



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: October 19, 2005

RE: Delphi Automotive Systems, LLC. / 095-18256-00016

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

Notice of Decision: Approval – Effective Immediately

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

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

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

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

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

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

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

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

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

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

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

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



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

PART 70 OPERATING PERMIT RENEWAL OFFICE OF AIR QUALITY AND ANDERSON OFFICE OF AIR MANAGEMENT

**Delphi Automotive Systems, LLC
2620 East 38th Street
Anderson, Indiana 46013**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T095-18256-00016	
Original signed by: Paul Dubenetzky, Chief Permits Branch Office of Air Quality	Issuance Date: October 19, 2005 Expiration Date: October 19, 2010

TABLE OF CONTENTS

SECTION A	SOURCE SUMMARY	4
A.1	General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(15)][326 IAC 2-7-1(22)]	
A.2	Part 70 Source Definition [326 IAC 2-7-1(22)]	
A.3	Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]	
A.4	Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]	
A.5	Part 70 Permit Applicability [326 IAC 2-7-2]	
SECTION B	GENERAL CONDITIONS	7
B.1	Definitions [326 IAC 2-7-1]	
B.2	Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)][IC 15-13-6(a)]	
B.3	Term of Conditions [326 IAC 2-1.1-9.5]	
B.4	Enforceability [326 IAC 2-7-7]	
B.5	Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]	
B.6	Severability [326 IAC 2-7-5(5)]	
B.7	Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]	
B.8	Duty to Provide Information [326 IAC 2-7-5(6)(E)]	
B.9	Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]	
B.10	Annual Compliance Certification [326 IAC 2-7-6(5)]	
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]	
B.12	Emergency Provisions [326 IAC 2-7-16]	
B.13	Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]	
B.14	Prior Permits Superseded [326 IAC 2-1.1-9.5] [326 IAC 2-7-10.5]	
B.15	Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]	
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]	
B.17	Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]	
B.18	Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]	
B.19	Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]	
B.20	Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]	
B.21	Source Modification Requirement [326 IAC 2-7-10.5]	
B.22	Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]	
B.23	Transfer of Ownership or Operational Control [326 IAC 2-7-11]	
B.24	Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]	
B.25	Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314][326 IAC 1-1-6]	
SECTION C	SOURCE OPERATION CONDITIONS	18
	Emission Limitations and Standards [326 IAC 2-7-5(1)]	
C.1	Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [40 CFR 52 Subpart P][326 IAC 6-3-2]	
C.2	Opacity [326 IAC 5-1]	
C.3	Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.4	Incineration [326 IAC 4-2] [326 IAC 9-1-2]	
C.5	Fugitive Dust Emissions [326 IAC 6-4]	
C.6	Operation of Equipment [326 IAC 2-7-6(6)]	
C.7	Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
	Testing Requirements [326 IAC 2-7-6(1)]	
C.8	Performance Testing [326 IAC 3-6]	
	Compliance Requirements [326 IAC 2-1.1-11]	
C.9	Compliance Requirements [326 IAC 2-1.1-11]	

TABLE OF CONTENTS (Continued)

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

- C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]
- C.11 Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

- C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
- C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]
- C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

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

- C.15 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]
- C.16 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6][326 IAC 2-3]
- C.17 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-3]

Stratospheric Ozone Protection

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

SECTION D.1 FACILITY OPERATION CONDITIONS - Boilers..... 24

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

- D.1.1 New Source Performance Standards (NSPS) 40 CFR 60.48, Subpart Dc
- D.1.2 Oxides of Nitrogen (NOX) Emission Limit
- D.1.3 Particulate [326 IAC 6-2-4]

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

- D.1.4 Record Keeping Requirements
- D.1.5 Reporting Requirements

SECTION D.2 FACILITY OPERATION CONDITIONS – Varnish Operations..... 26

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

- D.2.1 Hazardous Air Pollutants [40 CFR 63, Subpart MMMM]
- D.2.2 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-9]
- D.2.3 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

Compliance Determination Requirements

- D.2.4 Volatile Organic Compounds (VOC)[326 IAC 8-1-2] [326 IAC 8-1-4]

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

- D.2.5 Record Keeping Requirements

SECTION D.3 FACILITY OPERATION CONDITIONS – Insignificant Activities..... 29

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

- D.3.1 Particulate Emissions [326 IAC 6-3-2]

Compliance Determination Requirements

- D.3.2 Particulate Control

Certification	30
Emergency Occurrence Report.....	31
Quarterly Report.....	33
Quarterly Deviation and Compliance Monitoring Report	34

SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary automotive parts manufacturing plant.

Responsible Official:	Anderson Site Manager
Source Address:	2911 State Road 9, Anderson, Indiana 46013 2900 South Scatterfield Road, Anderson, Indiana 46013 2900 State Road 9, Anderson, Indiana 46013 2902 State Road 9, Anderson, Indiana 46013 2620 East 38 th Street, Anderson, Indiana 46013
Mailing Address:	2620 East 38 th Street, Anderson, Indiana 46013
General Source Phone Number:	(765) 646-2955
SIC Code:	3714
County Location:	Madison
Source Location Status:	Nonattainment for 8-hour ozone standard Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules Major Source, under Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Part 70 Source Definition [326 IAC 2-7-1(22)]

This automobile parts manufacturing company consists of five (5) plants:

- (a) Plant 11 is located at 2911 State Road 9, Anderson, IN 46013;
- (b) Plant 16 is located at 2900 South Scatterfield Road, Anderson, IN 46013;
- (c) Plant 17 is located at 2902 State Road 9, Anderson, IN 46013;
- (d) Plant 18 is located at 2900 State Road 9, Anderson, IN 46013; and
- (e) Plant 20 is located at 2620 E. 38th Street, Anderson, IN 46013.

Since the five (5) plants are located on contiguous or adjacent properties, belong to the same industrial grouping, and under common control of the same entity, they will be considered one (1) source, effective from the date of issuance of this Part 70 permit.

A.3 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) Two (2) natural gas-fired firetube boilers that can physically burn only natural gas, identified as boiler A and boiler B, constructed in 1999, each with a maximum heat input capacity of 33.5 MMBtu per hour, and exhausting to stacks A33WA32 and C33NA32, respectively.

- (b) Two (2) natural gas-fired firetube boilers that can physically burn only natural gas, identified as boiler C and boiler D, constructed in 2000, each with a maximum heat input capacity of 25.1 MMBtu/hr, and exhausting to stacks DD10EA24 and DD10SA24, respectively.
- (c) Varnish operations consisting of the following:
 - (1) One (1) varnish dip tank, identified as EU 11-18 or Dip Tank A (North), constructed prior to 1973, with a drying oven and cooling area, with maximum capacity of 600 parts per hour, and exhausting to stacks N16EA19, N16NA9 and N18NA19, respectively.
 - (2) One (1) varnish dip tank, identified as EU 11-19 or Dip Tank B (South), constructed prior to 1973, with a drying oven and cooling area, with maximum capacity of 600 parts per hour, and exhausting to stacks N18EA19, N20EA9 and N18EA19, respectively.
 - (3) One (1) varnish dip tank, identified as EU 11-100 or Dip Tank C (East), constructed prior to 1973, with a drying oven and cooling area, with maximum capacity of 600 parts per hour, and exhausting to stacks G18EA25, G20EA7 and G24NA17, respectively.
 - (4) One (1) varnish dip tank, identified as EU 11-101 or Dip Tank D (West), constructed prior to 1973, with a drying oven and cooling area, with maximum capacity of 600 parts per hour, and exhausting to stacks G18SA25, G20SA8 and G20WA17, respectively.
- (d) One (1) trickle varnish line for rotors, identified as Trickle 1-rotor, constructed in 2000, exhausting to stack J12WA15, and consisting of the following three (3) processes:
 - (1) pre-heating, which is done by electric induction pre-heating oven;
 - (2) trickle varnish coating; and
 - (3) curing, which is done by electric infrared heating oven.
- (e) One (1) trickle varnish line for stators, identified as Trickle 2-stator, constructed in 2000, exhausting to stack L10SA15 and consisting of the following three (3) processes:
 - (1) pre-heating, which is done by electric induction pre-heating oven;
 - (2) trickle varnish coating; and
 - (3) curing, which is done by electric infrared heating oven.
- (f) One (1) trickle varnish line for rotors, identified as Trickle 3-rotor, constructed in 2001, exhausting to stack R15, and consisting of the following three (3) processes:
 - (1) pre-heating, which is done by electric induction pre-heating oven;
 - (2) trickle varnish coating; and
 - (3) curing, which is done by electric infrared heating oven.
- (g) One (1) trickle varnish line for stators, identified as Trickle 4-stator, constructed in 2001, exhausting to stack S15, and consisting of the following three (3) processes:
 - (1) pre-heating, which is done by electric induction pre-heating oven;
 - (2) trickle varnish coating; and

- (3) curing, which is done by electric infrared heating oven.

