysol	6.46	0.15600	0.750	31.00%	0.00%	0.00%	6.00%	0.00%	0.00%	0.00%	1.03	0.00	0.00	0.20	0.00	0.00	0.00
Kwik Prep	7.33	0.03200	0.750	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
3M Green Contact Adhesive	6.58	0.24500	0.750	0.00%	15.00%	0.00%	0.00%	15.00%	0.00%	0.00%	0.00	0.79	0.00	0.00	0.79	0.00	0.00
Subtotal											**1.03**	**0.79**	**0.00**	**0.20**	**0.79**	**0.00**	**0.00**
Enter/Ref. No. 2 Primer																	
Primer - K 38	12.45	0.07290	0.750	20.00%	5.00%	0.00%	5.00%	0.00%	0.00%	0.00%	0.60	0.15	0.00	0.15	0.00	0.00	0.00
Primer - K 201	8.03	0.01820	0.750	5.00%	10.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.02	0.05	0.00	0.00	0.00	0.00	0.00
Primer - DT 885 (Solvent)	7.12	0.01820	0.750	10.00%	20.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.04	0.09	0.00	0.00	0.00	0.00	0.00
Sealer - DP 50 LF	11.75	0.21000	0.750	5.00%	5.00%	5.00%	0.00%	0.00%	0.00%	0.00%	0.41	0.41	0.41	0.00	0.00	0.00	0.00
Sealer - DP 402 LF	7.75	0.10500	0.750	0.00%	5.00%	0.00%	0.00%	0.00%	40.00%	0.00%	0.00	0.13	0.00	0.00	0.00	1.07	0.00
Seaker - DT 885 (Solvent)	7.12	0.10500	0.750	10.00%	20.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.25	0.49	0.00	0.00	0.00	0.00	0.00
Subtotal											**1.31**	**1.31**	**0.41**	**0.15**	**0.00**	**1.07**	**0.00**
Enter/Ref. No. 2 Paint																	
Clearcoat - DCU 2042	7.91	0.10500	0.750	30.00%	0.00%	10.00%	0.00%	0.00%	0.00%	0.00%	0.82	0.00	0.27	0.00	0.00	0.00	0.00
Clearcoat - DCX 61	8.95	0.02600	0.750	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Clearcoat - DT 885	7.12	0.02600	0.750	10.00%	20.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.06	0.12	0.00	0.00	0.00	0.00	0.00
Base Paint - DBC	8.52	0.07900	0.750	20.00%	20.00%	20.00%	5.00%	0.00%	5.00%	0.00%	0.44	0.44	0.44	0.11	0.00	0.11	0.00
Base Paint - DT 885	7.12	0.07900	0.750	10.00%	20.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.18	0.37	0.00	0.00	0.00	0.00	0.00
Sealer - K 36	12.61	0.04840	0.750	20.00%	0.00%	0.00%	5.00%	0.00%	0.00%	0.00%	0.40	0.00	0.00	0.10	0.00	0.00	0.00
Sealer - DMC 903	8.38	0.02420	0.750	10.00%	45.30%	0.00%	5.00%	0.00%	0.00%	0.00%	0.07	0.30	0.00	0.03	0.00	0.00	0.00
Sealer - DT 885	7.12	0.02420	0.750	10.00%	20.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.06	0.11	0.00	0.00	0.00	0.00	0.00
Sealer - DCX 8	8.93	0.01210	0.750	0.00%	0.00%	0.00%	0.00%	0.00%	20.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.07	0.00
Accesory Solvent - DTL 16	6.67	0.03200	0.750	20.00%	30.00%	0.00%	5.00%	0.00%	0.00%	0.00%	0.14	0.21	0.00	0.04	0.00	0.00	0.00
Accessory Solvent - DX 330 Wax Remover	6.36	0.02500	0.750	0.00%	5.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.03	0.00	0.00	0.00	0.00	0.00
Accessory Solvent - MS 100	6.74	0.02100	0.750	0.00%	50.00%	0.00%	0.00%	0.00%	0.00%	20.00%	0.00	0.23	0.00	0.00	0.00	0.00	0.09
Accessory Solvent - DX 103	6.57	0.00900	0.750	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Subtotal											**2.17**	**1.82**	**0.72**	**0.28**	**0.00**	**0.18**	**0.09**
Enter/Un. No. 2																	
R477 Sound Shield	9.66	1.41200	0.750	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
AA Water Based Rust Protector	8.58	0.10200	0.750	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Bond-Title 7 Rubberized UC	7.58	0.04600	0.750	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Subtotal											**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**
										Totals:	**4.51**	**3.92**	**1.12**	**0.63**	**0.79**	**1.25**	**0.09**
																Overall Total:	**12.3**

