



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
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TO: Interested Parties / Applicant

DATE: October 14, 2005

RE: Elite Enterprises Inc./ 003-18364-00205

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

Notice of Decision: Approval – Effective Immediately

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

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

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

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

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

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

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

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

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

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

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

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



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PART 70 OPERATING PERMIT RENEWAL OFFICE OF AIR QUALITY

**Elite Enterprises Inc.
2701 South Coliseum Boulevard,
Suite 1158
Fort Wayne, Indiana 46803**

(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.: T003-18364-00205	
Issued by: Original signed by Paul Dubenetzky, Chief Permits Branch Office of Air Quality	Issuance Date: October 14, 2005 Expiration Date: October 14, 2010

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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 Management (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 metal and plastic parts surface coating source that serves the transportation (automotive and trucking), medical, consumer, and building industries.

Responsible Official:	Randall R. Geist
Source Address:	2701 South Coliseum Boulevard, Suite 1158, Fort Wayne, IN 46803
Mailing Address:	2701 South Coliseum Boulevard, Suite 1158, Fort Wayne, IN 46803
General Source Phone Number:	(219) 420-1605
SIC Code:	3714, 3479, 3089
County Location:	Allen
Source Location Status:	Nonattainment for ozone under the 8-hour standard Attainment or Unclassifiable for PM 2.5 Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules and Major Source, under Emission Offset Rules; Major Source, Section 112 of the Clean Air Act

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

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

Plant 1 (Elite Enterprises, Inc., Suite 1158)

(a) Four (4) paint booths, identified as PB1, PB2, PB3, PB4, each equipped with two (2) 8,200 acfm exhaust fans, constructed in October 2002, with a maximum capacity of one of the following:

- (1) 280 plastic large end caps per hour;
- (2) 280 plastic air deflectors per hour;
- (3) 140 plastic door trim parts per hour; and
- (4) 420 miscellaneous metal parts per hour.

Each paint booth is equipped with either a high volume low pressure (HVLP) spray gun application system or electrostatic spray application equipment and water wash filtration for particulate matter control, with each exhausting through one (1) stack, identified as PB-1 through PB-4, respectively.

Plant 2 (Creative Coatings, Inc., Suite 1284)

(b) One (1) overhead conveyor paint line consisting of the following equipment:

- (1) Five (5) stage water wash units (identified as WW 1 through 5), exhausting inside the building.
 - (2) One (1) dry off oven (identified as DO1) and one (1) bake oven (identified as BO1), both burning natural gas and with a combined maximum heat input capacity of 1.89 MMBtu per hour, and exhausting inside the building.
 - (3) Five (5) paint booths (identified as PB5 through PB9), used for coating metal and plastic parts using HVLP guns, with a maximum throughput rate of 75 units per hour, controlled by dry particulate filters and exhausting at stacks PB 5 through PB9.
- (c) One (1) floor conveyor paint line consisting of the following equipment:
- (1) One (1) paint booth (identified as PB10), used for coating metal and plastic parts using HVLP guns, with a maximum throughput rate of 21 units per hour, controlled by dry particulate filters and exhausting at stacks PB10A and 10B.
 - (2) One (1) bake oven (identified as BO2), both burning natural gas and with a combined maximum heat input capacity of 0.94 MMBtu per hour.
- (d) One (1) parts cleaning unit (wipe solvent), with a maximum solvent usage of 1.5 gallons per day.

Plant 2 (Creative Coatings, Inc., Suite 1206)

- (e) One dual use wet paint booth (application of base coat and clear coat), identified as PB-1, capable of painting 40 motor vehicle sets (consisting of plastic parts) per day, using low pressure-high volume (LPHV) spray guns, equipped with dry filters to control emissions, and exhausting through stacks Exh-1 through Exh-6.
- (f) One (1) parts cleaning operation (wipe solvent), with a maximum solvent usage of 1.0 gallons per day (isopropyl alcohol).

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):

Additional activities and categories of activities with emissions less than exemption levels specified at 326 IAC 2-7-1(21), including:

- (a) Paint mixing operations; [326 IAC 2-2] and
- (b) Sanding operations. [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, any applicable definitions found in 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, T003-7588-00205 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]

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

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

B.6 Severability [326 IAC 2-7-5(5)]

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

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

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

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

- (a) The Permittee shall furnish to IDEM, OAQ, 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.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3) (C)]

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

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

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

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

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

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

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

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1), (3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the PMPs, including any required record keeping as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, 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 PMP does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

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

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

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

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

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

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

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
 - (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.
 - (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
 - (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

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

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.
- This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.
- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ 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.14 Prior Permits Superseded [326 IAC 2-1.1-9.5] [326 IAC 2-7-10.5]

- (a) All terms and conditions of permits established prior to T003-18364-00205 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.15 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.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3) (C) (ii)]

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

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

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

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

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

B.18 Permit Renewal [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
Indianapolis, Indiana 46204

- (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.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

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

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

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

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

B.20 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.21 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

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

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

and

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

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

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

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

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

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

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

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

B.22 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.23 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.24 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

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

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

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.25 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.26 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]

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

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit(s) vented to the control equipment is in operation.

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-1(3), 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4, and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.

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

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

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.9 Performance Testing [326 IAC 3-6]

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

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

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

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

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements 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.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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

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

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

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

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

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

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

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

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

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on December 13, 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.14 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.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5]
[326 IAC 2-7-6]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. If a Permittee is required to have an Operation Maintenance and Monitoring (OMM) Plan under 40 CFR 60/63, such plans shall be deemed to satisfy the requirements for a CRP for those compliance monitoring conditions. A CRP shall be submitted to IDEM upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan, and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan to include such response steps taken.

The OMM Plan shall be submitted within the time frames specified by the applicable 40 CFR60/63 requirement.

- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
- (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

- (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
- (3) An automatic measurement was taken when the process was not operating.
- (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

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

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

The 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.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)] [326 IAC 2-6]

- (a) In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2007 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
 - (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);

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

The statement must be submitted to:

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

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.18 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.19 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
Indianapolis, Indiana 46204
- (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.

Stratospheric Ozone Protection

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

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

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

SECTION D.1 FACILITY OPERATION CONDITIONS

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

Plant 1 (Elite Enterprises, Inc., Suite 1158)

- (a) Four (4) paint booths, identified as PB1, PB2, PB3, PB4, each equipped with two (2) 8,200 acfm exhaust fans, constructed in October 2002, with a maximum capacity of one of the following:
- (1) 280 plastic large end caps per hour;
 - (2) 280 plastic air deflectors per hour;
 - (3) 140 plastic door trim parts per hour; and
 - (4) 420 miscellaneous metal parts per hour.

Each paint booth is equipped with either a high volume low pressure (HVLP) spray gun application system or electrostatic spray application equipment and water wash filtration for particulate matter control, with each exhausting through one (1) stack, identified as PB-1 through PB-4, respectively.

Also, the following insignificant activity which is specifically regulated, as defined in 326 IAC 2-7-1(21):

Paint mixing operations; [326 IAC 2-2]

(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.1.1 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 2 to 40 CFR Part 63, Subpart M] [40 CFR 63.3901]

- (a) The provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart M. The Permittee must comply with these requirements on and after January 2, 2004.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

D.1.2 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 2 to 40 CFR Part 63, Subpart P] [40 CFR 63.4501]

- (a) The provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart P. The Permittee must comply with these requirements on and after April 19, 2004.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

D.1.3 National General Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products [40 CFR Part 63, Subpart M MMM] [40 CFR 63.3882] [40 CFR 63.3883] [40 CFR 63.3980]

- (a) The provisions of 40 CFR Part 63, Subpart M MMM (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/misc/miscpg.html>. Pursuant to 40 CFR 63.3883(b), the Permittee must comply with these requirements on and after January 2, 2007.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.
- (c) The affected source is the collection of all of the items listed in 40 CFR 63.3882, paragraphs (b)(1) through (4) that are used for surface coating of miscellaneous metal parts and products within each subcategory as defined in 40 CFR 63.3881(a), paragraphs (2) through (6).
 - (1) All coating operations as defined in 40 CFR 63.3981;
 - (2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
 - (3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and
 - (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.
- (d) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.3980, and are applicable to the affected source.

D.1.4 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products [40 CFR Part 63, Subpart P PPP] [40 CFR 63.4481] [40 CFR 63.4482] [40 CFR 63.4483(b)] [40 CFR 63.4581]

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

- (3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and
 - (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.
- (d) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.4581, and are applicable to the affected source.

D.1.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to CP 003-8519-00205, issued on October 22, 1997, BACT for the four (4) paint booths (PB1 - PB4) for the coating of plastic parts shall be as follows:

- (a) High volume low pressure (HVLP) spray equipment shall be used for all first coat applications,
- (b) Either HVLP or electrostatic equipment shall be used for second coat applications,
- (c) Application of coating to a substrate by means of HVLP spray equipment shall operate between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system, and
- (d) A test gauge air cap and air cap assembly shall be utilized on the HVLP spray equipment and recorded weekly.
- (e) The VOC content of the coatings as applied to the plastic parts shall not exceed the following limits:
 - (1) 5.8 lb VOC per gallon of coating, minus water for topcoats, and
 - (2) 3.7 lb VOC per gallon of coating, minus water for prime coats.

D.1.6 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the spray booths which coat metal parts shall be limited to:

Coatings	Limit (pounds of VOC/gallon of coating less water delivered to the applicator)
Air Dried Coat	3.5
Extreme Performance Coat	3.5
All Other Coat	3.0

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

D.1.7 PSD Minor Limit [326 IAC 2-2]

Pursuant to Significant Source Modification 003-16500-00205 issued January 23, 2004; and as revised by this Title V permit, the total VOC input usage to the four (4) paint booths shall be limited to less than 249.7 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period, with compliance demonstrated at the end of each month. This usage limit is required to limit the source wide potential to emit of VOC to less than 250 tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.1.8 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to CP 003-8519-00205, issued on October 22, 1997 and 40 CFR 52 Subpart P, the PM from the four (4) paint booths (PB₁, PB₂, PB₃, and PB₄) shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

D.1.9 Particulate [326 IAC 6-3-2(d)]

Pursuant to Significant Source Modification 003-16500-00205, issued on January 23, 2004, and 326 IAC 6-3-2(d), particulate from the surface coating shall be controlled by a waterwash, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.1.10 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements:

D.1.11 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]

- (a) Compliance with the VOC content limit in conditions D.1.5(e) and D.1.6 shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis. This volume weighted average shall be determined by the following equation:

$$A = [\sum (C \times U) / \sum U]$$

Where: A is the volume weighted average in pounds VOC per gallon less water as applied;

C is the VOC content of the coating in pounds VOC per gallon less water as applied; and U is the usage rate of the coating in gallons per day.

- (b) Compliance with the VOC content and usage limitations contained in Condition D.1.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. 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.1.12 Monitoring

- (a) Daily inspections shall be performed to that the water level of the water pans meet the manufacturer's recommended level. To monitor the performance of the water pans, the water level of the pans shall be maintained weekly at a level where surface agitation indicates impact of the air flow. Water shall be kept free of solids and floating material that reduces the capture efficiency of the water pan. To monitor the performance of the baffles, weekly inspections of the baffle panels shall be conducted to verify placement and configuration meet recommendations of the manufacturer. In addition, weekly observations shall be made of the overspray from the surface coating booth stacks (PB-1 through PB-4) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

D.1.13 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.5 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 daily and shall be complete and sufficient to establish compliance with the VOC emission limits established in Conditions D.1.5 and D.1.6. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) The VOC content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on a daily 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 volume weighted VOC content of the coatings used for each day.
 - (4) The cleanup solvent usage for each day.
 - (5) The total VOC usage for each day.

- (6) A record of the test gauge air pressure utilized on the HVLP spray equipment for each week.
- (b) To document compliance with Condition D.1.7, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limit established in Condition D.1.7.
 - (1) The amount of coating material and solvent used on monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvent.
 - (2) The cleanup solvent usage for each month;
 - (3) The total VOC usage for each month; and
 - (4) The weight of VOCs emitted for each compliance period.
- (c) To document compliance with Condition D.1.8 and D.1.9, and D.1.12 the Permittee shall maintain a log of weekly overspray observations, weekly observations of the baffles, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.14 Notification Requirements [40 CFR 63.3910]

- (a) General. The Permittee must submit the applicable notifications in 40 CFR Part 63, Sections 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) by the dates specified in those sections, except as provided in 40 CFR 63.3910, paragraphs (b) and (c).
- (b) Initial notification. For this existing affected source, the Permittee must submit the initial notification no later than January 2, 2005. If using compliance with the Surface Coating of Automobiles and Light-Duty Trucks NESHAP (40 CFR Part 63, Subpart IIII) as provided for under 40 CFR 63.3881(d) to constitute compliance with this subpart for any or all of the metal parts coating operations, then the Permittee must include a statement to this effect in the initial notification, and no other notifications are required under this subpart in regard to those metal parts coating operations. If complying with another NESHAP that constitutes the predominant activity at the facility under 40 CFR 63.3881(e)(2) to constitute compliance with this subpart for the metal parts coating operations, then the Permittee must include a statement to this effect in the initial notification, and no other notifications are required under this subpart in regard to those metal parts coating operations.
- (c) Notification of compliance status. The Permittee must submit the notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR Part 63, Sections 63.3940, 63.3950, or 63.3960 that applies to the affected source. The notification of compliance status must contain the information specified in 40 CFR 63.3910(c), paragraphs (1) through (11) and any additional information specified in 40 CFR 63.9(h).