A.4 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, flux application, magnaflux and welding equipment. [326 IAC 6-3-2]
- (b) 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 4000 actual cubic feet per minute, consisting of: Blasting (band, sand & steel), Broach machines (gear cutters), Buffing wheel, Chuckers, Deburring, Electrical discharge machines, Machine aluminum molds, Machining operations, Punch Presses, Repair hood, Sanders, Saws, cut-off and band, Sharpeners (drill & hob), Trimmer, Vibration chambers, Wire brush, and Wood shop. [326 IAC 6-3-2]
- (c) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
- (d) Insignificant surface coating operations, not regulated by a NESHAP, with PM10 emissions less than five (5) pounds per hour or twenty-five (25) pounds per day, with VOC emissions less than three (3) pounds per hour and five (5) pounds per day, including Adhesive application, Adhesive (hot melt), Dip booth, Dip tanks, Enamel touch up, Epoxy dispenser, Glue and ink operations, Glue dispensers, Mixing stations, Silicone coating, Spray booth, Varnish dip, and Varnish strip. [326 IAC 6-3-2]

A.5 Part 70 Permit Applicability [326 IAC 2-7-2]

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

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

SECTION B GENERAL CONDITIONS

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

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

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)][IC 15-13-6(a)]

- (a) This permit, T095-18256-00016, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ and Anderson Office of Air Management upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including an permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

- (a) The condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) The emission unit to which the condition pertains permanently ceases operation.

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

- (a) 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, and Anderson Office of Air Management, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.
- (b) Unless otherwise stated, all terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by Anderson Office of Air Management

B.5 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.6 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.7 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.8 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

- (a) The Permittee shall furnish to IDEM, OAQ, and Anderson Office of Air Management 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, and Anderson Office of Air Management copies of records required to be kept by this permit.

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

B.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. One (1) certification may cover multiple forms in one (1) submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.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. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

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

and

Anderson Office of Air Management
120 East 8th Street, P.O. Box 2100
Anderson, Indiana 46011

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, and Anderson Office of Air Management 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, and Anderson Office of Air Management 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 maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the PMPs, including any required record keeping as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, and Anderson Office of Air Management upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ and Anderson Office of Air Management. IDEM, OAQ, and Anderson Office of Air Management may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.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.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

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

IDEM Main Office
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

Anderson Office of Air Management
Telephone Number: 765-648-6158
Facsimile Number: 765-648-5924

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

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

and

Anderson Office of Air Management
120 East 8th Street, P.O. Box 2100
Anderson, Indiana 46011

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, and Anderson Office of Air Management may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.

- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.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) 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, and Anderson Office of Air Management shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, or Anderson Office of Air Management has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, or Anderson Office of Air Management has issued the modification. [326 IAC 2-7-12(b)(8)]

B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5] [326 IAC 2-7-10.5]

- (a) All terms and conditions of permits established prior to T095-18256-00016 and issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this combined permit, all previous registrations and permits are superseded by this Part 70 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
Indianapolis, Indiana 46204

and

Anderson Office of Air Management
120 East 8th Street, P.O. Box 2100
Anderson, Indiana 46011

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

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

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

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

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

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

- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, or Anderson Office of Air Management 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, or Anderson Office of Air Management 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, or Anderson Office of Air Management, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, or Anderson Office of Air Management may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

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

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

Request for renewal shall be submitted to:

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

and

Anderson Office of Air Management
120 East 8th Street, P.O. Box 2100
Anderson, Indiana 46011

- (b) A timely renewal application is one that is:
 - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit;
and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and Anderson Office of Air Management on or before the date it is due.

- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, and Anderson Office of Air Management 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, and Anderson Office of Air Management any additional information identified as being needed to process the application.

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

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

and

Anderson Office of Air Management
120 East 8th Street, P.O. Box 2100
Anderson, Indiana 46011

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

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

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

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

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

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

(3) The changes do not result in emissions which exceed the 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
Indianapolis, Indiana 46204

and

Anderson Office of Air Management
120 East 8th Street, P.O. Box 2100
Anderson, Indiana 46011

and

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

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

(5) The Permittee maintains records on-site 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, and Anderson Office of Air Management in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

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

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

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

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade 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.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

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

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

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1] [IC 13-17-3-2]

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

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

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

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

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

and

Anderson Office of Air Management
120 East 8th Street, P.O. Box 2100
Anderson, Indiana 46011

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

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

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

- (a) The Permittee shall pay annual fees to IDEM, OAQ, and Anderson Office of Air Management 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, or and Anderson Office of Air Management the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

- (a) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour. This condition is not federally enforceable.

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

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of

326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

and

Anderson Office of Air Management
120 East 8th Street, P.O. Box 2100
Anderson, Indiana 46011

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

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to

thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

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

C.8 Performance Testing [326 IAC 3-6]

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

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

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

and

Anderson Office of Air Management
120 East 8th Street, P.O. Box 2100
Anderson, Indiana 46011

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, and Anderson Office of Air Management not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, and Anderson Office of Air Management if the Permittee submits to IDEM, OAQ, and Anderson Office of Air Management 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.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

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

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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

Indiana Department of Environmental Management

Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

and

Anderson Office of Air Management
120 East 8th Street, P.O. Box 2100
Anderson, Indiana 46011

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.11 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.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on July 10, 1998.
- (b) Upon direct notification by IDEM, OAQ, and Anderson Office of Air Management 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.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

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

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

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

The response action documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

**C.15 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)]
[326 IAC 2-6]**

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

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

The statement must be submitted to:

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

and

Anderson Office of Air Management
120 East 8th Street, P.O. Box 2100
Anderson, Indiana 46011

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

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

C.16 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6][326 IAC 2-3]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or Anderson Office of Air Management makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or Anderson Office of Air Management 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) If there is a reasonable possibility that a "project" (as defined in 326 IAC 2-3-1(II)) at an existing emissions unit, other than projects at a Clean Unit, which is not part of a "major modification" (as defined in 326 IAC 2-3-1(z)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-3-1 (mm)), the Permittee shall comply with following:

- (1) Before beginning actual construction of the "project" (as defined in 326 IAC 2-3-1(II)) at an existing emissions unit, document and maintain the following records:
 - (A) A description of the project.
 - (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
 - (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
 - (i) Baseline actual emissions;
 - (ii) Projected actual emissions;
 - (iii) Amount of emissions excluded under section 326 IAC 2-3-1(mm)(2)(A)(3); and
 - (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.
- (2) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and
- (3) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.17 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-3]

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

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

and

Anderson Office of Air Management
120 East 8th Street, P.O. Box 2100
Anderson, Indiana 46011
- (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, and Anderson Office of Air Management on or before the date it is due.

- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.
- (f) If the Permittee is required to comply with the recordkeeping provisions of (c) in Section C- General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-3-1(II)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ and Anderson Office of Air Management:
 - (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-3-1(qq), for that regulated NSR pollutant, and
 - (2) The emissions differ from the preconstruction projection as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(ii).
- (g) The report for project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:
 - (1) The name, address, and telephone number of the major stationary source.
 - (2) The annual emissions calculated in accordance with (c)(2) and (3) in Section C- General Record Keeping Requirements.
 - (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-3-2(c)(3).
 - (4) Any other information that the Permittee deems fit to include in this report,

Reports required in this part shall be submitted to:

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

and

Anderson Office of Air Management
120 East 8th Street, P.O. Box 2100
Anderson, Indiana 46011

- (h) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ and Anderson Office of Air Management. The general public may request this information from the IDEM, OAQ and Anderson Office of Air Management under 326 IAC 17.1.