All coatings are "as applied" to the applicators

METHODOLOGY

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

Appendix A: Emissions Calculations
HAPs
Surface Coating Operations

Company Name: The Braun Corporation
Address City IN Zip: 623 W. 11th Street Winamac, Indiana 46996
Permit Number: T 131-17702-00017
Reviewer: Kyle Gregory
Date: October 10, 2007

Bus/ParaTransit Van Line No. 1

Material	Density (lbs/gal)	Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % MIBK	Weight % Ethyl Benzene	Weight % Hexane	Weight % Glycol Ethers	Weight % Methyl Alcohol	Xylene Emissions (tons/yr)	Toluene Emissions (tons/yr)	MIBK Emissions (tons/yr)	Ethyl Benzene Emissions (tons/yr)	Hexane Emissions (tons/yr)	Glycol Ether Emissions (tons/yr)	Methyl Alcohol Emissions (tons/yr)
Para/Assem. No. 1																	
Contact Adhesive	6.59	1.5000	0.500	8.0%	10.0%	0.0%	0.0%	0.0%	0.0%	0.0%	1.73	2.16	0.00	0.00	0.00	0.00	0.00
RTV Sealant	8.76	0.3130	0.500	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Subtotal:											**1.73**	**2.16**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**
Para/Ref. 1																	
DP48LF Sealer	11.90	0.1670	0.500	4.1%	0.0%	3.7%	0.0%	5.3%	4.4%	0.5%	0.18	0.00	0.16	0.00	0.23	0.19	0.02
DP402 Catalyst	7.75	0.0830	0.500	2.3%	0.0%	0.0%	13.4%	0.0%	0.0%	0.0%	0.03	0.00	0.00	0.00	0.00	0.00	0.00
NCT Catalyst	7.69	0.0230	0.500	24.6%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.10	0.00	0.00	0.00	0.00	0.00	0.00
NCT Primer	10.93	0.1250	0.500	6.4%	0.0%	7.0%	0.0%	0.0%	0.0%	1.4%	0.19	0.00	0.21	0.00	0.00	0.00	0.04
DTL Thinner	6.69	0.2500	0.500	45.3%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	1.66	0.00	0.00	0.00	0.00	0.00	0.00
DBU Base	8.18	0.3130	0.500	7.1%	0.0%	3.1%	2.7%	0.0%	0.0%	0.6%	0.40	0.00	0.17	0.00	0.00	0.00	0.03
DRR1170 Reducer	7.13	0.3750	0.500	11.1%	0.0%	5.3%	0.0%	0.0%	0.0%	1.2%	0.65	0.00	0.31	0.00	0.00	0.00	0.07
DX394 Cleaner	8.07	0.1250	0.500	0.0%	0.0%	0.0%	0.0%	0.0%	8.0%	0.0%	0.00	0.00	0.00	0.00	0.00	0.18	0.00
DAU82 Clear	7.99	0.2500	0.500	6.3%	0.0%	1.2%	7.2%	0.0%	0.0%	0.0%	0.28	0.00	0.05	0.00	0.00	0.00	0.00
DAU Catalyst	7.83	0.2500	0.500	12.8%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.55	0.00	0.00	0.00	0.00	0.00	0.00
DT870 Reducer	6.91	0.1250	0.500	19.0%	0.0%	0.0%	32.5%	0.0%	0.0%	0.0%	0.36	0.00	0.00	0.00	0.00	0.00	0.00
Subtotal:											**4.39**	**0.00**	**0.91**	**0.00**	**0.23**	**0.37**	**0.17**
Para/Un. No. 1																	
Black Rust Protection	7.43	2.0000	0.625	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
AA Water Base Rust Prot	8.17	0.2500	0.625	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Subtotal:											**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

All coatings are "as applied" to the applicators

Totals:	**6.12**	**2.16**	**0.907**	**0.00**	**0.231**	**0.368**
						Overall Total: **9.96**

METHODOLOGY

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

Appendix A: Emissions Calculations
HAPs
Surface Coating Operations

Company Name: The Braun Corporation
Address City IN Zip: 623 W. 11th Street Winamac, Indiana 46996
Permit Number: T 131-17702-00017
Reviewer: Kyle Gregory
Date: October 10, 2007