D.1.15 Notification Requirements [40 CFR 63.4510]

- (a) General. The Permittee must submit the notifications in 40 CFR 40 CFR 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply to the affected source by the dates specified in those sections, except as provided in 40 CFR 63.4510, paragraphs (b) and (c).
- (b) Initial notification. The Permittee must submit the initial notification no later than April 19, 2005. If using compliance with the Automobiles and Light-Duty Trucks NESHAP (40 CFR Part 63, Subpart IIII) under 40 CFR 63.4881(d) to constitute compliance with this subpart for the plastic part coating operations, then the Permittee must include a statement to this effect in the initial notification and no other notifications are required under this subpart. If complying with another NESHAP that constitutes the predominant activity at the facility under 40 CFR 63.4481(e)(2) to constitute compliance with this subpart for the plastic coating operations, then the Permittee must include a statement to this effect in the initial notification and no other notifications are required under this subpart.
- (c) Notification of compliance status. The Permittee must submit the notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR 63.4540, 40 CFR 63.4550, or 40 CFR 63.4560 that applies to the affected source. The notification of compliance status must contain the information specified in 40 CFR 63.4510(c), paragraphs (1) through (11) and in 40 CFR 63.9(h).

D.1.16 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12]
[326 IAC 2-7-5]

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

- (a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Part 70 permit the applicable requirements of 40 CFR 63, Subpart MMMM, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.

The significant permit modification application shall be submitted no later than April 2, 2006.

- (b) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Part 70 permit the applicable requirements of 40 CFR 63, Subpart PPPP, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.

The significant permit modification application shall be submitted no later than July 19, 2006.

- (c) The significant permit modification applications shall be submitted to:

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

D.1.17 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.7 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)]

Plant 2 (Creative Coatings, Inc.)

- (b) One (1) overhead conveyor paint line consisting of the following equipment:
 - (1) Five (5) stage water wash units (identified as WW 1 through 5), exhausting inside the building.
 - (2) One (1) dry off oven (identified as DO1) and one (1) bake oven (identified as BO1), both burning natural gas and with a combined maximum heat input capacity of 1.89 MMBtu per hour, and exhausting inside the building.
 - (3) Five (5) paint booths (identified as PB5 through PB9), used for coating metal and plastic parts using HVLP guns, with a maximum throughput rate of 75 units per hour, controlled by dry particulate filters and exhausting at stacks PB 5 through PB9.
- (c) One (1) floor conveyor paint line consisting of the following equipment:
 - (1) One (1) paint booth (identified as PB10), used for coating metal and plastic parts using HVLP guns, with a maximum throughput rate of 21 units per hour, controlled by dry particulate filters and exhausting at stacks PB10A and 10B.
 - (2) One (1) bake oven (identified as BO2), both burning natural gas and with a combined maximum heat input capacity of 0.94 MMBtu per hour.
- (d) One (1) parts cleaning unit (wipe solvent), with a maximum solvent usage of 1.5 gallons per day.

(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 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 2 to 40 CFR Part 63, Subpart M] [40 CFR 63.3901]

- (a) The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart M. The Permittee must comply with these requirements on and after August 18, 2006.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

D.2.2 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 2 to 40 CFR Part 63, Subpart PPPP] [40 CFR 63.2398]

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

D.2.3 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products [40 CFR Part 63, Subpart MMMM] [40 CFR 63.3882] [40 CFR 63.3883] [40 CFR 63.3980]

- (a) The provisions of 40 CFR Part 63, Subpart MMMM (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/misc/miscpg.html>. Pursuant to 40 CFR 63.3883(b), the Permittee must comply with these requirements on and after the date 3 years after the effective date of 40 CFR Part 63, Subpart MMMM.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.
- (c) The affected source is the collection of all of the items listed in 40 CFR 63.3882, paragraphs (b)(1) through (4) that are used for surface coating of miscellaneous metal parts and products within each subcategory as defined in 40 CFR 63.3881(a), paragraphs (2) through (6).
 - (1) All coating operations as defined in 40 CFR 63.3981;
 - (2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
 - (3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and
 - (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.
- (d) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.3980, which are incorporated by reference.

D.2.4 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products [40 CFR Part 63, Subpart PPPP] [40 CFR 63.4481] [40 CFR 63.4482]

- (a) The provisions of 40 CFR Part 63, Subpart PPPP (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/plastic/plasticpg.html>. Pursuant to 40 CFR 63.4483(b), the Permittee must comply with these requirements on and after August 22, 2006.

- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.
- (c) The following emissions units comprise the affected source that is subject to 40 CFR 63, Subpart PPPP:
 - (1) All coating operations as defined in 40 CFR 63.4581;
 - (2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
 - (3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and
 - (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.
- (d) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.4581, and are applicable to the affected source.

D.2.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-6] [326 IAC 2-1.1-5]

- (a) The amount of VOC in coatings, dilution solvents, and clean-up solvents used in the overhead conveyor paint line when painting plastic parts shall be limited to less than twenty-three (23) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) The amount of VOC in coatings, dilution solvents, and clean-up solvents used in the floor conveyor paint line when painting plastic parts shall be limited to less than sixteen (16) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits renders the requirements of 326 IAC 8-1-6 (BACT) and 326 IAC 2-1.1-5 (Nonattainment NSR) not applicable.

D.2.6 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the paint booths which coats metal parts shall be limited to:

Coatings	Limit (pounds of VOC/gallon of coating less water delivered to the applicator)
Air Dried Coat	3.5
Extreme Performance Coat	3.5
All Other Coat	3.0

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

D.2.7 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to 40 CFR 52 Subpart P, the PM from the overhead conveyor paint line and floor conveyor paint line shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

D.2.8 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the overhead conveyor paint line and floor conveyor paint line shall each be controlled by dry particulate filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.2.9 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.2.10 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]

- (a) Compliance with the VOC content limit in Condition D.2.6 shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis. This volume weighted average shall be determined by the following equation:

$$A = [\sum (C \times U) / \sum U]$$

Where: A is the volume weighted average in pounds VOC per gallon less water as applied;
C is the VOC content of the coating in pounds VOC per gallon less water as applied;
and U is the usage rate of the coating in gallons per day.

- (b) Compliance with the VOC content and usage limitations contained in Conditions D.2.5 and D.2.6 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. 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.2.11 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 six (6) paint booth stacks while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a

noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

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

D.2.12 Record Keeping Requirements

- (a) To document compliance with conditions D.2.5 and D.2.6, 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.2.5 and D.2.6.
 - (1) The VOC content of each coating material and solvent used less water;
 - (2) The amount of coating material and solvent used on daily 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 solvent.
 - (3) The volume weighted average VOC content of the coatings used for each day;
 - (4) The daily cleanup solvent usage;
 - (5) The total VOC usage for each day; and
 - (6) A record of the test gauge air pressure utilized on the HVLP spray equipment for each week.
- (b) To document compliance with Condition D.2.11, the Permittee shall maintain a log of weekly overspray observations, weekly observations of the water level in the pans, 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.2.13 Notification Requirements [40 CFR 63.3910]

- (a) General. The Permittee must submit the applicable notifications in 40 CFR Part 63, Sections 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) by the dates specified in those sections, except as provided in 40 CFR 63.3910, paragraphs (b) and (c).
- (b) Initial notification. The Permittee must submit the initial notification no later than 1 year after the effective date of 40 CFR Part 63, Subpart M. M. M. M.

- (c) Notification of compliance status. The Permittee must submit the notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR Part 63, Sections 63.3940, 63.3950, or 63.3960 that applies to the affected source. The notification of compliance status must contain the information specified in 40 CFR 63.3910(c), paragraphs (1) through (11) and any additional information specified in 40 CFR 63.9(h).

D.2.14 Notification Requirements [40 CFR 63.4510]

- (a) General. The Permittee must submit the notifications in 40 CFR 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply to the source by the dates specified in those sections, except as provided in paragraphs (b) and (c) of this section.
- (b) Initial notification. The Permittee must submit the initial notification required by 40 CFR 63.9(b) for a new or reconstructed affected source no later than 120 days after initial startup or 120 days after the effective date of 40 CFR Part 63, Subpart PPPP, whichever is later. (For an existing affected source) the Permittee must submit the initial notification no later than 1 year after the effective date of 40 CFR Part 63, Subpart PPPP. If the Permittee is using compliance with the Automobiles and Light-Duty Trucks NESHAP (subpart IIII of this part) under 40 CFR 63.4881(d) to constitute compliance with this subpart for the plastic part coating operations, then the Permittee must include a statement to this effect in the initial notification and no other notifications are required under this subpart. If the Permittee is complying with another NESHAP that constitutes the predominant activity at the facility under 40 CFR 63.4481(e)(2) to constitute compliance with this subpart for the plastic coating operations, then the Permittee must include a statement to this effect in the initial notification and no other notifications are required under this subpart.
- (c) Notification of compliance status. The Permittee must submit the notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR 63.4540, 40 CFR 63.4550, or 40 CFR 63.4560 that applies to the affected source. The notification of compliance status must contain the information specified in 40 CFR 63.4510, paragraphs (c)(1) through (11) and in 40 CFR 63.9(h).

D.2.15 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12] [326 IAC 2-7-5]

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

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

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

D.2.16 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.5 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

The following insignificant activities, as defined in 326 IAC 2-7-1(21):

Additional activities and categories of activities with emissions less than exemption levels specified at 326 IAC 2-7-1(21), including:

Sanding operations. [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 [326 IAC 6-3-2]**

Pursuant to 326 IAC 6-3-2, the particulate from the sanding operations shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

Compliance Determination Requirements

There are no specific compliance determination requirements applicable to these facilities.

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

There are no specific compliance monitoring requirements applicable to these facilities.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Elite Enterprises Inc.
Source Address: 2701, Coliseum Blvd., Suite 1158, Fort Wayne, IN 46803
Mailing Address: 2701, Coliseum Blvd., Suite 1158, Fort Wayne, IN 46803
Part 70 Permit No.: T003-18364-00205

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
Indianapolis, Indiana 46204
Phone: 317-233-5674
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Elite Enterprises Inc.
Source Address: 2701, Coliseum Blvd., Suite 1158, Fort Wayne, IN 46803
Mailing Address: 2701, Coliseum Blvd., Suite 1158, Fort Wayne, IN 46803
Part 70 Permit No.: T003-18364-00205

This form consists of 2 pages

Page 1 of 2

- | |
|--|
| <input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) <ul style="list-style-type: none">C The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); andC The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16. |
|--|

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

Part 70 Quarterly Report (I)

Source Name: Elite Enterprises Inc.
Source Address: 2701, Coliseum Blvd., Suite 1158, Fort Wayne, IN 46803
Mailing Address: 2701, Coliseum Blvd., Suite 1158, Fort Wayne, IN 46803
Part 70 Permit No.: T003-18364-00205
Facility: Four (4) Paint Booths (PB1, PB2, PB3, PB4)
Parameter: Volatile Organic Compounds (VOC)
Limit: The total VOC input usage to the four (4) paint booths shall be limited to less than 249.7 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period with compliance demonstrated at the end of each month.

YEAR: _____

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

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

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

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report (II)

Source Name: Elite Enterprises Inc.
Source Address: 2701, Coliseum Blvd., Suite 1158, Fort Wayne, IN 46803
Mailing Address: 2701, Coliseum Blvd., Suite 1158, Fort Wayne, IN 46803
Part 70 Permit No.: T003-18364-00205
Facility: Five (5) Paint Booths (PB5, PB6, PB7, PB8 and PB9)
Parameter: Volatile Organic Compounds (VOC)
Limit: The total VOC input usage to the five (5) paint booths shall be limited to less than 23.0 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period with compliance demonstrated at the end of each month.

YEAR: _____

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

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

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

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report (III)

Source Name: Elite Enterprises Inc.
Source Address: 2701, Coliseum Blvd., Suite 1158, Fort Wayne, IN 46803
Mailing Address: 2701, Coliseum Blvd., Suite 1158, Fort Wayne, IN 46803
Part 70 Permit No.: T003-18364-00205
Facility: One (1) Paint Booth (PB10)
Parameter: Volatile Organic Compounds (VOC)
Limit: The total VOC input usage to the paint booth PB10 shall be limited to less than 16.0 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period with compliance demonstrated at the end of each month.

YEAR: _____

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

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

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

Attach a signed certification to complete this report.

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

Source Name: Elite Enterprises Inc.
 Source Address: 2701, Coliseum Blvd. Suite 1158, Fort Wayne, IN 46803.
 Mailing Address: 2701, Coliseum Blvd. Suite 1158, Fort Wayne, IN 46803.
 Part 70 Permit No.: T003-18364-00205

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

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

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

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

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

Source Background and Description

Source Name:	Elite Enterprises, Inc.
Source Location:	2701 South Coliseum Blvd., Suite 1158, Fort Wayne, Indiana 46803
County:	Allen
SIC Code:	3479, 3089
Operation Permit No.:	T003-7588-00205
Operation Permit Issuance Date:	September 3, 1999
Permit Renewal No.:	T003-18364-00205
Permit Reviewer:	Seema Roy/EVP

On January 27, 2005, the Office of Air Quality (OAQ) had a notice published in the Fort Wayne Journal Gazette, Fort Wayne, Indiana, stating that Elite Enterprises, Inc. had applied for a Part 70 permit renewal to operate a metal and plastic parts surface coating source. The notice also stated that OAQ proposed to issue a permit 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 this permit should be issued as proposed.

On May 28, 2005, W. D. Gabbard of Gabbard Environmental Services, Inc. submitted comments on behalf of Elite Enterprises, Inc. on the proposed Title V Permit Renewal in which he requested to incorporate the First Administrative Amendment No. 003-19473-00205, issued on October 21, 2004, into the Title V Permit Renewal.

Upon further review, IDEM, OAQ has also incorporated the Part 70 Significant Permit Modification No. 003-19780-00205, issued on November 11, 2004, into the Title V Permit Renewal, which was inadvertently left out of the renewal.