Stratospheric Ozone Protection

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)]: Boilers

- (a) Two (2) natural gas-fired firetube boilers, identified as boiler A and boiler B, constructed in 1999, each with a maximum heat input capacity of 33.5 MMBtu per hour, and exhausting to stacks A33WA32 and C33NA32, respectively.
- (b) Two (2) natural gas-fired firetube boilers, identified as boiler C and boiler D, constructed in 2000, each with a maximum heat input capacity of 25.1 MMBtu/hr, and exhausting to stacks DD10EA24 and DD10SA24, respectively.

(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 New Source Performance Standards (NSPS) 40 CFR 60.48, Subpart Dc

Pursuant to 40 CFR 60.48c, Subpart Dc, Subsection (g), the Permittee shall maintain records of the amounts of fuel combusted during each month for the two (2) 33.5 MMBtu/hr boilers and the two (2) 25.1 MMBtu/hr boilers. The total fuel usage shall be prorated amongst the individual boilers based on their hours of operation.

D.1.2 Oxides of Nitrogen (NO_x) Emission Limit

Pursuant to First Minor Source Modification 095-11322-00016, issued on November 18, 1999, the Permittee shall limit input of natural gas to boilers A and B to a combined total of less than 247 MMCF of natural gas per twelve consecutive month period, with compliance determined at the end of each month. Compliance with this limit ensures that NO_x emissions from these two boilers are less than 25 tons per twelve consecutive month period. Compliance with this condition makes 326 IAC 2-7-10.5(f) (Significant Source Modification) not applicable to the construction of boilers A and B.

D.1.3 Particulate [326 IAC 6-2-4]

- (a) Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating) the PM from the two (2) 33.5 MMBtu/hr heat input boilers (A and B) shall be limited to 0.27 pounds per MMBtu heat input.

This limitation is based on the following equation:

$$Pt = \frac{1.09}{Q^{0.26}} = 0.27 \text{ lbs/MMBtu}$$

Where Pt = emission rate limit (lbs/MMBtu)
Q = total source heat input capacity (MMBtu/hr) (Q equals 204.8 MMBtu/hr)

- (b) Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating) the PM from the two (2) 25.1 MMBtu/hr heat input boilers (C and D) shall be limited to 0.32 pounds per MMBtu heat input.

This limitation is based on the following equation:

$$Pt = \frac{1.09}{Q^{0.26}} = 0.32 \text{ lbs/MMBtu}$$

Where Pt = emission rate limit (lbs/MMBtu)
Q = total source heat input capacity (MMBtu/hr) (Q equals 117.2 MMBtu/hr)

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

D.1.4 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain monthly records of the meter readings of the natural gas fuel usage. The total fuel usage shall be prorated amongst the individual boilers based on their hours of operation. The Permittee shall retain natural gas usage records for a period of five (5) years.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.5 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.2 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the six (6) month period being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.2

FACILITY OPERATION CONDITIONS

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

- (c) Varnish operations consisting of the following:
- (1) One (1) varnish dip tank, identified as EU 11-18 or Dip Tank A (North), constructed prior to 1973, with a drying oven and cooling area, with maximum capacity of 600 parts per hour, and exhausting to stacks N16EA19, N16NA9 and N18NA19, respectively.
 - (2) One (1) varnish dip tank, identified as EU 11-19 or Dip Tank B (South), constructed prior to 1973, with a drying oven and cooling area, with maximum capacity of 600 parts per hour, and exhausting to stacks N18EA19, N20EA9 and N18EA19, respectively.
 - (3) One (1) varnish dip tank, identified as EU 11-100 or Dip Tank C (East), constructed prior to 1973, with a drying oven and cooling area, with maximum capacity of 600 parts per hour, and exhausting to stacks G18EA25, G20EA7 and G24NA17, respectively.
 - (4) One (1) varnish dip tank, identified as EU 11-101 or Dip Tank D (West), constructed prior to 1973, with a drying oven and cooling area, with maximum capacity of 600 parts per hour, and exhausting to stacks G18SA25, G20SA8 and G20WA17, respectively.
- (d) One (1) trickle varnish line for rotors, identified as Trickle 1-rotor, constructed in 2000, exhausting to stack J12WA15, and consisting of the following three (3) processes:
- (1) pre-heating, which is done by electric induction pre-heating oven;
 - (2) trickle varnish coating; and
 - (3) curing, which is done by electric infrared heating oven.
- (e) One (1) trickle varnish line for stators, identified as Trickle 2-stator, constructed in 2000, exhausting to stack L10SA15 and consisting of the following three (3) processes:
- (1) pre-heating, which is done by electric induction pre-heating oven;
 - (2) trickle varnish coating; and
 - (3) curing, which is done by electric infrared heating oven.
- (f) One (1) trickle varnish line for rotors, identified as Trickle 3-rotor, constructed in 2001, exhausting to stack R15, and consisting of the following three (3) processes:
- (1) pre-heating, which is done by electric induction pre-heating oven;
 - (2) trickle varnish coating; and
 - (3) curing, which is done by electric infrared heating oven.
- (g) One (1) trickle varnish line for stators, identified as Trickle 4-stator, constructed in 2001, exhausting to stack S15, and consisting of the following three (3) processes:
- (1) pre-heating, which is done by electric induction pre-heating oven;
 - (2) trickle varnish coating; and
 - (3) curing, which is done by electric infrared heating oven.

(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 Hazardous Air Pollutants [40 CFR 63, Subpart M]

Any change that would increase HAP emissions to greater than ten (10) tons per year of a single HAP or greater than twenty-five (25) tons per year of a combination of HAPs requires prior approval from IDEM, OAQ.

D.2.2 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9, the Permittee shall not allow the discharge into the atmosphere VOC in excess of three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator at trickle varnish lines Trickle 2-stator, and Trickle 4-stator.

D.2.3 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment of trickle varnish lines Trickle 2-stator and Trickle 4-stator during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

Compliance Determination Requirements

D.2.4 Volatile Organic Compounds (VOC)[326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC content contained in condition D.2.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ and Anderson Office of Air Management reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.2.5 Record Keeping Requirements

- (a) To document compliance with Condition D.2.2, the Permittee shall maintain records in accordance with (1) through (3) below, for the coatings delivered to the operators of trickle varnish lines Trickle 2-stator and Trickle 4-stator. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limit established in Condition D.2.3.
 - (1) The amount and VOC content of each coating material and dilution solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (2) A log of the dates of use; and
 - (3) The total VOC usages for each month.
- (b) To document compliance with Condition D.2.1, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP usage limits and/or the HAP emission limits established in Condition D.2.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) The amount and HAP content of each coating material and solvent used on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (2) The total HAP usage for each month; and
 - (3) The weight of HAPs emitted for each compliance period.

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

SECTION D.3

FACILITY OPERATION CONDITIONS

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

Insignificant Activities:

- (a) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, flux application, magnaflux and welding equipment. [326 IAC 6-3-2]
- (b) 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 4000 actual cubic feet per minute, consisting of: Blasting (band, sand & steel), Broach machines (gear cutters), Buffing wheel, Chuckers, Deburring, Electrical discharge machines, Machine aluminum molds, Machining operations, Punch Presses, Repair hood, Sanders, Saws, cut-off and band, Sharpeners (drill & hob), Trimmer, Vibration chambers, Wire brush, and Wood shop. [326 IAC 6-3-2]
- (d) Insignificant surface coating operations, not regulated by a NESHAP, with PM10 emissions less than five (5) pounds per hour or twenty-five (25) pounds per day, with VOC emissions less than three (3) pounds per hour and five (5) pounds per day, including Adhesive application, Adhesive (hot melt), Dip booth, Dip tanks, Enamel touch up, Epoxy dispenser, Glue and ink operations, Glue dispensers, Mixing stations, Silicone coating, Spray booth, Varnish dip, and Varnish strip. [326 IAC 6-3-2]

(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 Emissions [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the allowable particulate emissions from each of the brazing, cutting, soldering, or welding processes, the insignificant grinding and machining operations, and the insignificant surface coating operations shall not exceed the allowable emission rate based on the following equation:

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

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Compliance Determination Requirements

D.3.2 Particulate Control

The control devices for particulate control shall be in operation at all times when the insignificant grinding, machining and surface coating operations are in operation.

