



Joseph E. Kernan  
Governor

Lori F. Kaplan  
Commissioner

December 9, 2003

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

TO: Interested Parties / Applicant

RE: Valeo Sylvania, LLC, Indiana / 071-18127-00006

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.



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# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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December 9, 2003

Mr. Thomas Day  
Valeo Sylvania, LLC, Indiana 47274  
1231 A Avenue North, Seymour

Re: 071-18127-00006  
Significant Permit Modification to:  
Part 70 permit No.: T071-6559-00006

Dear Mr. Day:

Valeo Sylvania, LLC was issued Part 70 operating permit T071-6559-00006 on August 27, 1999 for the operation of a plant which produces automotive plastic lighting assemblies. A letter requesting changes to this permit was received on August 14, 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 replacing the one (1) paint booth, Argent Painting, identified as emission unit 10, for coating plastic automotive lighting assembly components, with a maximum capacity of 300 units per hour, using a waterwash for overspray control, exhausting to stacks PP-E-86 and PP-E-89 with the following:

One (1) robotic argent paint system, identified as emission unit 10, for coating plastic automotive lighting assembly components, with a maximum capacity of 200 units per hour, using dry filters for overspray control, exhausting to one (1) stack, identified as PP-E-03-101.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

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 call Linda Quigley at (973) 575-2555, extension 3284, or call (800) 451-6027, press 0 and ask for extension 3-6878.

Sincerely,

Original signed by Paul Dubenetzky

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

Attachments  
LQ/EVP

cc: File - Jackson County  
Jackson County Health Department  
Air Compliance Section Inspector - Vaughn Ison  
Compliance Data Section - Karen Ampil

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December 9, 2003

Administrative and Development  
Technical Support and Modeling - Michele Boner



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## PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Valeo Sylvania, L.L.C.  
Freeman Field Industrial Park  
1231 A Avenue North  
Seymour, Indiana 47274**

(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.: T071-6559-00006	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: August 27, 1999  Expiration Date: August 27, 2004

Permit Reopening No.: 071-13326, issued on March 18, 2002  
First Administrative Amendment No.: 071-14925, issued on June 12, 2003

First Significant Permit Modification: 071-18127-00006	Pages Affected: 6, 33, 34, 34a, 35
Issued by: Original signed by Paul Dubenetzky  Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: December 9, 2003

- (e) One (1) robotic argent paint system, identified as emission unit 10, for coating plastic automotive lighting assembly components, with a maximum capacity of 200 units per hour, using dry filters for overspray control exhausting to one (1) stack, identified as PP-E-03-101.
  
- (f) One (1) cleaning station, identified as emission unit 12, for the cleaning of epoxy pumps, with a maximum capacity of 1.92 pounds of cleaning material usage per hour, using no controls and exhausting to stack PP-E-94.

### SECTION D.3

### FACILITY OPERATION CONDITIONS

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

- a) One (1) paint booth, Hard Coat #1, identified as emission unit 8, for coating plastic automotive lighting assembly components with a maximum capacity of 720 units per hour, using an Oscar VIII Overspray Collection and Recovery System for overspray control and exhausting to stacks PP-E-30, 32, 33, and 34.
- b) One (1) paint booth, Hard Coat #2, identified as emission unit 9, for coating plastic automotive lighting assembly components with a maximum capacity of 720 units per hour, using an Oscar VIII Overspray Collection and Recovery System for overspray control and exhausting to stacks PP-E-84, 85, and 90.
- c) One (1) robotic argent paint system, identified as emission unit 10, for coating plastic automotive lighting assembly components, with a maximum capacity of 200 units per hour, using dry filters for overspray control exhausting to one (1) stack, identified as PP-E-03-101.

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

D.3.1 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 12 to 40 CFR Part 63, Subpart PPPP] [40 CFR 63.2398]

The provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart PPPP. The Permittee must comply with these requirements on and after the effective date of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products.