The Permit Renewal has been revised as follows to incorporate the revisions made in the First Administrative Amendment No. 003-19473-00205, issued on October 21, 2004 and the Part 70 Significant Permit Modification No. 003-19780-00205, issued on November 11, 2004 into the Part 70 Permit Renewal. In addition some other miscellaneous changes have been made to the permit. Changes made to the permit are shown in bold and deleted permit language is shown with a line through it. Any permit changes affecting the permit's Table of Contents and formatting changes are also made without replication herein. The spreadsheets have also been revised accordingly.

1. The 8-hour ozone nonattainment designations in 69 FR 23858 have been incorporated in 326 IAC 1-4-1 effective December 12, 2004. Therefore, provisions of 326 IAC 2-3 are applicable in these areas. IDEM has deleted the Nonattainment NSR term from the permit and replaced it with appropriate term in 326 IAC 2-3 as Emissions Offset. On January 5, 2005, EPA promulgated nonattainment designations for the PM-2.5 NAAQS. These designations become effective on April 5, 2005 (70 FR 944). Allen County has been designated as attainment or unclassifiable 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 surrogate for PM2.5 emissions. Section A.1, General Information, has been revised as follows:

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

The Permittee owns and operates a metal and plastic parts surface coating source that serves the transportation (automotive and trucking), medical, consumer, and building industries.

Responsible Official:	Michael R. Krebs Randall R. Geist
Source Address:	2701 South Coliseum Boulevard, Suite 1158, Fort Wayne, IN 46803
Mailing Address:	2701 South Coliseum Boulevard, Suite 1158, Fort Wayne, IN 46803
General Source Phone Number:	(219) 420-1605
SIC Code:	3714 , 3479, 3089
County Location:	Allen
Source Location Status:	Nonattainment for ozone under the 8-hour standard Attainment or Unclassifiable for PM 2.5 Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules and Major Source, under Nonattainment NSR Emission Offset Rules ; Major Source, Section 112 of the Clean Air Act

2. Section A.2 has been revised as follows to incorporate the revisions made in the First Administrative Amendment No. 003-19473-00205, issued on October 21, 2004 and the Part 70 Significant Permit Modification No. 003-19780-00205, issued on November 11, 2004 into the Part 70 Permit Renewal.

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

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

Plant 1 (Elite Enterprises, Inc., Suite 1158)

- (a) Four (4) paint booths, identified as PB1, PB2, PB3, PB4, each equipped with two (2) 8,200 acfm exhaust fans, constructed in October 2002, with a maximum capacity of one of the following:
- (a)(1) 280 plastic large end caps per hour;
 - (b)(2) 280 plastic air deflectors per hour;
 - (c)(3) 140 plastic door trim parts per hour; and
 - (d)(4) 420 miscellaneous metal parts per hour.

Each paint booth is equipped with either a high volume low pressure (HVLP) spray gun application system or electrostatic spray application equipment and water wash filtration for particulate matter control, with each exhausting through one (1) stack, identified as PB-1 through PB-4, respectively.

Plant 2 (Creative Coatings, Inc., Suite 1284)

- (b) **One (1) overhead conveyor paint line consisting of the following equipment:**
- (1) **Five (5) stage water wash units (identified as WW 1 through 5), exhausting inside the building.**

- (2) One (1) dry off oven (identified as DO1) and one (1) bake oven (identified as BO1), both burning natural gas and with a combined maximum heat input capacity of 1.89 MMBtu per hour, and exhausting inside the building.
 - (3) Five (5) paint booths (identified as PB5 through PB9), used for coating metal and plastic parts using HVLP guns, with a maximum throughput rate of 75 units per hour, controlled by dry particulate filters and exhausting at stacks PB 5 through PB9.
- (c) One (1) floor conveyor paint line consisting of the following equipment:
- (1) One (1) paint booth (identified as PB10), used for coating metal and plastic parts using HVLP guns, with a maximum throughput rate of 21 units per hour, controlled by dry particulate filters and exhausting at stacks PB10A and 10B.
 - (2) One (1) bake oven (identified as BO2), both burning natural gas and with a combined maximum heat input capacity of 0.94 MMBtu per hour.
- (d) One (1) parts cleaning unit (wipe solvent), with a maximum solvent usage of 1.5 gallons per day.

Plant 2 (Creative Coatings, Inc., Suite 1206)

- (e) One dual use wet paint booth (application of base coat and clear coat), identified as PB-1, capable of painting 40 motor vehicle sets (consisting of plastic parts) per day, using low pressure-high volume (LPHV) spray guns, equipped with dry filters to control emissions, and exhausting through stacks Exh-1 through Exh-6.
- (f) One (1) parts cleaning operation (wipe solvent), with a maximum solvent usage of 1.0 gallons per day (isopropyl alcohol).

3. Condition B.2 is revised as follows to include the correct Indiana Code for the authority of the condition.

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 13-15-6(a)~~]
[13-15-3-6(a)]

-
- (a) This permit, T003-7588-00205 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.

4. Pursuant to 326 IAC 1-1-6 Credible evidence, effective March 16, 2005, Condition B.26 has been revised to include the new language as follows:

~~B.26 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314]~~

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

B.26 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.

5. The facility description box in section D.1 has been revised as follows:

SECTION D.1 FACILITY OPERATION CONDITIONS

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

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

Plant 1 (Elite Enterprises, Inc., Suite 1158)

- (a)** Four (4) paint booths, identified as PB1, PB2, PB3, PB4, each equipped with two (2) 8,200 acfm exhaust fans, constructed in October 2002, with a maximum capacity of one of the following:
- ~~(a)~~**(1)** 280 plastic large end caps per hour;
 - ~~(b)~~**(2)** 280 plastic air deflectors per hour;
 - ~~(c)~~**(3)** 140 plastic door trim parts per hour; and
 - ~~(d)~~**(4)** 420 miscellaneous metal parts per hour.

Each paint booth is equipped with either a high volume low pressure (HVLV) spray gun application system or electrostatic spray application equipment and water wash filtration for particulate matter control, with each exhausting through one (1) stack, identified as PB-1 through PB-4, respectively.

Also, the following insignificant activity which is specifically regulated, as defined in 326 IAC 2-7-1(21):

Paint mixing operations; [326 IAC 2-2]

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

6. The previous section D.2 in the permit renewal has been changed to Section D.3 and a new section D.2 (for Plant 2) is included as follows:

SECTION D.2 FACILITY OPERATION CONDITIONS

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

Plant 2 (Creative Coatings, Inc., Suite 1284)

- (b) One (1) overhead conveyor paint line consisting of the following equipment:
- (1) Five (5) stage water wash units (identified as WW 1 through 5)
 - (2) One (1) dry off oven (identified as DO1) and one (1) bake oven (identified as BO1), both burning natural gas and with a combined maximum heat input capacity of 1.89 MMBtu per hour.
 - (3) Five (5) paint booths (identified as PB5 through PB9), used for coating metal and plastic parts using HVLP guns, with a maximum throughput rate of 75 units per hour, controlled by dry particulate filters and exhausting at stacks PB 5 through PB9.
- (c) One (1) floor conveyor paint line consisting of the following equipment:
- (1) One (1) paint booth (identified as PB10), used for coating metal and plastic parts using HVLP guns, with a maximum throughput rate of 21 units per hour, controlled by dry particulate filters and exhausting at stacks PB10A and 10B.
 - (2) One (1) bake oven (identified as BO2), both burning natural gas and with a combined maximum heat input capacity of 0.94 MMBtu per hour.
- (d) One (1) parts cleaning unit (wipe solvent), with a maximum solvent usage of 1.5 gallons per day.

(The information describing this 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 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 2 to 40 CFR Part 63, Subpart M] [40 CFR 63.3901]

- (a) The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart M. The Permittee must comply with these requirements on and after August 18, 2006.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

D.2.2 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 2 to 40 CFR Part 63, Subpart PPPP] [40 CFR 63.2398]

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

D.2.3 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products [40 CFR Part 63, Subpart MMMM] [40 CFR 63.3882] [40 CFR 63.3883] [40 CFR 63.3980]

- (a) The provisions of 40 CFR Part 63, Subpart MMMM (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/misc/miscpg.html>. Pursuant to 40 CFR 63.3883(b), the Permittee must comply with these requirements on and after the date 3 years after the effective date of 40 CFR Part 63, Subpart MMMM.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.
- (c) The affected source is the collection of all of the items listed in 40 CFR 63.3882, paragraphs (b)(1) through (4) that are used for surface coating of miscellaneous metal parts and products within each subcategory as defined in 40 CFR 63.3881(a), paragraphs (2) through (6).
 - (1) All coating operations as defined in 40 CFR 63.3981;
 - (2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
 - (3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and
 - (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.
- (d) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.3980, which are incorporated by reference.

D.2.4 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products [40 CFR Part 63, Subpart PPPP] [40 CFR 63.4481] [40 CFR 63.4482]

- (a) The provisions of 40 CFR Part 63, Subpart PPPP (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/plastic/plasticpg.html>. Pursuant to 40 CFR 63.4483(b), the Permittee must comply with these requirements on and after August 22, 2006.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.
- (c) The following emissions units comprise the affected source that is subject to 40 CFR 63, Subpart PPPP:
- (1) All coating operations as defined in 40 CFR 63.4581;
 - (2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
 - (3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and
 - (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.
- (d) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.4581, and are applicable to the affected source.

D.2.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-6] [326 IAC 2-1.1-5]

- (a) The amount of VOC in coatings, dilution solvents, and clean-up solvents used in the overhead conveyor paint line when painting plastic parts shall be limited to less than twenty-three (23) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) The amount of VOC in coatings, dilution solvents, and clean-up solvents used in the floor conveyor paint line when painting plastic parts shall be limited to less than sixteen (16) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits renders the requirements of 326 IAC 8-1-6 (BACT) and 326 IAC 2-1.1-5 (Nonattainment NSR) not applicable.

D.2.6 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the paint booths which coats metal parts shall be limited to:

Coatings	Limit (pounds of VOC/gallon of coating less water delivered to the applicator)
Air Dried Coat	3.5
Extreme Performance Coat	3.5
All Other Coat	3.0

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

D.2.7 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to 40 CFR 52 Subpart P, the PM from the overhead conveyor paint line and floor conveyor paint line shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

D.2.8 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the overhead conveyor paint line and floor conveyor paint line shall each be controlled by dry particulate filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.2.9 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.2.10 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]

(a) Compliance with the VOC content limit in Condition D.2.6 shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis.

This volume weighted average shall be determined by the following equation:

$$A = [\sum (C \times U) / \sum U]$$

Where: A is the volume weighted average in pounds VOC per gallon less water as applied;
C is the VOC content of the coating in pounds VOC per gallon less water as applied;
and U is the usage rate of the coating in gallons per day.

- (b) Compliance with the VOC content and usage limitations contained in Conditions D.2.5 and D.2.6 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. 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.2.11 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 six (6) paint booth stacks while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

D.2.12 Record Keeping Requirements

- (a) To document compliance with conditions D.2.5 and D.2.6, 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.2.5 and D.2.6.
 - (1) The VOC content of each coating material and solvent used less water;
 - (2) The amount of coating material and solvent used on daily 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 solvent.
 - (3) The volume weighted average VOC content of the coatings used for each day;
 - (4) The daily cleanup solvent usage;

- (5) The total VOC usage for each day; and
 - (6) A record of the test gauge air pressure utilized on the HVLP spray equipment for each week.
- (b) To document compliance with Condition D.2.11, the Permittee shall maintain a log of weekly overspray observations, weekly observations of the water level in the pans, 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.2.13 Notification Requirements [40 CFR 63.3910]

- (a) **General.** The Permittee must submit the applicable notifications in 40 CFR Part 63, Sections 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) by the dates specified in those sections, except as provided in 40 CFR 63.3910, paragraphs (b) and (c).
- (b) **Initial notification.** The Permittee must submit the initial notification no later than 1 year after the effective date of 40 CFR Part 63, Subpart Mmmm.
- (c) **Notification of compliance status.** The Permittee must submit the notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR Part 63, Sections 63.3940, 63.3950, or 63.3960 that applies to the affected source. The notification of compliance status must contain the information specified in 40 CFR 63.3910(c), paragraphs (1) through (11) and any additional information specified in 40 CFR 63.9(h).

D.2.14 Notification Requirements [40 CFR 63.4510]

- (a) **General.** The Permittee must submit the notifications in 40 CFR 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply to the source by the dates specified in those sections, except as provided in paragraphs (b) and (c) of this section.
- (b) **Initial notification.** The Permittee must submit the initial notification required by 40 CFR 63.9(b) for a new or reconstructed affected source no later than 120 days after initial startup or 120 days after the effective date of 40 CFR Part 63, Subpart Pppp, whichever is later. (For an existing affected source) the Permittee must submit the initial notification no later than 1 year after the effective date of 40 CFR Part 63, Subpart Pppp. If the Permittee is using compliance with the Automobiles and Light-Duty Trucks NESHAP (subpart Iiii of this part) under 40 CFR 63.4881(d) to constitute compliance with this subpart for the plastic part coating operations, then the Permittee must include a statement to this effect in the initial notification and no other notifications are required under this subpart. If the Permittee is complying with another NESHAP that constitutes the predominant activity at the facility under 40 CFR 63.4481(e)(2) to constitute compliance with this subpart for the plastic coating operations, then the Permittee must include a statement to this effect in the initial notification and no other notifications are required under this subpart.

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

D.2.15 Requirement to Submit a Significant Permit Modification Application
[326 IAC 2-7-12][326 IAC 2-7-5]

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

- (a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Title V permit the applicable requirements of 40 CFR 63, Subpart Mmmm and Subpart Pppp, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.
- (b) The significant permit modification application shall be submitted no later than twenty-seven months after the effective date of 40 CFR 63, Subpart Mmmm and Subpart Pppp.
- (c) The significant permit modification application shall be submitted to:

Indiana Department of Environmental
Management Permits Branch, Office of Air
Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46204-6015-4

D.2.16 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.5 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

- 7. The P.O. box and the zip code have been revised throughout the permit to reflect the current IDEM mailing address.
- 8. The signature block has been revised to reflect the present Permits Branch Chief.