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

and

Anderson Office of Air Management

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Delphi Automotive Systems, LLC
Source Address: 2620 East 38th Street, Anderson, Indiana 46013
Mailing Address: 2620 East 38th Street, Anderson, Indiana 46013
Part 70 Permit No.: 095-18256-00016

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify)
- Report (specify)
- Notification (specify)
- Affidavit (specify)
- Other (specify)

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

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

**COMPLIANCE BRANCH
100 North Senate Avenue
Indianapolis, Indiana 46204
Phone: 317-233-5674
Fax: 317-233-5967**

**and
Anderson Office of Air Management**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Delphi Automotive Systems, LLC
Source Address: 2620 East 38th Street, Anderson, Indiana 46013
Mailing Address: 2620 East 38th Street, Anderson, Indiana 46013
Part 70 Permit No.: 095-18256-00016

This form consists of 2 pages

Page 1 of 2

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

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

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

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

Page 2 of 2

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

Form Completed by:

Title / Position:

Date:

Phone:

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
Anderson Office of Air Management**

Part 70 Quarterly Report

Source Name: Delphi Automotive Systems, LLC
Source Address: 2620 East 38th Street, Anderson, Indiana 46013
Mailing Address: 2620 East 38th Street, Anderson, Indiana 46013
Part 70 Permit No.: 095-18256-00016
Facility: Boilers A and B
Parameter: Oxides of Nitrogen (NO_x)
Limit: Total input of natural gas to boilers A and B shall be less than 247 million cubic feet (MMCF) per twelve consecutive month period, with compliance determined at the end of each month.

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	Natural Gas Usage This Month	Natural Gas Usage Previous 11 Months	Natural Gas Usage 12 Month Total
Month 1			
Month 2			
Month 3			

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.
Deviation has been reported on:

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

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION
 and
 Anderson Office of Air Management**

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

Source Name: Delphi Automotive Systems, LLC
 Source Address: 2620 East 38th Street, Anderson, Indiana 46013
 Mailing Address: 2620 East 38th Street, Anderson, Indiana 46013
 Part 70 Permit No.: 095-18256-00016

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

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked ΔNo deviations occurred this reporting period@.</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

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

Form Completed By:

Title/Position:

Date:

Phone:

Attach a signed certification to complete this report.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

FEB 14 2005

REPLY TO THE ATTENTION OF:
(AE-17J)

Ronald L. Collins
Environmental Engineering
Delphi Corporation
8750 Hague Road, Building #4
M/S 462-394-202
Indianapolis, Indiana 46256

Re: Approval of Alternative Fuel Usage Monitoring

Dear Mr. Collins:

Thank you for your letter dated January 24, 2005 requesting U.S. EPA Region 5 to approve an alternative fuel usage monitoring schedule. Specifically, Delphi Corporation (Delphi) is requesting to monitor the natural gas burned in the boilers on a monthly basis instead of the required daily monitoring under the New Source Performance Standards (NSPS) program, 40 C.F.R., Part 60, Subpart Dc.

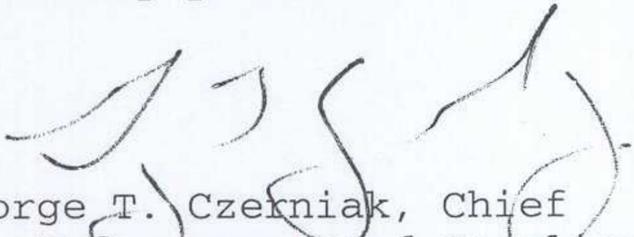
In accordance with past decisions and a letter from John Rasnic, Director, Stationary Source Compliance Division, EPA Headquarters to Jewel A. Harper, region IV, Air Enforcement branch Chief, dated February 20, 1992, an allowance was given for monthly monitoring of fuel usage if only natural gas is burned. Delphi burns only natural gas in their four boilers. U.S. EPA approves Delphi's request to perform monthly monitoring instead of daily monitoring.

Delphi also requested to use the monthly gas consumption and prorate the usage to individual boilers based on the hours of operation. U.S. EPA approves Delphi's request to prorate the gas usage among their four boilers.

Finally, the above determination is based on the Federal regulations and provides the minimum conditions for compliance with 40 C.F.R. Part 60, Subpart Dc. The State of Indiana is the delegated authority and maintains the right to implement more stringent requirements than those outlined above. This authority includes, but is not limited to, requiring the sulfur content and nitrogen content of the fuel be monitored daily.

If you have any questions concerning the matters addressed in this letter, please contact Ms. Sarah Marshall of my staff, at (312) 886-6797.

Sincerely yours,

A handwritten signature in black ink, appearing to read "G. Czerniak". The signature is stylized and somewhat cursive, with a large initial "G" and a long horizontal stroke.

George T. Czerniak, Chief
Air Enforcement and Compliance Assurance Branch

cc: Stephen Treimel
ERG

bcc: official file copy
originating organization's reading file
Branch reading file

file: C:\EPAWork\Misc determinations\delphi2.wpd

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

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

Source Background and Description

Source Name:	Delphi Automotive Systems, LLC
Source Location:	2911 State Road 9, Anderson, Indiana 46013 2900 South Scatterfield Road, Anderson, Indiana 46013 2900 State Road 9, Anderson, Indiana 46013 2902 State Road 9, Anderson, Indiana 46013 2620 East 38 th Street, Anderson, Indiana 46013
County:	Madison
SIC Code:	3714
Operation Permit No.:	095-6388-00016
Operation Permit Issuance Date:	August 31, 1999
Permit Renewal No.:	095-18256-00016
Permit Reviewer:	ERG/ST

The Office of Air Quality (OAQ) has reviewed a Part 70 Operating Permit Renewal application from Delphi Automotive Systems, LLC relating to the operation of a stationary automotive parts manufacturing plant.

Source Definition

This Source Definition from the previous Part 70 Operating Permit was incorporated into this permit as follows:

This automobile parts manufacturing company consists of five (5) plants:

- (a) Plant 11 is located at 2911 State Road 9, Anderson, IN 46013;
- (b) Plant 16 is located at 2900 South Scatterfield Road, Anderson, IN 46013;
- (c) Plant 17 is located at 2902 State Road 9, Anderson, IN 46013;
- (d) Plant 18 is located at 2900 State Road 9, Anderson, IN 46013; and
- (e) Plant 20 is located at 2620 E. 38th Street, Anderson, IN 46013.

Since these five (5) plants are located on contiguous or adjacent properties, have the same SIC codes and are owned by one (1) company, they will be considered one (1) source.

Permitted Emission Units and Pollution Control Equipment

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

- (a) Two (2) natural gas-fired firetube boilers that can physically burn only natural gas, identified as boiler A and boiler B, constructed in 1999, each with a maximum heat input capacity of 33.5 MMBtu per hour, and exhausting to stacks A33WA32 and C33NA32, respectively.