Bus/ParaTransit Van Line No. 2

Material	Density (lbs/gal)	Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % MIBK	Weight % Ethyl Benzene	Weight % Hexane	Weight % Glycol Ethers	Weight % Methyl Alcohol	Xylene Emissions (tons/yr)	Toluene Emissions (tons/yr)	MIBK Emissions (tons/yr)	Ethyl Benzene Emissions (tons/yr)	Hexane Emissions (tons/yr)	Glycol Ether Emissions (tons/yr)	Methyl Alcohol Emissions (tons/yr)
Para/Assem. No. 2																	
Contact Adhesive	6.59	1.5000	0.500	8.0%	10.0%	0.0%	0.0%	0.0%	0.0%	0.0%	1.73	2.16	0.00	0.00	0.00	0.00	0.00
RTV Sealant	8.76	0.3130	0.500	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Subtotal:											**1.73**	**2.16**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**
Para/Ref. 2																	
DP48LF Sealer	11.90	0.1670	0.500	4.1%	0.0%	3.7%	0.0%	5.3%	4.4%	0.5%	0.18	0.00	0.16	0.00	0.23	0.19	0.02
DP402 Catalyst	7.75	0.0830	0.500	2.3%	0.0%	0.0%	13.4%	0.0%	0.0%	0.0%	0.03	0.00	0.00	0.00	0.00	0.00	0.00
NCT Catalyst	7.69	0.0230	0.500	24.6%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.10	0.00	0.00	0.00	0.00	0.00	0.00
NCT Primer	10.93	0.1250	0.500	6.4%	0.0%	7.0%	0.0%	0.0%	0.0%	1.4%	0.19	0.00	0.21	0.00	0.00	0.00	0.04
DTL Thinner	6.69	0.2500	0.500	45.3%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	1.66	0.00	0.00	0.00	0.00	0.00	0.00
DBU Base	8.18	0.3130	0.500	7.1%	0.0%	3.1%	2.7%	0.0%	0.0%	0.6%	0.40	0.00	0.17	0.00	0.00	0.00	0.03
DRR1170 Reducer	7.13	0.3750	0.500	11.1%	0.0%	5.3%	0.0%	0.0%	0.0%	1.2%	0.65	0.00	0.31	0.00	0.00	0.00	0.07
DX394 Cleaner	8.07	0.1250	0.500	0.0%	0.0%	0.0%	0.0%	0.0%	8.0%	0.0%	0.00	0.00	0.00	0.00	0.00	0.18	0.00
DAU82 Clear	7.99	0.2500	0.500	6.3%	0.0%	1.2%	7.2%	0.0%	0.0%	0.0%	0.28	0.00	0.05	0.00	0.00	0.00	0.00
DAU Catalyst	7.83	0.2500	0.500	12.8%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.55	0.00	0.00	0.00	0.00	0.00	0.00
DT870 Reducer	6.91	0.1250	0.500	19.0%	0.0%	0.0%	32.5%	0.0%	0.0%	0.0%	0.36	0.00	0.00	0.00	0.00	0.00	0.00
Subtotal:											**4.39**	**0.00**	**0.91**	**0.00**	**0.23**	**0.37**	**0.17**
Para/Un. No. 2																	
Black Rust Protection	7.43	2.0000	0.625	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
AA Water Base Rust Prot	8.17	0.2500	0.625	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Subtotal:											**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

All coatings are "as applied" to the applicators

Totals:	**6.12**	**2.16**	**0.907**	**0.00**	**0.231**	**0.368**
						Overall Total: **9.96**

METHODOLOGY

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

Appendix A: Emissions Calculations
HAPs
Surface Coating Operations

Company Name: The Braun Corporation
Address City IN Zip: 623 W. 11th Street Winamac, Indiana 46996
Permit Number: T 131-17702-00017
Reviewer: Kyle Gregory
Date: October 10, 2007

