



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

October 5, 2004

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

TO: Interested Parties / Applicant

RE: Ashley Industrial Molding / SPM 033-17813-00017

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval – Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

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

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

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



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Joseph E. Kernan
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October 5, 2004

Mr. Rodney Schoon
Ashley Industrial Molding, Inc.
320 South Wabash Avenue
Ashley, IN 46704

Re: 033-17813-00017
First Significant Permit Modification to
Part 70 No.: T 033-5941-00017

Dear Mr. Schoon:

Ashley Industrial Molding, Inc. was issued a permit on July 31, 2001 for a fiberglass reinforced plastic parts manufacturing and painting source. A letter requesting changes to this permit was received on June 30, 2003. Pursuant to the provisions of 326 IAC 2-7-12 a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of changes in the VOC limit from the surface coating booths at the source pursuant to 326 IAC 8-1-6. A top-down BACT analysis was provided and reviewed. The VOC limit on the three (3) spray booths (SB-1 through SB-3) has been re-apportioned from 99.9 tons per year to 149.9 tons per year. As a result, to keep the source-wide allowable VOC emissions to less than two hundred fifty (250) tons per year, the allowable VOC emissions from the seventeen (17) molding presses has been reduced from 139 tons per year to 89 tons per year. These limits will keep the source minor pursuant to 326 IAC 2-2 (PSD).

The changes in the Part 70 Operating Permit are documented in the Technical Support Document. All other conditions of the permit shall remain unchanged and in effect. For your convenience, the entire revised Title V Operating Permit, with all modifications and amendments will be provided upon approval.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Craig J. Friederich, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, at 631-691-3395 ext. 19 or in Indiana at 1-800-451-6027 (ext 631-691-3395).

Sincerely,

Original signed by
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
CJF/MES

cc: File - Dekalb County
U.S. EPA, Region V
Dekalb County Health Department
Northern Regional Office
Air Compliance Section Inspector - Doyle Houser
Compliance Branch
Administrative and Development Section
Technical Support and Modeling - Michelle Boner



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PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

Ashley Industrial Molding, Inc.
320 South Wabash Avenue
Ashley, Indiana 46705

(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.

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 033-5941-00017	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: July 31, 2001 Expiration Date: July 31, 2006

First Administrative Amendment 033-14753-00017, issued on August 28, 2001 and
 First Review Request 033-15893-00017, issued on March 11, 2002.

First Significant Permit Modification 033-17813-00017	Sections Affected: D.1, Quarterly Report Forms
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: October 4, 2004

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.4 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

The Permittee owns and operates a stationary high-pressure fiberglass-reinforced plastics manufacturing and painting source.

Responsible Official:	Rodney Schoon
Source Address:	320 South Wabash Avenue
Mailing Address:	320 South Wabash Avenue
General Source Phone Number:	260-587-9155
SIC Code:	3089
County Location:	Dekalb
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source under PSD Rules; Major Source, Section 112 of the Clean Air Act

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

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

- (a) One (1) surface coating line, consisting of:
 - (1) One (1) prime booth and one (1) flashoff tunnel, identified as SB-1, PM overspray controlled by HVLP or electrostatic spray applicators, air atomization spray applicators and dry filters, installed in 1987, exhausted through Stack 2A, capacity: 10.25 gallons of coating per hour for SB-1, SB-2, and SB-3, total.
 - (2) One (1) first topcoat booth and one (1) flashoff tunnel, identified as SB-2, PM overspray controlled by HVLP or electrostatic spray applicators, air atomization spray applicators and dry filters, installed in 1987, exhausted through Stack 2B, capacity: 10.25 gallons of coating per hour for SB-1, SB-2, and SB-3, total.
 - (3) One (1) second topcoat booth and one (1) flashoff tunnel, identified as SB-3, PM overspray controlled by HVLP or electrostatic spray applicators, air atomization spray applicators and dry filters, installed in 1987, exhausted through Stack 2C, capacity: 10.25 gallons of coating per hour for SB-1, SB-2, and SB-3, total.
- (b) One (1) boiler, identified as BLRA, installed in 1979, using natural gas as a primary fuel and No. 2 fuel oil as a backup fuel, exhausted through Stack 5A, capacity: 8.4 million British thermal units per hour.
- (c) One (1) boiler, identified as BLRB, installed in 1975, using natural gas as a primary fuel and No. 2 fuel oil as a backup fuel, exhausted through Stack 5B, capacity: 4.2 million British thermal units per hour.