9. Two new Part 70 Quarterly Report Forms to show compliance with Condition D.2.5 have been added as follows:

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

Part 70 Quarterly Report (II)

Source Name: Elite Enterprises Inc.
Source Address: 2701, Coliseum Blvd., Suite 1158, Fort Wayne, IN 46803
Mailing Address: 2701, Coliseum Blvd., Suite 1158, Fort Wayne, IN 46803
Part 70 Permit No.: T003-18364-00205
Facility: Five (5) Paint Booths (PB5, PB6, PB7, PB8 and PB9)
Parameter: Volatile Organic Compounds (VOC)
Limit: The total VOC input usage to the five (5) paint booths shall be limited to less than 23.0 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period with compliance demonstrated at the end of each month.

YEAR: _____

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

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

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

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report (III)

Source Name: Elite Enterprises Inc.
Source Address: 2701, Coliseum Blvd., Suite 1158, Fort Wayne, IN 46803
Mailing Address: 2701, Coliseum Blvd., Suite 1158, Fort Wayne, IN 46803
Part 70 Permit No.: T003-18364-00205
Facility: One (1) Paint Booth (PB10)
Parameter: Volatile Organic Compounds (VOC)
Limit: The total VOC input usage to the paint booth PB10 shall be limited to less than 16.0 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period with compliance demonstrated at the end of each month.

YEAR: _____

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

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

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

Attach a signed certification to complete this report.

10. The following changes are made to the Technical Support Document with this addendum. However IDEM prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the Technical Support Document that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that all comments and responses are documented and part of the records regarding this permit decision.

County Attainment Status

The source is located in Allen County.

Pollutant	Status
PM-2.5	Attainment or Unclassifiable
PM-10	Attainment
SO ₂	Attainment
NO ₂	Attainment
1 Hour Ozone	Attainment
8 Hour Ozone	Basic Nonattainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) 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 and NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. Allen County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for ~~nonattainment new source review~~ **Emission Offset, 326 IAC 2-3.**
- (b) **Allen 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 surrogate for PM2.5 emissions.**
- (b)(c) Allen County has been classified as attainment or unclassifiable in Indiana for the remaining criteria pollutants. Therefore these emissions were reviewed pursuant to the requirements for Prevention of Source Deterioration (PSD), 326 IAC 2-2.

State Rule Applicability – Entire Source

~~.....~~
~~Nonattainment New Source Review (NSR) 326 IAC 2-3 (Emission Offset)~~

This existing source is located in Allen County which was redesignated on June 15, 2004 as a basic nonattainment area for the 8 hour ozone standard. Upon this redesignation, the source became a major source because it has a potential to emit of VOC at greater than the ~~nonattainment NSR~~ **Emission Offset** applicability threshold of 100 tons per year. As such, any modification made to this source after June 15, 2004 shall be reviewed pursuant to the requirements of ~~nonattainment NSR~~ **326 IAC 2-3. No modifications have occurred at this source since June 15, 2004. The source was issued a significant permit modification no. 003-19780-00205 on November 11, 2004 in which the total VOC emissions were limited to less than forty (40) tons per year. Therefore, the requirements of this rule do not apply to the source.**

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:	Elite Enterprises, Inc.
Source Location:	2701 South Coliseum Blvd., Suite 1158, Fort Wayne, Indiana 46803
County:	Allen
SIC Code:	3479, 3089
Operation Permit No.:	T003-7588-00205
Operation Permit Issuance Date:	September 3, 1999
Permit Renewal No.:	T003-18364-00205
Permit Reviewer:	Rajnish Sharma/EVP

The Office of Air Quality (OAQ) has reviewed a Part 70 Operating Permit Renewal application from Elite Enterprises, Inc. relating to the operation of a metal and plastic parts surface coating source that serves the transportation (automotive and trucking), medical, consumer, and building industries.

History

Elite Enterprises had nine (9) paint booths (PB1-PB9) which were operating under Part 70 Operating Permit T003-7588-00205, issued on September 3, 1999. These booths were replaced by four (4) larger and more efficient booths through Significant Source Modification 003-16500-00205-3479, issued on January 23, 2004.

Permitted Emission Units and Pollution Control Equipment

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

Four (4) paint booths, identified as PB1, PB2, PB3, PB4, each equipped with two (2) 8,200 acfm exhaust fans, constructed in October 2002, with a maximum capacity of one of the following:

- (a) 280 plastic large end caps per hour;
- (b) 280 plastic air deflectors per hour;
- (c) 140 plastic door trim parts per hour; and
- (d) 420 miscellaneous metal parts per hour.

Each paint booth is equipped with either a high volume low pressure (HVLP) spray gun application system or electrostatic spray application equipment and water wash filtration for particulate matter control, with each exhausting through one (1) stack, identified as PB-1 through PB-4, respectively.

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 (10) million Btu per hour, including:
 - (1) Six (6) natural gas make-up heaters, identified as AM1, AM2, AM3, AM4, AM5, AM6, with respective maximum heat capacities of 3.0, 3.0, 1.5, 1.5, 1.5, and 1.5 million British thermal units (MMBtu) per hour; and
 - (2) One (1) natural gas-fired burn-off oven, with a maximum heat input capacity of 0.35 million British thermal units (MMBtu) per hour;
- (b) Cleaners and solvents characterized as follows:
 - (1) Having a vapor pressure equal or less than 2 kPa; 15mmHg; or 0.3 psi measured at 38 degrees C (100°F) or;
 - (2) Having a vapor pressure equal to or less than 0.7kPa; 5mmHg; or 0.1 psi measured at 20°C (68°F);the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months;
- (c) Paved and unpaved roads and parking lots with public access;
- (d) Additional activities and categories of activities with emissions less than exemption levels specified at 326 IAC 2-7-1(21), including:
 - (1) Sanding operations. [326 IAC 6-3-2]

Existing Approvals

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

- (a) Part 70 Operating Permit T003-7588-00205, issued on September 3, 1999;
- (b) Significant Source Modification 003-16500-00205-3479, issued on January 23, 2004;
- (c) Significant Permit Modification 003-17491-00205-3479, issued on February 9, 2004; and
- (d) Review Request 003-16308-00205, issued on August 21, 2003.

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:

Significant Source Modification 003-16500, issued January 23, 2004, PSD minor limit (Condition D.1.7):

Reason revised: The PSD minor limit in CP003-8519, as modified in Significant Source Modification 003-16500, omitted VOC emissions attributable to natural gas combustion at this

source. The PSD limit has been adjusted herein to account for the potential to emit of 0.3 tons per year for this insignificant activity.

Enforcement Issue

The source has the following enforcement actions :
Agreed Order, Case No. 2003-13451-A, effective June 28, 2004.

- (1) The Agreed Order is in relation to the following equipment installed and operated without a permit:
 - (a) The source modified its coating operation, which resulted in an increase to the potential to emit of a regulated pollutant without obtaining a source modification, a violation of 326, IAC 2-7-10.5.
 - (b) The source did not obtain a significant permit modification for the modification to the coating operation, a violation of 326 IAC 2-7-12.
 - (c) This source failed to submit the annual compliance certification for the year 2002 by July 1, 2003, a violation of this Part 70 permit condition.
- (2) This Part 70 application renewal was submitted less than nine (9) months prior to the expiration of the source's existing permit, a violation of 326 IAC 2-7-4(a)(1)(D) and condition B.18 of Part 70 Permit No. T003-7588-00205. This is not a part of the Agreed Order.

Recommendation

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

An administratively complete Part 70 permit renewal application for the purposes of this review was received on January 14, 2004.

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

Emission Calculations

See Appendix A of this document for detailed emissions calculations (pages 1 through 11).

Potential to Emit of the Source

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

The source was issued a Part 70 Operating Permit on September 3, 1999. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of the original Part 70 operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/emission unit	Potential to Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
four (4) paint booths (PB1-PB4)	1.69 ⁽¹⁾	1.69 ⁽¹⁾	0.0	<249.7 ⁽²⁾	0.0	0.0	> 10 (Single) > 25 (Combined)
natural gas combustion (insignificant activity)	0.10	0.41	0.03	0.30	4.54	5.41	< 10 (Single) < 25 (Combined)
Total PTE	1.79	1.79	0.03	<250	4.54	5.41	> 10 (Single) > 25 (Combined)

(1) Controlled emission rates pursuant to 326 IAC 6-3-2(d). Assumes PM10 equal to PM.
 (2) Maximum allowable VOC emissions such that the requirements of 326 IAC 2-2 (PSD) do not apply, as reflected in Condition D.1.7.

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7. 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 any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Nonattainment NSR applicability.

Actual Emissions

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

Pollutant	Actual Emissions (tons/year)
PM	Not reported
PM-10	Not reported
SO ₂	Not reported
VOC	99.12
CO	Not reported
NO _x	Not reported
HAP (specify)	Not reported

County Attainment Status

The source is located in Allen County.

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

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

Part 70 Permit Conditions

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

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

Federal Rule Applicability

- (a) This source is not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.390, Subpart MM (Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations)). This rule applies to affected facilities in an automobile or light-duty truck assembly plant. Exempt from this rule are operations used to coat plastic body components or all-plastic automobile or light duty truck bodies on separate coating lines. The source coats plastic automobile trim, not vehicle bodies, and does not assemble automobiles or light-duty trucks, therefore, the requirements of 40 CFR Part 60.390, Subpart MM do not apply.

There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) incorporated into this permit.

- (b) This existing source is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs), 326 IAC 20 (40 CFR Part 63.3880, Subpart M MMM (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products)) since it uses 946 liters (250 gallons) per year of coatings that contain HAPs in the surface coating of miscellaneous metal parts and products as defined at 63.3881(a); and it is a major source of HAP emissions, as defined at 40 CFR 63.2. The following requirements shall apply:
- (1) The provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart M MMM. The Permittee must comply with these requirements on and after January 2, 2004.
 - (2) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (1) of this condition.
 - (3) The provisions of 40 CFR Part 63, Subpart M MMM (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/misc/miscpg.html>. Pursuant to 40 CFR 63.3883(b), the Permittee must comply with these requirements on and after January 2, 2007.
 - (4) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (4) of this condition.
 - (5) The affected source is the collection of all of the items listed in 40 CFR 63.3882, paragraphs (A) through (D) that are used for surface coating of miscellaneous metal parts and products within each subcategory as defined in 40 CFR 63.3881(a), paragraphs (2) through (6).

- (A) All coating operations as defined in 40 CFR 63.3981;
 - (B) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
 - (C) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and
 - (D) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.
- (6) Terminology used in this section is defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.3980, and are applicable to the affected source.
- (7) Pursuant to 40 CFR 63.3910, the Permittee shall comply with the following notification requirements:
- (A) General. The Permittee must submit the applicable notifications in 40 CFR Part 63, Sections 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) by the dates specified in those sections, except as provided in 40 CFR 63.3910, paragraphs (b) and (c).
 - (B) Initial notification. For this existing affected source, the Permittee must submit the initial notification no later than January 2, 2005. If using compliance with the Surface Coating of automobiles and Light-Duty Trucks NESHAP (40 CFR Part 63, Subpart IIII) as provided for under 40 CFR 63.3881(d) to constitute compliance with this subpart for any or all of the metal parts coating operations, then the Permittee must include a statement for any or all of the metal parts coating operations. If complying with another NESHAP that constitutes the predominant activity at the facility under 40 CFR 63.3881 (e)(2) to constitute the compliance with this subpart for the metal parts coating operations, then the Permittee must include a statement to this effect in the initial notification, and no other notifications are required under this subpart in regard to those metal parts coating operations.
 - (C) Notice of compliance status. The Permittee must submit the notification of compliance status required by 40 CFR Part 63.9(h) no later than 30 calendar days following the end of the in the initial compliance period described in 40 CFR Part 63, Sections 63.3940, 63.3950, or 63.3960 that applies to the affected source. The notification of compliance status must contain the information specified in 40 CFR 63.3910(c), paragraphs(1) through (11) and any additional information specified in 40 CFR 63.9(h).
- (8) Pursuant to 326 IAC 2-7-12 and 326 IAC 2-7-5, the Permittee shall submit an application for a significant permit modification to IDEM, QAQ to include information regarding which compliance option or options will be chosen in the Part 70 permit.
- (c) The source coats 70% metal parts and 30 % plastic parts and hence is not exempt form 326 IAC 20 (40 CFR 63.4480, Subpart PPPP based on 326 IAC 20 (40 CFR Part 63.3880, Subpart MMMM applicability. Hence this existing source is subject to the NESHAPs, 326 IAC 20 (40 CFR 63.4480, Subpart PPPP (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products)) since it uses 378 liters (100 gallons) per year of coatings that contain HAPs in the surface

coating of plastic parts and products as defined at 63.4480 (a); and it is a major source of HAP emissions, as defined at 40 CFR 63.2. The following shall apply:

- (1) The provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart PPPP. The Permittee must comply with these requirements on and after April 19, 2004.
- (2) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (1) of this condition.
- (3) The provisions of 40 CFR Part 63, Subpart PPPP (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/plastic/plasticpg.html>. Pursuant to 40 CFR 63.4483(b), the Permittee must comply with these requirements on and after April 19, 2007.
- (4) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (3) of this condition.