~~D.3.2 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]~~

- (a) The provisions of 40 CFR Part 63, Subpart PPPP (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/plastic/plasticpg.html>. Pursuant to 40 CFR 63.4483(b), the Permittee must comply with these requirements on and after the date that is three (3) years after the effective date of 40 CFR Part 63, Subpart PPPP.
- (b) This subpart applies to the surface coating of any plastic parts or products, as described in 40 CFR 63.4481, paragraph (a)(1), and it includes the following subcategories:
  - (1) general use coating subcategory
  - (2) automotive lamp coating subcategory
  - (3) TPO coating subcategory
  - (4) assembled on-road vehicle coating subcategory

These subcategories are further defined in 40 CFR 63.4481, paragraphs (a)(2) through (5).

- (c) The following emissions units comprise the affected source that is subject to 40 CFR 63, Subpart PPPP:
  - (1) All coating operations as defined in 40 CFR 63.4581;
  - (2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
  - (3) All manual and automated equipment and containers used for conveying coatings,

Valeo Sylvania, L.L.C.  
Seymour, Indiana  
Permit Reviewer: KERAMIDA/RMEH

First Significant Permit Modification 071-18127-00006  
Modified by: Linda Quigley/EVP

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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, which are incorporated by reference.

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~~D.3.3 Volatile Organic Compound (VOC)~~

Any change or modification which may increase potential emissions from the paint booths, identified as emission units 8, 9, and 10, to twenty-five (25) tons VOC or more per year, shall require prior approval from the OAQ to determine applicability requirements of 326 IAC 8-1-6, before such change may occur.

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~~D.3.4 Particulate Matter (PM) [40 CFR 52 Subpart P]~~

Pursuant to [40 CFR 52 Subpart P], the PM from each of the three (3) paint booths 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:

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

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~~D.3.5 Particulate [326 IAC 6-3-2(d)]~~

Pursuant to 326 IAC 6-3-2(d), particulate from each of the three (3) paint booths shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.

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~~D.3.6 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**

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~~D.3.7 Testing Requirements [326 IAC 2-7-6(1),(6)]~~

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the Particulate Matter limit specified in Condition D.3.4 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

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

#### **D.3.8 Monitoring**

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- (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 (PP-E-30, 32, 33, 34, 84, 85, 90, and PP-E-03-101) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response 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]**

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#### **D.3.9 Notification Requirements [40 CFR 63.4510]**

- (a) General. The Permittee must submit the notifications in 40 CFR 40 CFR 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply to you by the dates specified in those sections, except as provided in paragraphs (b) and (c) of this section.
- (b) Initial notification. The Permittee must submit the initial notification required by 40 CFR 63.9(b) for an existing affected source no later than 1 year after the effective date of 40 CFR Part 63, Subpart PPPP. If the Permittee is using compliance with the Automobiles and Light-Duty Trucks NESHAP (subpart IIII of this part) under 40 CFR 63.4881(d) to constitute compliance with this subpart for plastic part coating operations, then the Permittee must include a statement to this effect in the initial notification and no other notifications are required under this subpart. If the Permittee is complying with another NESHAP that constitutes the predominant activity at the facility under 40 CFR 63.4481(e)(2) to constitute compliance with this subpart for plastic coating operations, then the Permittee must include a statement to this effect in the initial notification and no other notifications are required under this subpart.
- (c) Notification of compliance status. The Permittee must submit the notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR 63.4540, 40 CFR 63.4550, or 40 CFR 63.4560 that applies to the affected source. The notification of compliance status must contain the information specified in 40 CFR 63.4510, paragraphs (c)(1) through (11)

and in 40 CFR 63.9(h).

