



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: June 7, 2007
RE: Valeo Sylvania LLC / 071-18360-00006
FROM: Nisha Sizemore
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval – Effective Immediately

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

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

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

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

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

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

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

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

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

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

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

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



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Part 70 Operating Permit Renewal OFFICE OF AIR QUALITY

**Valeo Sylvania, LLC
1231 A Avenue North
Seymour, Indiana 47274**

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

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. This permit also addresses certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-7-10.5, applicable to those conditions.

Operation Permit No.: T071-18360-00006	
Original Signed by: Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: June 7, 2007 Expiration Date: June 7, 2012

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SECTION A

SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary source producing automotive plastic lighting assemblies.

Source Address:	1231 A Avenue North, Seymour, Indiana 47274
Mailing Address:	1231 A Avenue North, Seymour, Indiana 47274
General Source Phone Number:	812-574-5744
SIC Code:	3647
County Location:	Jackson
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) One (1) spray paint booth, South wing Manual Spray Paint Booth, installed in 1996, using high volume low pressure spray application, identified as emission unit #3, for coating plastic automotive lighting assembly components with a maximum capacity of 100 units per hour, using dry filters for overspray control, and exhausting to stacks PP-E-40, 75 and 88.
- (b) One (1) paint booth, Hard Coat #1, installed in 1994, using high volume low pressure spray application, identified as emission unit #8, for coating plastic automotive lighting assembly components with a maximum capacity of 720 units per hour, using an Oscar VIII Overspray Collection and Recovery System for overspray control and exhausting to stacks PP-E-30, 32, 33, and 34.
- (c) One (1) paint booth, Hard Coat #2, installed in 1996, using high volume low pressure spray application, identified as emission unit # 9, for coating plastic automotive lighting assembly components with a maximum capacity of 720 units per hour, using an Oscar VIII Overspray Collection and Recovery System for overspray control and exhausting to stacks PP-E-84, 85, and 90.
- (d) One (1) robotic argent paint system, installed in 2003, using high volume low pressure spray application, identified as emission unit #10, for coating plastic automotive lighting assembly components, with a maximum capacity of 200 units per hour, using dry filters for overspray control exhausting to one (1) stack, identified as PP-E-03-101.
- (e) Eleven (11) Thermoset Closed Injection Molding Presses, installed in 1978, and one (1) Thermoset Closed Injection Molding Press, installed in 2006, collectively identified as BMC, for closed injection molding of automotive lighting reflectors with a throughput capacity of 1194.20 pounds of bulk mold compound per hour.

- (f) One (1) flow coating line, identified as emission unit #6, installed in 1994, for coating plastic automotive lighting assembly components. The flowcoater has a maximum capacity of 1,440 units per hour, and uses a regenerative thermal oxidizer to reduce volatile organic compound emissions and exhausts to stacks PP-E-10, 11, 7, and 83.
- (g) One (1) lens surface coating booth, installed in 2006, using flowcoating application method, with a maximum throughput of 144 lenses per hour, identified as emission unit #13, with VOC controlled by one (1) regenerative thermal oxidizer, which exhausts to one (1) stack, identified as HC-05-01.
- (h) One (1) base coat surface coating process, installed in 2006, using air atomization spray application, with a maximum throughput of 144 units per hour, using dry filters for particulate control, and exhausting inside the building.

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

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:
 - (1) One (1) natural gas fired boiler with a maximum heat input capacity of 4.69 MMBtu/hr, installed after June 1989; [326 IAC 6-2-4]
 - (2) One (1) natural gas fired boiler with a maximum heat input capacity of 6.42 MMBtu/hr, installed after June 1989. [326 IAC 6-2-4]
- (b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-3-2]
- (c) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. [326 IAC 6-3-2]
- (d) One baghouse controlling dust from the BMC press area. [326 IAC 6-3-2]

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

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

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

SECTION B GENERAL CONDITIONS

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

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

B.2 Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)][IC 13-15-3-6(a)]

- (a) This permit, T071-18360-00006, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

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

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

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

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

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

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

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

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

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

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

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

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

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

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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

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

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

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

B.11 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-0178 (ask for Compliance Section)
Facsimile Number: 317-233-6865

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

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

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

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

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
 - (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.
 - (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
 - (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

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

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

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

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

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

- (a) All terms and conditions of permits established prior to T071-18360-00006 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

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

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

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

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

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

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

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

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

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

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
- (1) That this permit contains a material mistake.

- (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

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

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

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
 - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

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

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

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

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

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

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

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

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b),(c), or (e) without a prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
 - (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

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

and

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

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

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

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

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

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

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

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

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

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

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

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

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

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

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

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

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

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

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

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 Opacity [326 IAC 5-1]

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

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

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

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

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

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

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

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

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

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

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
MC 61-52 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

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

C.7 Performance Testing [326 IAC 3-6]

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

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

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

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

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

Compliance Requirements [326 IAC 2-1.1-11]

C.8 Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.9 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

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

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

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

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

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

C.10 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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 June 3, 1996.
- (b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.
[326 IAC 1-5-3]

C.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 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; and/or
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
 - (1) monitoring data;
 - (2) monitor performance data, if applicable; and
 - (3) corrective actions taken.

C.15 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.16 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)(3), starting in 2006 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
 - (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
 - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

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

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

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

C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

Stratospheric Ozone Protection

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

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

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) spray paint booth, South wing Manual Spray Paint Booth, installed in 1996, using high volume low pressure spray application, identified as emission unit #3, for coating plastic automotive lighting assembly components with a maximum capacity of 100 units per hour, using dry filters for overspray control, and exhausting to stacks PP-E-40, 75 and 88.
- (b) One (1) paint booth, Hard Coat #1, installed in 1994, using high volume low pressure spray application, identified as emission unit #8, for coating plastic automotive lighting assembly components with a maximum capacity of 720 units per hour, using an Oscar VIII Overspray Collection and Recovery System for overspray control and exhausting to stacks PP-E-30, 32, 33, and 34.
- (c) One (1) paint booth, Hard Coat #2, installed in 1996, using high volume low pressure spray application, identified as emission unit # 9, for coating plastic automotive lighting assembly components with a maximum capacity of 720 units per hour, using an Oscar VIII Overspray Collection and Recovery System for overspray control and exhausting to stacks PP-E-84, 85, and 90.
- (d) One (1) robotic argent paint system, installed in 2003, using high volume low pressure spray application, identified as emission unit #10, for coating plastic automotive lighting assembly components, with a maximum capacity of 200 units per hour, using dry filters for overspray control exhausting to one (1) stack, identified as PP-E-03-101.
- (f) One (1) flow coating line, identified as emission unit #6, installed in 1994, for coating plastic automotive lighting assembly components. The flowcoater has a maximum capacity of 1,440 units per hour, and uses a regenerative thermal oxidizer to reduce volatile organic compound emissions and exhausts to stacks PP-E-10, 11, 7, and 83.
- (g) One (1) lens surface coating booth, installed in 2006, using flowcoating application method, with a maximum throughput of 144 lenses per hour, identified as emission unit #13, with VOC controlled by one (1) regenerative thermal oxidizer, which exhausts to one (1) stack, identified as HC-05-01.
- (h) One (1) base coat surface coating process, installed in 2006, using air atomization spray application, with a maximum throughput of 144 units per hour, using dry filters for particulate control, and exhausting inside the building.
- (The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

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

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

Pursuant to 326 IAC 8-1-6 (Requirements for new facilities) and Construction Permit CP-071-2037, issued on October 16, 1991, BACT for the one (1) flow coating line, identified as emission unit #6, has been determined to be:

The use of a thermal oxidizer system with a capture efficiency of 100% and a destruction efficiency of 95%. The minimum oxidizer operation temperature shall not fall below 1,400 degrees Fahrenheit or a temperature and fan amperage established during the latest stack test.