The following emissions units comprise the affected source that is subject to 40 CFR 63, Subpart PPPP:

- (A) All coating operations as defined in 40 CFR 63.4581;
 - (B) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
 - (C) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and
 - (D) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.
- (5) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.4581, and are applicable to the affected source.
 - (6) Pursuant to 40 CFR 63.4510, the Permittee shall comply with the following notification requirements.
 - (A) General. The Permittee must submit the notifications in 40 CFR 63.7(b) and (c), 63.8 (f) (4), and 63.9(b) through (e) and (h) that apply to the affected source by the dates specified in those sections, except as provided in 40 CFR 63.4510, paragraphs (b) and (c).
 - (B) Initial Notification. For this existing affected source, the Permittee must submit the initial notification no later than April 19, 2005. If using compliance with the Automobiles and Light-Duty Trucks NESHAP (40 CFR Part 63, Subpart IIII) under 40 CFR 63.4881 (d) to constitute with this subject for the plastic part coating operations, then the Permittee

must include a statement to this effect in the initial notification and no other notifications are required under this subpart. If complying with another NESHAP that constitutes the predominant activity at the facility under 40 CFR 63.4481 (e) (2) to constitute compliance with this subpart for the plastic coating operations, then the Permittee must include a statement to this effect in the initial notification and no other notifications are required under this subpart.

- (C) Notification of compliance status. The Permittee must submit the notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR 63.4550, 40 CFR 63.4550, or 40 CFR 63.4560 that applies to the affected source. The notification of compliance status must contain the information specified in 40 CFR 63.4501(c), paragraphs (1) through (11) and in 40 CFR 63.9(h).
- (7) Pursuant to 326 IAC 2-7-12 and 326 IAC 2-7-5, the Permittee shall submit an application for a significant permit modification to IDEM, QAQ to include information regarding which compliance option or options will be chosen in the Part 70 permit.
- (d) This source is not subject to the NESHAPs, 326 IAC 20 (40 CFR 63.3080, Subpart IIII (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Automobiles and Light Duty Trucks)). This rule applies to surface coating sources that apply topcoat to new automobiles or light duty truck bodies, or body parts for new automobiles or light duty trucks that are located at major HAP emitting sources. Pursuant to §63.3081 (c) (1), this rule does not apply to a surface coating source subject to any other NESHAP in Part 63 as of June 25, 2004, except as provided at §63.3082(c). Since this source is subject to the surface coating NESHAPs, Subparts MMMM and PPPP, both promulgated prior to June 25, 2004, the requirements of Subpart IIII are not applicable to this source.
- (e) This source is not subject to the NESHAPs, 326 IAC 20 (40 CFR 63.7490, Subpart DDDD (National Emission Standards for Hazardous Air Pollutants for Industrial Commercial and Institutional Boilers and Process Heaters)). Pursuant to § 63.7575 (Definitions), a boiler is an enclosed device using controlled flame combustion and having the primary purpose of recovering thermal energy in the form of steam or hot water; and process heater is an enclosed device using a controlled flame (that is not a boiler) and the unit's primary purpose is to transfer heat indirectly to a process material (liquid, gas or solid) or to heat a transfer material for use in a process unit instead of generating steam. The air makeup units and burn of oven, as insignificant activities, do not meet the definition of boiler nor process heater since they do not generate steam or hot water, nor do they transfer heat indirectly to a process stream. Therefore the requirements of Subpart DDDD are not applicable to this source.
- (f) The requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not applicable to this source. Such requirements 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 or 71 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 be classified as a Part 70 major source.

This source is required to obtain a Part 70 permit. Also, paint booths PB1, PB2, PB3 and PB4 are PSEUs each having a PTE at or above 100% of the Part 70 major source threshold for VOC, single HAP and combined HAPs. This notwithstanding, 40 CFR 64.2(b)(1)(i), *Exemptions*, specifies that the requirements of this rule do not apply to any emission limit or standard proposed by the Administrator after November 15, 1990 pursuant to section 111 or 112 of the Act. This source is subject to the requirements of 40 CFR 63, Subparts M, M, M, M and P, P, P, P which are section 112 emission limits established after November 15, 1990. Therefore the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not applicable to these four PSEUs.

State Rule Applicability – Entire Source

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

This existing minor stationary source, which was initially constructed in 1999 (with modifications in 2002) which was after the August 7, 1977 rule applicability date, is not major because it is not one of the 28 listed source categories and it does not have the potential to emit of 250 tons per year of any criteria pollutant after enforceable controls and limitations since it started operation. The source shall continue to limit VOC emissions to less than 250 tons per 12 consecutive month period and also the Potential to Emit of PM and PM 10 is less than 100 tons per 12 consecutive month period. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) do not apply.

Significant Source Modification 003-16500, issued on January 23, 2004, approved the replacement of nine paint booths (PB1-PB9) with the four (4) paint booths (PB1-PB4) reflected in this approval. The total source PTE of VOC continued to be limited to less than 250 tons per year in SSM 003-16500. Therefore, the requirements of 326 IAC 2-2 did not apply to the modification.

On April 15, 2004, the United States Environment Protection Agency (USEPA) named 23 Indiana counties and one partial county nonattainment for the new 8-hour ozone standard. The designations became effective on June 15, 2004, with Allen County being designated as nonattainment for the 8-hour ozone standard. This notwithstanding, the PSD minor limitation established in the permit for source VOC emissions remains unchanged, as it is based on source operations prior to June 15, 2004 when Allen County was attainment for the 1-hour ozone standard.

Nonattainment New Source Review (NSR)

This existing source is located in Allen County which was redesignated on June 15, 2004 as a basic nonattainment area for the 8 hour ozone standard. Upon this redesignation, the source became a major source because it has a potential to emit of VOC at greater than the nonattainment NSR applicability threshold of 100 tons per year. As such, any modification made to this source after June 15, 2004 shall be reviewed pursuant to the requirements of nonattainment NSR. No modifications have occurred at this source since June 15, 2004.

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 2007 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))

This rule applies to major sources of hazardous air pollutants (HAP) constructed or reconstructed after July 27, 1997 and are not specifically regulated by sections 112(d), 112(h) or 112(j) of CAA.. The source is a major source for HAPs and was constructed in 1999. However the source is subject to the requirements of NESHAP subparts M, P, R, S, T, V, W, X, Y, Z, AA, AB, AC, AD, AE, AF, AG, AH, AI, AJ, AK, AL, AM, AN, AO, AP, AQ, AR, AS, AT, AU, AV, AW, AX, AY, AZ, BA, BB, BC, BD, BE, BF, BG, BH, BI, BJ, BK, BL, BM, BN, BO, BP, BQ, BR, BS, BT, BU, BV, BW, BX, BY, BZ, CA, CB, CC, CD, CE, CF, CG, CH, CI, CJ, CK, CL, CM, CN, CO, CP, CQ, CR, CS, CT, CU, CV, CW, CX, CY, CZ, DA, DB, DC, DD, DE, DF, DG, DH, DI, DJ, DK, DL, DM, DN, DO, DP, DQ, DR, DS, DT, DU, DV, DW, DX, DY, DZ, EA, EB, EC, ED, EE, EF, EG, EH, EI, EJ, EK, EL, EM, EN, EO, EP, EQ, ER, ES, ET, EU, EV, EW, EX, EY, EZ, FA, FB, FC, FD, FE, FF, FG, FH, FI, FJ, FK, FL, FM, FN, FO, FP, FQ, FR, FS, FT, FU, FV, FW, FX, FY, FZ, GA, GB, GC, GD, GE, GF, GG, GH, GI, GJ, GK, GL, GM, GN, GO, GP, GQ, GR, GS, GT, GU, GV, GW, GX, GY, GZ, HA, HB, HC, HD, HE, HF, HG, HH, HI, HJ, HK, HL, HM, HN, HO, HP, HQ, HR, HS, HT, HU, HV, HW, HX, HY, HZ, IA, IB, IC, ID, IE, IF, IG, IH, II, IJ, IK, IL, IM, IN, IO, IP, IQ, IR, IS, IT, IU, IV, IW, IX, IY, IZ, JA, JB, JC, JD, JE, JF, JG, JH, JI, JJ, JK, JL, JM, JN, JO, JP, JQ, JR, JS, JT, JU, JV, JW, JX, JY, JZ, KA, KB, KC, KD, KE, KF, KG, KH, KI, KJ, KK, KL, KM, KN, KO, KP, KQ, KR, KS, KT, KU, KV, KW, KX, KY, KZ, LA, LB, LC, LD, LE, LF, LG, LH, LI, LJ, LK, LL, LM, LN, LO, LP, LQ, LR, LS, LT, LU, LV, LW, LX, LY, LZ, MA, MB, MC, MD, ME, MF, MG, MH, MI, MJ, MK, ML, MM, MN, MO, MP, MQ, MR, MS, MT, MU, MV, MW, MX, MY, MZ, NA, NB, NC, ND, NE, NF, NG, NH, NI, NJ, NK, NL, NM, NN, NO, NP, NQ, NR, NS, NT, NU, NV, NW, NX, NY, NZ, OA, OB, OC, OD, OE, OF, OG, OH, OI, OJ, OK, OL, OM, ON, OO, OP, OQ, OR, OS, OT, OU, OV, OW, OX, OY, OZ, PA, PB, PC, PD, PE, PF, PG, PH, PI, PJ, PK, PL, PM, PN, PO, PP, PQ, PR, PS, PT, PU, PV, PW, PX, PY, PZ, QA, QB, QC, QD, QE, QF, QG, QH, QI, QJ, QK, QL, QM, QN, QO, QP, QQ, QR, QS, QT, QU, QV, QW, QX, QY, QZ, RA, RB, RC, RD, RE, RF, RG, RH, RI, RJ, RK, RL, RM, RN, RO, RP, RQ, RR, RS, RT, RU, RV, RW, RX, RY, RZ, SA, SB, SC, SD, SE, SF, SG, SH, SI, SJ, SK, SL, SM, SN, SO, SP, SQ, SR, SS, ST, SU, SV, SW, SX, SY, SZ, TA, TB, TC, TD, TE, TF, TG, TH, TI, TJ, TK, TL, TM, TN, TO, TP, TQ, TR, TS, TT, TU, TV, TW, TX, TY, TZ, UA, UB, UC, UD, UE, UF, UG, UH, UI, UJ, UK, UL, UM, UN, UO, UP, UQ, UR, US, UT, UY, UZ, VA, VB, VC, VD, VE, VF, VG, VH, VI, VJ, VK, VL, VM, VN, VO, VP, VQ, VR, VS, VT, VU, VV, VW, VX, VY, VZ, WA, WB, WC, WD, WE, WF, WG, WH, WI, WJ, WK, WL, WM, WN, WO, WP, WQ, WR, WS, WT, WU, WV, WW, WX, WY, WZ, XA, XB, XC, XD, XE, XF, XG, XH, XI, XJ, XK, XL, XM, XN, XO, XP, XQ, XR, XS, XT, XU, XV, XW, XX, XY, XZ, YA, YB, YC, YD, YE, YF, YG, YH, YI, YJ, YK, YL, YM, YN, YO, YP, YQ, YR, YS, YT, YU, YV, YW, YX, YY, YZ, ZA, ZB, ZC, ZD, ZE, ZF, ZG, ZH, ZI, ZJ, ZK, ZL, ZM, ZN, ZO, ZP, ZQ, ZR, ZS, ZT, ZU, ZV, ZW, ZX, ZY, ZZ.

State Rule Applicability – Individual Facilities

326 IAC 4-2-2 (Incinerator: Requirements)

This rule applies to the natural gas fired paint burn off oven and states that;

All incinerators shall :

1. consist of primary and secondary chambers or the equivalent;
2. be equipped with a primary burner unless burning wood products;
3. comply with 326 IAC 5-1 and 326 IAC 2;
4. be maintained properly as specified by the manufacturer and approved by the commissioner;
5. be operated according to the manufacturer's recommendations and only burn waste approved by the commissioner;
6. comply with other state and/or local rules or ordinances regarding installation and operation of the incinerators;
7. be operated so that emissions of hazardous material includingm but not limited to, pathogenic bacteria, dangerous chemicals or gases, or noxious odors are prevented;
8. not emit particulate matter in excess of;
 - a) incinerators with a maximum refuse-burning capacity of two hundred (200) or more pounds per hour; three tenths (0.3) pounds of particulate matter per one thousand (1000) pounds of dry exhaust gas at standard conditions corrected to fifty percent (50%) excess air; or
 - b) all other incinerators ; five-tenths (0.5) pounds of particulate matter per one thousand (1000) pounds of dry exhaust gas at standard conditions corrected to fifty percent (50%) excess air: and
9. not create a nuisance or a fire hazard.

If any of the above result, the burning shall be terminated immediately.

326 IAC 6-3-2 (Process Operations)

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

will remain applicable requirements until the revisions to 326 IAC 6-3 are approved into the SIP and the condition is modified in a subsequent permit action.

Pursuant to Significant Source Modification 003-16500-00205-3479, issued on January 23, 2004, and 40 CFR 52 Subpart P, the particulate matter (PM) from the four paint booths shall be limited by the following:

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

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

Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating shall be controlled by waterwash and the Permittee shall operate the control device in accordance with manufacturer's specifications.

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

Pursuant to CP 003-8519-00205 issued on October 22, 1997 the surface coating facilities PB1, PB2, PB3 and PB4 are subject to this rule for the coating of plastic parts since each facility is newly constructed after January 1, 1980; has a potential to emit VOC at 25 tons per year each; and is not regulated by another Article 8 rule.

Prior to the issuance of the Significant Source Modification 003-16500, considered as reconstructed or newly constructed on January 23, 2004 IDEM reviewed the modification applications and decided that since the booths were not considered as reconstructed or newly constructed and had the same combined potential to emit as the nine (9) paint booths being replaced the BACT accepted in CP 003-8519-00205, issued on October 22, 1997, is still valid for the four (4) new paint booths (PB1-PB4) which is detailed as follows:

- (a) High volume low pressure (HVLP) spray equipment shall be used for all first coat applications,
- (b) Either HVLP or electrostatic equipment shall be used for second coat applications,
- (c) Application of coating to a substrate by means of HVLP spray equipment shall operate between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system, and
- (d) A test gauge air cap and air cap assembly shall be utilized on the HVLP spray equipment and recorded weekly.
- (e) The VOC content of the coatings as applied to the plastic parts shall not exceed the following limits:
 - (1) 5.8 lb VOC per gallon of coating, minus water for topcoats, and
 - (2) 3.7 lb VOC per gallon of coating, minus water for prime coats.