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D.3.10 Record Keeping Requirements [40 CFR 63.4530] [40 CFR 63.4531] [40 CFR 63.10(b)(1)]

- (a) The Permittee must collect and keep records of the data and information specified in 40 CFR 63.4530, paragraphs (c) through (h). Failure to collect and keep these records is a deviation from the applicable standard.
  - (b) Records must be in a form suitable and readily available for expeditious review. Where appropriate, the records may be maintained as electronic spreadsheets or as a database. Each record must be kept for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. Each record must be kept on-site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. Records may be kept off-site for the remaining 3 years.
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D.3.11 Reporting Requirements [40 CFR 63.4520]

The Permittee must submit semiannual compliance reports for each affected source according to the requirements of 40 CFR 63.4520, paragraphs (a)(1) through (7). The semiannual compliance reporting requirements may be satisfied by reports required under other parts of the Clean Air Act (CAA), as specified in 40 CFR 63.4520, paragraph (a)(2).

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D.3.12 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 Title V permit.

- (a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Title V permit the applicable requirements of 40 CFR 63, Subpart PPPP, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.
- (b) The significant permit modification application shall be submitted no later than twenty-seven months after the effective date of 40 CFR 63, Subpart PPPP.
- (c) The significant permit modification application shall be submitted to:  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

#### D.3.13 Record Keeping Requirements

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- (a) To document compliance with Condition D.3.3, the Permittee shall maintain records in accordance with (1) through (3) below:
  - (1) The amount and VOC content of each VOC based coating material and VOC based 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) The cleanup solvent VOC usage for each month;
  - (3) The total VOC usage for each month; and
- (b) To document compliance with Condition D.3.8, 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.3.14 Reporting Requirements

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These records shall be made available upon request to the Office of Air Quality.



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December 9, 2003

Mr. Thomas Day  
Valeo Sylvania, LLC, Indiana 47274  
1231 A Avenue North, Seymour

Re: 071-18127-00006  
Significant Permit Modification to:  
Part 70 permit No.: T071-6559-00006

Dear Mr. Day:

Valeo Sylvania, LLC was issued Part 70 operating permit T071-6559-00006 on August 27, 1999 for the operation of a plant which produces automotive plastic lighting assemblies. A letter requesting changes to this permit was received on August 14, 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 replacing the one (1) paint booth, Argent Painting, identified as emission unit 10, for coating plastic automotive lighting assembly components, with a maximum capacity of 300 units per hour, using a waterwash for overspray control, exhausting to stacks PP-E-86 and PP-E-89 with the following:

One (1) robotic argent paint system, identified as emission unit 10, for coating plastic automotive lighting assembly components, with a maximum capacity of 200 units per hour, using dry filters for overspray control, exhausting to one (1) stack, identified as PP-E-03-101.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

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 call Linda Quigley at (973) 575-2555, extension 3284, or call (800) 451-6027, press 0 and ask for extension 3-6878.

Sincerely,

Original signed by Paul Dubenetzky

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

Attachments  
LQ/EVP

cc: File - Jackson County  
Jackson County Health Department  
Air Compliance Section Inspector - Vaughn Ison  
Compliance Data Section - Karen Ampil

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December 9, 2003

Administrative and Development  
Technical Support and Modeling - Michele Boner

## Indiana Department of Environmental Management Office of Air Quality

### Technical Support Document (TSD) for a Minor Source Modification and a Significant Permit Modification to a Part 70 Operating Permit

#### Source Background and Description

<b>Source Name:</b>	<b>Valeo Sylvania, LLC</b>
<b>Source Location:</b>	<b>1231 A Avenue North, Seymour, Indiana 47274</b>
<b>County:</b>	<b>Jackson</b>
<b>SIC Code:</b>	<b>3647</b>
<b>Operation Permit No.:</b>	<b>T071-6559-00006</b>
<b>Operation Permit Issuance Date:</b>	<b>August 27, 1999</b>
<b>Minor Source Modification No.:</b>	<b>071-17822-00006</b>
<b>Significant Permit Modification No.:</b>	<b>071-18127-00006</b>
<b>Permit Reviewer:</b>	<b>Linda Quigley/EVP</b>

The Office of Air Quality (OAQ) has reviewed a modification application from Valeo Sylvania, LLC relating to the construction and operation of the following:

one (1) robotic argent paint system, identified as emission unit 10, for coating plastic automotive lighting assembly components, with a maximum capacity of 200 units per hour, using dry filters for overspray control, exhausting to one (1) stack, identified as PP-E-03-101.