D.1.2 Volatile Organic Compounds (VOC) BACT [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 (Requirements for new facilities), and SSM 071-21822-00006, issued on March 23, 2006, BACT for the lens surface coating line, identified as emission unit #13, has been determined to be:

- (a) The use of a thermal oxidizer system with a capture efficiency of 100% and a destruction efficiency of 95%; and
- (b) The total amount of VOC delivered to the coating applicators of the lens surface coating booth shall be limited to less than 60.41 tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month.

This limit, in conjunction with (a), limits the potential to emit VOC from the lens coating booth to less than 3.02 tons per year.

D.1.3 Volatile Organic Compounds (VOC) PSD Minor Limit [326 IAC 2-2]

The VOC emissions from the one (1) flow coating line, identified as unit #6, and the one (1) lens coating booth, identified as unit #13, shall be less than 200.57 tons per twelve consecutive month period with compliance determined at the end of each month. Compliance with this limit in combination with potential emissions from emission units #3, #8, #9, #10, the twelve (12) closed injection molding presses, the base coat surface coating process, and insignificant combustion units, shall keep the source-wide emissions of VOC to less than 250 tons per year and shall render the requirements of 326 IAC 2-2 not applicable.

D.1.4 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2(d)]

Pursuant 326 IAC 6-3-2(d), particulate from the spray booths (identified as units #3, #8, #9, #10, and base coat surface coating process) shall be controlled by dry filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications and control emissions from the spray booths (identified as units #3, #8, #9, #10, and base coat surface coating process) at all times when the spray booths are in operation.

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

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for each of the spray booths and their respective control devices.

Compliance Determination Requirements

D.1.6 Volatile Organic Compounds (VOC) Emissions

Compliance with Condition D.1.3 shall be determined by the following equation:

VOC emissions by units #6 and #13 = ((amount of VOC delivered to coating applicators of unit #6) * (1 – overall control efficiency of thermal oxidizer system from the latest compliant stack test)) + ((amount of VOC delivered to coating applicators of unit #13) * (1 – overall control efficiency of thermal oxidizer system from the latest compliant stack test))

D.1.7 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

In order to comply with Conditions D.1.1 and D.1.2, the Permittee shall conduct a performance test to verify the overall control efficiency of the thermal oxidizers and operating temperatures utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C – Performance Testing.

D.1.8 Thermal Oxidizer Temperature [40 CFR 64]

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizers for measuring operating temperature. For purposes of this condition, continuous shall mean temperature measurement no less than once per minute. The output of this system shall be recorded as continuous readings. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall operate the thermal oxidizers at or above the 3-hour average temperature of 1400°F.
- (b) The Permittee shall determine the 3-hour average temperature from the most recent valid stack test that demonstrates compliance with limits in Conditions D.1.1 and D.1.2, as approved by IDEM.
- (c) On and after the date the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the 3-hour average temperature as observed during the compliant stack test.

D.1.9 Volatile Organic Compounds (VOC)[326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC content and usage contained in Conditions D.1.2 and D.1.6 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.1.10 Parametric Monitoring [40 CFR 64]

- (a) The Permittee shall determine fan amperage from the most recent valid stack test that demonstrates compliance with control efficiency as approved by IDEM.
- (b) The fan amperage shall be observed at least once per day when the thermal oxidizers are in operation. When for any one reading, the fan amperage is outside the normal range as established in most recent compliant stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A reading that is outside the range as established in the most recent compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.1.11 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (PP-E-40, 75 and 88, PP-E-30, 32, 33 and 34, PP-E-84, 85 and 90, and PP-E-03-101) while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.12 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.2 and D.1.6, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in Conditions D.1.2 and D.1.6.
 - (1) The VOC content of each coating material and solvent used less water.
 - (2) The amount of coating material and solvent used on a monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (3) The monthly cleanup solvent usage; and
 - (4) The total VOC usage for each month.
 - (5) The continuous temperature records for the thermal oxidizer and the 3-hour average temperature used to demonstrate compliance during the most recent compliant stack test.
 - (6) Daily records of the fan amperage.
- (b) To document compliance with Condition D.1.11, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements of this permit.

D.1.13 Reporting Requirements

Quarterly summaries of the information to document compliance with Conditions D.1.1, D.1.2 and D.1.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.2 FACILITY OPERATION CONDITIONS

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

- (e) Eleven (11) Thermoset Closed Injection Molding Presses, installed in 1978, and one (1) Thermoset Closed Injection Molding Press, installed in 2006, collectively identified as BMC, for closed injection molding of automotive lighting reflectors with a throughput capacity of 1194.20 pounds of bulk mold compound per hour.

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

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

D.2.1 Hazardous Air Pollutants (HAPs) Minor Limit [326 IAC 2-7]

Pursuant to Significant Permit Modification 071-21932-00006, issued on April 7, 2006:

- (a) The total styrene delivered to the twelve (12) thermoset closed injection molding presses shall be limited to less than 433.79 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) Styrene loss for the twelve (12) thermoset closed injection molding presses shall be limited to 1% of styrene input.

Compliance with the above limits in combination with potential HAP emissions from Units #3, #10, and insignificant activities shall limit single HAP emissions to less than ten (10) tons per year and combined HAP emissions to less than twenty-five (25) tons per year and shall make the source an area source for HAPs.

D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.2.3 Hazardous Air Pollutants (HAPs)

Compliance with the HAP content and usage limitations contained in Condition D.2.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the manufacturer. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.2.4 Record Keeping Requirements

- (a) 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 styrene usage limit and styrene emission limit established in Condition D.2.1.
- (1) The styrene content of each material and solvent used;
- (2) The total styrene usage for each month; and
- (3) The weight of styrene emitted for each compliance period.

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

D.2.6 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.3 FACILITY OPERATION CONDITIONS

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:
 - (1) One (1) natural gas fired boiler with a maximum heat input capacity of 4.69 MMBtu/hr, installed after June 1989 [326 IAC 6-2-4];
 - (2) One (1) natural gas fired boiler with a maximum heat input capacity of 6.42 MMBtu/hr, installed after June 1989 [326 IAC 6-2-4].
- (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 or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations [326 IAC 6-3-2].
- (c) Manufacturing activities such as brazing equipment, cutting torches, soldering equipment, welding equipment [326 IAC 6-3-2].
- (d) One baghouse controlling dust from the BMC press area [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 Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from the brazing equipment, cutting torches, soldering equipment, welding equipment, grinding and machining operations, deburring; buffing, polishing, abrasive blasting, pneumatic conveying, woodworking operations and BMC press area, each with a process weight rate of less than one hundred (100) pounds per hour, shall not exceed 0.551 pounds per hour.

D.3.2 Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating), PM emissions from each of the two (2) boilers shall be limited to 0.58 pounds per MMBtu heat input.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Valeo Sylvania, LLC
Source Address: 1231 A Avenue North, Seymour, Indiana 47274
Mailing Address: 1231 A Avenue North, Seymour, Indiana 47274
Part 70 Permit No.: T071-18360-00006

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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Valeo Sylvania, LLC
Source Address: 1231 A Avenue North, Seymour, Indiana 47274
Mailing Address: 1231 A Avenue North, Seymour, Indiana 47274
Part 70 Permit No.: T071-18360-00006

This form consists of 2 pages

Page 1 of 2

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

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

Part 70 Quarterly Report

Source Name: Valeo Sylvania, LLC
Source Address: 1231 A Avenue North, Seymour, Indiana 47274
Mailing Address: 1231 A Avenue North, Seymour, Indiana 47274
Part 70 Permit No.: T071-18360-00006
Facility: One (1) lens surface coating booth, identified as #13
Parameter: VOC
Limit: Less than 60.41 VOC delivered to the coating applicators of the lens surface coating booth, identified as emission unit #13.