Pursuant to Significant Source Modification 003-16500, issued on January 23, 2004, compliance with the VOC content limits of paragraph (e) shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis. This volume weighted average shall be determined by the following equation:

$$A = [\sum (C \times U) / \sum U]$$

Where: A is the volume weighted average in pounds VOC per gallon less water as applied;
C is the VOC content of the coating in pounds VOC per gallon less water as applied; and
U is the usage rate of the coating in gallons per day.

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

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of the coating delivered to the applicator at spray booth PB1, PB2, PB3 and PB4 when coating metal parts shall be limited to the following:

Coatings	Limit (lbs VOC/gallon of coating, less water, delivered to the applicator)
Extreme Performance Coat	3.5

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized. Based on the MSDS submitted by the source and calculations made, the spray booth is in compliance with this requirement.

Compliance with the VOC content limits shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis. This volume weighted average shall be determined by the following equation:

$$A = [\sum (C \times U) / \sum U]$$

Where: A is the volume weighted average in pounds VOC per gallon less water as applied;
C is the VOC content of the coating in pounds VOC per gallon less water as applied; and
U is the usage rate of the coating in gallons per day.

Testing Requirements

While IDEM may require compliance testing at anytimes to determine if the source is in compliance with an applicable limit or standard, compliance testing is not required as part of this approval. Coating material usage and related VOC and volatile organic HAP emissions continue to assume 2,000 pounds of pollutant input to the coating operation per ton of pollutant emitted, and particulate is controlled by waterwash to comply with the allowable particulate limits.

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 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.

The four (4) paint booths (PB1 - PB4) have applicable compliance monitoring conditions as specified below:

- (a) Daily inspections shall be performed to verify that the water level of the water pans meet the manufacturer's recommended level. To monitor the performance of the water pans, the water level of the pans shall be maintained weekly at a level where surface agitation indicates impact of the air flow. Water shall be kept free of solids and floating material that reduces the capture efficiency of the water pan. To monitor the performance of the baffles, weekly inspections of the baffle panels shall be conducted to verify placement and configuration meet recommendations of the manufacturer. In addition, weekly observations shall be made of the overspray from the surface coating booth stacks (PB-1 through PB-4) while the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

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

These monitoring conditions are necessary because the water wash must operate properly to ensure compliance with 326 IAC 6-3-2(d) (Particulate Emission Limitations) and 326 IAC 2-7 (Part 70).

Conclusion

The operation of this metal and plastic parts surface coating source shall be subject to the conditions of this Part 70 permit T003-18364-00205

Appendix A: Emissions Calculations

VOC and Particulate

From Four (4) Paint Booths

Company Name: Elite Enterprise, Inc.
Address City IN Zip: 2701 South Coliseum Blvd., Fort Wayne, IN 46803
Pit ID: 003-00205
Part 70 Renewal No.: 003-18364-00205
Reviewer: Seema Roy/EVP
Date: 10/14/05

Uncontrolled Potential Emissions (tons/year)

Pollutant	Emissions Generating Activity					TOTAL
	Natural Gas Combustion	PB1, PB2, PB3 and PB4	PB5, PB6, PB7, PB8 and PB9	PB10	Parts Cleaning Operation	
PM	0.19	82.54	17.40	3.60	0.00	103.73
PM10	0.58	82.54	17.40	3.60	0.00	104.12
SO2	0.04	0.00	0.00	0.00	0.00	0.04
NOx	6.65	0.00	0.00	0.00	0.00	6.65
VOC	0.37	3,460.75	46.80	16.20	1.80	3,525.92
CO	5.58	0.00	0.00	0.00	0.00	5.58
total HAPs	0.12	889.39	5.03	6.92	0.00	901.46
worst case single HAP	0.12	568.81	4.81	5.29	0.00	579.03
	Hexane	Xylene	Xylene	Toluene		
Total emissions based on rated capacity at 8,760 hours/year.						

Controlled Potential Emissions (tons/year)

Pollutant	Emissions Generating Activity					TOTAL
	Plant 1: Natural Gas Combustion	PB1, PB2, PB3 and PB4	PB5, PB6, PB7, PB8 and PB9	PB10	Parts Cleaning Operation	
PM	0.19	1.65	0.87	0.18	0.00	2.89
PM10	0.58	1.65	0.87	0.18	0.00	3.28
SO2	0.04	0.00	0.00	0.00	0.00	0.04
NOx	6.65	0.00	0.00	0.00	0.00	6.65
VOC	0.37	<210.65	Less than 23.0*	Less than 16.0*	1.80	Less than 250
CO	5.58	0.00	0.00	0.00	0.00	5.58
total HAPs	0.12	889.39	5.03	6.92	0.00	901.46
worst case single HAP	0.12	568.81	4.81	5.29	0.00	579.03
	Hexane	Xylene	Xylene	Toluene		
Total emissions based on rated capacity at 8,760 hours/year, after control.						

*Pursuant to Part 70 SPM No. 003-19780-00205, issued on November 11, 2004.

**Appendix A: Emissions Calculations
VOC and Particulate
From Plant 1, Elite Enterprises, Inc. (Four (4) Paint Booths)**

Company Name: Elite Enterprise, Inc.
Address City IN Zip: 2701 South Coliseum Blvd., Fort Wayne, IN 46803
Pit ID: 003-00205
Part 70 Renewal No.: 003-18364-00205
Reviewer: Seema Roy/EVP
Date: 10/14/05

Material	Program	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum Usage (units/hr)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
PB1																
222S Clear Adhesion	Mirror Covers	7.1	94.22%	0.0%	94.2%	0.0%	4.11%	0.00520	780	6.66	6.66	27.02	118.34	0.41	162.08	75%
764-2591 DK. Grey	TPO EndCaps & Centers	7.8	79.43%	0.0%	79.4%	0.0%	15.15%	0.02280	240	6.17	6.17	33.77	147.92	2.19	40.74	75%
MPP4110A	Boiler Covers	7.4	89.47%	0.0%	89.5%	0.0%	7.27%	0.01391	180	6.66	6.66	16.67	73.00	0.49	91.56	75%
Total PB1												33.77	147.92	2.19		

Material	Program	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum Usage (units/hr)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
PB2																
193S IMRON 5000	TPO EndCaps & Centers (Flexible Gray)	9.0	25.01%	0.0%	25.0%	0.0%	70.02%	0.00680	240	2.26	2.26	3.68	16.13	2.76	3.22	75%
193S IMRON 5000	TPO EndCaps & Centers (Silver Flexible)	9.0	25.01%	0.0%	25.0%	0.0%	70.02%	0.00360	240	2.26	2.26	1.95	8.54	1.46	3.22	75%
193S IMRON 5000	Mirror Covers	9.0	25.01%	0.0%	25.0%	0.0%	70.02%	0.00130	780	2.26	2.26	2.29	10.02	1.71	3.22	75%
193S IMRON 5000	Columbia Bumpers	9.0	25.01%	0.0%	25.0%	0.0%	70.02%	0.00670	100	2.26	2.26	1.51	6.62	1.13	3.22	75%
373P23290 Flexible	TPO EndCaps & Centers	10.5	35.98%	0.0%	36.0%	0.0%	45.11%	0.02650	240	3.77	3.77	24.00	105.14	10.68	8.37	75%
373P23290 Flexible	Mirror Covers	10.5	35.98%	0.0%	36.0%	0.0%	45.11%	0.00604	780	3.77	3.77	17.78	77.88	7.91	8.37	75%
373P24812 ARGENT Silver Flexible primer	TPO EndCaps & Centers	9.2	43.94%	0.0%	43.9%	0.0%	42.33%	0.01480	240	4.05	4.05	14.39	63.03	4.59	9.57	75%
373P24812 ARGENT Silver Flexible primer	Columbia Bumpers	9.2	43.94%	0.0%	43.9%	0.0%	42.33%	0.02660	100	4.05	4.05	10.78	47.20	3.44	9.57	75%
11ALC46859 A.D. Gray Cond. Primer	Fender Extensions	8.7	62.10%	0.0%	62.1%	0.0%	23.60%	0.03100	240	5.40	5.40	40.20	176.06	6.13	22.89	75%
11ALC46859 A.D. Gray Cond. Primer	IC Bus Badge	8.7	62.10%	0.0%	62.1%	0.0%	23.60%	0.00620	500	5.40	5.40	16.75	73.36	2.56	22.89	75%
818-5325 Stonegard Primer	Tecstar	10.9	32.48%	0.0%	32.5%	0.0%	52.40%	0.09850	270	3.53	3.53	93.81	410.88	48.75	6.73	75%
HAP34256B TPO-5 GLOSS Dk. Gray Primer	Side Fairings	8.9	47.06%	0.0%	47.1%	0.0%	42.03%	0.05140	120	4.21	4.21	25.95	113.66	7.30	10.01	75%
HAP34256B TPO-5 GLOSS Dk. Gray Primer	Columbia Bumpers	8.9	47.06%	0.0%	47.1%	0.0%	42.03%	0.05140	100	4.21	4.21	21.62	94.72	6.08	10.01	75%
602-1060F HS CONDUCTIVE PRIMER	Delphi Bezels	8.9	57.45%	0.0%	57.5%	0.0%	32.69%	0.00011	10,152	5.12	5.12	5.72	25.04	1.06	15.66	75%
602-1060F HS CONDUCTIVE PRIMER	Plastic Omnium Bezels	8.9	57.45%	0.0%	57.5%	0.0%	32.69%	0.00011	10,152	5.12	5.12	5.72	25.04	1.06	15.66	75%

**Appendix A: Emissions Calculations
VOC and Particulate
From Plant 1, Elite Enterprises, Inc. (Four (4) Paint Booths)**

Company Name: Elite Enterprise, Inc.
Address City IN Zip: 2701 South Coliseum Blvd., Fort Wayne, IN 46803
Pit ID: 003-00205
Part 70 Renewal No.: 003-18364-00205
Reviewer: Seema Roy/EVP
Date: 10/14/05

Material	Program	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum Usage (units/hr)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
PB2 Cont'd																
602-1060F HS CONDUCTIVE PRIMER	Tow Hook Covers	8.9	57.45%	0.0%	57.5%	0.0%	32.69%	0.02500	96	5.12	5.12	12.29	53.81	2.27	15.66	75%
RPPW9800 Primer	KJ & CS Fuel Doors	10.3	37.69%	0.0%	37.7%	0.0%	54.07%	0.00270	2,400	3.88	3.88	25.13	110.08	10.39	7.17	75%
RPPW9800 Primer	P221 Fuel Doors	10.3	37.69%	0.0%	37.7%	0.0%	54.07%	0.00270	1,800	3.88	3.88	18.85	82.56	7.79	7.17	75%
SF53MP-4 Primer T.I.	Lacks	7.9	74.48%	0.0%	74.5%	0.0%	0.00%	0.00020	6,300	5.87	5.87	7.39	32.39	0.63	N/A	75%
UAE2560 POPFREE(TM) GRAY CONDUCTIVE PRIMER	B-Pillars	9.7	48.30%	0.0%	48.3%	0.0%	31.10%	0.01461	300	4.66	20.43	89.54	392.19	5.47	14.99	75%
UAE2560 POPFREE(TM) GRAY CONDUCTIVE PRIMER	Savana	9.7	48.30%	0.0%	48.3%	0.0%	31.10%	0.04275	90	4.66	17.93	69.00	302.21	4.80	14.99	75%
XM0226 Clear Urethane Hardener (Part B)	B-Pillars	8.8	25.97%	0.0%	26.0%	0.0%	69.99%	0.00258	300	2.28	2.28	1.76	7.73	1.26	3.26	75%
XM0226 Clear Urethane Hardener (Part B)	Savana	8.8	25.97%	0.0%	26.0%	0.0%	69.99%	0.00754	90	2.28	2.28	1.55	6.78	1.10	3.26	75%
Acetone	TPO EndCaps & Centers	6.6	100.00%	0.0%	100.0%	0.0%	0.00%	0.00164	240	6.59	6.59	2.59	11.36	0.00	N/A	0%
Acetone	Columbia Bumpers	6.6	100.00%	0.0%	100.0%	0.0%	0.00%	0.00296	100	6.59	6.59	1.95	8.54	0.00	N/A	0%
EB-Acetate	Lacks	7.8	100.00%	0.0%	100.0%	0.0%	0.00%	0.00020	6,300	7.84	7.84	9.88	43.27	0.00	N/A	0%
NBA Butyl Acetate	Tecstar	7.4	100.00%	0.0%	100.0%	0.0%	0.00%	0.18970	270	7.35	7.35	376.46	1648.89	0.00	N/A	0%
NBA Butyl Acetate	KJ & CS Fuel Doors	7.4	100.00%	0.0%	100.0%	0.0%	0.00%	0.00014	2,400	7.35	7.35	2.47	10.82	0.00	N/A	0%
NBA Butyl Acetate	P221 Fuel Doors	7.4	100.00%	0.0%	100.0%	0.0%	0.00%	0.00014	1,800	7.35	7.35	1.85	8.11	0.00	N/A	0%
Glycol/Ether/EB EB	IC Bus Badge	7.5	100.00%	0.0%	100.0%	0.0%	0.00%	0.00069	500	7.49	7.49	2.58	11.32	0.00	N/A	0%
Glycol/Ether/EB EB	Fender Extensions	7.5	100.00%	0.0%	100.0%	0.0%	0.00%	0.00034	240	7.49	7.49	0.62	2.71	0.00	N/A	0%
Xylene	Lacks	7.3	100.00%	0.0%	100.0%	0.0%	0.00%	0.00060	6,300	7.25	7.25	27.41	120.03	0.00	N/A	0%
Total PB2												519.62	2275.94	48.75		