#### History

On August 14, 2003, Valeo Sylvania, LLC submitted an application to the OAQ requesting to replace the one (1) paint booth, Argent Painting, identified as emission unit 10, for coating plastic automotive lighting assembly components, with a maximum capacity of 300 units per hour, using a waterwash for overspray control, exhausting to stacks PP-E-86 and PP-E-89 at their existing plant. This paint booth would be replaced with one (1) new robotic argent paint system, again identified as emission unit 10, for coating plastic automotive lighting assembly components, with a maximum capacity of 200 units per hour, using dry filters for overspray control, exhausting to one (1) stack, identified as PP-E-03-101. Valeo Sylvania, LLC was issued a Part 70 permit on August 27, 1999.

#### Unpermitted Emission Units and Pollution Control Equipment

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

#### Existing Approvals

The source was issued Part 70 Operating Permit T071-6559-00006 on August 27, 1999. The source has since received the following:

- (a) Permit Reopening No.: 071-13326, issued on March 18, 2002; and
- (b) First Administrative Amendment No.: 071-14925, issued on June 12, 2003.

#### Enforcement Issue

There are no enforcement actions pending.

**Stack Summary**

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
PP-E-03-101	Argent Paint System	30	24	10,000	ambient

**Recommendation**

The staff recommends to the Commissioner that the Minor Source Modification and 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 August 14, 2003.

**Emission Calculations**

See Appendix A of this document for detailed emissions calculations two (2) pages.

**Potential To Emit Before Controls (Modification)**

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

This table reflects the potential to emit (PTE) before controls for the modification. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	14.22
PM-10	14.22
SO <sub>2</sub>	0.00
VOC	22.77
CO	0.00
NO <sub>x</sub>	0.00

HAP's	Potential To Emit (tons/year)
toluene	less than 10
xylene	less than 10
TOTAL	less than 25

**Justification for Modification**

The Title V permit is being modified through a Minor Source Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5(d)(4)(B) for modifications for which the potential to emit is less than twenty-five (25) tons per year and equal to or greater than ten (10) tons per year of VOC.

Valeo Sylvania, LLC  
Seymour, Indiana  
Permit Reviewer: Linda Quigley/EVP

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MSM071-17822-00006  
SPM071-18127-00006

The Minor Source Modification will give the source approval to construct the new emission unit. A Significant Permit Modification (071-18127-00006) will be issued to incorporate the source modification into the Part 70 permit and will give the source approval to operate the new emission unit. The Significant Permit Modification is being performed pursuant to 326 IAC 2-7-12(d)(1) because the modification does involve significant changes to the Part 70 permit.

### County Attainment Status

The source is located in Jackson County.

Pollutant	Status
PM-10	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	attainment
CO	attainment
Lead	attainment

Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Jackson County has been designated as attainment or unclassifiable for ozone.

### 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	0.36
PM-10	0.36
SO <sub>2</sub>	0.02
VOC	>250
CO	0.62
NOx	2.94

Except for VOC, these emissions are based upon the 2001 emission data reported by the applicant to IDEM in the Plant Emissions Inventory. This existing source is a major stationary source because at least one attainment regulated pollutant (i.e., VOC) is emitted at, or has the potential to emit at, a rate of 250 tons per year. The PTE of VOC is based upon the Technical Support Document to Part 70 Permit No. T071-6559-00006 on August 27, 1999.

**Potential to Emit After Controls for the Modification**

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units for the modification.