- (d) One (1) natural gas-fired pyrolysis cleaning furnace, identified as AFT-1, rated at 0.35 million British thermal units per hour, installed in 1987, exhausted through Stack 7, capacity: 10 pounds of waste per hour.
- (e) One reinforced plastic molding press, identified as PR-109, installed prior to 1980. This press is used to punch holes in the molded SMC. There are no air emissions from this press.
- (f) One (1) 200-ton Hannifin reinforced plastic molding press, identified as PR-204, installed prior to 1980, capacity: 534 pounds of SMC per hour.
- (g) One (1) 250-ton Version reinforced plastic molding press, identified as PR-234, installed prior to 1980, capacity: 534 pounds of SMC per hour.
- (h) One (1) 300-ton Erie reinforced plastic molding press, identified as PR-346, installed prior to 1980, capacity: 168 pounds of SMC per hour.
- (i) One (1) 300-ton Erie reinforced plastic molding press, identified as PR-347, installed prior to 1980, capacity: 168 pounds of SMC per hour.
- (j) One (1) 350-ton Lawton reinforced plastic molding press, identified as PR-365, installed prior to 1980, capacity: 168 pounds of SMC per hour.
- (k) One (1) 400-ton Lawton reinforced plastic molding press, identified as PR-437, installed prior to 1980, capacity: 86 pounds of SMC per hour.
- (l) One (1) 400-ton Dake reinforced plastic molding press, identified as PR-440, installed prior to 1980, capacity: 86 pounds of SMC per hour.
- (m) One (1) 600-ton RHML reinforced plastic molding press, identified as PR-651, installed prior to 1980, capacity: 12 pounds of SMC per hour.
- (n) One (1) 600-ton RHML reinforced plastic molding press, identified as PR-654, installed prior to 1980, capacity: 12 pounds of SMC per hour.
- (o) One (1) 800-ton French reinforced plastic molding press, identified as PR-845, installed prior to 1980, capacity: 195 pounds of SMC per hour.
- (p) One (1) 1,000-ton EEMCO reinforced plastic molding press, identified as PR-1039, installed prior to 1980, capacity: 442 pounds of SMC per hour.
- (q) One (1) 1,000-ton Clearing reinforced plastic molding press, identified as PR-1056, installed in 1986, capacity: 355 pounds of SMC per hour.
- (r) One (1) 1,200-ton Dominoon reinforced plastic molding press, identified as PR-1252, installed in 1987, capacity: 99 pounds of SMC per hour.
- (s) One (1) 2,000-ton W-W-M reinforced plastic molding press, identified as PR-2053, installed prior to 1980, capacity: 454 pounds of SMC per hour.
- (t) One (1) 2,500-ton W-W-M reinforced plastic molding press, identified as PR-2560, installed in 1984, capacity: 627 pounds of SMC per hour.
- (u) One (1) 3,000-ton Erie reinforced plastic molding press, identified as PR-3038, installed prior to 1980, capacity: 1,098 pounds of SMC per hour.

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) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. (326 IAC 6-3)
- (b) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone. (326 IAC 6-3)
- (c) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. (326 IAC 6-3)

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)]

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

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

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

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

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

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

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

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

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

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

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

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

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

(b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]

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

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

B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

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

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

and

United States Environmental Protection Agency, Region V
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.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

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

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes

to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.12 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, except as provided in 326 IAC 2-7-16.

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

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and/or the Northern Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

Telephone Number: 574-245-4870 (Northern Regional Office)
Facsimile Number: 574-245-4877 (Northern Regional Office)

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

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

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

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

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) 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.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is 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.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for

which a permit shield has been granted.

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

- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. All previously issued operating permits are superseded by this permit.
- (c) 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.
- (d) 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.
- (e) 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.
- (f) 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).
- (g) 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)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(7)]

B.14 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

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

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

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.

The notification by the Permittee 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 or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

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

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously

as practicable. [326 IAC 2-7-9(b)]

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

B.17 Permit Renewal [326 IAC 2-7-4]

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

Request for renewal shall be submitted to:

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

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

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

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015
- Any such application shall be certified by the “responsible official” as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

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

B.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 emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:
- Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

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

in advance of the change by written notification at least ten (10) days in advance copy of this permit; and

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

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

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

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

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

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

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

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]

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

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

- (b) Have access to and copy any records that must be kept under the conditions of this permit;
- (c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) 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, P.O. Box 6015
Indianapolis, Indiana 46206-6015

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

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

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

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

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

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

- C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]
Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- C.2 Opacity [326 IAC 5-1]
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]
The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.
- C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]
The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.
- C.5 Fugitive Dust Emissions [326 IAC 6-4]
The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.
- C.6 Operation of Equipment [326 IAC 2-7-6(6)]
Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.
- C.7 Stack Height [326 IAC 1-7]
The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).
- All required notifications shall be submitted to:
- Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015
- The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

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

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

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

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

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

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

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

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

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

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

C.12 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.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

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

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

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

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

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

(c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

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

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

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

(a) A compliance schedule for meeting the requirements of 40 CFR 68; or

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

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

C.15 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:
- (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:
 - (A) Reasonable response steps that may be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps may constitute a violation of the permit.
- (c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.

- (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.
- (f) At its discretion, IDEM may excuse the Permittee's failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in any quarter. Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do not 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.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