**Appendix A: Emissions Calculations
VOC and Particulate
From Plant 1, Elite Enterprises, Inc. (Four (4) Paint Booths)**

Company Name: Elite Enterprise, Inc.
Address City IN Zip: 2701 South Coliseum Blvd., Fort Wayne, IN 46803
Pit ID: 003-00205
Part 70 Renewal No.: 003-18364-00205
Reviewer: Seema Roy/EVP
Date: 10/14/05

Material	Program	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum Usage (units/hr)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
PB3																
CBC382EA Pewter Metallic	Tecstar	8.3	45.77%	0.0%	45.8%	0.0%	46.29%	0.03940	270	3.80	3.80	40.46	177.22	11.99	8.22	75%
CBC8555G Black	Tecstar	8.2	41.28%	0.0%	41.3%	0.0%	50.66%	0.04650	270	3.38	3.38	42.45	185.91	15.09	6.67	75%
CBC8624A Olympic White	Tecstar	10.1	39.93%	0.0%	39.9%	0.0%	42.46%	0.04570	270	4.03	4.03	49.71	217.74	18.70	9.49	75%
CBC8624A Olympic White	Delphi Bezels	10.1	39.93%	0.0%	39.9%	0.0%	42.46%	0.00025	10,152	4.03	4.03	10.23	44.79	3.85	9.49	75%
CBC8624A Olympic White	P221 Fuel Doors	10.1	39.93%	0.0%	39.9%	0.0%	42.46%	0.00457	1,800	4.03	4.03	33.14	145.16	12.46	9.49	75%
CBC8624A Olympic White	Savana	10.1	39.93%	0.0%	39.9%	0.0%	42.46%	0.04570	90	4.03	4.03	16.57	72.58	6.23	9.49	75%
CBC8624A Olympic White	Tow Hook Covers	10.1	39.93%	0.0%	39.9%	0.0%	42.46%	0.02229	96	4.03	4.03	8.62	37.76	3.24	9.49	75%
UHD72MP-B24B New Mustang	Lacks	8.3	57.82%	0.0%	57.8%	0.0%	0.00%	0.00110	6,300	4.80	4.80	33.26	145.67	6.07	N/A	75%
872AB921 Black Basecoat	Tecstar	8.1	51.26%	0.0%	51.3%	0.0%	41.87%	0.04650	270	4.14	4.14	52.00	227.76	12.36	9.89	75%
871X 6112 Pewter Metallic	Tecstar	8.1	50.79%	0.0%	50.8%	0.0%	41.25%	0.04060	270	4.12	4.12	45.21	198.02	10.95	10.00	75%
872X 5963 Olympic White	Tecstar	10.7	36.36%	0.0%	36.4%	0.0%	46.89%	0.04560	270	3.89	3.89	47.86	209.61	20.94	8.29	75%
872X 5963 Olympic White	Plastic Omnium Bezels	10.7	36.36%	0.0%	36.4%	0.0%	46.89%	0.00027	10,152	3.89	3.89	10.65	46.66	4.66	8.29	75%
C-17 1,6 Hexamethylene Disocyanate	Lacks	9.4	10.40%	0.0%	10.4%	0.0%	87.00%	0.00018	6,300	0.98	0.98	1.11	4.86	2.39	1.12	75%
TKPS8624A OLYMPIC WHITE	Headlamp Washer Covers	9.7	36.69%	0.0%	36.7%	0.0%	48.95%	0.00052	520	3.56	3.56	0.96	4.22	0.42	7.27	75%
TKPSM382E PEWTER METALLIC	Boiler Covers	8.4	60.86%	0.0%	60.9%	0.0%	28.50%	0.07878	180	5.11	5.11	72.49	317.52	11.66	17.94	75%
MAK Methyl N-Amyl Ketone	Lacks	6.8	100.00%	0.0%	100.0%	0.0%	0.00%	0.00045	6,300	6.80	6.80	19.28	84.44	0.00	N/A	0%
PM-Acetate	Lacks	8.1	100.00%	0.0%	100.0%	0.0%	0.00%	0.00045	6,300	8.06	8.06	22.85	100.08	0.00	N/A	0%
Xylene	Plastic Omnium Bezels	7.3	100.00%	0.0%	100.0%	0.0%	0.00%	0.00007	10,152	7.25	7.25	5.15	22.57	0.00	N/A	0%
Glycol/Ether/EB EB Solvent	Lacks	7.5	100.00%	0.0%	100.0%	0.0%	0.00%	0.00002	6,300	7.49	7.49	0.94	4.13	0.00	N/A	0%
Glycol/Ether/EB EB Solvent	Plastic Omnium Bezels	7.5	100.00%	0.0%	100.0%	0.0%	0.00%	0.00001	10,152	7.49	7.49	0.76	3.33	0.00	N/A	0%
Glycol/Ether/EB EB Solvent	Tecstar	7.5	100.00%	0.0%	100.0%	0.0%	0.00%	0.00084	270	7.49	7.49	1.70	7.44	0.00	N/A	0%
Acetone	Tecstar	6.6	100.00%	0.0%	100.0%	0.0%	0.00%	0.00835	270	6.59	6.59	14.86	65.07	0.00	N/A	0%
Total PB3												138.03	604.59	20.94		

Appendix A: Emissions Calculations
VOC and Particulate
From Plant 1, Elite Enterprises, Inc. (Four (4) Paint Booths)

Company Name: Elite Enterprise, Inc.
 Address City IN Zip: 2701 South Coliseum Blvd., Fort Wayne, IN 46803
 Pit ID: 003-00205
 Part 70 Renewal No.: 003-18364-00205
 Reviewer: Seema Roy/EVP
 Date: 10/14/05

Material	Program	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum Usage (units/hr)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
PB4																
RK-7017 Clara 2K	Tecstar	8.3	46.41%	0.0%	46.4%	0.0%	47.18%	0.02550	270	3.86	3.86	26.59	116.44	7.67	8.18	75%
RK-7017 Clara 2K	Plastic Omnium Bezels	8.3	46.41%	0.0%	46.4%	0.0%	47.18%	0.00026	10,152	3.86	3.86	10.19	44.64	2.94	8.18	75%
RK-7017 Clara 2K	Savana	8.3	46.41%	0.0%	46.4%	0.0%	47.18%	0.02550	90	3.86	3.86	8.86	38.81	2.56	8.18	75%
Rk-7018 Urethane Activator	Tecstar	8.9	28.00%	0.0%	28.0%	0.0%	65.74%	0.01050	270	2.50	2.50	7.08	31.01	4.55	3.80	75%
Rk-7018 Urethane Activator	Plastic Omnium Bezels	8.9	28.00%	0.0%	28.0%	0.0%	65.74%	0.00011	10,152	2.50	2.50	2.79	12.22	1.79	3.80	75%
Rk-7018 Urethane Activator	Savana	8.9	28.00%	0.0%	28.0%	0.0%	65.74%	0.01050	90	2.50	2.50	2.36	10.34	1.52	3.80	75%
C-17 1,6 Hexamethylene Diisocyanate	Lacks	9.4	10.40%	0.0%	10.4%	0.0%	87.00%	0.00067	6,300	0.98	0.98	4.13	18.07	8.89	1.12	75%
HD7CP-B1 Clear Coat	Lacks	8.3	50.57%	0.0%	50.6%	0.0%	0.00%	0.00200	6,300	4.17	4.17	52.57	230.25	12.85	N/A	75%
TKU2000C 2-K CLEARCOAT	Boiler Covers	7.9	57.88%	0.0%	57.9%	0.0%	36.16%	0.03795	180	4.58	4.58	31.31	137.16	5.70	12.68	75%
TKU2000C 2-K CLEARCOAT	Headlamp Washer Covers	7.9	57.88%	0.0%	57.9%	0.0%	36.16%	0.00107	520	4.58	4.58	2.55	11.17	0.46	12.68	75%
DCT1002B	Delphi Bezels	8.4	40.04%	0.0%	40.0%	0.0%	55.60%	0.00029	10,152	3.36	3.36	9.90	43.37	3.71	6.05	75%
DCT1002B	Tow Hook Covers	8.4	40.04%	0.0%	40.0%	0.0%	55.60%	0.02258	96	3.36	3.36	7.29	31.93	2.73	6.05	75%
DCT1002B	P221 Fuel Doors	8.4	40.04%	0.0%	40.0%	0.0%	55.60%	0.00529	1,800	3.36	3.36	32.03	140.27	11.99	6.05	75%
Xylene	Tecstar	7.3	100.00%	0.0%	100.0%	0.0%	0.00%	0.01570	270	7.25	7.25	30.73	134.61	0.00	N/A	0%
Xylene	Plastic Omnium Bezels	7.3	100.00%	0.0%	100.0%	0.0%	0.00%	0.00016	10,152	7.25	7.25	11.78	51.58	0.00	N/A	0%
Xylene	Savana	7.3	100.00%	0.0%	100.0%	0.0%	0.00%	0.01570	90	7.25	7.25	10.24	44.87	0.00	N/A	0%
MAK Methyl N-Amyl Ketone	Lacks	6.8	100.00%	0.0%	100.0%	0.0%	0.00%	0.00029	6,300	6.80	6.80	12.42	54.42	0.00	N/A	0%
PM-Acetate	Lacks	8.1	100.00%	0.0%	100.0%	0.0%	0.00%	0.00029	6,300	8.06	8.06	14.73	64.50	0.00	N/A	0%
Total PB4												132.47	580.22	12.85		
Potential Emissions												790.12	3460.75	82.54		

Controlled Potential Emissions

Total Controlled Potential Emissions:			Control Efficiency:		Controlled VOC lbs per Hour	Controlled VOC tons per Year	Controlled PM tons/yr
			VOC	PM			
Total Emissions	VOC	PM/PM10	0.00%	98.00%	790.12	3460.75	1.65
Uncontrolled (tons/yr)	3460.75	82.54					
Controlled (tons/yr)	3460.75	1.65					

METHODOLOGY

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

Appendix A: Emissions Calculations
HAPs from Plant 1, Elite Enterprises, Inc. (Four (4) Paint Booths)

Company Name: Elite Enterprise, Inc.
 Address City IN Zip: 2701 South Coliseum Blvd., Fort Wayne, IN 46803
 Pit ID: 003-00205
 Part 70 Renewal No.: 003-18364-00205
 Reviewer: Seema Roy/EVP
 Date: 10/14/05

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Hexa methylene diisocyanate	Weight % EthylBenzene	Weight % MEK	Weight % MIBK	Weight % Methanol	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Hexamethylene diisocyanate Emissions (ton/yr)	EthylBenzene Emissions (ton/yr)	MEK Emissions (ton/yr)	MIBK Emissions (ton/yr)	Methanol Emissions (ton/yr)
PB2 Cont'd																	
602-1060F HS CONDUCTIVE PRIMER	8.9	0.00011	10,152	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
602-1060F HS CONDUCTIVE PRIMER	8.9	0.00011	10,152	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
602-1060F HS CONDUCTIVE PRIMER	8.9	0.02500	96	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
RPPW9800 Primer	10.3	0.00270	2,400	0.32%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.93	0.00	0.00	0.00	0.00	0.00	0.00
RPPW9800 Primer	10.3	0.00270	1,800	0.32%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.70	0.00	0.00	0.00	0.00	0.00	0.00
SF53MP-4 Primer T.I.	7.9	0.00020	6,300	13.00%	0.00%	0.00%	0.00%	35.00%	0.00%	0.00%	5.65	0.00	0.00	0.00	15.22	0.00	0.00
UAE2560 POPFREE(TM) GRAY CONDUCTIVE PRIMER	9.7	0.01461	300	0.28%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.52	0.00	0.00	0.00	0.00	0.00	0.00
UAE2560 POPFREE(TM) GRAY CONDUCTIVE PRIMER	9.7	0.04275	90	0.28%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.46	0.00	0.00	0.00	0.00	0.00	0.00
XM0226 Clear Urethane Hardener (Part B)	8.8	0.00258	300	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
XM0226 Clear Urethane Hardener (Part B)	8.8	0.00754	90	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Acetone	6.6	0.00164	240	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Acetone	6.6	0.00296	100	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
EB-Acetate	7.8	0.00020	6,300	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
NBA Butyl Acetate	7.4	0.18970	270	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
NBA Butyl Acetate	7.4	0.00014	2,400	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
NBA Butyl Acetate	7.4	0.00014	1,800	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Glycol/Ether/EB EB	7.5	0.00069	500	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Glycol/Ether/EB EB	7.5	0.00034	240	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Xylene	7.3	0.00060	6,300	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	120.03	0.00	0.00	0.00	0.00	0.00	0.00
											176.74	1.30	0.00	0.00	15.22	0.00	0.00

Appendix A: Emissions Calculations
HAPs from Plant 1, Elite Enterprises, Inc. (Four (4) Paint Booths)

Company Name: Elite Enterprise, Inc.
 Address City IN Zip: 2701 South Coliseum Blvd., Fort Wayne, IN 46803
 PIT ID: 003-00205
 Part 70 Renewal No.: 003-18364-00205
 Reviewer: Seema Roy/EVP
 Date: 10/14/05