Process/facility	Potential to Emit (tons/year)							
	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	Single HAP	Total HAPs
new robotic Argent Paint System (EU10)	0.09	0.09	0.00	22.77	0.00	0.00	5.38 (toluene)	5.57
PSD Threshold	25.0	15.0	40.0	40.0	100.0	40.0	--	--

This modification to an existing major stationary source is not major because the emission increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply to this modification.

**Federal Rule Applicability**

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this modification.
- (b) This source is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR 63.4480, Subpart PPPP (Surface Coating of Plastic Parts and Products and (326 IAC 20-1-1)), effective the date the rule is published in the Federal Register. The provisions of this Subpart apply to the surface coating of any plastic parts or products source that uses 378 liters (100 gallons) per year, or more, of coatings that contain hazardous air pollutants (HAP) in the surface coating of plastic parts or products, and that is a major source, is located at a major source of HAP, or is a part of major source of emissions of HAP (as defined in 40 CFR 63.2, Subpart A). This source is involved in the surface coating of plastics and uses more than 378 liters (100 gallons) per year, or more, of coatings that contain hazardous air pollutants (HAP) and is a major source of HAP. Therefore, the requirements of this rule apply to this source. The source is an existing affected source because it started coating plastic parts before December 4, 2002. The source has not chosen the method of compliance yet.

Pursuant to this rule, the Permittee must comply with 40 CFR 63, Subpart PPPP on and after the date that is three years after the effective date of the rule. Since the compliance date of the rule has not passed and the Permittee has not chosen the method of compliance with Subpart PPPP, the detailed requirements of the NESHAP will not be included in this approval. Rather, this permit will state that the Permittee must comply with Subpart PPPP by the compliance date, or accept and meet an enforceable HAP emissions limit below the major source threshold prior to compliance date. As an existing affected source, the Permittee shall submit an Initial Notification containing the information specified in 40 CFR 63.9(b)(2) no later than one (1) year after the effective date of 40 CFR 63, Subpart PPPP. In addition, the Permittee must submit an application for a significant permit modification in order to establish enforceable limits or establish the compliance method. Such application shall be submitted no later than twenty-seven (27) months after the effective date of 40 CFR 63, Subpart PPPP.

### **State Rule Applicability - Entire Source**

#### **326 IAC 2-2 (Prevention of Significant Deterioration)**

This modification to a major PSD source is not major because the potential to emit of VOC from the modification is less than forty (40) tons per year. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) do not apply.

#### **326 IAC 2-4.1-1 (New Source Toxics Control)**

Pursuant to 326 IAC 2-4.1-1 (New Source Toxics Control), any process or production unit, which in and of itself emits or has the potential to emit (PTE) 10 tons per year of any HAP or 25 tons per year of the combination of HAP, and is constructed or reconstructed after July 27, 1997, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT). This rule does not apply to this modification because the source is subject to 40 CFR 63, Subpart PPPP.

#### **326 IAC 2-6 (Emission Reporting)**

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

#### **326 IAC 5-1 (Opacity Limitations)**

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

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

### **State Rule Applicability - Individual Facilities**

#### **40 CFR 52 Subpart P (Indiana SIP)**

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

Pursuant to 40 CFR 52 Subpart P, the particulate matter (PM) from the robotic Argent Paint Booth (EU10) shall be limited by the following:

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

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

Under the rule revision, and pursuant to 326 IAC 6-3-2(d), particulate from the robotic Argent Paint Booth (EU10) shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

The source shall comply with this requirement by installing a dry filter for particulate control.

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

Provisions of 326 IAC 8-1-6 apply to facilities located in any county constructed after January 1, 1980, which are not otherwise regulated by any other provisions of 326 IAC 8, and have potential VOC emissions of 25 tons per year or greater. The new robotic Argent Paint Booth does not have the potential to emit VOC of 25 tons per year. Therefore, the requirements of 326 IAC 8-1-6 shall not apply.

### Compliance Requirements

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

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

The robotic Argent Paint Booth has applicable compliance monitoring conditions as specified below:

- (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 stack, identified as PP-E-03-101, while the booth is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and

Reports, shall be considered a violation of this permit.