Insignificant Coating Facilities

Material	Density (lbs/gal)	Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % MIBK	Weight % Ethyl Benzene	Weight % Hexane	Weight % Glycol Ethers	Weight % Methyl Alcohol	Xylene Emissions (tons/yr)	Toluene Emissions (tons/yr)	MIBK Emissions (tons/yr)	Ethyl Benzene Emissions (tons/yr)	Hexane Emissions (tons/yr)	Glycol Ether Emissions (tons/yr)	Methyl Alcohol Emissions (tons/yr)
Touch-Up Booth No. 1 (Plant 4)																	
DBU Base	8.18	0.0160	1.250	7.1%	0.0%	3.1%	2.7%	0.0%	0.0%	0.6%	0.05	0.00	0.02	0.02	0.00	0.00	0.00
DBU Reducer	7.13	0.0160	1.250	11.1%	0.0%	5.3%	0.0%	0.0%	0.0%	1.2%	0.07	0.00	0.03	0.00	0.00	0.00	0.01
DAU Acrylic Urethane Clear	7.99	0.0160	1.250	6.3%	0.0%	1.2%	7.2%	0.0%	0.0%	0.0%	0.04	0.00	0.01	0.05	0.00	0.00	0.00
DAU2 Catalyst	7.83	0.0160	1.250	12.8%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.09	0.00	0.00	0.00	0.00	0.00	0.00
DT870 Reducer	6.91	0.0160	1.250	19.0%	0.0%	0.0%	32.5%	0.0%	0.0%	0.0%	0.12	0.00	0.00	0.20	0.00	0.00	0.00
Subtotal:											**0.367**	**0.00**	**0.064**	**0.266**	**0.00**	**0.00**	**0.012**
Touch-Up Booth No. 2 (Plant 4)																	
DBU Base	8.18	0.0160	1.250	7.1%	0.0%	3.1%	2.7%	0.0%	0.0%	0.6%	0.05	0.00	0.02	0.02	0.00	0.00	0.00
DBU Reducer	7.13	0.0160	1.250	11.1%	0.0%	5.3%	0.0%	0.0%	0.0%	1.2%	0.07	0.00	0.03	0.00	0.00	0.00	0.01
DAU Acrylic Urethane Clear	7.99	0.0160	1.250	6.3%	0.0%	1.2%	7.2%	0.0%	0.0%	0.0%	0.04	0.00	0.01	0.05	0.00	0.00	0.00
DAU2 Catalyst	7.83	0.0160	1.250	12.8%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.09	0.00	0.00	0.00	0.00	0.00	0.00
DT870 Reducer	6.91	0.0160	1.250	19.0%	0.0%	0.0%	32.5%	0.0%	0.0%	0.0%	0.12	0.00	0.00	0.20	0.00	0.00	0.00
Subtotal:											**0.367**	**0.00**	**0.064**	**0.266**	**0.00**	**0.00**	**0.012**
										Totals:	**0.734**	**0.00**	**0.127**	**0.533**	**0.00**	**0.00**	**0.024**
																Overall Total:	**1.42**

All coatings are "as applied" to the applicators

METHODOLOGY

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

Insignificant Degreasing Operations

Material	Usage (gal/day)	Density (lbs/gal)	Weight % VOC	Weight % HAP	VOC Emissions (tons/yr)	HAP Emissions (tons/yr)
Safety-Kleen 105 Solvent	9.53	6.68	99.9%	4.00%	11.60	0.464

METHODOLOGY

VOC emissions (tons/yr) = Usage (gal/day) x Density (lbs/gal) x Weight % VOC x 365 days/yr / 2,000 lbs/ton
HAP emissions (tons/yr) = Usage (gal/day) x Density (lbs/gal) x Weight % HAP x 365 days/yr / 2,000 lbs/ton

Appendix A: Emissions Calculations
Burn-off Oven

Company Name: **The Braun Corporation**
Address City IN Zip: **623 W. 11th Street Winamac, Indiana 46996**
Permit Number: **T 131-17702-00017**
Reviewer: **Kyle Gregory**
Date: **October 10, 2007**

Throughput (lbs/hr)	Throughput ton/yr
8.0	35.04

	Pollutant				
	PM	SO2	CO	VOC	NOx
Emission Factor in lb/ton	7.0	2.5	10.0	3.0	3.0
Potential Emissions in ton/yr	0.123	0.044	0.175	0.053	0.053

METHODOLOGY

Emission factors are from AP 42 (5th Edition 1/95) Table 2.1-12, Uncontrolled emission factors for industrial/commercial refuse combustors, multiple chambers
Throughput (lb/hr) * 8760 hr/yr * ton/2000 lb = throughput (ton/yr)

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler

Company Name: The Braun Corporation
Address City IN Zip: 623 W. 11th Street Winamac, Indiana 46996
Permit Number: T 131-17702-00017
Reviewer: Kyle Gregory
Date: October 10, 2007