QUARTER :

YEAR:

Month	VOC Usage This Month	VOC Usage Previous 11 Months	VOC 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

Part 70 Quarterly Report

Source Name: Valeo Sylvania, LLC
 Source Address: 1231 A Avenue North, Seymour, Indiana 47274
 Mailing Address: 1231 A Avenue North, Seymour, Indiana 47274
 Part 70 Permit No.: T071-18360-00006
 Facility: Units #6 and #13
 Parameter: VOC
 Limit: Less than 200.57 tons per twelve (12) consecutive month period

QUARTER :

YEAR:

Month	VOC Emissions This Month	VOC Emissions Previous 11 Months	VOC Emissions 12 Month Total
Month 1			
Month 2			
Month 3			

VOC emissions by units #6 and #13 = ((amount of VOC delivered to coating applicators of unit #6) * (1 – overall control efficiency of thermal oxidizer system from the latest compliant stack test)) + ((amount of VOC delivered to coating applicators of unit #13) * (1 – overall control efficiency of thermal oxidizer system from the latest compliant stack test)), as stated in Condition D.1.6.

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

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

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Valeo Sylvania, LLC
Source Address: 1231 "A" Avenue North, Seymour, Indiana 47274
Mailing Address: 1231 "A" Avenue North, Seymour, Indiana 47274
Part 70 Permit No.: T071-6559-00006
Facility: Twelve (12) Thermoset Closed Injection Molding Presses
Parameter: Styrene
Limit: Less than 433.79 tons styrene delivered to the twelve (12) thermoset closed injection molding presses.

QUARTER :

YEAR:

Month	Styrene Usage This Month	Styrene Usage previous 11 Months	Styrene Usage 12 Month Total
	Column 1	Column 2	Column 1 + Column 2
Month 1			
Month 2			
Month 3			

No deviation occurred in this quarter.

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

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

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Valeo Sylvania, LLC
Source Address: 1231 A Avenue North, Seymour, Indiana 47274
Mailing Address: 1231 A Avenue North, Seymour, Indiana 47274
Part 70 Permit No.: T071-18360-00006

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

Page 1 of 2

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

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

Source Name:	Valeo Sylvania, L.L.C.
Source Location:	1231 A Avenue North, Seymour, IN 47274
County:	Jackson
SIC Code:	3647
Operation Permit No.:	T071-18360-00006
Permit Reviewer:	Linda Quigley / EVP

On April 14, 2007, the Office of Air Quality (OAQ) had a notice published in The Tribune, in Seymour, Indiana, stating that Valeo Sylvania, L.L.C. had applied for a Part 70 Operating Permit renewal. The notice also stated that OAQ proposed to issue the Part 70 Operating Permit renewal for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not these permits should be issued as proposed.

On May 14, 2007, Elizabeth Hill of Bruce Carter Associates, L.L.C., submitted comments on behalf of Valeo Sylvania, L.L.C. on the proposed Part 70 Permit. The summary of comments and corresponding responses are as follows (bolded language has been added and the language with a line through it has been deleted):

Comment 1: Valeo Sylvania has removed one (1) flow coating line currently identified as emission unit #7. Please remove the references to this emission unit in A.2, the related condition in Section D.1 and related reporting forms.

Response 1: Sections A.2, D.1 and the Quarterly Report Form have been revised as follows:

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

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

.....

- (f) ~~Two (2)~~ **One (1)** flow coating lines, identified as emission units ~~#6 and #7~~, installed in 1994 ~~and 1995 respectively~~, for coating plastic automotive lighting assembly components. ~~Each~~ **The** flowcoater has a maximum capacity of 1,440 units per hour, and ~~each~~ uses a regenerative thermal oxidizer to reduce volatile organic compound emissions and ~~exhausting exhausts~~ to stacks PP-E-10, 11, 7, and 83.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

.....

(f) ~~Two (2)~~ **One (1)** flow coating lines, identified as emission units #6 and #7, installed in 1994 and 1995 respectively, for coating plastic automotive lighting assembly components. ~~Each~~ **The** flowcoater has a maximum capacity of 1,440 units per hour, and ~~each~~ uses a regenerative thermal oxidizer to reduce volatile organic compound emissions and ~~exhausting~~ **exhausts** to stacks PP-E-10, 11, 7, and 83.

.....

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

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

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

Pursuant to 326 IAC 8-1-6 (Requirements for new facilities) and Construction Permit CP-071-2037, issued on October 16, 1991, BACT for the ~~two (2)~~ **one (1)** flow coating lines, identified as emission units #6 and #7, has been determined to be:

The use of a thermal oxidizer system with a capture efficiency of 100% and a destruction efficiency of 95%. The minimum oxidizer operation temperature shall not fall below 1,400 degrees Fahrenheit or a temperature and fan amperage established during the latest stack test.

.....

D.1.3 Volatile Organic Compounds (VOC) PSD Minor Limit [326 IAC 2-2]

The VOC emissions from the ~~two (2)~~ **one (1)** flow coating lines, identified as units #6 and #7, and the one (1) lens coating booth, identified as unit #13, shall be less than 200.57 tons per twelve consecutive month period with compliance determined at the end of each month. Compliance with this limit in combination with potential emissions from emission units #3, #8, #9, #10, the twelve (12) closed injection molding presses, the base coat surface coating process, and insignificant combustion units, shall keep the source-wide emissions of VOC to less than 250 tons per year and shall render the requirements of 326 IAC 2-2 not applicable.

.....

D.1.6 Volatile Organic Compounds (VOC) Emissions

Compliance with Condition D.1.3 shall be determined by the following equation:

VOC emissions by units #6, #7 and #13 = ((amount of VOC delivered to coating applicators of units #6 and #7) * (1 – overall control efficiency of thermal oxidizer system from the latest compliant stack test)) + ((amount of VOC delivered to coating applicators of unit #13) * (1 – overall control efficiency of thermal oxidizer system from the latest compliant stack test))

.....

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

Part 70 Quarterly Report

Source Name: Valeo Sylvania, LLC
 Source Address: 1231 A Avenue North, Seymour, Indiana 47274
 Mailing Address: 1231 A Avenue North, Seymour, Indiana 47274
 Part 70 Permit No.: T071-18360-00006
 Facility: Units #6, #7 and #13
 Parameter: VOC
 Limit: Less than 200.57 tons per twelve (12) consecutive month period

QUARTER :

YEAR:

Month	VOC Emissions This Month	VOC Emissions Previous 11 Months	VOC Emissions 12 Month Total
Month 1			
Month 2			
Month 3			

VOC emissions by units #6, #7 and #13 = ((amount of VOC delivered to coating applicators of units #6 and #7) * (1 – overall control efficiency of thermal oxidizer system from the latest compliant stack test)) + ((amount of VOC delivered to coating applicators of unit #13) * (1 – overall control efficiency of thermal oxidizer system from the latest compliant stack test)), as stated in Condition D.1.6.

.....

Comment 2: In reference to D.1.8 Thermal Oxidizer Temperature, the source would like to be able to demonstrate compliance with the temperature requirements by using an instantaneous temperature reading or an alternative to the 3-hour average.

Response 2: Instantaneous readings for the purpose of compliance with the temperature requirements are more stringent than 3-hour averages. The operating temperature shall be determined from the most recent valid stack test which will utilize a 3-hour average. If all temperatures recorded are above the minimum temperature, the source will be in compliance with the 3-hour average temperature requirement. For the purpose of demonstrating continuous compliance with the temperature requirement, IDEM, OAQ agrees that the Permittee can utilize continuous readings as follows:

D.1.8 Thermal Oxidizer Temperature [40 CFR 64]

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizers for measuring operating temperature. For purposes of this condition, continuous shall mean temperature measurement no less than once per minute. The output of this system shall be recorded as ~~3-hour average~~ **continuous readings**. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall operate the thermal oxidizers at or above the 3-hour average temperature of 1400°F.
- (b) The Permittee shall determine the 3-hour average temperature from the most recent valid stack test that demonstrates compliance with limits in Conditions D.1.1 and D.1.2, as approved by IDEM.
- (c) On and after the date the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the 3-hour average temperature as observed during the compliant stack test.