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

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

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

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

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

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

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

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

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

SECTION D.1 FACILITY OPERATION CONDITIONS

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

- (a) One (1) surface coating line, consisting of:
 - (1) One (1) prime booth and one (1) flashoff tunnel, identified as SB-1, HVLP or electrostatic spray applicators to be installed, equipped with air atomization spray applicators and dry filters for PM overspray control, installed in 1987, exhausted through Stack 2A, capacity: 10.25 gallons of coating per hour for SB-1, SB-2, and SB-3, total.
 - (2) One (1) first topcoat booth and one (1) flashoff tunnel, identified as SB-2, HVLP or electrostatic spray applicators to be installed, equipped with air atomization spray applicators and dry filters for PM overspray control, installed in 1987, exhausted through Stack 2B, capacity: 10.25 gallons of coating per hour for SB-1, SB-2, and SB-3, total.
 - (3) One (1) second topcoat booth and one (1) flashoff tunnel, identified as SB-3, HVLP or electrostatic spray applicators to be installed, equipped with air atomization spray applicators and dry filters for PM overspray control, installed in 1987, exhausted through Stack 2C, capacity: 10.25 gallons of coating per hour for SB-1, SB-2, and SB-3, total.
- (e) One reinforced plastic molding press, identified as PR-109, installed prior to 1980. This press is used to punch holes in the molded SMC. There are no air emissions from this press.
- (f) One (1) 200-ton Hannifin reinforced plastic molding press, identified as PR-204, installed prior to 1980, capacity: 534 pounds of SMC per hour.
- (g) One (1) 250-ton Verson reinforced plastic molding press, identified as PR-234, installed prior to 1980, capacity: 534 pounds of SMC per hour.
- (h) One (1) 300-ton Erie reinforced plastic molding press, identified as PR-346, installed prior to 1980, capacity: 168 pounds of SMC per hour.
- (i) One (1) 300-ton Erie reinforced plastic molding press, identified as PR-347, installed prior to 1980, capacity: 168 pounds of SMC per hour.
- (j) One (1) 350-ton Lawton reinforced plastic molding press, identified as PR-365, installed prior to 1980, capacity: 168 pounds of SMC per hour.
- (k) One (1) 400-ton Lawton reinforced plastic molding press, identified as PR-437, installed prior to 1980, capacity: 86 pounds of SMC per hour.
- (l) One (1) 400-ton Dake reinforced plastic molding press, identified as PR-440, installed prior to 1980, capacity: 86 pounds of SMC per hour.
- (m) One (1) 600-ton RHML reinforced plastic molding press, identified as PR-651, installed prior to 1980, capacity: 12 pounds of SMC per hour.
- (n) One (1) 600-ton RHML reinforced plastic molding press, identified as PR-654, installed prior to 1980, capacity: 12 pounds of SMC per hour.
- (o) One (1) 800-ton French reinforced plastic molding press, identified as PR-845, installed prior to 1980, capacity: 195 pounds of SMC per hour.
- (p) One (1) 1,000-ton EEMCO reinforced plastic molding press, identified as PR-1039, installed prior to 1980, capacity: 442 pounds of SMC per hour.
- (q) One (1) 1,000-ton Clearing reinforced plastic molding press, identified as PR-1056, installed in 1986, capacity: 355 pounds of SMC per hour.
- (r) One (1) 1,200-ton Dominoon reinforced plastic molding press, identified as PR-1252, installed in 1987, capacity: 99 pounds of SMC per hour.
- (s) One (1) 2,000-ton W-W-M reinforced plastic molding press, identified as PR-2053, installed prior to 1980, capacity: 454 pounds of SMC per hour.
- (t) One (1) 2,500-ton W-W-M reinforced plastic molding press, identified as PR-2560, installed in 1984, capacity: 627 pounds of SMC per hour.
- (u) One (1) 3,000-ton Erie reinforced plastic molding press, identified as PR-3038, installed prior to 1980, capacity: 1,098 pounds of SMC per hour.

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

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

D.1.1 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 2 to 40 CFR Part 63, Subpart PPPP] [40 CFR 63.4501]

- (a) The provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart PPPP. The Permittee must comply with these requirements on and after April 19, 2007.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

D.1.2 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products [40 CFR Part 63, Subpart PPPP] [40 CFR 63.4481] [40 CFR 63.4482] [40 CFR 63.4483(b)] [40 CFR 63.4581]

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

D.1.3 Volatile Organic Compounds [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6, Best Available Control Technology (BACT) for the three (3) surface coating booths, identified as SB-1 through SB-3, has been determined to be:

- (a) The potential VOC delivered to the applicators including cleanup solvents shall be limited to a total of no more than one-hundred forty nine and nine tenths (149.9) tons per twelve (12) consecutive month period, with compliance determined at the end of each month;
- (b) The method of application at the spray booths shall be done with high volume-low pressure (HVLP) spray applicators or electrostatic applicators;

- (c) The use of medium (41-50%) and high (no less than 51%) solids content coatings, except the use of coatings with a volume percent solids of no less than 38% can be used if required by military specifications; and
- (d) The following management and work practices shall apply:
 - (1) Operator training course.
 - (2) Spray gun cleaning.
 - (3) The cleanup solvent containers used to transport solvent from drums to work stations be closed containers having soft gasketed closures.
 - (4) The application equipment operators shall be instructed and trained on the methods and practices utilized to minimize spillage on the floor and over application.
 - (5) Storage containers used to store VOC and/or HAPs containing materials shall be kept covered when not in use.
 - (6) Cleanup solvents will be reused in the process as much as possible to reduce hazardous waste and the related impact on the environment.

D.1.4 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

- (a) The total potential to emit VOC from the seventeen (17) molding presses (PR-109, 204, 234, 346, 347, 365, 437, 440, 651, 654, 845, 1039, 1056, 1252, 2053, 2560, and 3038) shall be limited to no more than eighty nine (89.0) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) Compliance with the VOC emission limit in Condition D.1.4(a) shall be determined with the use of a three (3.0%) percent VOC flashoff factor for each molding press.
- (c) This VOC emission limit combined with the BACT VOC usage limit in Condition D.1.3, the full potential to emit VOC from the combustion units and ten (10) tons per year from insignificant activities shall limit the total source-wide VOC emissions to less than two hundred and fifty (250) tons per twelve (12) consecutive month period. Compliance with this limit makes the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 40 CFR 52.21 not applicable.

D.1.5 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the PM from the three (3) surface coating booths, identified as SB-1 through SB-3 shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

D.1.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.1.7 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.3 and D.1.4 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

D.1.8 VOC Emissions

Compliance with Conditions D.1.3 and D.1.4 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

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

D.1.9 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the three (3) surface coating booths, identified as SB-1 through SB-3 are in operation.

D.1.10 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 2A, 2B and 2C while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

D.1.11 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.3 and D.1.4, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.3 and D.1.4
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each month;

- (4) The total VOC usage for each month; and
- (5) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.10 and D.1.11, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.12 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.3 and D.1.4 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).

D.1.13 Notification Requirements [40 CFR 63.4510]

- (a) General. The Permittee must submit the applicable notifications in 40 CFR Part 63, Sections 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) by the dates specified in those sections, except as provided in 40 CFR 63.4510, paragraphs (b) and (c).
- (b) Notification of compliance status. The Permittee must submit the notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR 63.4540, 40 CFR 63.4550, or 40 CFR 63.4560 that applies to the affected source. The notification of compliance status must contain the information specified in 40 CFR 63.4510(c), paragraphs (1) through (11) and any additional information specified in 40 CFR 63.9(h).

D.1.14 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]

The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information regarding which compliance option or options will be chosen in the Part 70 permit.