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

These monitoring conditions are necessary because the dry filters for overspray control must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations).

## Changes Proposed

The changes listed below have been made to Part 70 Operating Permit T071-6559-00006. This includes revising Section A.2 and the equipment description box at Section D.3 to reflect the equipment change. Also, conditions of Section D.3 have been revised as necessary to include the new spray booth, EU10. This includes Condition D.3.2, which is revised to not only include the new surface coating facility, but also to revise the 326 IAC 6-3 requirements for the existing equipment based on the rule changes that became effective on June 12, 2002. A new Condition D.3.3 is similarly added to the permit to again reflect the 326 IAC 6-3 rule requirements that became effective on June 12, 2002. The requirements of new D.3.4 replace those of existing Condition D.3.5. The changes to the permit are as follows:

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

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

- (a) Two (2) spray paint booths, Aero Coating Booth and the South Wing Manual Spray Paint Booth, identified as emission units 2 and 3, for coating plastic automotive lighting assembly components with a maximum capacity of 1,395 units per hour at Aero Coating, and 100 units per hour at the South Wing Manual Spray Paint Booth, using dry filters for overspray control, and exhausting to stacks PP-E-40, 75 and 88.
- (b) Two (2) flow coating lines, Flowcoater #1, identified as emission unit 6, and Flowcoater #2, identified as emission unit 7, for coating plastic automotive lighting assembly components. Each flowcoater has a maximum capacity of 1,440 units per hour, and each uses a regenerative thermal oxidizer to reduce volatile organic compound emissions and dry filters for overspray control. Exhausting to stacks PP-E-10, 11, 7, and 83.
- (c) One (1) paint booth, Hard Coat #1, identified as emission unit 8, for coating plastic automotive lighting assembly components with a maximum capacity of 720 units per hour, using an Oscar VIII Overspray Collection and Recovery System for overspray control and exhausting to stacks PP-E-30, 32, 33, and 34.
- (d) One (1) paint booth, Hard Coat #2, identified as emission unit 9, for coating plastic automotive lighting assembly components with a maximum capacity of 720 units per hour, using an Oscar VIII Overspray Collection and Recovery System for overspray control and exhausting to stacks PP-E-84, 85, and 90.
- (e) ~~One (1) paint booth, Argent Painting, identified as emission unit 10, for coating plastic automotive lighting assembly components, with a maximum capacity of 300 units per hour, using a waterwash for overspray control exhausting to stacks PP-E-86 and PP-E-89.~~ **One (1) robotic argent paint system, identified as emission unit 10, for coating plastic automotive lighting assembly components, with a maximum capacity of 200 units per hour, using dry filters for overspray control exhausting to one (1) stack, identified as PP-E-03-101.**
- (f) One (1) cleaning station, identified as emission unit 12, for the cleaning of epoxy pumps, with a maximum capacity of 1.92 pounds of cleaning material usage per hour, using no controls and exhausting to stack PP-E-94.

## SECTION D.3 FACILITY OPERATION CONDITIONS

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

- a) One (1) paint booth, Hard Coat #1, identified as emission unit 8, for coating plastic automotive lighting assembly components with a maximum capacity of 720 units per hour, using an Oscar VIII Overspray Collection and Recovery System for overspray control and exhausting to stacks PP-E-30, 32, 33, and 34.
- b) One (1) paint booth, Hard Coat #2, identified as emission unit 9, for coating plastic automotive lighting assembly components with a maximum capacity of 720 units per hour, using an Oscar VIII Overspray Collection and Recovery System for overspray control and exhausting to stacks PP-E-84, 85, and 90.
- c) ~~One (1) paint booth, Argent Painting, identified as emission unit 10, for coating plastic automotive lighting assembly components, with a maximum capacity of 300 units per hour, using a waterwash for overspray control exhausting to stacks PP-E-86 and PP-E-89.~~

**One (1) robotic argent paint system, identified as emission unit 10, for coating plastic automotive lighting assembly components, with a maximum capacity of 200 units per hour, using dry filters for overspray control exhausting to one (1) stack, identified as PP-E-03-101.**

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

#### D.3.1 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 12 to 40 CFR Part 63, Subpart PPPP] [40 CFR 63.2398]

The provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart PPPP. The Permittee must comply with these requirements on and after the effective date of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products.