D.1.12 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.2 and D.1.6, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in Conditions D.1.2 and D.1.6.
 - (1) The VOC content of each coating material and solvent used less water.
 - (2) The amount of coating material and solvent used on a monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (3) The monthly cleanup solvent usage; and
 - (4) The total VOC usage for each month.
 - (5) The continuous temperature records (~~on a 3-hour average basis~~) for the thermal oxidizer and the 3-hour average temperature used to demonstrate compliance during the most recent compliant stack test.
 - (6) Daily records of the fan amperage.

Upon further review, IDEM, OAQ has decided to make the following changes:

- (1) All occurrences of IDEM's mailing addresses have been updated in the permit. All addresses have been revised to include a mail code (MC) as follows:

Asbestos Section:	MC 61-52 IGCN 1003
Compliance Branch:	MC 61-53 IGCN 1003
Permits Branch:	MC 61-53 IGCN 1003
Technical Support and Modeling Section:	MC 61-50 IGCN 1003

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

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

Source Background and Description

Source Name:	Valeo Sylvania, L.L.C.
Source Location:	1231 A Avenue North, Seymour, IN 47274
County:	Jackson
SIC Code:	3647
Operation Permit No.:	T071-6559-00006
Operation Permit Issuance Date:	August 27, 1999
Permit Renewal No.:	T071-18360-00006
Permit Reviewer:	Linda Quigley / EVP

The Office of Air Quality (OAQ) has reviewed a Part 70 Operating Permit renewal application from Valeo Sylvania, L.L.C. relating to the operation of a stationary source producing automotive plastic lighting assemblies.

Permitted Emission Units and Pollution Control Equipment

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

- (a) One (1) spray paint booth, South wing Manual Spray Paint Booth, installed in 1996, using high volume low pressure spray application, identified as emission unit #3, for coating plastic automotive lighting assembly components with a maximum capacity of 100 units per hour, using dry filters for overspray control, and exhausting to stacks PP-E-40, 75 and 88.
- (b) One (1) paint booth, Hard Coat #1, installed in 1994, using high volume low pressure spray application, identified as emission unit #8, for coating plastic automotive lighting assembly components with a maximum capacity of 720 units per hour, using an Oscar VIII Overspray Collection and Recovery System for overspray control and exhausting to stacks PP-E-30, 32, 33, and 34.
- (c) One (1) paint booth, Hard Coat #2, installed in 1996, using high volume low pressure spray application, identified as emission unit # 9, for coating plastic automotive lighting assembly components with a maximum capacity of 720 units per hour, using an Oscar VIII Overspray Collection and Recovery System for overspray control and exhausting to stacks PP-E-84, 85, and 90.
- (d) One (1) robotic argent paint system, installed in 2003, using high volume low pressure spray application, identified as emission unit #10, for coating plastic automotive lighting assembly components, with a maximum capacity of 200 units per hour, using dry filters for overspray control exhausting to one (1) stack, identified as PP-E-03-101.
- (e) Eleven (11) Thermoset Closed Injection Molding Presses, installed in 1978, and one (1) Thermoset Closed Injection Molding Press, installed in 2006, collectively identified as BMC, for closed injection molding of automotive lighting reflectors with a throughput capacity of 1194.20 pounds of bulk mold compound per hour.

- (f) Two (2) flow coating lines, identified as emission units #6 and #7, installed in 1994 and 1995 respectively, for coating plastic automotive lighting assembly components. Each flowcoater has a maximum capacity of 1,440 units per hour, and each uses a regenerative thermal oxidizer to reduce volatile organic compound emissions and exhausting to stacks PP-E-10, 11, 7, and 83.
- (g) One (1) lens surface coating booth, installed in 2006, using flowcoating application method, with a maximum throughput of 144 lenses per hour, identified as emission unit #13, with VOC controlled by one (1) regenerative thermal oxidizer, which exhausts to one (1) stack, identified as HC-05-01.
- (h) One (1) base coat surface coating process, installed in 2006, using air atomization spray application, with a maximum throughput of 144 units per hour, using dry filters for particulate control, and exhausting inside the building.

Unpermitted Emission Units and Pollution Control Equipment

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

Insignificant Activities

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:
 - (1) One (1) thermal oxidizer with a maximum heat input capacity of 0.17 MMBtu/hr;
 - (2) Seventeen (17) HVAC units with a combined total heat input capacity of 3.2 MMBtu/hr;
 - (3) Eighteen (18) AMU units with a combined total heat input capacity of 50.00 MMBtu/hr;
 - (4) Seventeen (17) miscellaneous heaters with a combined total heat input capacity of 29.79 MMBtu/hr;
 - (5) One (1) natural gas fired boiler with a maximum heat input capacity of 4.69 MMBtu/hr, installed after June 1989; [326 IAC 6-2-4]
 - (6) One (1) natural gas fired boiler with a maximum heat input capacity of 6.42 MMBtu/hr, installed after June 1989. [326 IAC 6-2-4]
- (b) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (c) Cleaners and solvents characterized as follows:
 - A) having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100EF) or;
 - B) having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20EC (68EF);the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (d) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-3-2]
- (e) Closed loop heating and cooling systems.
- (f) Infrared cure equipment.

- (g) Exposure chambers ("towers", "columns"), for curing of ultraviolet inks and ultra-violet coatings where heat is the intended discharge.
- (h) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.
- (i) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.
- (j) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.
- (k) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (l) Paved and unpaved roads and parking lots with public access.
- (m) Enclosed conveyor systems for conveying plastic raw materials and plastic finished goods.
- (n) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (o) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. [326 IAC 6-3-2]
- (p) Any unit emitting greater than 1 pound per day but less than 5 pounds per day or 1 ton per year of a single HAP; in this case, molding presses for ABS resin which emit styrene.
- (q) Vacuum metalizing units which have emissions less than or equal to insignificant thresholds.
- (r) One baghouse controlling dust from the BMC press area. [326 IAC 6-3-2].

Existing Approvals

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

- (a) Part 70 Permit No. T071-6559-00006, issued on August 24, 1999;
- (b) First Part 70 re-opening No.071-13326-00006, issued on March 18, 2002;
- (c) First Administrative Amendment No. 071-14925-00006, issued on June 12, 2003;
- (d) First Minor Source Modification No. 071-17822-00006, issued on November 24, 2003;
- (e) First Significant Permit Modification No. 071-18127-00006, issued on December 9, 2003;
- (f) First Significant Source Modification No. 071-21822-00006, issued on March 23, 2006;
- (g) Second Significant Permit Modification No. 071-21932-00006, issued on April 7, 2006.