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Hexa methylene diisocyanate	Weight % EthylBenzene	Weight % MEK	Weight % MIBK	Weight % Methanol	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Hexamethylene diisocyanate Emissions (ton/yr)	EthylBenzene Emissions (ton/yr)	MEK Emissions (ton/yr)	MIBK Emissions (ton/yr)	Methanol Emissions (ton/yr)		
PB3																			
CBC382EA Pewter Metallic	8.3	0.03940	270	2.13%	0.19%	0.00%	0.39%	1.62%	4.02%	0.00%	8.25	0.74	0.00	1.51	6.27	15.57	0.00		
CBC8555G Black	8.2	0.04650	270	0.26%	2.17%	0.00%	0.00%	0.00%	0.61%	0.00%	1.17	9.77	0.00	0.00	0.00	2.75	0.00		
CBC8624A Olympic White	10.1	0.04570	270	0.56%	3.74%	0.00%	0.12%	0.93%	0.75%	1.95%	3.05	20.39	0.00	0.65	5.07	4.09	10.63		
CBC8624A Olympic White	10.1	0.00025	10,152	0.56%	3.74%	0.00%	0.12%	0.93%	0.75%	1.95%	0.63	4.19	0.00	0.13	1.04	0.84	2.19		
CBC8624A Olympic White	10.1	0.00457	1,800	0.56%	3.74%	0.00%	0.12%	0.93%	0.75%	1.95%	2.04	13.60	0.00	0.44	3.38	2.73	7.09		
CBC8624A Olympic White	10.1	0.04570	90	0.56%	3.74%	0.00%	0.12%	0.93%	0.75%	1.95%	1.02	6.80	0.00	0.22	1.69	1.36	3.54		
CBC8624A Olympic White	10.1	0.02229	96	0.56%	3.74%	0.00%	0.12%	0.93%	0.75%	1.95%	0.53	3.54	0.00	0.11	0.88	0.71	1.84		
UHD72MP-B24B New Mustang	8.3	0.00110	6,300	0.00%	0.00%	0.00%	0.00%	20.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	50.39	0.00	0.00		
872AB921 Black Basecoat	8.1	0.04650	270	0.00%	17.00%	0.00%	2.50%	3.00%	0.00%	2.00%	0.00	75.54	0.00	11.11	13.33	0.00	8.89		
871X 6112 Pewter Metallic	8.1	0.04060	270	13.00%	0.00%	0.00%	2.50%	2.00%	0.00%	0.00%	50.68	0.00	0.00	9.75	7.80	0.00	0.00		
872X 5963 Olympic White	10.7	0.04560	270	10.00%	0.00%	0.00%	1.90%	2.00%	0.00%	3.00%	57.65	0.00	0.00	10.95	11.53	0.00	17.29		
872X 5963 Olympic White	10.7	0.00027	10,152	10.00%	0.00%	0.00%	1.90%	2.00%	0.00%	3.00%	12.83	0.00	0.00	2.44	2.57	0.00	3.85		
C-17 1.6 Hexamathylene Diisocyanate	9.4	0.00018	6,300	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00		
TKPS8624A OLYMPIC WHITE	9.7	0.00052	520	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00		
TKPSM382E PEWTER METALLIC	8.4	0.07878	180	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00		
MAK Methyl N- Amyl Ketone	6.8	0.00045	6,300	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00		
PM-Acetate	8.1	0.00045	6,300	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00		
Xylene	7.3	0.00007	10,152	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	22.57	0.00	0.00	0.00	0.00	0.00	0.00		
Glycol/Ether/EB EB Solvent	7.5	0.00002	6,300	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00		
Glycol/Ether/EB EB Solvent	7.5	0.00001	10,152	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00		
Glycol/Ether/EB EB Solvent	7.5	0.00084	270	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00		
Acetone	6.6	0.00835	270	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00		
											80.21	75.54	0.00	11.11	50.39	15.57	17.29		

Appendix A: Emissions Calculations
HAPs from Plant 1, Elite Enterprises, Inc. (Four (4) Paint Booths)

Company Name: Elite Enterprise, Inc.
Address City IN Zip: 2701 South Coliseum Blvd., Fort Wayne, IN 46803
Plt ID: 003-00205
Part 70 Renewal No.: 003-18364-00205
Reviewer: Seema Roy/EVP
Date: 10/14/05

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Hexa methylene diisocyanate	Weight % EthylBenzene	Weight % MEK	Weight % MIBK	Weight % Methanol	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Hexamethylene diisocyanate Emissions (ton/yr)	EthylBenzene Emissions (ton/yr)	MEK Emissions (ton/yr)	MIBK Emissions (ton/yr)	Methanol Emissions (ton/yr)	
PB4																		
RK-7017 Clara 2K	8.3	0.02550	270	4.00%	0.00%	0.00%	0.70%	0.00%	0.00%	0.00%	10.04	0.00	0.00	1.76	0.00	0.00	0.00	
RK-7017 Clara 2K	8.3	0.00026	10,152	4.00%	0.00%	0.00%	0.70%	0.00%	0.00%	0.00%	3.85	0.00	0.00	0.67	0.00	0.00	0.00	
RK-7017 Clara 2K	8.3	0.02550	90	4.00%	0.00%	0.00%	0.70%	0.00%	0.00%	0.00%	3.35	0.00	0.00	0.59	0.00	0.00	0.00	
Rk-7018 Urethane Activator	8.9	0.01050	270	9.00%	0.00%	0.00%	1.80%	0.00%	0.00%	0.00%	9.97	0.00	0.00	1.99	0.00	0.00	0.00	
Rk-7018 Urethane Activator	8.9	0.00011	10,152	9.00%	0.00%	0.00%	1.80%	0.00%	0.00%	0.00%	3.93	0.00	0.00	0.79	0.00	0.00	0.00	
Rk-7018 Urethane Activator	8.9	0.01050	90	9.00%	0.00%	0.00%	1.80%	0.00%	0.00%	0.00%	3.32	0.00	0.00	0.66	0.00	0.00	0.00	
C-17 1,6 Hexamathylene Diisocyanate	9.4	0.00067	6,300	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
HD7CP-B1 Clear Coat	8.3	0.00200	6,300	0.00%	0.00%	0.00%	0.00%	0.00%	15.00%	0.00%	0.00	0.00	0.00	0.00	0.00	68.30	0.00	
TKU2000C 2-K CLEARCOAT	7.9	0.03795	180	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
TKU2000C 2-K CLEARCOAT	7.9	0.00107	520	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
DCT1002B	8.4	0.00029	10,152	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
DCT1002B	8.4	0.02258	96	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
DCT1002B	8.4	0.00529	1,800	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Xylene	7.3	0.01570	270	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	134.61	0.00	0.00	0.00	0.00	0.00	0.00	
Xylene	7.3	0.00016	10,152	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	51.58	0.00	0.00	0.00	0.00	0.00	0.00	
Xylene	7.3	0.01570	90	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	44.87	0.00	0.00	0.00	0.00	0.00	0.00	
MAK Methyl N- Amyl Ketone	6.8	0.00029	6,300	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
PM-Acetate	8.1	0.00029	6,300	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
											241.10	0.00	0.00	1.99	0.00	68.30	0.00	
Total HAP Emissions											568.81	120.80	0.00	21.85	76.78	83.86	17.29	

Appendix A: Emissions Calculations

Plant 1, Elite Enterprises, Inc. (Six (6) Natural Gas Fired Makeup Heaters and One (1) Burn-off Oven)
Heat Input Capacity, MM BTU/HR <100

Company Name: Elite Enterprise, Inc.
Address City IN Zip: 2701 South Coliseum Blvd., Fort Wayne, IN 46803
Plt ID: 003-00205
Part 70 Renewal No.: 003-18364-00205
Reviewer: Seema Roy/EVP
Date: 10/14/05

Heat Input Capacity

MMBtu/hr

12.35

Potential Throughput

MMCF/yr

108.2

Facilities	MMBtu/hr
makeup heater AM1	3.0
makeup heater AM2	3.0
makeup heater AM3	1.5
makeup heater AM4	1.5
makeup heater AM5	1.5
makeup heater AM6	1.5
burn-off oven	0.35

Pollutant

	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.103	0.411	0.032	5.409	0.298	4.544

*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 7/98)

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

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	1.136E-04	6.491E-05	4.057E-03	9.737E-02	1.839E-04

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	2.705E-05	5.950E-05	7.573E-05	2.056E-05	1.136E-04

Methodology is the same as above.

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emission Calculations
Plant 2, Creative Coatings, Inc. (Three (3) Natural Gas-Fired Ovens)**

**Company Name: Elite Enterprise, Inc.
Address City IN Zip: 2701 South Coliseum Blvd., Fort Wayne, IN 46803
Plt ID: 003-00205
Part 70 Renewal No.: 003-18364-00205
Reviewer: Seema Roy/EVP
Date: 10/14/05**

Heat Input Capacity
MMBtu/hour

Potential Throughput
MMCF/year

2.83 (3 Units only)

24.8

Pollutant

	* PM	* PM10	SO ₂	** NO _x	VOC	CO
Emission Factor (lb/MMCF)	7.6	7.6	0.6	100	5.5	84
Potential To Emit (tons/year)	0.09	0.09	0.01	1.2	0.07	1.04

*PM and PM10 emission factors are filterable and condensable PM and PM10 combined.

**Emission factors for NO_x: Uncontrolled = 100 lb/MMCF.

Emission factors are from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (July, 1998).

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

METHODOLOGY

Potential Throughput (MMCF/year) = Heat Input Capacity (MMBtu/hour) * 8760 hours/year * 1 MMCF/1000 MMBtu

Potential To Emit (tons/year) = Potential Throughput (MMCF/year) * Emission Factor (lb/MMCF) * 1 ton/2000 lbs

See next page for HAPs emissions calculations.

**Appendix A: Emission Calculations
Plant 2, Creative Coatings, Inc. (Three (3) Natural Gas-Fired Ovens)**

**Company Name: Elite Enterprise, Inc.
Address City IN Zip: 2701 South Coliseum Blvd., Fort Wayne, IN 46803
Pit ID: 003-00205
Part 70 Renewal No.: 003-18364-00205
Reviewer: Seema Roy/EVP
Date: 10/14/05**

HAPs - Organics

Emission Factor (lb/MMCF)	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential To Emit (tons/year)	2.60E-05	1.49E-05	9.30E-04	2.23E-02	4.21E-05

TOTAL

2.33E-02

HAPs - Metals

Emission Factor (lb/MMCF)	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential To Emit (tons/year)	6.20E-06	1.36E-05	1.74E-05	4.71E-06	2.60E-05

TOTAL

6.79E-05

Methodology is the same as previous page.

The five highest organic and metal HAPs emission factors provided above are from AP-42, Chapter 1.4, Table 1-4.2, 1.4-3 and 1.4-4 (July, 1998).

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emissions Calculations
VOC and Particulate
From Plant 2, Creative Coatings, Inc. (Six (6) Paint Booths)**

**Company Name: Elite Enterprise, Inc.
Address City IN Zip: 2701 South Coliseum Blvd., Fort Wayne, IN 46803
Plt ID: 003-00205
Part 70 Renewal No.: 003-18364-00205
Reviewer: Seema Roy/EVP
Date: 10/14/05**

Emission Unit	Material	Density (lb/gal)	Weight % Volatile (H ₂ O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	PTE of VOC (lbs/hour)	PTE of VOC (lbs/day)	PTE of VOC (tons/year)	PTE of PM/PM10 (tons/year)	* Transfer Efficiency
Overhear Conveyor Line	Gray Monocoat	8.89	48.5%	0.0%	48.5%	0.0%	40.6%	0.03300	75	4.31	4.31	10.7	256	46.8	17.4	65%
Floorboard Conveyor Line	AD Gray Cond Primer	8.72	61.2%	0.0%	61.2%	0.0%	23.7%	0.0330	21.0	5.33	5.33	3.70	88.7	16.2	3.60	65%
														62.9	21.0	

* All material applied by HVLP spray guns to plastic parts and controlled by dry particulate filters.
Note: The clean up solvent used in the paint booths is acetone which is not a VOC.

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = Density (lb/gal) * Weight % Organics * 1 / (1-Volume % water)

Pounds of VOC per Gallon Coating = Density (lb/gal) * Weight % Organics

PTE of VOC (lbs/hour) = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hour)

PTE of VOC (lbs/day) = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hour) * 24 hours/day

PTE of VOC (tons/year) = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hour) * 8760 hours/year * 1 ton/2000 lbs

PTE of PM/PM10 (tons/year) = Maximum (units/hour) * Gal of Material (gal/unit) * Density (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer Efficiency) * 8760 hours/year * 1 ton/2000 lbs

**Appendix A: HAP Emissions Calculations
From Plant 2, Creative Coatings, Inc. (Six (6) Paint Booths)**

**Company Name: Elite Enterprise, Inc.
Address City IN Zip: 2701 South Coliseum Blvd., Fort Wayne, IN 46803
Pit ID: 003-00205
Part 70 Renewal No.: 003-18364-00205
Reviewer: Seema Roy/EVP
Date: 10/14/05**

Emission Unit	Material	Density (lb/gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Ethyl Benzene	Weight % Formaldehyde	PTE of Xylene (ton/year)	PTE of Toluene (ton/year)	PTE of Ethylbenzene (ton/year)	PTE of Formaldehyde (ton/year)
Overhear Conveyor Line	Gray Monocoat	8.89	0.03300	75	4.99%		1.00%		4.81	0.00	0.22	
Floorboard Conveyor Line	AD Gray Cond Primer	8.72	0.0330	21	4.99%	20%	4.99%	0.04%	1.32	5.29	0.30	0.011
									6.13	5.29	0.52	0.01

**Single Highest HAP (tons/year) = 6.13
Combination of HAPs (tons/year) = 12.0**

METHODOLOGY

PTE of HAPS (tons/year) = Density (lb/gal) * Gal of Mat (gal/unit) * Maximum (units/hour) * Weight % HAP * 8760 hours/year * 1 ton/2000 lbs

Appendix A: Emissions Calculations
Plant 2, Creative Coatings, Inc. (Parts Cleaning)

Company Name: Elite Enterprise, Inc.
Address City IN Zip: 2701 South Coliseum Blvd., Fort Wayne, IN 46803
Pit ID: 003-00205
Part 70 Renewal No.: 003-18364-00205
Reviewer: Seema Roy/EVP
Date: 10/14/05

Emission Unit	Density (lb/gal)	Maximum Usage Rate (gal/day)	PTE of VOC (tons/year)
Parts Cleaning	6.57	1.5	1.80

METHODOLOGY

PTE of VOC (tons/year) = Density (lb/gal) * Maximum Usage Rate (gal/day) * 365 days/year * 1 ton/2000 lbs