#### D.3.2 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]

- (a) The provisions of 40 CFR Part 63, Subpart PPPP (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/plastic/plasticpg.html>. Pursuant to 40 CFR 63.4483(b), the Permittee must comply with these requirements on and after the date that is three (3) years after the effective date of 40 CFR Part 63, Subpart PPPP.
- (b) This subpart applies to the surface coating of any plastic parts or products, as described in 40 CFR 63.4481, paragraph (a)(1), and it includes the following subcategories:
  - (1) general use coating subcategory;
  - (2) automotive lamp coating subcategory;
  - (3) TPO coating subcategory;
  - (4) assembled on-road vehicle coating subcategory;
  - (5) These subcategories are further defined in 40 CFR 63.4481, paragraphs (a)(2) through (5).
- (c) The following emissions units comprise the affected source that is subject to 40 CFR 63, Subpart PPPP:
  - (1) All coating operations as defined in 40 CFR 63.4581;
  - (2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
  - (3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and

**(4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.**

**(d) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.4581, which are incorporated by reference.**

~~D.3.1~~ **D.3.3** Volatile Organic Compound (VOC)

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Any change or modification which may increase potential emissions from the paint booths, identified as emission units 8, 9, and 10, to twenty-five (25) tons VOC or more per year, shall require prior approval from the ~~OSM~~ **OAQ** to determine applicability requirements of 326 IAC 8-1-6, before such change may occur.

~~D.3.2~~ **D.3.4** Particulate Matter (PM) ~~[326 IAC 6-3-2(e)]~~ **[40 CFR 52 Subpart P]**

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**Pursuant to [40 CFR 52 Subpart P], the PM overspray from each of the three (3) paint booths shall not exceed the pound per hour emission rate established as E in the following formula:**

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

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

**D.3.5 Particulate [326 IAC 6-3-2(d)]**

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**Pursuant to 326 IAC 6-3-2(d), particulate from each of the three (3) paint booths shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.**

~~D.3.36~~ Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

**Compliance Determination Requirements**

~~D.3.47~~ Testing Requirements [326 IAC 2-7-6(1),(6)]

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The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the Particulate Matter limit specified in Condition ~~D.3.2~~ **D.3.4** shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

~~D.3.5~~ Particulate Matter (PM)

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~~The recovery system and dry filters for PM control shall be in operation at all times when the paint booth is in operation.~~

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

### ~~D.3.6~~ **D.3.8** Monitoring

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- (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 (PP-E-30, 32, 33, 34, 84, 85, 90, ~~86, and 89~~ and **PP-E-03-101**) 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)~~ Daily inspections shall be performed to verify that:
- ~~1) Water level in pan must be maintained to the manufacturers recommended level and/or~~
  - ~~2) Water level in pan must be maintained at a level where surface agitation indicates impact of the air flow. Water must be kept free of solids and floating material that reduces the capture efficiency of the water pan.~~
- ~~(c)~~(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance **Monitoring Response** Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- ~~(d)~~(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.3.9** Notification Requirements [40 CFR 63.4510]

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

- (c) **Notification of compliance status.** The Permittee must submit the notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR 63.4540, 40 CFR 63.4550, or 40 CFR 63.4560 that applies to the affected source. The notification of compliance status must contain the information specified in 40 CFR 63.4510, paragraphs (c)(1) through (11) and in 40 CFR 63.9(h).