- (a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Part 70 permit the applicable requirements of 40 CFR 63, Subpart PPPP, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.
- (b) The significant permit modification application shall be submitted no later than July 19, 2006.
- (c) The significant permit modification application shall be submitted to:

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

SECTION D.2

FACILITY OPERATION CONDITIONS

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

- (b) One (1) boiler, identified as BLRA, installed in 1979, using natural gas as a primary fuel and No. 2 fuel oil as a backup fuel, exhausted through Stack 5A, capacity: 8.4 million British thermal units per hour.
- (c) One (1) boiler, identified as BLRB, installed in 1975, using natural gas as a primary fuel and No. 2 fuel oil as a backup fuel, exhausted through Stack 5B, capacity: 4.2 million British thermal units per hour.
- (d) One (1) natural gas-fired pyrolysis cleaning furnace, identified as AFT-1, rated at 0.35 million British thermal units per hour, installed in 1987, exhausted through Stack 7, capacity: 10 pounds of waste 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 Particulate Matter (PM) [326 IAC 6-2-3]

- (a) Pursuant to 326 IAC 6-2-3(e), the allowable PM emission rate from the one (1) boiler, identified as BLRA, shall not exceed 0.6 pounds per million British thermal units per hour heat input.
- (b) Pursuant to 326 IAC 6-2-3(e), the allowable PM emission rate from the one (1) boiler, identified as BLRB, shall not exceed 0.6 pounds per million British thermal units heat input.

SECTION D.3

FACILITY OPERATION CONDITIONS

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

- (a) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. (326 IAC 6-3)
- (b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. (326 IAC 6-3)
- (c) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.

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

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

D.3.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the grinding and machining, brazing, cutting, soldering, welding and trimming operations shall not exceed allowable PM emission rate based on the following equations:

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

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

P = process weight rate in tons per hour.

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

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Ashley Industrial Molding, Inc.
Source Address: 320 South Wabash Avenue, Ashley, Indiana 46705
Mailing Address: 320 South Wabash Avenue, Ashley, Indiana 46705
Part 70 Permit No.: T 033-5941-00017

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:

Date:

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

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Ashley Industrial Molding, Inc.
Source Address: 320 South Wabash Avenue, Ashley, Indiana 46705
Mailing Address: 320 South Wabash Avenue, Ashley, Indiana 46705
Part 70 Permit No.: T 033-5941-00017

This form consists of 2 pages

Page 1 of 2

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

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

Part 70 Quarterly Report

Source Name: Ashley Industrial Molding, Inc.
Source Address: 320 South Wabash Avenue, Ashley, Indiana 46705
Mailing Address: 320 South Wabash Avenue, Ashley, Indiana 46705
Part 70 Permit No.: T 033-5941-00017
Facility: Three (3) Paint Booths (SB-1 through SB-3)
Parameter: VOC Usage
Limit: Total of 149.9 tons per twelve (12) consecutive month period, with compliance determined at the end of each month

YEAR: _____

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

9 No deviation occurred in this month.

9 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: Ashley Industrial Molding, Inc.
Source Address: 320 South Wabash Avenue, Ashley, Indiana 46705
Mailing Address: 320 South Wabash Avenue, Ashley, Indiana 46705
Part 70 Permit No.: T 033-5941-00017
Facility: Seventeen (17) Molding Presses
Parameter: VOC emissions calculated with a three (3%) percent flashoff factor
Limit: Total of 89.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month

YEAR: _____

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

- 9 No deviation occurred in this month.
- 9 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: Ashley Industrial Molding, Inc.
Source Address: 320 South Wabash Avenue, Ashley, Indiana 46705
Mailing Address: 320 South Wabash Avenue, Ashley, Indiana 46705
Part 70 Permit No.: T 033-5941-00017

Months: _____ to _____ Year: _____

Page 1 of 2

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

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:	

9 No deviation occurred in this month.

9 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

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

Source Background and Description

Source Name:	Ashley Industrial Molding, Inc.
Source Location:	320 South Wabash Avenue, Ashley, Indiana 46705
County:	Dekalb
SIC Code:	3069
Operation Permit No.:	T 033-5941-00017
Operation Permit Issuance Date:	July 31, 2001
Significant Permit Modification No.:	033-17813-00017
Permit Reviewer:	Craig J. Friederich

The Office of Air Quality (OAQ) has reviewed a permit modification application from Ashley Industrial Molding, Inc. relating to the revision of the Best Available Control Technology (BACT) limits pursuant to 326 IAC 8-1-6, which were contained in the original Part 70 Operating Permit (T 033-5941-00017) issued on July 31, 2001.

History

On June 20, 2003, Ashley Industrial Molding, Inc. submitted an application to the OAQ requesting to revise their existing BACT limit on the three (3) surface coating booths (SB-1 through SB-3) of 99.9 tons per year, total. This BACT limit, along with the allowable limit pursuant to 326 IAC 2-2 of 139 tons per year from the seventeen (17) molding presses, ensured that the allowable emissions were less than two hundred fifty (250) tons per year, and therefore, the requirements of 326 IAC 2-2 were not applicable. These limits were agreed upon by Meridian Automotive Systems, Inc., then owner of the source. On July 31, 2001, the source was purchased from Meridian Automotive Systems by Ashley Industrial Molding, Inc. With an increase in production, Ashley Industrial Molding can not comply with the existing VOC limit of 99.9 tons per year on their three (3) paint booths. Therefore, Ashley has requested that the limits be re-apportioned to allow for a higher limit on the spray booths and a lower allowable on the molding presses. To do so, a top down BACT analysis for the spray booths has been submitted by the Permittee for review.

Enforcement Issue

- (a) IDEM is aware that Ashley Industrial Molding, Inc. has emitted Volatile Organic Compounds (VOC's) at a level higher than the allowable levels permitted in T 033-5941-00017.
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed approval is intended to satisfy the requirements of the construction permit rules.