Facility	MMBtu/hr
Powder coat cure oven	2.00
Burn off oven	1.56
Repair 1 (touch-up) unit	1.00
Repair 2 (touch-up) unit	1.00
Eight (8) prep/prime/paint units	1.00 (each)
Three (3) paint units	2.00 (each)
Space heating units	26.0 (total)
Total Heat Input Capacity	**45.56**

Potential Throughput
MMCF/yr

399

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.90	7.60	0.600	100 **see below	5.50	84.0
Potential Emission in tons/yr	0.379	1.52	0.120	20.0	1.10	16.8

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	0.00210	0.00120	0.07500	1.80000	0.00340
Potential Emission in tons/yr	0.000419	0.000239	0.014966	0.359195	0.000678

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	
Emission Factor in lb/MMcf	0.0005	0.0011	0.0014	0.0004	0.0021	**Total**
Potential Emission in tons/yr	0.00010	0.00022	0.00028	0.00008	0.00042	**0.377**

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

METHODOLOGY

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Appendix A: Emissions Calculations
Welding and Thermal Cutting

Company Name: **The Braun Corporation**
Address City IN Zip: **623 W. 11th Street Winamac, Indiana 46996**
Permit Number: **T 131-17702-00017**
Reviewer: **Kyle Gregory**
Date: **October 10, 2007**

	Number of Stations	Max. electrode consumption (total) (lbs/hr)	EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
			PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
WELDING											
Stick (E7018 electrode)	6	59	0.0211	0.0009			1.24	0.053	0.00	0.00	0.053

CUTTING	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)**				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Plasma**	7	0.5	40	0.0039				0.066	0.000	0.00	0.00	0.000

EMISSION TOTALS	PM = PM10	Mn	Ni	Cr	HAPS
Potential Emissions lbs/hr	1.24	0.05	0.00	0.00	0.053
Potential Emissions lbs/day	29.88	1.27	0.00	0.00	1.27
Potential Emissions tons/year	5.45	0.233	0.00	0.00	0.233

METHODOLOGY

*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.
**Emission Factor for plasma cutting from American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted). Therefore, the
Using AWS average values: (0.25 g/min)/(3.6 m/min) x (0.0022 lb/g)/(39.37 in./m) x (1,000 in.) = 0.0039 lb/1,000 in. cut, 8 mm thick
Plasma cutting emissions, lb/hr: (# of stations)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 8 mm thick)
Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)
Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)
Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day
Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.

Assuming only worst case welding process is used
Used plasma cutting emission factors for laser cutting emissions

Appendix A: Emissions Summary

Company Name: The Braun Corporation
Address City IN Zip: 623 W. 11th Street Winamac, Indiana 46996
Permit Number: T 131-17702-00017
Reviewer: Kyle Gregory
Date: October 10, 2007

Uncontrolled Potential to Emit

	Pollutants					
Facility	PM	PM10	SO2	NOx	VOC	CO
EnterVan Line No. 1	28.1	28.1	0.00	0.00	56.4	0.00
EnterVan Line No. 2	26.9	26.9	0.00	0.00	47.5	0.00
Bus/ParaTransit Van Line No. 1	17.8	17.8	0.00	0.00	51.0	0.00
Bus/ParaTransit Van Line No. 2	17.8	17.8	0.00	0.00	51.0	0.00
Touch-Up Booth 1 & 2	0.943	0.943	0.00	0.00	4.78	0.00
Degreasing Operations	0.00	0.00	0.00	0.00	11.6	0.00
Natural Gas Combustion	0.379	1.52	0.120	20.0	1.10	16.8
Burn-off Oven (waste emissions)	0.123	0.123	0.044	0.175	0.053	0.053
Welding Operations	5.45	5.45	0.00	0.00	0.00	0.00
Total	**97.5**	**98.7**	**0.164**	**20.1**	**223**	**16.8**