**D.3.10 Record Keeping Requirements [40 CFR 63.4530] [40 CFR 63.4531] [40 CFR 63.10(b)(1)]**

- (a) The Permittee must collect and keep records of the data and information specified in 40 CFR 63.4530, paragraphs (c) through (h). Failure to collect and keep these records is a deviation from the applicable standard.
- (b) Records must be in a form suitable and readily available for expeditious review. Where appropriate, the records may be maintained as electronic spreadsheets or as a database. Each record must be kept for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. Each record must be kept on-site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. Records may be kept off-site for the remaining 3 years.

**D.3.11 Reporting Requirements [40 CFR 63.4520]**

~~The Permittee must submit semiannual compliance reports for each affected source~~ according to the requirements of 40 CFR 63.4520, paragraphs (a)(1) through (7). The semiannual compliance reporting requirements may be satisfied by reports required under other parts of the Clean Air Act (CAA), as specified in 40 CFR 63.4520, paragraph (a)(2).

**D.3.12 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 Title V permit.

- (a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Title V permit the applicable requirements of 40 CFR 63, Subpart PPPP, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.
- (b) The significant permit modification application shall be submitted no later than twenty-seven months after the effective date of 40 CFR 63, Subpart PPPP.
- (c) The significant permit modification application shall be submitted to:  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

~~D.3.7~~ **D.3.13 Record Keeping Requirements**

- (a) To document compliance with Condition ~~D.3.4~~ **D.3.3**, the Permittee shall maintain records in accordance with (1) through (3) below:

- (1) The amount and VOC content of each VOC based coating material and VOC based 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) The cleanup solvent VOC usage for each month;
  - (3) The total VOC usage for each month; and
- (b) To document compliance with Condition ~~D.3.6~~ **D.3.8**, 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.3.8~~ D.3.14** Reporting Requirements

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These records shall be made available upon request to the Office of Air ~~Management~~ **Quality**.

**Conclusion**

The construction and operation of this robotic argenta paint system shall be subject to the conditions of the attached proposed Minor Source Modification No. 071-17822-00006 and Significant Permit Modification No. 071-18127-00006.

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

**Company Name: Valeo Sylvania, LLC  
Address City IN Zip: 1231 A Avenue North, Seymour, IN 47274  
Minor Source Modification No.: 071-17822-00006  
Significant Permit Modification No.: 071-18127-00006  
Part 70 No.: T071-6559-00006  
Reviewer: Linda Quigley/EVP  
Application Rec.: August 14, 2003**

Booth I.D.	Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Argent	Argent Paint 303LE21326H	8.5	59.04%	0.0%	59.0%	0.0%	30.62%	0.00480	200.000	5.04	5.04	4.84	116.12	21.19	13.23	16.46	10%
	Hardener LE9425B	8.1	59.01%	0.0%	59.0%	0.0%	35.00%	0.00038	200.000	4.75	4.75	0.36	8.66	1.58	0.99	13.57	10%
	Acetone	6.6	0.00%	0.0%	0.0%	0.0%	0.00%	0.00480	200.000	0.00	0.00	0.00	0.00	0.00	n/a	n/a	n/a

**Potential Emissions**

**5.20                    124.79                    22.77                    14.22**

**METHODOLOGY**

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

**Appendix A: Emission Calculations  
HAP Emission Calculations**

**Company Name: Valeo Sylvania, LLC**  
**Address City IN Zip: 1231 A Avenue North, Seymour, IN 47274**  
**Minor Source Modification No.: 071-17822-00006**  
**Significant Permit Modification No.: 071-18127-00006**  
**Part 70 No.: T071-6559-00006**  
**Reviewer: Linda Quigley/EVP**  
**Application Rec.: August 14, 2003**

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)
Argent Paint	8.537	0.004800	200.00	0.00%	15.00%	0.00	5.38
Hardener	8.05	0.000380	200.00	7.00%	0.00%	0.19	0.00

Total Potential Emissions

**0.19**

**5.38**

**METHODOLOGY**

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