Stack Summary

There is no new construction proposed in this approval.

Recommendation

The staff recommends to the Commissioner that the Part 70 Significant Permit Modification 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 June 20, 2003. Additional information was received on September 29, 2003, February 20, 2004, and May 24, 2004.

Emission Calculations

The potential to emit of the source has not changed as a result of this proposed permit modification. The source is going to be increasing the actual hours of operation. Therefore, there are no emission calculations.

Justification for Modification

The proposed operating conditions shall be incorporated into the Part 70 Operating Permit as a Significant Permit Modification (SPM 039-18697-00157) in accordance with 326 IAC 2-7-12(d)(1).

Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	26.3
PM ₁₀	26.1
SO ₂	17.9
VOC	less than 250
CO	14.9
NO _x	23.0

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.
- (b) These emissions are based upon the Technical Support Document for T 033-5941-00017.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.
- (b) The plastic parts surface coating operations are subject to the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products, 40 CFR 63,

Subpart PPPP. The three (3) paint booths, identified as SB-1 through SB-3 are considered an existing affected source pursuant to 40 CFR 63.4482. The U.S. EPA Administrator has signed and will publish a final Maximum Achievable Control Technology Standard (MACT) at 40 CFR 63, Subpart PPPP, for Surface Coating of Plastic Parts and Products. A copy of the signed version of the MACT is currently available on the U.S. EPA website, <http://www.epa.gov/ttn/oarpg/t3pfpr.html>, and will be published in the Federal Register.

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

This rule has a future compliance date; therefore, the specific details of the rule and how the Permittee will demonstrate compliance are not provided in the permit. The Permittee shall submit an application for a significant permit modification that will specify the option or options for the emission limitations and standards and methods for determining compliance chosen by the Permittee. This application must be submitted by July 19, 2006, which is nine months prior to the compliance date for the MACT. At that time, IDEM, OAQ will include the specific details of the rule and how the Permittee will demonstrate. In addition, pursuant to 40 CFR 63, Subpart PPPP, the Permittee shall submit:

- (1) An Initial Notification containing the information specified in 40 CFR 63.9(b)(2) no later than April 19, 2005, which is one (1) year after the effective date of 40 CFR 63, Subpart PPPP.
- (2) A Notification of Compliance Status containing the information required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR 63.4540, 40 CFR 63.4550, or 40 CFR 63.4560 that applies to your affected source.

State Rule Applicability - Individual Facilities

326 IAC 2-2 (Prevention of Significant Deterioration)

In order to remain a minor source pursuant to 326 IAC 2-2 (PSD), Ashley Industrial Molding has agreed to a source-wide VOC emissions limit of less than 250 tons per twelve (12) consecutive months, including insignificant activities. With the VOC limit pursuant to 326 IAC 8-1-6 being adjusted from 99.9 tons per year to 149.9 tons per year, the emissions from the seventeen (17) molding machines shall be limited to less than 89.0 tons per year, to render the requirements of 326 IAC 2-2 not applicable.

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

Ashley Industrial Molding, Inc. has requested a modification to the VOC limits contained in their BACT analysis from T 033-5941-00017. Due to the increase in actual hours of operation, the limit of 99.9 tons per year from the three (3) surface coating booths, identified as SB-1 through SB-3, is no longer sufficient. In order to re-apportion the limit on the booths, a top-down BACT analysis from Ashley Industrial Molding was required. Ashley was required to do a cost analysis to determine the economic feasibility of add on controls.

- (a) The three (3) surface coating booths, identified as SB-1 through SB-3, have the potential to emit volatile organic compounds (VOC) greater than twenty-five (25) tons per year. Therefore, these facilities are subject to Best Available Control Technology (BACT) requirements pursuant to this rule.

A top-down BACT analysis from Ashley Industrial Molding, Inc. was received on September 29, 2003, with additional information received February 20, 2004 and May 24, 2004, which evaluated the cost and feasibility of the use of add-on controls.

Ashley Industrial Molding, Inc. did a cost analysis of three different types of add-on controls. The add-on controls which were analyzed were a regenerative thermal oxidizer (RTO), a concentrator/oxidizer combination (Durr), and a catalytic oxidizer (CC). Three different RTO's were analyzed (Durr, CMM, and Crawford). Capital costs were obtained for all three types of controls. Using the EPA's cost guidance factors, the capital costs were adjusted to obtain the total operating costs for each of the controls. The range, in cost per ton of VOC removed, was between \$4,084 (CMM RTO) and \$5,486 (Crawford RTO).

IDEM, OAQ has reviewed sources that were considered similar to Ashley to determine if add-on controls are required. One source that was reviewed, which can be considered a similar source within the same source category as Ashley, is Mastermold in Wisconsin. There are two Mastermold plants, one in Mauston Wisconsin and one in Johnson Creek Wisconsin. In neither case were add-on controls required. The most recent air approval issued was in December of 2003 to Mastermold in Mauston, Wisconsin. Mastermold is a direct competitor of Ashley Industrial Molding, Inc. Mastermold submitted cost estimates to the Wisconsin DNR for a thermal oxidizer, regenerative thermal oxidizer, and a carbon absorption system. The RTO was the least expensive at \$3,960 dollars per ton of VOC removed. Wisconsin DNR determined that this control cost was economically infeasible. This amount is less expensive than the cost per ton removed at Ashley. Wisconsin DNR required the Latest Available Control Techniques (LACT) and operating practices, as well as a VOC limit of 63.8 tons per year. LACT was determined to be the use of coatings with less than 4.9 pounds of VOC per gallon of paint, less water. The BACT determination for Mastermold was used as a basis for BACT at Ashley, being that they are similar sources within the same source category.