- (b) Two (2) natural gas-fired firetube boilers that can physically burn only natural gas, identified as boiler C and boiler D, constructed in 2000, each with a maximum heat input capacity of 25.1 MMBtu/hr, and exhausting to stacks DD10EA24 and DD10SA24, respectively.
- (c) Varnish operations consisting of the following:
 - (1) One (1) varnish dip tank, identified as EU 11-18 or Dip Tank A (North), constructed prior to 1973, with a drying oven and cooling area, with maximum capacity of 600 parts per hour, and exhausting to stacks N16EA19, N16NA9 and N18NA19, respectively.
 - (2) One (1) varnish dip tank, identified as EU 11-19 or Dip Tank B (South), constructed prior to 1973, with a drying oven and cooling area, with maximum capacity of 600 parts per hour, and exhausting to stacks N18EA19, N20EA9 and N18EA19, respectively.
 - (3) One (1) varnish dip tank, identified as EU 11-100 or Dip Tank C (East), constructed prior to 1973, with a drying oven and cooling area, with maximum capacity of 600 parts per hour, and exhausting to stacks G18EA25, G20EA7 and G24NA17, respectively.
 - (4) One (1) varnish dip tank, identified as EU 11-101 or Dip Tank D (West), constructed prior to 1973, with a drying oven and cooling area, with maximum capacity of 600 parts per hour, and exhausting to stacks G18SA25, G20SA8 and G20WA17, respectively.
- (d) One (1) trickle varnish line for rotors, identified as Trickle 1-rotor, constructed in 2000, exhausting to stack J12WA15, and consisting of the following three (3) processes:
 - (1) pre-heating, which is done by electric induction pre-heating oven;
 - (2) trickle varnish coating; and
 - (3) curing, which is done by electric infrared heating oven.
- (e) One (1) trickle varnish line for stators, identified as Trickle 2-stator, constructed in 2000, exhausting to stack L10SA15 and consisting of the following three (3) processes:
 - (1) pre-heating, which is done by electric induction pre-heating oven;
 - (2) trickle varnish coating; and
 - (3) curing, which is done by electric infrared heating oven.
- (f) One (1) trickle varnish line for rotors, identified as Trickle 3-rotor, constructed in 2001, exhausting to stack R15, and consisting of the following three (3) processes:
 - (1) pre-heating, which is done by electric induction pre-heating oven;
 - (2) trickle varnish coating; and
 - (3) curing, which is done by electric infrared heating oven.
- (g) One (1) trickle varnish line for stators, identified as Trickle 4-stator, constructed in 2001, exhausting to stack S15, and consisting of the following three (3) processes:
 - (1) pre-heating, which is done by electric induction pre-heating oven;

- (2) trickle varnish coating; and
- (3) curing, which is done by electric infrared heating oven.

Insignificant Activities

The source also consists of the following insignificant activities, 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, flux application, magnaflux and welding equipment. [326 IAC 6-3-2]
- (b) 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 4000 actual cubic feet per minute, consisting of: Blasting (band, sand & steel), Broach machines (gear cutters), Buffing wheel, Chuckers, Deburring, Electrical discharge machines, Machine aluminum molds, Machining operations, Punch Presses, Repair hood, Sanders, Saws, cut-off and band, Sharpeners (drill & hob), Trimmer, Vibration chambers, Wire brush, and Wood shop. [326 IAC 6-3-2]
- (c) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
- (d) Insignificant surface coating operations, not regulated by a NESHAP, with PM10 emissions less than five (5) pounds per hour or twenty-five (25) pounds per day, with VOC emissions less than three (3) pounds per hour and five (5) pounds per day, including Adhesive application, Adhesive (hot melt), Dip booth, Dip tanks, Enamel touch up, Epoxy dispenser, Glue and ink operations, Glue dispensers, Mixing stations, Silicone coating, Spray booth, Varnish dip, and Varnish strip. [326 IAC 6-3-2]
- (e) Natural gas-fired combustion sources with heat input less than ten million (10,000,000) Btu per hour, consisting of a gas-fired Dryer, Furnaces, Ovens, and a Vacuum furnace.
- (f) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage tank of less than 10,500 gallon capacity.
- (g) A petroleum fuel (other than gasoline) dispensing facility, having a storage tank of less than 10,500 gallon capacity, and dispensing less than 230,000 gallons per month.
- (h) Storage tanks less than one thousand (1,000) gallons in capacity with annual throughputs less than twelve thousand (12,000) gallons.
- (i) Vessels storing lubricating oils, hydraulic oils, machining oils and machining fluids.
- (j) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary coatings.
- (k) Machining where an aqueous cutting coolant continuously floods the machine interface.
- (l) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6, constructed prior to 1980.
- (m) Cleaners and solvents characterized as having a vapor pressure of less than 0.7kPa; 5 mmHg or 1 psi measured at 20 degrees C (88 degrees F).
- (n) Closed loop heating and cooling systems.

- (o) Rolling oil recovery systems.
- (p) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1%.
- (q) Any operation using aqueous solutions containing less than 1% by weight of VOC's excluding HAPs.
- (r) Forced and induced draft cooling tower system not regulated under a NESHAP.
- (s) Quenching operations used with heat treating processes.
- (t) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (u) Heat exchanger cleaning and repair.
- (v) Enclosed systems for conveying plastic raw materials and plastic finished goods.
- (w) Asbestos abatement projects regulated by 326 IAC 14-10.
- (x) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures or vehicles at the source where air emissions for those activities would not be associated with any production processes.
- (y) Equipment used to collect any material that might be released during a malfunction, process upset or spill clean up, including catch tanks, temporary liquid separators, tanks and fluid handling equipment.
- (x) Blowdown for any of the following: sight glass; boiler, compressors; pumps and cooling towers.
- (aa) Furnaces used for melting metals other than beryllium with a brim full capacity of less than 460 cubic inches by volume.
- (bb) On-site fire and emergency response training approved by the department.
- (cc) Diesel generators not exceeding 1800 horsepower.
- (dd) Stationary fire pumps.
- (ee) Mold release agents using low volatile products (vapor pressure less than 2 kilopascals measured at 38 degrees C).
- (ff) A laboratory as defined in 326 IAC 2-7-1(21)(D).
- (gg) Rust prevention (Acrylic acid, methyl ethyl ketone).
- (hh) Other emission units, not regulated by a NESHAP, with PM10 and SO₂ emissions less than five (5) pounds per hour or twenty-five (25) pounds per day, CO emissions less than twenty-five (25) pounds per day, with VOC emissions less than three (3) pounds per hour and five (5) pounds per day, with lead emissions less than six-tenths (0.6) tons per year or three and twenty-nine hundredths (3.29) pounds per day, with HAP emissions less than five (5) pounds per day or one (1) ton per year of a single HAP, and less than twelve and five tenths (12.5) pound per day or two and five tenths (2.5) ton per year of any combination of HAPs, consisting of: Assembly (black shell), Atomized aluminum powder, Banders, Battery formation, Battery test cabinets, Blander, Cleaning (ink stamp), Coil

removal, Cold boxes, Conductive ink, Cure handlers, Cut-out dials (final), Feeders, Foaming station, Mixing tanks, Molding presses, Molding, Ovens, Plastic injection, Re-op operation, Rust inhibitors, Test station, Thermotron units, Vulcan machine, Winding machines, and Wire stripping.

Existing Approvals

The source has been operating under Title V Operating Permit T095-6388-00016, issued on August 31, 1999, and the following modifications:

- (a) First Minor Source Modification 095-11322-00016, issued on November 18, 1999,
- (b) First Minor Permit Modification 095-11377-00016, issued on November 18, 1999,
- (c) Second Minor Source Modification 095-11938-00016, issued on April 3, 2000,
- (d) Second Minor Permit Modification 095-11994-00016, issued on April 25, 2000,
- (e) Third Minor Source Modification 095-12180-00016, issued on May 30, 2000,
- (f) First Administrative Amendment 095-12368-00016, issued on July 18, 2000,
- (g) Third Minor Permit Modification 095-12242-00016, issued on July 28, 2000,
- (h) First Significant Permit Modification 095-12800-00016, issued on January 16, 2001,
- (i) Fourth Minor Source Modification 095-14015-00016, issued on April 20, 2001,
- (j) Fourth Minor Permit Modification 095-14041-00016, issued on May 24, 2001,
- (k) Second Administrative Amendment 095-14509-00016, issued on August 21, 2001,
- (l) Reopening 095-13386-00016, issued on January 30, 2002,
- (m) Third Administrative Amendment 095-17671-00016, issued on June 2, 2003,

Enforcement Issue

There are no enforcement actions pending.

Recommendation

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

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

An administratively complete Part 70 permit renewal application for the purposes of this review was received on November 5, 2003. Additional information was received on December 13, 2004 and January 18, 2005.