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

The following terms and conditions from previous approvals have been revised in this Part 70 permit:

- (1) Part 70 Permit No. T071-6559-00006, issued on August 24, 1999, Condition A.2:

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

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

- (a) ~~Two~~ One (2 1) spray paint booths, ~~Aero Coating Booth~~ and the South wing Manual Spray Paint Booth, identified as emission units ~~2 and 3~~, for coating plastic automotive lighting assembly components with a maximum capacity of ~~1,395 units per hour at Aero Coating, and 100 units per hour at the South wing Manual Spray Paint Booth~~, using dry filters for overspray control, and exhausting to stacks PP-E-40, 75 and 88.
- (b) Two (2) flow coating lines, flowcoater #1, identified as emission unit 6, and flowcoater #2, identified as emission unit 7, for coating plastic automotive lighting assembly components. Each flowcoater has a maximum capacity of 1,440 units per hour, and each uses a regenerative thermal oxidizer to reduce volatile organic compound emissions and dry filters for overspray control, and exhausting to stacks PP-E-10, 11, 7, and 83.
- (c) One (1) paint booth, Hard Coat #1, identified as emission unit 8, for coating plastic automotive lighting assembly components with a maximum capacity of 720 units per hour, using an Oscar VIII Overspray Collection and Recovery System for overspray control and exhausting to stacks PP-E-30, 32, 33, and 34.
- (d) One (1) paint booth, Hard Coat #2, identified as emission unit 9, for coating plastic automotive lighting assembly components with a maximum capacity of 720 units per hour, using an Oscar VIII Overspray Collection and Recovery System for overspray control and exhausting to stacks PP-E-84, 85, and 90.
- (e) One (1) robotic argent paint system, identified as emission unit 10, for coating plastic automotive lighting assembly components, with a maximum capacity of 200 units per hour, using dry filters for overspray control exhausting to one (1) stack, identified as PP-E-03-101.

Reason changed: Item (a) is modified in this renewal because the source removed Aero coating booth, identified as unit 2, from the plant.

- (2) Part 70 permit No. T071-6559-00006, issued on August 24, 1999, Condition D.1.1:

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

~~Pursuant to CP-36-12-91-0103, issued on December 29, 1987, the quantity of paint usage and solvent content, as percent volatile organic compounds by weight, shall be such that the VOC emissions from the surface coating facilities shall not exceed ten (10) tons per month combined. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply.~~

Reason Changed: When CP 36-12-91-0103 permit was issued on December 29, 1987, the source had five (5) paint spray booths, identified as units #1, #2, #3, #4, and #5. Pursuant to CP 36-12-91-0103, these spray booths had a combined VOC emission limit of ten (10) tons per month. The source has dismantled units #1, #2, #4, and #5 and the only operational emission unit, currently, for which ten (10) tons per month limit applies is unit #3. Unit #3 has unrestricted potential to emit VOC of 2.83 tons per year and is not subject to the requirements of 326 IAC 8-1-6, best available control technology (BACT).

Enforcement Issue

There are no enforcement actions pending.

Recommendation

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

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

An administratively complete Part 70 permit renewal application for the purposes of this review was received on December 31, 2003.

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

Emission Calculations

See Appendix A of this document for detailed emission calculations, pages 1 through 5.

County Attainment Status

The source is located in Jackson County.

Pollutant	Status
PM2.5	Attainment
PM-10	Attainment
SO ₂	Attainment
NO ₂	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Jackson County has been classified as unclassifiable or attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM 2.5 emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as a surrogate for PM2.5 emissions. See the State Rule Applicability – Entire Source section.

- (b) Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC emissions and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Jackson County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (c) Jackson 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. See the State Rule Applicability for the source section.
- (d) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 redesignating Delaware, Greene, Jackson, Vanderburgh, Vigo and Warrick Counties to attainment for the eight-hour ozone standard.
- (e) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.
- (f) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD or Emission Offset applicability.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	tons/year
PM	142.48
PM-10	144.84
SO ₂	0.25
VOC	2004.11
CO	34.68
NO _x	41.29

HAPs	tons/year
xylene	0.19
toluene	6.11
styrene	4.34
Total	10.63

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC and PM₁₀ are each equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all other criteria pollutants, except PM, are less than 100 tons per year.

Actual Emissions

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

Pollutant	Actual Emissions (tons/year)
PM	Not reported
PM-10	0.00
SO ₂	0.00
VOC	49.00
CO	4.00
NO _x	5.00
HAP (specify)	Not reported

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.

Potential to Emit After Issuance

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

Process/emission unit	Potential to Emit (tons/year)							
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs	
							Single	Total
Unit 3	0.18	0.18	0.00	2.83	0.00	0.00	0.72	0.72
Unit 6 ⁽¹⁾	0.00	0.00	0.00	47.43	0.00	0.00	0.00	0.00
Unit 7 ⁽¹⁾	0.00	0.00	0.00	47.43	0.00	0.00	0.00	0.00
Unit 8	5.44	5.44	0.00	6.34	0.00	0.00	0.00	0.00
Unit 9	5.44	5.44	0.00	6.34	0.00	0.00	0.00	0.00
Unit 10	2.34	2.34	0.00	22.77	0.00	0.00	5.38	5.57
Unit 13 ⁽¹⁾	0.00	0.00	0.00	3.02	0.00	0.00	0.00	0.00

Process/emission unit	Potential to Emit (tons/year)							
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs	
							Single	Total
Closed Molding	0.00	0.00	0.00	4.34	0.00	0.00	4.34	4.34
Natural Gas Combustion	0.78	3.14	0.25	2.27	34.68	41.29	0.00	0.00
Base coat (UVACR)	0.77	0.77	0.00	1.74	0.00	0.00	0.00	0.00
Total PTE	14.95	17.31	0.25	144.51	34.68	41.29	6.11	10.63

(1) Represents VOC emissions controlled by thermal oxidizers pursuant to 326 IAC 8-1-6.

- (a) This existing stationary source is not major for PSD because the emissions of each criteria pollutant are less than two hundred fifty (<250) tons per year, and it is not one of the twenty-eight (28) listed source categories.
- (b) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

Federal Rule Applicability

- (a) The requirements of 40 CFR Part 64, Compliance Assurance Monitoring, apply to a pollutant-specific emissions unit (PSEU), as defined in 40 CFR 64.1, at a major source that is required to obtain a Part 70 permit if the PSEU meets the following criteria:
 - (1) the unit is subject to an emission limitation or standard for an applicable regulated air pollutant,
 - (2) the unit uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard, and
 - (3) the unit has a potential to emit (PTE) before controls equal to or greater than 100 percent of the amount (tons per year) of the pollutant required for a source to classified as a Part 70 major source.

This source was issued initial Part 70 Permit No. T071-6559-00006, on August 24, 1999. The two (2) flow coating lines, identified as units #6 and #7, as PSEUs have uncontrolled PTE at greater than 100 percent of the applicable major Part 70 threshold, each uses a control device (Thermal Oxidizer TO-1) as defined in 40 CFR 64.1 to comply with the BACT 326 IAC 8-1-6 requirements. The PSEUs meets the criteria for Compliance Assurance Monitoring applicability. Hence 40 CFR Part 64, Compliance Assurance Monitoring, are applicable to the two (2) flow coat lines.

The pollutant-specific emission units as two (2) flow coating lines, identified as units #6 and #7, are not a "large units" as described in 40 CFR 64.5. Therefore, the owner or operator has to submit a CAM plan pursuant to 40 CFR 64 as part of the Part 70 renewal application. The Permittee has submitted a CAM plan on December 16, 2003. The current monitoring requirements, which include a continuous monitoring system for measuring operating temperature of the thermal oxidizer and fan amperage observations, for the two (2) flow coating lines, identified as unit # 6 & 7, will satisfy the requirements of 40 CFR 64, Compliance Assurance Monitoring.

All other emission units as PSEUs have uncontrolled PTE less than 100 percent of applicable major Part 70 threshold. Therefore, the 40 CFR Part 64, Compliance Assurance Monitoring, is not applicable to other emission units.

- (b) The two (2) natural gas fired boilers, constructed after June 1989, are not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c - 60.48c, Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units) because each boiler has a maximum design heat input capacity less than 10 MMBtu per hour.
- (c) The two (2) natural gas fired boilers, are not subject to 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 because the potential to emit of single HAPs at this source is less than ten (10) tons per year and the potential to emit the combination of HAPs is less than twenty-five (25) tons per year. Since this is an area source of hazardous air pollutants, as defined at 40 CFR 63.2, the source is not subject to the requirements of 40 CFR Part 63, Subpart DDDDD and the related rule requirements are not included in the permit.
- (d) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products [40 CFR Part 63, Subpart PPPP] because the potential to emit of single HAPs at this source is less than ten (10) tons per year and the potential to emit the combination of HAPs is less than twenty-five (25) tons per year. Since this is an area source of hazardous air pollutants, as defined at 40 CFR 63.2, the source is not subject to the requirements of 40 CFR Part 63, Subpart PPPP and the related rule requirements are not included in the permit.