There were several other sources that were evaluated which were considered similar to Ashley. However, all the other sources evaluated can be differentiated from Ashley for various reasons (market served, substrate material, size of operation, etc.). Very few surface coat SMC molded plastics like Ashley. Most of the sources reviewed coat injection molded materials. SMC is the most difficult to coat, yet is a superior material than other types of plastics due to heat resistance, dimensional integrity, etc. This is a "niche" market that is preferred by Ashley's clients and is very cost sensitive. These companies demand a class "A" finish at an acceptable price. The sources that were reviewed which had add-on controls were only similar to Ashley in some aspects, and thus should not be considered "similar" sources, as per the reasons stated above. Some had add ons required for special reasons, i.e. Venture Industries in Michigan which had severe permit violations and was being threatened with litigation by the State of Michigan. To help resolve the pending litigation, Venture paid a heavy fine and added controls. Ashley does not have such severe permit violations and has maintained that the source will not emit any more than the allowable source wide VOC limit of less than two-hundred fifty (250) tons per year.

The IDEM, OAQ, has reviewed the BACT analysis provided by Ashley Industrial Molding, Inc, and has concluded that add-on controls are not required at the source. IDEM, OAQ agrees that requiring add-on controls at Ashley would put the source at an unfair disadvantage with their direct competitors. The sources which were similar to Ashley which were required to have add-on controls can in fact be differentiated from Ashley because of the reasons stated above.

Therefore, BACT for the three (3) surface coating booths, identified as SB-1 through SB-3, has been determined to be:

- (1) The potential VOC delivered to the applicators shall be limited to a total of 149.9 tons per twelve (12) consecutive month period for the three (3) surface coating booths, identified as SB-1 through SB-3.
- (2) The method of application at the three (3) surface coating booths, identified as SB-1 through SB-3, shall be performed with high volume-low pressure (HVLP) spray applicators or electrostatic applicators;
- (3) The use of medium (41-50%) and high (no less than 51%) solids content coatings, except the use of coatings with a volume percent solids of no less than 38% can be used if required by military specifications; and
- (4) The following management and work practices shall apply:
 - (A) Operator training course.
 - (B) Spray gun cleaning.
 - (C) The cleanup solvent containers used to transport solvent from drums to work stations be closed containers having soft gasketed closures.
 - (D) The application equipment operators shall be instructed and trained on the methods and practices utilized to minimize spillage on the floor and over application.
 - (E) Storage containers used to store VOC and/or HAPs containing materials shall be kept covered when not in use.
 - (F) Cleanup solvents will be reused in the process as much as possible to reduce hazardous waste and the related impact on the environment.

Compliance Requirements

There are no additional Compliance Requirements applicable in this permit modification.

Proposed Changes

The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language appears in bold):

Change 1:

The NESHAP for surface coating of plastic parts has been promulgated on April 19, 2004. Therefore, Conditions D.1.1, D.1.2, D.1.13 and D.1.14 have been added. All subsequent conditions have been re-numbered accordingly, and the rule cites in each condition have been revised.

D.1.1 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 2 to 40 CFR Part 63, Subpart PPPP] [40 CFR 63.4501]

- (a) **The provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart PPPP. The Permittee must**

comply with these requirements on and after April 19, 2007.

- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

D.1.2 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products [40 CFR Part 63, Subpart PPPP] [40 CFR 63.4481] [40 CFR 63.4482] [40 CFR 63.4483(b)] [40 CFR 63.4581]

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

D.1.13 Notification Requirements [40 CFR 63.4510]

- (a) General. The Permittee must submit the applicable notifications in 40 CFR Part 63, Sections 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) by the dates specified in those sections, except as provided in 40 CFR 63.4510, paragraphs (b) and (c).
- (b) Notification of compliance status. The Permittee must submit the notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR 63.4540, 40 CFR 63.4550, or 40 CFR 63.4560 that applies to the affected source. The notification of compliance status must contain the information specified in 40 CFR 63.4510(c), paragraphs (1) through (11) and any additional information specified in 40 CFR 63.9(h).

D.1.14 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]

The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information regarding which compliance option or options will be chosen in the Part 70 permit.

- (a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Part 70 permit the applicable requirements of 40 CFR 63, Subpart PPPP, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.
- (b) The significant permit modification application shall be submitted no later than July 19, 2006.
- (c) The significant permit modification application shall be submitted to:

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

Change 2:

After reviewing the Top-Down BACT analysis provided by Ashley Industrial Molding, Conditions D.1.1 (now D.1.3), and D.1.2 (now D.1.4) have been revised as follows. Please note that the limit on the molding machines pursuant to 326 IAC 2-2 should have been for all seventeen (17) molding machines, and the typographical error has been corrected. The Quarterly Report Form also referred to the seventeen (17) molding presses as injection molding machines. This typographical error has also been corrected. All Quarterly Report forms have been revised to reflect these changes.

D.1.13 Volatile Organic Compounds [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6, Best Available Control Technology (BACT) for the three (3) surface coating booths, identified as SB-1 through SB-3, has been determined to be:

- (a) The potential VOC delivered to the applicators including cleanup solvents shall be limited to a total of no more than ~~ninety-nine and nine tenths (99.9)~~ **one-hundred forty nine and nine tenths (149.9)** tons per twelve (12) consecutive month period, **with compliance determined at the end of each month**;
- (b) The method of application at the spray booths shall be done with high volume-low pressure (HVLP) spray applicators or electrostatic applicators;
- (c) The use of medium (41-50%) and high (no less than 51%) solids content coatings, except the use of coatings with a volume percent solids of no less than 38% can be used if required by military specifications; and
- (d) The following management and work practices shall apply:
 - (1) Operator training course.
 - (2) Spray gun cleaning.