There was no notice of completeness letter mailed to the Permittee.

Emission Calculations

See Appendix A of this document for detailed emission calculations (page 1-3).

Potential to Emit of the Source

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

The source was issued a Part 70 Operating Permit on August 31, 1999. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of the original Part 70 Operating Permit

and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/emission unit	Potential to Emit (tons/year)						HAPs
	PM	PM-10	SO ₂	VOC	CO	NO _x	
Natural Gas Fired Boilers (A, B, C, D)	3.90	3.90	0.31	2.82	43.1	51.3	0.04
Varnish Dip Tanks A, B, C, D	--	--	--	84.8	--	--	Formaldehyde 9.66
Varnish Line Trickle 1-rotor	--	--	--	5.45	--	--	T-Butyl Perbenzoate 0.77
Varnish Line Trickle 2-stator	--	--	--	10.9	--	--	T-Butyl Perbenzoate 1.54
Varnish Line Trickle 3-rotor	--	--	--	3.09	--	--	T-Butyl Perbenzoate 0.44
Varnish Line Trickle 4-stator	--	--	--	7.80	--	--	T-Butyl Perbenzoate 1.11
Total PTE	3.90	3.90	0.31	115	43.1	51.3	Single HAP: 9.66 Combination of HAPs: 13.6

--“ Emissions are negligible (less than 0.1 tons per year).

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

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

Pollutant	Actual Emissions (tons/year)
PM	Not reported
PM10	0
SO ₂	0
VOC	33
CO	10
NO _x	13
Lead	0
HAP	Not reported

County Attainment Status

The source is located in Madison County.

Pollutant	Status
PM-10	Attainment
SO ₂	Attainment
NO ₂	Attainment
1-hour Ozone	Attainment
8-hour Ozone	Basic Nonattainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Madison County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Emission Offset.
- (b) Madison County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Part 70 Permit Conditions

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

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

Federal Rule Applicability

- (a) The requirements of 40 CFR Part 64, Compliance Assurance Monitoring (CAM) are not included in this permit. In order for this rule to apply, a pollutant-specific-emissions-unit at a source that requires a Part 70 or Part 71 permit must meet three criteria for a given pollutant: 1) the unit is subject to an applicable emission limitation or standard for the applicable regulated air pollutant, 2) the unit uses a control device to achieve compliance with any such emission limitation or standard, and 3) the unit has the potential to emit, of the applicable regulated air pollutant, equal or greater than 100 percent of the amount required for a source to be classified as a major source. None of the emissions units at this source has a PTE for PM, PM₁₀, SO₂, NO_x, VOC or CO greater than 100 tons per year and uses a control device to achieve compliance with that limit.
- (b) The requirements of the New Source Performance Standards for Fossil-Fuel-Fired Steam Generators, (326 IAC 12, 40 CFR 60, Subpart D) are not applicable to the boilers because the maximum heat input capacity of the two (2) 33.5 MMBtu/hr boilers and the two (2) 25.1 MMBtu/hr boilers is less than 250 MMBtu/hr.
- (c) The requirements of the New Source Performance Standards for Electric Utility Steam Generating Units, (326 IAC 12, 40 CFR 60, Subpart Da) are not applicable to the two (2) 33.5 MMBtu/hr boilers and the two (2) 25.1 MMBtu/hr boilers because these boilers are not electric utility steam generating units.
- (d) The requirements of the New Source Performance Standards for Industrial-Commercial-Institutional Steam Generating Units, (326 IAC 12, 40 CFR 60, Subpart Db) are not applicable to the two (2) 33.5 MMBtu/hr boilers and the two (2) 25.1 MMBtu/hr boilers because the maximum heat input capacity of each boiler is less than 100 MMBtu/hr.
- (e) The two (2) 33.5 MMBtu/hr boilers and the two (2) 25.1 MMBtu/hr boilers are subject to the requirements of the New Source Performance Standard for Small Industrial-Commercial-Institutional Steam Generating Units (326 IAC 12, 40 CFR Part 60, Subpart Dc) because these boilers each have a heat input capacity greater than 10 MMBtu/hr and less than 100 MMBtu/hr and was constructed after June 9, 1989. However, since these boilers can physically burn only natural gas, the boilers are subject only to the record keeping requirements in 40 CFR 60.48c. Under this rule, the source is required to

maintain daily records of the amount and type of fuel burned. If the source would like to change the frequency of record keeping from daily recording to monthly recording, then the source must send a letter requesting this change to the following address:

George Czerniak
c/o U.S. Environmental Protection Agency, Region V
Air and Radiation Division
Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

The request should reference the NSPS requirement and the EPA memorandum from John Rasnic to Jewell Harper (dated February 20, 1992), which provides guidance on obtaining approval for alternative monitoring plans.

- (f) The requirements of the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD, are not applicable to the two (2) 33.5 MMBtu/hr natural gas fired firetube boilers and the two (2) 25.1 MMBtu/hr natural gas fired firetube boilers. This source is a minor source of HAPs. The potential to emit from the entire source for a single HAP is less than ten (10) tons per year and the potential to emit from the entire source for a combination of HAPs is less than twenty-five tons per year.
- (g) The requirements of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products (40 CFR 63, Subpart MMMM) are not applicable to the four (4) varnish dip tanks (A,B, C, D) and the four (4) varnish trickle lines (Trickle 1-rotor, Trickle 2-stator, Trickle 3-rotor, and Trickle 4-stator). This source is not a major source of HAPs. The potential to emit from the entire source for a single HAP is less than ten (10) tons per year and the potential to emit from the entire source for a combination of HAPs is less than twenty-five tons per year.

State Rule Applicability – Entire Source

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

The source submitted an Emergency Reduction Plan (ERP) on July 10, 1998.

326 IAC 2-3 (Emission Offset)

This source is located in Madison County. Madison County was designated as a nonattainment area for the 8-hour ozone standard in June 2004. The potential to emit of VOC of this source, after limits, is greater than 100 tons per year. Therefore, this source is a major source under Emission Offset. Any future modifications that increase VOC or NO_x emissions must be reviewed in accordance with 326 IAC 2-3.

326 IAC 2-2 (Prevention of Significant Deterioration)

This source is not in 1 of the 28 source categories and there are no applicable New Source Performance Standards that were in effect on August 7, 1980, therefore, fugitive emissions of PM and VOC are not counted towards applicability of PSD applicability.

This source was constructed prior to 1973. Since information about the source is not available for the period from the time of construction to the time that the source's first Title V permit was issued on August 31, 1999, this PSD review will begin with what is known about the source at the time of the issuance of Title V Operating Permit 095-6388-00016. In 1999, the PTE for PM, PM₁₀, VOC, NO_x, SO₂ and CO from the entire source, before limits and controls, was less than 250 tons per year. At the time that 095-6388-00016 was issued, this source was a minor source under PSD.

Under First Minor Source Modification 095-11322-00016, issued on November 18, 1999, the source added two boilers. The source took a natural gas input limit under 095-11322-00016 to limit emission of NO_x to less than 25 tons per year. This limit made the provisions of 326 IAC 2-

7-10.5(f) (Significant Source Modification) not applicable. This modification did not trigger PSD review because the PTE for PM, PM10, VOC, NO_x, SO₂ and CO due to this modification was less than 250 tons per year. After this modification, the source had a PTE for all criteria pollutants less than 250 tons per year. Therefore, the source was a minor source under PSD.

Under Second Minor Source Modification 095-11938-00016, issued on April 3, 2000, the source added two (2) trickle varnish lines. This modification did not trigger PSD review because the PTE for VOC was under the PSD significant level.

Under Second Minor Permit Modification 095-11994-00016, issued on April 25, 2000, the PSD status of the source was changed to a major source for VOC under PSD to reflect emissions data from a February 18, 1999 annual inspection at the source. This data showed that PTE for VOC for the entire source was greater than 250 tons per year.

Under Third Minor Source Modification 095-12180-00016, issued on May 30, 2000, the source added two (2) boilers and removed two (2) boilers. The PTE for NO_x and CO for this modification was less than 25 tons per year. This modification did not trigger PSD review because the PTE for NO_x and CO were under the PSD significant level.