	HAPs							
Facility	Benzene	Dichlorobenzene	Ethyl Benzene	Formaldehyde	Glycol Ether	Hexane	Methyl Alcohol	MIBK
EnterVan Line 1	0.00	0.00	0.906	0.00	1.43	0.794	0.186	1.84
EnterVan Line 2	0.00	0.00	0.627	0.00	1.25	0.794	0.093	1.12
Bus/ParaTransit Van Line No. 1	0.00	0.00	0.000	0.00	0.368	0.231	0.168	0.907
Bus/ParaTransit Van Line No. 2	0.00	0.00	0.000	0.00	0.368	0.231	0.168	0.907
Touch-Up Booth 1 & 2	0.00	0.00	0.533	0.00	0.00	0.000	0.000	0.127
Degreasing Operations	0.00	0.00	0.060	0.00	0.00	0.00	0.00	0.00
Natural Gas Combustion	0.0004	0.0002	0.00	0.015	0.00	0.359	0.00	0.00
Burn-off Oven (waste emissions)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Welding Operations	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	**0.0004**	**0.0002**	**2.13**	**0.015**	**3.42**	**2.41**	**0.614**	**4.90**

	HAPs							
Facility	Toluene	Xylene	Cadmium	Chromium	Lead	Manganese	Nickel	**Total**
EnterVan Line 1	5.74	6.68	0.00	0.00	0.00	0.00	0.00	**17.6**
EnterVan Line 2	3.92	4.51	0.00	0.00	0.00	0.00	0.00	**12.3**
Bus/ParaTransit Van Line No. 1	2.16	6.12	0.00	0.00	0.00	0.00	0.00	**9.96**
Bus/ParaTransit Van Line No. 2	2.16	6.12	0.00	0.00	0.00	0.00	0.00	**9.96**
Touch-Up Booth 1 & 2	0.000	0.734	0.00	0.00	0.00	0.00	0.00	**1.42**
Degreasing Operations	0.060	0.120	0.00	0.00	0.00	0.00	0.00	**0.464**
Natural Gas Combustion	0.001	0.00	0.0002	0.0003	0.0001	0.0001	0.0004	**0.377**
Burn-off Oven (waste emissions)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**
Welding Operations	0.00	0.00	0.00	0.00	0.00	0.233	0.00	**0.233**
Total	**14.1**	**24.3**	**0.0002**	**0.0003**	**0.0001**	**0.233**	**0.0004**	**52.3**

Emissions Summary continued on next page

Appendix A: Emissions Summary

Company Name: **The Braun Corporation**
Address City IN Zip: **623 W. 11th Street Winamac, Indiana 46996**
Permit Number: **T 131-17702-00017**
Plt ID: **131-00017**
Reviewer: **Kyle Gregory**
Date: **July 14, 2003**

Potential Emissions After Control

	Pollutants					
Facility	PM	PM10	SO2	NOx	VOC	CO
EnterVan Line No. 1	14.0	14.0	0.00	0.00	56.4	0.00
EnterVan Line No. 2	13.5	13.5	0.00	0.00	47.5	0.00
Bus/ParaTransit Van Line No. 1	8.91	8.91	0.00	0.00	51.0	0.00
Bus/ParaTransit Van Line No. 2	8.91	8.91	0.00	0.00	51.0	0.00
Touch-Up Booth 1 & 2	0.471	0.471	0.00	0.00	4.8	0.00
Degreasing Operations	0.00	0.00	0.00	0.00	12.0	0.00
Natural Gas Combustion	0.379	1.52	0.120	20.0	1.10	16.8
Burn-off Oven (waste emissions)	0.123	0.123	0.044	0.175	0.053	0.053
Welding Operations	5.45	5.45	0.00	0.00	0.00	0.00
Total	**51.7**	**52.9**	**0.164**	**20.1**	**224**	**16.8**

	HAPs							
Facility	Benzene	Dichlorobenzene	Ethyl benzene	Formaldehyde	Glycol ether	Hexane	Methyl Alcohol	MIBK
EnterVan Line 1	0.00	0.00	0.906	0.00	1.43	0.79	0.186	1.84
EnterVan Line 2	0.00	0.00	0.627	0.00	1.25	0.79	0.093	1.12
Bus/ParaTransit Van Line No. 1	0.00	0.00	0.00	0.00	0.37	0.23	0.17	0.91
Bus/ParaTransit Van Line No. 2	0.00	0.00	0.00	0.00	0.37	0.23	0.17	0.91
Touch-Up Booth 1 & 2	0.00	0.00	0.53	0.00	0.00	0.00	0.00	0.13
Degreasing Operations	0.00	0.00	0.060	0.00	0.00	0.00	0.00	0.00
Natural Gas Combustion	0.0004	0.0002	0.00	0.015	0.00	0.359	0.00	0.00
Burn-off Oven (waste emissions)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Welding Operations	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	**0.0004**	**0.0002**	**2.13**	**0.015**	**3.42**	**2.409**	**0.614**	**4.90**