- (3) The cleanup solvent containers used to transport solvent from drums to work stations be closed containers having soft gasketed closures.
- (4) The application equipment operators shall be instructed and trained on the methods and practices utilized to minimize spillage on the floor and over application.
- (5) Storage containers used to store VOC and/or HAPs containing materials shall be kept covered when not in use.
- (6) Cleanup solvents will be reused in the process as much as possible to reduce hazardous waste and the related impact on the environment.

D.1.24 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

- (a) The total potential to emit VOC from the ~~fifteen (15)~~ **seventeen (17)** molding presses (PR-**109**, 204, 234, 346, 347, 365, 437, 440, 651, **654**, 845, 1039, 1056, 1252, 2053, 2560, and 3038) shall be limited to no more than ~~one hundred and thirty-nine (139)~~ **eighty nine (89)** tons per twelve (12) consecutive month period, **with compliance determined at the end of each month.**
- (b) Compliance with the VOC emission limit in Condition D.1.24(a) shall be determined with the use of a three (3.0%) percent VOC flashoff factor for each molding press.
- (c) This VOC emission limit combined with the BACT VOC usage limit in Condition D.1.43, the full potential to emit VOC from the combustion units and ten (10) tons per year from insignificant activities shall limit the total source-wide VOC emissions to less than two hundred and fifty (250) tons per twelve (12) consecutive month period. Compliance with this limit makes the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 40 CFR 52.21 not applicable.

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

Part 70 Quarterly Report

Source Name: Ashley Industrial Molding, Inc.
Source Address: 320 South Wabash Avenue, Ashley, Indiana 46705
Mailing Address: 320 South Wabash Avenue, Ashley, Indiana 46705
Part 70 Permit No.: T 033-5941-00017
Facility: Three (3) Paint Booths (SB-1 through SB-3)
Parameter: VOC Usage
Limit: Total of ~~99.9~~ **149.9** tons per twelve (12) consecutive month period, **with compliance determined at the end of each month**

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

Part 70 Quarterly Report

Source Name: Ashley Industrial Molding, Inc.
Source Address: 320 South Wabash Avenue, Ashley, Indiana 46705
Mailing Address: 320 South Wabash Avenue, Ashley, Indiana 46705
Part 70 Permit No.: T 033-5941-00017
Facility: ~~Fifteen (15)~~ **Seventeen (17)** Injection Molding Machines ~~Presses~~
Parameter: VOC emissions calculated with a three (3%) percent flashoff factor
Limit: Total of ~~139~~ **89.0** tons per twelve (12) consecutive month period, **with compliance determined at the end of each month**

Change 3:

Condition B.25 has been added as follows:

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

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

Change 4:

The area codes for the telephone numbers in Conditions A.1 and B.12(b)(4) have been updated as follows:

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

The Permittee owns and operates a stationary high-pressure fiberglass-reinforced plastics manufacturing and painting source.

Responsible Official: Rodney Schoon
Source Address: 320 South Wabash Avenue
Mailing Address: 320 South Wabash Avenue
General Source Phone Number: ~~219~~**260** -587-9155
SIC Code: 3089
County Location: Dekalb
Source Location Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Minor Source under PSD Rules;
Major Source, Section 112 of the Clean Air Act

B.12 Emergency Provisions [326 IAC 2-7-16]

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or 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:

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

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

Telephone Number: 317-233-5674 (ask for Compliance Section)

Facsimile Number: 317-233-5967

Telephone Number: ~~219~~ **574**-245-4870 (Northern Regional Office)

Facsimile Number: ~~219~~-**574**-245-4877 (Northern Regional Office)

Conclusion

The operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Permit Modification No. 033-17813-00017.

Indiana Department of Environmental Management Office of Air Quality

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

Source Name:	Ashley Industrial Molding, Inc.
Source Location:	320 South Wabash Avenue, Ashley, Indiana 46705
County:	Dekalb
Operation Permit No.:	T 033-5941-00017
Significant Permit Modification No.:	033-17813-00017
SIC Code:	3069
Permit Reviewer:	Craig J. Friederich

On August 2, 2004, the Office of Air Quality (OAQ) had a notice published in the Auburn Evening Star, Auburn, Indiana, stating that Ashley Industrial Molding, Inc. had applied for a Significant Permit Modification to a Part 70 Operating Permit to revise their existing BACT limit. The notice also stated that OAQ proposed to issue a Significant Permit Modification and provided information on how the public could review the proposed Significant Permit Modification and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this Significant Permit Modification to a Part 70 Operating Permit should be issued as proposed.

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

Change 1:

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

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-~~0425~~**4230** (ask for OAQ, ~~Technical Support and Modeling~~ **Billing, Licensing, and Training** Section), to determine the appropriate permit fee.

BACT Cost Analysis

Source Name: Meridian Automotive Systems
 Location: 320 South Wabash Avenue, Ashley, Indiana 46705
 Permit No.: T 033-5941-000017
 Permit Reviewer: CJF/MES

Oven Exhaust Only - Scenario 1

Capital Cost

Option	Base Price	Direct and Indirect Costs	Total
Recuperative	\$128,815	\$111,537	\$240,352
Regenerative	\$587,232	\$114,100	\$701,332
Catalytic	N/A	N/A	N/A

Annual Operating, Maintenance & Recovery Cost

Option	Direct Cost	Indirect Cost	Capital Recovery Cost	Total
Recuperative	\$14,707	\$15,901	\$34,221	\$64,829
Regenerative	\$6,096	\$28,943	\$99,854	\$134,893
Catalytic	N/A	N/A	N/A	N/A

Evaluation

Option	Potential Emissions (tons/yr)	Emissions Removed (tons/yr)	Control Efficiency (%)	\$/ton removed
Recuperative	12.9	12.26	95	\$5,290
Regenerative	12.9	12.26	95	\$11,003
Catalytic	N/A	N/A	N/A	N/A