Under First Administrative Amendment 095-12368-00016, issued on July 18, 2000, the PSD status of the source was changed to a minor source for VOC under PSD based on emissions data submitted on June 13, 2000. This data showed that PTE for VOC for the entire source was less than 250 tons per year.

Under First Significant Permit Modification 095-12800-00016, issued on January 16, 2001, the source made changes that did not result in an increase in emissions.

Under Fourth Minor Source Modification 095-14015-00016, issued on April 20, 2001, the source added two (2) trickle varnish lines. The PTE for VOC for this modification was less than 25 tons per year. This modification did not trigger PSD review because the PTE for VOC was under the PSD significant level.

The PTE for PM, PM10, SO₂ and CO from the entire source is less than 100 tons per year. The source is a minor source for PM, PM10, SO₂ and CO under PSD. The PTE for VOC is greater than 100 tons per year. The source is a major source for VOC under 326 IAC 2-3 (Emission Offset).

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

This source was constructed prior to 1997. The source has not added any new major sources of HAP after July 27, 1997. Therefore, the source is not subject to the requirements of 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants).

326 IAC 2-6 (Emission Reporting)

Since this source is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, this source is subject to 326 IAC 2-6 (Emission Reporting). In accordance with the compliance schedule in 326 IAC 2-6-3, an emission statement must be submitted triennially by July 1 beginning in 2005 and every 3 years after. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 5-1 (Opacity Limitations)

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

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

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

326 IAC 6-4 (Fugitive Dust Emissions)

Pursuant to 326 IAC 6-4, the source shall not generate fugitive dust to the extent that some portion of the material escapes beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located.

326 IAC 6-5 (Fugitive Particulate Matter Emissions Limitations)

This source is not subject to 326 IAC 6-5, because this source is not subject to the potential fugitive particulate matter emissions are less than 25 tons per year after controls.

326 IAC 8-6 (Organic Solvent Emission Limitations)

This source is not located in Lake or Marion Counties and was constructed prior to October 7, 1974. Therefore, the requirements of 326 IAC 8-6 do not apply to this source.

State Rule Applicability – Varnish Dip Tanks (EU 11-18, EU 11-19, EU 11-100, EU 11-101) and Trickle Varnish Lines (Trickle 1-rotor, Trickle 2-stator, Trickle 3-rotor, and Trickle 4-stator)

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

The requirements of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) do not apply to the varnish dip tanks and the trickle varnish lines because the application method has a 100% transfer efficiency. No airborne particulate emissions is created in this process.

326 IAC 8-1-6 (General Reduction Requirements)

- (a) The requirements of 326 IAC 8-1-6 do not apply to the varnish dip tanks (EU 11-18, EU 11-19, EU 11-100, EU 11-101) because these facilities were constructed prior to January 1, 1980.
- (b) The requirements of 326 IAC 8-1-6 do not apply to the trickle varnish lines (Trickle 2-stator and Trickle 4-stator) because these facilities are already regulated by another Article 8 rule.
- (c) The requirements of 326 IAC 8-1-6 do not apply to the trickle varnish lines (Trickle 1-rotor and Trickle 3-rotor) because these facilities have potential emissions of less than twenty-five tons per year of VOC.

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

- (a) The four (4) varnish dip tanks (EU 11-18, EU 11-19, EU 11-100, EU 11-101) are used to coat metal parts, are located in Madison County and were constructed prior to January 1, 1980. Therefore, the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating) do not apply to these facilities.
- (b) The two (2) trickle varnish lines (Trickle 1-rotor and Trickle 3-rotor) are used to coat metal parts, were constructed after July 1, 1990 and have actual emissions of less than fifteen (15) pounds of VOC per day before controls. Therefore, the requirements 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) do not apply.
- (c) The two (2) trickle varnish lines (Trickle 2-stator and Trickle 4-stator) are used to coat metal parts, were constructed after July 1, 1990 and have actual emissions of greater than fifteen (15) pounds of VOC per day before controls. Pursuant to 326 IAC 8-2-1(a)(4) (Applicability) and 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of the coating delivered to the applicator at the two (2) trickle varnish lines (Trickle 2-stator and Trickle 4-stator) shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.

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

Based on the MSDS submitted by the source and calculations made, the trickle varnish lines are in compliance with this requirement.

State Rule Applicability – Natural Gas Fired Boilers (A, B, C, D)

First Minor Source Modification 095-11322-00016

Pursuant to First Minor Source Modification 095-11322-00016, issued on November 18, 1999, the Permittee shall limit input of natural gas to boilers A and B to a combined total of less than 247 MMCF of natural gas per twelve consecutive month period, with compliance determined at the end of each month. Compliance with this limit ensures that NO_x emissions from these two boilers are less than 25 tons per twelve consecutive month period. Compliance with this condition makes 326 IAC 2-7-10.5(f) (Significant Source Modification) not applicable to the construction of boilers A and B.

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

Pursuant to 326 IAC 6-2-4, indirect heating facilities constructed after September 12, 1983, shall be limited by the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

Where Pt = emission rate limit (lbs/MMBtu)
Q = total source heat input capacity (MMBtu/hr)

(a) The emission rate limit for boilers A and B calculated from the equation above equals:

$$Pt = \frac{1.09}{(68.9 + 68.9 + 33.5 + 33.5)^{0.26}} = 0.27 \text{ lbs/MMBtu}$$

(b) The emission rate limit for boilers C and D calculated from the equation above equals:

$$Pt = \frac{1.09}{(33.5 + 33.5 + 25.1 + 25.1)^{0.26}} = 0.32 \text{ lbs/MMBtu}$$

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

The four natural gas-fired boilers (A, B, C, D) at this source are not subject to the requirements of 326 IAC 7-1.1 because none of these facilities has the potential to emit twenty-five (25) tons per year or ten (10) pounds per hour of sulfur dioxide.

326 IAC 9 (Carbon Monoxide Emission Requirements)

This source is not among the listed source categories in 326 IAC 9-1-2. Therefore, the requirements of 326 IAC 9-1-2 are not applicable to these boilers.

326 IAC 10 (Nitrogen Oxide Emission Requirements)

This source is not located in Clark or Floyd County. Therefore, the requirements of 326 IAC 10-1-3 are not applicable to these boilers.

State Rule Applicability – Insignificant Activities

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

Pursuant to 326 IAC 6-3-2, the particulate emissions from the insignificant grinding and machining operations, brazing equipment, cutting torches, soldering equipment, welding equipment 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:

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

The control equipment shall be in operation at all times the insignificant grinding and machining operations are in operation, in order to comply with this limit.

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

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

Pursuant to 326 IAC 6-3-2, the particulate emissions from the insignificant surface coating operations 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:

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

The control equipment shall be in operation at all times the insignificant surface coating operations are in operation, in order to comply with this limit.

326 IAC 8-3-2 (Cold Cleaner Operations)

This cold cleaner degreasing facility is located in Madison County and was constructed prior to January 1, 1980. Therefore, the requirements of 326 IAC 8-3-2 and 8-3-5 do not apply to the organic solvent degreasing operations.

Testing Requirements

The Permittee is not required to perform compliance stack tests on the Varnish Dip Tanks (EU 11-18, EU 11-19, EU 11-100, EU 11-101) for VOC emissions because there are no applicable requirements for the varnish dip tanks. The Permittee is not required to perform compliance stack tests on the Trickle Varnish Lines Trickle 1-rotor, Trickle 2-rotor, Trickle 3-rotor, and Trickle 4-stator for VOC emissions because there are no VOC control devices in operation and records must be kept of all VOCs used in the trickle varnish lines.

Compliance Requirements

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

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period. No compliance monitoring is required for the facilities at this source.

Conclusion

The operation of this stationary automotive parts manufacturing plant shall be subject to the conditions of this Part 70 permit 095-18256-00016.