State Rule Applicability – Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

The source was constructed in 1978, after the PSD applicability of August 7, 1977. This source has always been a minor stationary source because the controlled emissions of volatile organic compounds have always been less than 250 tons per year and it is not one of the 28 listed source categories.

The source was issued CP 071-2037 on October 16, 1991. This permit was issued to install two (2) flow coating lines, identified as units # 6 and #7. The flow coating lines are subject to 326 IAC 8-1-6 because potential VOC emissions exceed 25 tons per year and are not otherwise regulated by other provisions of 326 IAC 8. Pursuant to 326 IAC 8-1-6, the source is required to use a thermal oxidizer system with a capture efficiency of 100% and destruction efficiency of 95%.

The unrestricted potential to emit of VOC from the entire source was greater than 250 tons per year. After the issuance of CP 071-2037 in 1991, the controlled emissions of VOC from the entire source were 142.19 tons per year, which is less than 250 tons per year. However, there is no enforceable limit in the permit, therefore, a source-wide VOC limit will be established in this permit in order to render 326 IAC 2-2 not applicable (see page 10 below).

The source was issued CP 071-3564 on June 29, 1994. This permit was issued to install Hard Coat Booth #1, identified as emission unit # 8, with a recovery system as control device. The uncontrolled VOC emissions were 31.8 tons per year. Controlled VOC emissions were 15.9 tons per year. After the issuance of this permit, the source was still a minor stationary source in 1994 because the restricted potential emissions of VOC from the entire source were less than 250 tons per year. *(Note: The source has since been using a lower VOC coating in this booth, see page two (2) of Appendix A).*

The source was issued CP 071-5089 on July 8, 1996. This permit was issued to install Hard Coat Booth #2, identified as emission unit #9, with a recovery system as control device. The unrestricted potential VOC emissions were 6.82 tons per year. After the issuance of this permit, the source was still a minor stationary source in 1996 because the restricted potential emissions of VOC from the entire source were less than 250 tons per year. *(Note: The source has since been using a lower VOC coating in this booth, see page two (2) of Appendix A).*

The source was issued CP 071-5423 on August 1, 1996. This permit was issued to install one (1) robotic paint spray booth (emission unit #10, since replaced). The unrestricted potential VOC emissions were 24.89 tons per year. After the issuance of this permit, the source was still a minor stationary source in 1996 because the restricted potential emissions of VOC from the entire source were less than 250 tons per year.

The source was issued TV 071-6559-00006 on August 27, 1999. This permit incorporated the existing permitted emission units as listed above, two paint booths constructed in 1987 (emission units #2 and #3; emission unit #2 has since been removed), as well as incorporating eleven (11) Thermoset Closed Injection Molding Presses. The unrestricted potential VOC emissions from the entire source were greater than 250 tons per year. The restricted potential VOC emissions from the entire source were 182.99 tons per year, which is less than 250 tons per year.

The source was issued Minor Source Modification No. 071-17822-00006 on November 24, 2003 for the installation of one (1) robotic argnet paint system, identified as unit #10. The unrestricted potential VOC emissions were 22.77 tons per year. After the issuance of this permit, the source was still a minor stationary source in 2003 because the restricted potential emissions of VOC from the entire source were less than 250 tons per year.

The source was issued Significant Source Modification No. 071-21822-00006 on March 23, 2006 for the installation of an automotive lens coating booth, identified as unit #13, the addition of one (1) Thermoset Closed Injection Molding Press, and a base coat surface coating process. The potential VOC emissions after controls were 4.76 tons per year. The restricted potential to emit of VOC from the entire source was less than 250 tons per year.

Note: When SSM 071-21822-00006 was issued, Jackson County was designated as non-attainment for the 8-hour ozone standard. The source was designated a major source under Emission Offset rules. Jackson County has since been redesignated as attainment for the 8-hour ozone standard. This source is still considered a minor source under PSD rules.

In order to render the requirements of 326 IAC 2-2 not applicable, the following applies:

The VOC emissions from the two (2) flow coating lines, identified as units #6 and #7, and the one (1) lens coating booth, identified as unit #13, shall be less than 200.57 tons per twelve consecutive month period with compliance determined at the end of each month. Compliance with this limit in combination with potential emissions from emission units #3, #8, #9, #10, the twelve (12) closed injection molding presses, the base coat surface coating process, and insignificant combustion units, shall keep the source-wide emissions of VOC to less than 250 tons per year and shall render the requirements of 326 IAC 2-2 not applicable.

VOC emissions shall be determined by the following equation:

$(\text{VOC emissions from units \#6, \#7 and \#13}) < 249 \text{ tons per year} - (\text{PTE of all other emission units})$

$\text{VOC emissions by units \#6, \#7 and \#13} = ((\text{amount of VOC delivered to coating applicators of units \#6 and \#7}) * (1 - \text{overall control efficiency of thermal oxidizer system from the latest compliant stack test})) + ((\text{amount of VOC delivered to coating applicators of unit \#13}) * (1 - \text{overall control efficiency of thermal oxidizer system from the latest compliant stack test}))$

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 2006 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 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

326 IAC 2-4.1 does not apply to the source because the source does not emit greater than 10 tons per year of a single HAP or 25 tons per year of a combination of HAPs.

State Rule Applicability – Individual Facilities

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

The Permittee shall comply as follows:

- (a) Pursuant to 326 IAC 6-3-2(d), particulate from units #3, #8, #9, #10 and the base coat surface coating process shall be controlled by particulate dry filters, and the Permittee shall operate the control devices in accordance with manufacturer's specifications.
- (b) Pursuant to 326 IAC 6-3-1(b)(7), the two (2) flow coating lines, identified as units #6 and #7, and the one (1) lens coating booth, using flow coating application, identified as emission unit #13, are exempt from 326 IAC 6-3.
- (c) 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. Therefore, the particulate emissions from the brazing equipment, cutting torches, soldering equipment, welding equipment, grinding and machining operations, deburring; buffing, polishing, abrasive blasting, pneumatic conveying, woodworking operations and BMC press area, each with a process weight rate of less than one hundred (100) pounds per hour, shall not exceed 0.551 pounds per hour.

326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)

The two (2) natural gas fired boilers as insignificant activities, both installed in June 1989 and individually rated at 4.69 MMBtu per hour and 6.42 MMBtu/hr, respectively, are subject 326 IAC 6-2 (Particulate Emissions Limitations for Sources of Indirect Heating). Pursuant to 326 IAC 6-2-1, indirect heating facilities not in a specified county and receiving a permit to construct on or after September 21, 1983, shall limit particulate matter (PM) emissions according to the equation at 326 IAC 6-2-4 as follows:

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

where: Pt = pounds of PM emitted per MMBtu heat input (lb/MMBtu)
Q = total source operating capacity rating (MMBtu/hr)

$$Pt = 1.09/11.11^{0.26} = 0.58$$

Therefore, the emission limit for each of the two (2) boilers is 0.58 lb/MMBtu.

Compliance calculation:

$(0.09 \text{ tons PM/yr}) * (\text{hr}/11.11 \text{ MMBtu}) * (\text{yr}/8,760 \text{ hrs}) * (2,000 \text{ lbs/ton}) = 0.002 \text{ lbs PM/MMBtu}$

Actual lbs PM/MMBtu (0.002) is less than allowable lbs PM/MMBtu (0.58), therefore the boilers can comply with the requirements of 326 IAC 6-2-4.