Prime Booth Only - Scenario 2

Capital Cost

Option	Base Price	Direct and Indirect Costs	Total
Recuperative	\$242,803	\$210,235	\$453,038
Regenerative	\$940,929	\$182,824	\$1,123,753
Catalytic	\$311,693	\$162,726	\$474,419

Annual Operating, Maintenance & Recovery Cost

Option	Direct Cost	Indirect Cost	Capital Recovery Cost	Total
Recuperative	\$63,864	\$24,409	\$64,502	\$152,775
Regenerative	\$59,698	\$45,850	\$159,997	\$265,535
Catalytic	\$63,587	\$25,264	\$64,306	\$153,157

Evaluation

Option	Potential Emissions (tons/yr)	Emissions Removed (tons/yr)	Control Efficiency (%)	\$/ton removed
Recuperative	3.5	3.33	95	\$45,878
Regenerative	3.5	3.33	95	\$79,740
Catalytic	3.5	3.33	95	\$45,993

Top Coat Booth 1 - Scenario 3a

Capital Cost

Option	Base Price	Direct and Indirect Costs	Total
Recuperative	\$279,314	\$454,096	\$733,410
Regenerative	\$1,229,513	\$238,897	\$1,468,410
Catalytic	\$424,843	\$485,148	\$909,991

Annual Operating, Maintenance & Recovery Cost

Option	Direct Cost	Indirect Cost	Capital Recovery Cost	Total
Recuperative	\$109,448	\$38,909	\$104,421	\$252,778
Regenerative	\$108,911	\$62,912	\$209,068	\$380,891
Catalytic	\$108,963	\$45,973	\$123,888	\$278,824

Evaluation

Option	Potential Emissions (tons/yr)	Emissions Removed (tons/yr)	Control Efficiency (%)	\$/ton removed
Recuperative	34.3	32.59	95	\$7,756
Regenerative	34.3	32.59	95	\$11,687
Catalytic	34.3	32.59	95	\$8,556

Top Coat Booth 2 - Scenario 3b

Capital Cost

Option	Base Price	Direct and Indirect Costs	Total
Recuperative	\$270,397	\$439,599	\$709,996
Regenerative	\$1,147,635	\$222,987	\$1,370,622
Catalytic	\$395,436	\$451,567	\$847,003

Annual Operating, Maintenance & Recovery Cost

Option	Direct Cost	Indirect Cost	Capital Recovery Cost	Total
Recuperative	\$98,068	\$37,973	\$101,087	\$237,128
Regenerative	\$96,502	\$59,001	\$195,146	\$350,649
Catalytic	\$92,166	\$40,167	\$115,610	\$247,943

Evaluation

Option	Potential Emissions (tons/yr)	Emissions Removed (tons/yr)	Control Efficiency (%)	\$/ton removed
Recuperative	34.3	32.59	95	\$7,276
Regenerative	34.3	32.59	95	\$10,759
Catalytic	34.3	32.59	95	\$7,608

Top Coat Booths 1 & 2 - Scenario 4

Capital Cost

Option	Base Price	Direct and Indirect Costs	Total
Recuperative	\$326,855	\$531,387	\$858,242
Regenerative	\$1,818,281	\$353,295	\$2,171,576
Catalytic	\$601,372	\$686,736	\$1,288,108

Annual Operating, Maintenance & Recovery Cost

Option	Direct Cost	Indirect Cost	Capital Recovery Cost	Total
Recuperative	\$191,274	\$43,903	\$122,194	\$357,371
Regenerative	\$198,139	\$91,039	\$309,184	\$598,362
Catalytic	\$190,366	\$61,097	\$172,757	\$424,220

Evaluation

Option	Potential Emissions (tons/yr)	Emissions Removed (tons/yr)	Control Efficiency (%)	\$/ton removed
Recuperative	68.6	65.17	95	\$5,484
Regenerative	68.6	65.17	95	\$9,182
Catalytic	68.6	65.17	95	\$6,509

**Oven, Prime and Top Coat Booths Combined - Scenario 5
 Capital Cost**

Option	Base Price	Direct and Indirect Costs	Total
Recuperative	\$350,948	\$570,557	\$921,505
Regenerative	\$2,233,416	\$433,956	\$2,667,372
Catalytic	\$703,771	\$803,669	\$1,507,440

Annual Operating, Maintenance & Recovery Cost

Option	Direct Cost	Indirect Cost	Capital Recovery Cost	Total
Recuperative	\$248,968	\$46,433	\$131,202	\$426,603
Regenerative	\$261,053	\$110,871	\$379,774	\$751,698
Catalytic	\$247,761	\$69,871	\$200,483	\$518,115

Evaluation

Option	Potential Emissions (tons/yr)	Emissions Removed (tons/yr)	Control Efficiency (%)	\$/ton removed
Recuperative	84.9	80.66	95	\$5,289
Regenerative	84.9	80.66	95	\$9,319
Catalytic	84.9	80.66	95	\$6,423

Methodology:

Emissions removed = (potential emissions)*(control efficiency)
 \$/ton removed = total annual cost/emissions removed

The cost breakdown is as follows:

1. Capital Cost

- a) Base price: purchase price, auxiliary equipment, instruments, controls, taxes and freight.
- b) Direct installation cost: foundations/supports, erection/handling, electrical, piping, insulation, painting, site preparation and building/facility.
- c) Indirect installation cost: engineering, supervision, construction/field expenses, construction fee, start up, performance test, model study and contingencies.

2. Annual Cost

- a) Direct operating cost: operating labor (operator, supervisor), labor and material maintenance, operating materials, utilities (electricity, gas).
- b) Indirect operating cost: overhead, property tax, insurance, administration and capital recovery cost (for 10 yrs life of the system at 7% interest rate).

Meridian Automotive Systems
Ashley, Indiana
Permit Reviewer: CJF/MES

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