**Appendix A: Emission Calculations
VOC Emissions from Surface Coating of Rotors and Stators**

Company Name: Delphi Automotive Systems, LLC
Address: 2620 East 38th Street, Anderson, Indiana 46013
Title V: 095-18256-00016
Reviewer: ERG/ST
Date: December 14, 2004

Facility	Material	Density (lb/gal)	Weight % Water	Weight % Organics	Weight % Solids	Max. Usage (gal/unit)	Maximum Throughput (units/hour)	PTE of VOC * (lb/hr)	PTE of VOC * (ton/yr)
11-18 Dip Tank A	WS-2000	8.60	20.0%	39.0%	41.0%	0.0029	375	3.69	16.1
	2-Butoxy	7.48	0.0%	100%	0.0%	0.00042	375	1.17	5.11
11-19 Dip Tank B	WS-2000	8.60	20.0%	39.0%	41.0%	0.0029	375	3.69	16.1
	2-Butoxy	7.48	0.0%	100%	0.0%	0.00042	375	1.17	5.11
11-100 Dip Tank C	WS-2000	8.60	20.0%	39.0%	41.0%	0.0018	400	2.46	10.8
	2-Butoxy	7.48	0.0%	100%	0.0%	0.00079	400	2.36	10.4
11-101 Dip Tank D	WS-2000	8.60	20.0%	39.0%	41.0%	0.0018	400	2.46	10.8
	2-Butoxy	7.48	0.0%	100%	0.0%	0.00079	400	2.36	10.4
Trickle 1 - Rotor	9183 Resin	9.01	0.0%	38.0%	62.0%	0.0049	212	1.24	5.45
	T-Butyl	8.67	0.0%	100%	0.0%				
Trickle 2 - Stator	9183 Resin	9.01	0.0%	38.0%	62.0%	0.0098	212	2.49	10.9
	T-Butyl	8.67	0.0%	100%	0.0%				
Trickle 3 - Rotor	9183 Resin	9.01	0.0%	38.0%	62.0%	0.0029	200	0.70	3.09
	T-Butyl	8.67	0.0%	100%	0.0%				
Trickle 4 - Stator	9183 Resin	9.01	0.0%	38.0%	62.0%	0.0078	189	1.78	7.80
	T-Butyl	8.67	0.0%	100%	0.0%				
Total								112	

All coatings are applied with dip or trickle application methods. Transfer efficiency is 100 % and no particulate emissions occur. Trickle Lines use a resin and catalyst mixture in a 50:1 ratio. The manufacturer certifies that the cured product releases only 1.2 pounds of VOC per gallon of material used.

Methodology

PTE of VOC Dip Tanks (lbs/hr) = Density (lb/gal) x Weight % Organics x Max. Usage (gal/unit) x Max. Throughput (units/hr)

PTE of VOC Dip Tanks (tons/yr) = Density (lb/gal) x Weight % Organics x Max. Usage (gal/unit) x Max. Throughput (units/hr) x 8760 (hr/yr) x 1 ton/2000 lbs.

PTE of VOC Trickle Lines (lbs/hr) = 1.2 lbs VOC/gal x Max. Usage (gal/unit) x Max. Throughput (units/hr)

PTE of VOC Trickle Lines (tons/yr) = 1.2 lbs VOC/gal x Max. Usage (gal/unit) x Max. Throughput (units/hr) x 8760 (hr/yr) x 1 ton/2000 lbs.

Appendix A: Emission Calculations
HAP Emissions from Surface Coating of Rotors and Stators

Company Name: Delphi Automotive Systems, LLC
Address: 2620 East 38th Street, Anderson, Indiana 46013
Title V: 095-18256-00016
Reviewer: ERG/ST
Date: December 14, 2004

Facility	Material	Density (lb/gal)	Weight % Formaldehyde	Weight % T-Butyl Perbenzoate	Max. Usage (gal/unit)	Maximum Throughput (units/hour)	PTE of Formaldehyde (ton/yr)	PTE of T-Butyl Perbenzoate (ton/yr)
11-18 Dip Tank A	WS-2000	8.60	7.0%	0.0%	0.0029	375	2.90	0.00
	2-Butoxy	7.48	0.0%	0.0%	0.00042	375	0.00	0.00
11-19 Dip Tank B	WS-2000	8.60	7.0%	0.0%	0.0029	375	2.90	0.00
	2-Butoxy	7.48	0.0%	0.0%	0.00042	375	0.00	0.00
11-100 Dip Tank C	WS-2000	8.60	7.0%	0.0%	0.0018	400	1.93	0.00
	2-Butoxy	7.48	0.0%	0.0%	0.00079	400	0.00	0.00
11-101 Dip Tank D	WS-2000	8.60	7.0%	0.0%	0.0018	400	1.93	0.00
	2-Butoxy	7.48	0.0%	0.0%	0.00079	400	0.00	0.00
Trickle 1 - Rotor	9183 Resin	9.01	0.0%	0.0%	0.0049	212	0.00	0.00
	T-Butyl	8.67	0.0%	100%			0.00	0.77
Trickle 2 - Stator	9183 Resin	9.01	0.0%	0.0%	0.0098	212	0.00	0.00
	T-Butyl	8.67	0.0%	100%			0.00	1.54
Trickle 3 - Rotor	9183 Resin	9.01	0.0%	0.0%	0.0029	200	0.00	0.00
	T-Butyl	8.67	0.0%	100%			0.00	0.44
Trickle 4 - Stator	9183 Resin	9.01	0.0%	0.0%	0.0078	189	0.00	0.00
	T-Butyl	8.67	0.0%	100%			0.00	1.11
Totals							9.66	3.86

Assume all HAP is volatilized and emitted.
Trickle Lines use a resin and catalyst mixture in a 50:1 ratio.

Methodology

PTE of HAP (tons/yr) = Density (lb/gal) x Weight % HAP x Max. Usage (gal/unit) x Max. Throughput (units/hr) x 8760 (hr/yr) x 1 ton/2000 lbs.

**Appendix A: Emission Calculations
Combustion Emissions for Natural Gas Fired Boilers**

Company Name: Delphi Automotive Systems, LLC
Address: 2620 East 38th Street, Anderson, Indiana 46013
Title V: 095-18256-00016
Reviewer: ERG/ST
Date: December 14, 2004

Emission Unit Description	Emission Unit ID	Heat Input Capacity (MMBtu/hr)	Maximum Potential Throughput (MMCF/yr)
Natural Gas-Fired Boiler	Boiler A	33.5	293
Natural Gas-Fired Boiler	Boiler B	33.5	293
Natural Gas-Fired Boiler	Boiler C	25.1	220
Natural Gas-Fired Boiler	Boiler D	25.1	220

Emission Factors (lbs/MMCF)						
PM*	PM10*	SO ₂	NO _x **	CO	VOC	HAPs
7.6	7.6	0.6	100	84	5.5	0.09

Potential To Emit (tons/yr)							
Emission Unit ID	PM	PM10	SO ₂	NO _x	CO	VOC	HAPs
Boiler A	1.12	1.12	0.09	14.7	12.3	0.81	0.013
Boiler B	1.12	1.12	0.09	14.7	12.3	0.81	0.013
Boiler C	0.84	0.84	0.07	11.0	9.23	0.60	0.010
Boiler D	0.84	0.84	0.07	11.0	9.23	0.60	0.010
TOTALS	3.90	3.90	0.31	51.3	43.1	2.82	0.04

* PM and PM10 emission factor are for condensable and filterable PM and PM10 combined.

**Emission factor for NO_x: Uncontrolled = 100 lb/MMCF

Emission factors are from AP-42, Chapter 1.4 - Natural Gas Combustion, Tables 1.4-1, 1.4-2, 1.4-3 and 1.4-4. SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03. (AP-42 Supplement D 7/98)

1 MMBtu = 1,000,000 Btu

1 MMCF = 1,000,000 cubic feet of gas

All Emission factors are based on normal firing.

Methodology

Max. Potential Throughput (MMCF/yr) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

PTE (tons/yr) = Max. Potential Throughput (MMCF/yr) x Emission Factor (lb/MMCF) x 1/2,000 (ton/lbs)

Total HAP emissions from the natural gas boilers are negligible.