	HAPs							
Facility	Toluene	Xylene	Cadmium	Chromium	Lead	Manganese	Nickel	**Total**
EnterVan Line 1	5.74	6.68	0.00	0.00	0.00	0.00	0.00	**17.6**
EnterVan Line 2	3.92	4.51	0.00	0.00	0.00	0.00	0.00	**12.3**
Bus/ParaTransit Van Line No. 1	2.16	6.12	0.00	0.00	0.00	0.00	0.00	**9.96**
Bus/ParaTransit Van Line No. 2	2.16	6.12	0.00	0.00	0.00	0.00	0.00	**9.96**
Touch-Up Booth 1 & 2	0.00	0.73	0.00	0.00	0.00	0.00	0.00	**1.42**
Degreasing Operations	0.060	0.120	0.00	0.00	0.00	0.00	0.00	**0.464**
Natural Gas Combustion	0.001	0.00	0.0002	0.0003	0.0001	0.0001	0.0004	**0.377**
Burn-off Oven (waste emissions)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**
Welding Operations	0.00	0.00	0.00	0.00	0.00	0.233	0.00	**0.233**
Total	**14.06**	**24.3**	**0.0002**	**0.0003**	**0.0001**	**0.233**	**0.0004**	**52.3**

Emissions Summary continued on next page

Appendix A: Emissions Summary

Company Name: **The Braun Corporation**
Address City IN Zip: **623 W. 11th Street Winamac, Indiana 46996**
Permit Number: **T 131-17702-00017**
Plt ID: **131-00017**
Reviewer: **Kyle Gregory**
Date: **July 14, 2003**

Limited Potential to Emit

	Pollutants					
Facility	PM	PM10	SO2	NOx	VOC	CO
EnterVan Line No. 1	14.0	14.0	0.0	0.0	56.4	0.0
EnterVan Line No. 2	13.5	13.5	0.0	0.0	47.5	0.0
Bus/ParaTransit Van Line No. 1	8.91	8.91	0.00	0.00	51.0	0.00
Bus/ParaTransit Van Line No. 2	8.91	8.91	0.00	0.00	51.0	0.00
Touch-Up Booth 1 & 2	0.471	0.471	0.00	0.00	4.8	0.00
Degreasing Operations	0.00	0.00	0.00	0.00	12.0	0.00
Natural Gas Combustion	0.379	1.52	0.120	20.0	1.10	16.8
Burn-off Oven (waste emissions)	0.123	0.123	0.044	0.175	0.053	0.053
Welding Operations	5.45	5.45	0.00	0.00	0.00	0.00
Total	**51.7**	**52.9**	**0.164**	**20.1**	**224**	**16.8**

	HAPs							
Facility	Benzene	Dichlorobenzene	Ethyl benzene	Formaldehyde	Glycol ether	Hexane	Methyl Alcohol	MIBK
EnterVan Line 1	9.63	9.63	9.63	9.63	9.63	9.63	9.63	9.63
EnterVan Line 2								
Bus/ParaTransit Van Line No. 1								
Bus/ParaTransit Van Line No. 2								
Touch-Up Booth 1 & 2								
Degreasing Operations								
Natural Gas Combustion	0.0004	0.0002	0.00	0.015	0.00	0.359	0.00	0.00
Burn-off Oven (waste emissions)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Welding Operations	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	**9.6304**	**9.6302**	**9.63**	**9.645**	**9.63**	**9.989**	**9.630**	**9.63**

	HAPs							
Facility	Toluene	Xylene	Cadmium	Chromium	Lead	Manganese	Nickel	**Total**
EnterVan Line 1	9.63	9.63	9.63	9.63	9.63	9.63	9.63	**24.3**
EnterVan Line 2								
Bus/ParaTransit Van Line No. 1								
Bus/ParaTransit Van Line No. 2								
Touch-Up Booth 1 & 2								
Degreasing Operations								
Natural Gas Combustion	0.001	0.00	0.0002	0.0003	0.0001	0.000	0.0004	**0.377**
Burn-off Oven (waste emissions)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**
Welding Operations	0.00	0.00	0.00	0.00	0.00	0.233	0.00	**0.233**
Total	**9.63**	**9.6**	**9.6302**	**9.6303**	**9.6301**	**9.863**	**9.6304**	**24.9**