326 IAC 8-1-6 (BACT)

- (a) The potential VOC emissions from the coating booths identified as units #3, #8, #9, #10 and base coat surface coating process, and the closed molding area, identified as BMC area, are each less than 25 tons per year. Therefore, 326 IAC 8-1-6 does not apply.
- (b) The potential VOC emissions from each of the two (2) flow coating lines, identified as emission units #6 and #7, are greater than 25 tons per year. Therefore, 326 IAC 8-1-6 apply to these emission units #6 and #7. Pursuant to CP 071-2037, issued on October 16, 1991, BACT for these flow coating lines has been determined to be the use of a thermal oxidizer system with a capture efficiency of 100% and a destruction efficiency of 95%. The minimum oxidizer operation temperature shall not fall below 1,400 degrees Fahrenheit or a temperature and fan amperage established during the latest stack test. In addition, the source shall comply with the following emission limitation:
 - (1) The total amount of VOC delivered to the coating applicators of the two (2) flow coating lines, identified as emission units #6 and #7, shall be limited to less than 1897.08 tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month. This limit, in conjunction with (b), limits the potential to emit VOC from the two (2) flow coating lines to less than 94.85 tons per year.

Compliance with the above limits and conditions will satisfy the requirements of 326 IAC 8-1-6.

- (c) Pursuant to significant permit modification no. 071-21932-00006, IDEM, OAQ has determined that the BACT for the one (1) lens surface coating booth, identified as unit #13 is the use of a RTO with an overall control efficiency of 95% to control VOC emissions from the lens surface coating booth. In addition, the source shall comply with the following emission limitations:
 - (1) The exhaust shall be vented to Regenerative Thermal Oxidizer with a minimum of 95% destruction and 100% capture efficiency for VOC;

- (2) The total amount of VOC delivered to the coating applicators of the lens surface coating booth shall be limited to less than 60.41 tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month. This limit, in conjunction with (c), limits the potential to emit VOC from the lens surface coating booth to less than 3.02 tons per year.

Compliance with the above limits and conditions will satisfy the requirements of 326 IAC 8-1-6.

Testing Requirements

- (a) The Permittee shall conduct a performance test to verify the overall control efficiency of the thermal oxidizer controlling VOC emissions from the one (1) lens surface coating booth utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C – Performance Testing.

The most recent valid compliance demonstration was conducted on September 12 and 29, 2006. The overall efficiency of the thermal oxidizer was determined to be 97.9 percent. Test results are subject to final approval by the Compliance Data Section.

- (b) The Permittee shall conduct a performance test to verify the overall control efficiency of the thermal oxidizer controlling VOC emissions from the two (2) flow coating lines, identified as emission units #6 & #7 utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C – Performance Testing.

The most recent valid compliance demonstration was conducted on September 12 and 29, 2006. The overall efficiency of the thermal oxidizer was determined to be 98.71 percent. Test results are subject to final approval by the Compliance Data Section.

- (c) Pursuant to Significant Permit Modification 071-21932-00006, the Permittee performed testing on a representative thermoset closed injection molding press, in order to demonstrate compliance with the styrene limit in Condition D.1.2. on October 26, 2006. Test results demonstrated compliance and established an emission factor for styrene emissions from the closed injection molding presses of 0.0015 lb of styrene per lb of product. Test results are subject to final approval by the Compliance Data Section.

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.

- (a) The thermal oxidizers have applicable compliance determination conditions as specified below:
- (1) A continuous monitoring system shall be calibrated, maintained, and operated on each of the thermal oxidizers for measuring operating temperature. For the purposes of this condition, continuous shall mean no less often than once per minute. The output of this system shall be recorded as a 3-hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the 3-hour average temperature of 1400°F.
 - (2) The Permittee shall determine the 3-hour average temperature from the most recent valid stack test that demonstrates compliance with limits in Conditions D.1.1 and D.2.1 of the Part 70 Permit, as approved by IDEM.
 - (3) On and after the date the approved stack test results are available, the Permittee shall operate each of the thermal oxidizers at or above the 3-hour average temperature as observed during the compliant stack test.
 - (4) The Permittee shall determine the appropriate fan amperage from the most recent compliant valid stack test.
 - (5) The fan amperage shall be observed at least once per day when each of the thermal oxidizers is in operation. When for any one reading, the fan amperage is outside the normal range or the temperature is below the temperature as established in most recent compliant stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A reading that is outside the range as established in the most recent compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.
- (b) The coating booths, identified as unit #3, unit #8, unit #9, unit #10, and base coat surface coating process, have applicable compliance monitoring conditions as specified below:
- (1) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (PP-E-40, 75 and 88, PP-E-30, 32, 33 and 34, PP-E-84, 85 and 90, and PP-E-03-101) while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

These monitoring conditions are necessary because the dry filters must operate properly to ensure compliance with 326 IAC 6-3-2 (Particulate Emission Limitations, Work Practices, and Control Technologies) and the thermal oxidizers must operate properly to ensure compliance with 326 IAC 2-7 (Part 70), and 326 IAC 8-1-6.

Conclusion

The operation of this stationary source producing automotive plastic lighting assemblies shall be subject to the conditions of this Part 70 Permit T071-18360-00006.

**Appendix A: Emissions Calculations
VOC and Particulate
Entire Source Emissions**

**Company Name: Valeo Sylvania, LLC
Address City IN Zip: 1231 A Avenue North, Seymour, IN 47274
Part 70 Permit: T071-18360-00006
Reviewer: LQ/EVP
Date: March 5, 2007**

Unlimited Potential to Emit

Process / Emission Unit	PM (tons / yr)	PM-10 (tons / yr)	SO2 (tons / yr)	NOx (tons / yr)	VOC (tons / yr)	CO (tons / yr)	Single HAP	HAPS (tons / yr)
Wabash Black / Unit 3	1.78	1.78	0.00	0.00	2.83	0.00	0.72	0.72
UVB63R2VS / Unit 6	0.00	0.00	0.00	0.00	427.14	0.00	0.00	0.00
UVB63R2VS / Unit 7	0.00	0.00	0.00	0.00	427.14	0.00	0.00	0.00
butyl acetate/ Unit 6	0.00	0.00	0.00	0.00	521.40	0.00	0.00	0.00
butyl acetate/ Unit 7	0.00	0.00	0.00	0.00	521.40	0.00	0.00	0.00
UVT2000V1 / Unit 8	54.39	54.39	0.00	0.00	6.34	0.00	0.00	0.00
UVT2000V1 / Unit 9	54.39	54.39	0.00	0.00	6.34	0.00	0.00	0.00
Argent Paint 303LE21326H / Unit 10	22.41	22.41	0.00	0.00	21.19	0.00	5.38	5.38
Hardener LE9425B / Unit 10	0.99	0.99	0.00	0.00	1.58	0.00	0.19	0.19
UV SRC topcoat/Unit 13	0.00	0.00	0.00	0.00	6.37	0.00	0.00	0.00
Isopropyl Alcohol/Unit 13	0.00	0.00	0.00	0.00	54.03	0.00	0.00	0.00
Basecoat (Barnz UVACR)	7.74	7.74	0.00	0.00	1.74	0.00	0.00	0.00
Closed Molding Operations	0.00	0.00	0.00	0.00	4.34	0.00	4.34	4.34
Natural gas combustion	0.78	3.14	0.25	41.29	2.27	34.68	0.00	0.00
Total	142.48	144.84	0.25	41.29	2004.11	34.68	6.11	10.63

Limited Potential to Emit

Process / Emission Unit	PM (tons / yr)	PM-10 (tons / yr)	SO2 (tons / yr)	NOx (tons / yr)	VOC (tons / yr)	CO (tons / yr)	Single HAP (Toluene)	HAPs (tons / yr)
Wabash Black / Unit 3	0.18	0.18	0.00	0.00	2.83	0.00	0.72	0.72
UVB63R2VS / Unit 6	0.00	0.00	0.00	0.00	21.36	0.00	0.00	0.00
UVB63R2VS / Unit 7	0.00	0.00	0.00	0.00	21.36	0.00	0.00	0.00
butyl acetate/ Unit 6	0.00	0.00	0.00	0.00	26.07	0.00	0.00	0.00
butyl acetate/ Unit 7	0.00	0.00	0.00	0.00	26.07	0.00	0.00	0.00
UVT2000V1 / Unit 8	5.44	5.44	0.00	0.00	6.34	0.00	0.00	0.00
UVT2000V1 / Unit 9	5.44	5.44	0.00	0.00	6.34	0.00	0.00	0.00
Argent Paint 303LE21326H / Unit 10	2.24	2.24	0.00	0.00	21.19	0.00	5.38	5.38
Hardener LE9425B / Unit 10	0.10	0.10	0.00	0.00	1.58	0.00	0.19	0.19
UV SRC topcoat/Unit 13	0.00	0.00	0.00	0.00	0.32	0.00	0.00	0.00
Isopropyl Alcohol/Unit 13	0.00	0.00	0.00	0.00	2.70	0.00	0.00	0.00
Basecoat (Barnz UVACR)	0.77	0.77	0.00	0.00	1.74	0.00	0.00	0.00
Closed Molding Operations	0.00	0.00	0.00	0.00	4.34	0.00	4.34	4.34
Natural gas combustion	0.78	3.14	0.25	41.29	2.27	34.68	0.00	0.00
Total	14.95	17.31	0.25	41.29	144.50	34.68	6.11	10.63

**Appendix A: Emissions Calculations
VOC and Particulate
HAPS from Coating Operations**

**Company Name: Valeo Sylvania, LLC
Address City IN Zip: 1231 A Avenue North, Seymour, IN 47274
Part 70 Permit: T071-18360-00006
Reviewer: LQ/EVP
Date: March 5, 2007**

Material / Emission Unit	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Styrene	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Styrene Emissions (ton/yr)
Wabash Black / Unit 3	8.5	0.00130	100.000	0.00%	15.00%	0.00%	0.00	0.72	0.00
UVB63R2VS / Unit 6	8.8	0.02200	1440.000	0.00%	0.00%	0.00%	0.00	0.00	0.00
UVB63R2VS / Unit 7	8.8	0.02200	1440.000	0.00%	0.00%	0.00%	0.00	0.00	0.00
butyl acetate/ Unit 6	7.5	0.01100	1440.000	0.00%	0.00%	0.00%	0.00	0.00	0.00
butyl acetate/ Unit 7	7.5	0.01100	1440.000	0.00%	0.00%	0.00%	0.00	0.00	0.00
UVT2000V1 / Unit 8	7.7	0.00275	720.000	0.00%	0.00%	0.00%	0.00	0.00	0.00
UVT2000V1 / Unit 9	7.7	0.00275	720.000	0.00%	0.00%	0.00%	0.00	0.00	0.00
Argent Paint 303LE21326H / Unit 10	8.537	0.004800	200.00	0.00%	15.00%	0.00%	0.00	5.38	0.00
Hardener LE9425B / Unit 10	8.05	0.000380	200.00	7.00%	0.00%	0.00%	0.19	0.00	0.00

Total Individual HAP Potential Emissions

0.19

6.11

0.00

Total HAPS Potential Emissions

6.29

METHODOLOGY

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

**Appendix A: Emissions Calculations
VOC and Particulate
Emissions from Closed Molding Operations**

Company Name: Valeo Sylvania, LLC
Address City IN Zip: 1231 A Avenue North, Seymour, IN 47274
Part 70 Permit: T071-18360-00006
Reviewer: LQ/EVP
Date: March 5, 2007

PRODUCT	TYPE	STATUS	V [cm ³]	sg [g/cm ³]	BOM [lb]	BOM AS OF 4/8/03	Press Size	Cycle Time [sec]	sec per hour	hour per day	day per week	week per year	Refl per year	lbs molded per year		% Styrene in BMC	Max lbs of Styrene Input	Max lbs of Styrene Emitted	BMC Press #
NEON	H/L (BUX-RHD)	CURRENT	244	1.838		0.9907	500 ton	57.0	3600	24	7	52	1,103,495	1,093,232	BMCI	11.2%	122,442	1,224	25
GMT 257	H/L	CURRENT	219	1.900	0.9173	0.9095	500 ton	62.3	3600	24	7	52	1,009,618	918,248	BMCI	11.2%	102,844	1,028	26
2003 CLIO	H/L	CURRENT	156	1.838	0.6321	0.6830	500 ton	53	3600	24	7	52	1,186,777	810,569	BMCI	11.2%	90,784	908	27
GMX 320	H/L	CURRENT	248	1.900	1.0388	0.9950	500 ton	81.0	3600	24	7	52	776,533	772,651	BMCI	11.2%	86,537	865	28
02 Viper		CURRENT	196	1.838		0.7930	250 ton	75.0	3600	24	7	52	838,656	665,054	BMCI	11.2%	74,486	745	41
GMT 265	DRL F/L	CURRENT	111	1.838		0.4500	250 ton	55	3600	24	7	52	1,143,622	514,630	BMCI	11.2%	57,639	576	42
03 ST22 Chr	H/L	CURRENT	327	1.900	1.3697	1.2950	500 ton	65.0	3600	24	7	52	967,680	1,253,146	REC T70	3.7%	46,366	464	29
05 WK	H/L (BUX-RHD)	CURRENT	266	1.838	1.0777	1.0777	500 ton	60.0	3600	24	7	52	1,048,320	1,129,774	REC T70	3.7%	41,802	418	39
05 WK	H/L (BUX-LHD)	CURRENT	266	1.838	1.0777	1.0777	500 ton	60.0	3600	24	7	52	1,048,320	1,129,774	REC T70	3.7%	41,802	418	40
05 WK	H/L (DOM.)	CURRENT	266	1.838	1.0777	1.0777	500 ton	60.0	3600	24	7	52	1,048,320	1,129,774	REC T70	3.7%	41,802	418	44
01 RS	H/L	CURRENT	205	1.900	0.8587	0.9132	500 ton	55	3600	24	7	52	1,143,622	1,044,355	REC T70	3.7%	38,641	386	45
Neon	H/L (BUX-RHD)	Proposed	244	1.838		0.9907	500 ton	57	3600	24	7	52	1,103,495	1,093,232	BMCI	11.2%	122,442	1,224	Lean Cell

Total: 867,585 **8,676** **lbs styrene**

tons styrene
4.34 per year

Emission factor = 1% styrene emitted, based on information supplied by manufacturer.
Emissions based on worst case material and maximum load for each press.
Note: Permittee will be required to test a representative molding press to verify the styrene emission factor.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100**

Company Name: Valeo Sylvania, LLC
Address City IN Zip: 1231 A Avenue North, Seymour, IN 47274
Part 70 Permit: T071-18360-00006
Reviewer: LQ/EVP
Date: March 5, 2007

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

94.27

825.8

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.78	3.14	0.25	41.29	2.27	34.68

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Total heat input capacity =

seventeen (17) HVAC units with a combined total heat input capacity of 3.2 MMBtu/hr.

eighteen (18) AMU units with a combined total heat input capacity of 50.0 MMBtu/hr.

seventeen (17) miscellaneous heaters with a combined total heat input capacity of 29.79 MMBtu/hr.

one (1) RTO with a heat input capacity of 0.17 MMBtu/hr.

one (1) boiler with a heat input capacity of 4.69 MMBtu/hr

one (1) boiler with a heat input capacity of 6.42 MMBtu/hr