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**NOTICE OF 30-DAY PERIOD
FOR PUBLIC COMMENT**

Preliminary Findings Regarding New Source Review
and the Renewal of a Part 70 Operating Permit

for Nishikawa Standard Company in Marshall County

Part 70 No.: T 099-18590-00041

The Indiana Department of Environmental Management (IDEM), has received an application from Nishikawa Standard Company located at 501 High Road, Bremen, Indiana 46506, for New Source Review and the renewal of a Part 70 Operating Permit, also called a Title V Permit. IDEM's Office of Air Quality (OAQ) issues this type of permit to regulate the operation of sources that emit relatively large amounts of air pollution. This type of permit combines all of the requirements for controlling air pollution into one permit for the source, and requires the source to test equipment and keep records to ensure that the facility is following the requirements for controlling air pollution. IDEM has reviewed this application, and has developed preliminary findings, consisting of a draft permit and several supporting documents, that would allow Nishikawa Standard Company to continue to operate a rubber automotive parts coating source.

This draft Part 70 Operating Permit Renewal does not contain any new equipment that would emit air pollutants; however, some conditions from previously issued permits/approvals have been corrected, changed, or removed. This notice fulfills the public notice procedures to which those conditions are subject.

IDEM is aware that the one (1) spray booth, identified as B-13, has been constructed and operated prior to receipt of the proper permit. IDEM is reviewing this matter and will take appropriate action. This draft Title V operating permit renewal contains provisions to bring unpermitted equipment into compliance with construction permit rules.

A copy of the permit application and IDEM's preliminary findings are available at:

Bremen Public Library
304 North Jackson Street
Bremen, Indiana 46506

And

Northern Regional Office
220 W. Colfax Avenue, Suite 200
South Bend, Indiana 46601-1634

A copy of the preliminary findings is available on the Internet at: www.in.gov/idem/permits/air/pending.html.

How can you participate in this process?

The day after this announcement is published in a newspaper marks the beginning of a 30-day public comment period. During that 30-day period, you may comment on this draft permit. If the 30th day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the **air pollution impact** of this draft permit are received, with a request for a public hearing, IDEM may hold a public

hearing. If a public hearing is held, IDEM will make a separate announcement of the date, time, and location of that hearing. At a hearing, you would have an opportunity to submit written comments, make verbal comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing, should be sent in writing to IDEM. If you do not want to comment at this time, but would like to be added to IDEM's mailing list to receive notice of future action related to this permit application, please contact IDEM. Please refer to permit number T 099-18590-00041 in all correspondence.

To Contact IDEM:

IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for extension 3-6878

Pursuant to Contract No. A 305-5-66, IDEM, OAQ has assigned the processing of this permit application to Meteorological Evaluation Services Co., Inc. Therefore, questions should be directed to CarrieAnn Paukowits of Meteorological Evaluations Services Co., Inc.

To Contact the Permit Reviewer:

CarrieAnn Paukowits
Meteorological Evaluation Services Co., Inc.
165 Broadway
Amityville, New York 11701
Dial directly: (631) 691-3395, ext. 18

All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have legal authority to regulate zoning, odor or noise. For such issues, please contact your local officials.

What will happen after IDEM makes a decision?

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM's response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM's decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above, at the local library indicated above, and the IDEM public file room on the 12th floor of the Indiana Government Center North, 100 North Senate Avenue, Indianapolis and the Northern Regional Office, 220 W. Colfax Avenue, Suite 200, South Bend, Indiana 46601-1634.

If you have any questions please contact CarrieAnn Paukowits at the above address.

Nisha Sizemore, Chief
Permits Branch
Office of Air Quality

For additional information about air permits, and how you can participate, please see IDEM **Citizens' Guide to Public Participation** and **Permit Guide** on the Internet at: www.in.gov/idem/permits/guide/.

CAP/MES



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
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DRAFT

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(800) 451-6027
www.in.gov/idem

**New Source Review And
Part 70 Operating Permit Renewal
OFFICE OF AIR QUALITY**

**Nishikawa Standard Company
501 High Road
Bremen, Indiana 46506**

(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.: T 099-18590-00041	
Issued by: Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: Expiration Date:

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SECTION A

SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary rubber automotive parts coating source.

Source Address:	501 High Road, Bremen, Indiana 46506
Mailing Address:	324 Morrow Street, Topeka, Indiana 46571
General Source Phone Number:	(574)546-5938
SIC Code:	3069
County Location:	Marshall
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD Rules Major Source, Section 112 of the Clean Air Act

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

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

- (a) One (1) spray booth, identified as B-5, constructed in December 2006, equipped with manual spray guns and dry filters for overspray control, exhausting to stack S-5, capacity: 10 grams of coating per minute.
- (b) One (1) spray booth, identified as B-12, constructed in August 2003, equipped with manual spray applicators and dry filters for overspray control, exhausting to stack S-12, capacity: 10 grams of coating per minute.
- (c) One (1) spray booth, identified as B-7, constructed in September 1993, equipped with robotic spray applicators and dry filters for overspray control, exhausting to stack S-7, capacity: 30 grams of coating per minute.
- (d) One (1) spray booth, identified as B-8, constructed in December 2006, equipped with robotic spray applicators and dry filters for overspray control, exhausting to stack S-8, capacity: 10 grams of coating per minute.
- (e) One (1) spray booth, identified as B-9, constructed in December 2006, equipped with robotic spray applicators and dry filters for overspray control, exhausting to stack S-9, capacity: 10 grams of coating per minute.
- (f) One (1) spray booth, identified as B-10, constructed in December 2006, equipped with robotic spray applicators and dry filters for overspray control, exhausting to stack S-10, capacity: 10 grams of coating per minute.
- (g) One (1) spray booth, identified as B-14, constructed in September 1999 and modified in 2004, equipped with robotic spray applicators and dry filters for overspray control, exhausting to stack S-14, capacity: 10 grams of coating per minute.

- (h) One (1) spray booth, identified as B-11, constructed in August 1999, equipped with manual spray applicators and dry filters for overspray control, exhausting to stack S-11, capacity: 10 grams of coating per minute.
- (i) One (1) spray booth, identified as B-6, constructed in June 2004, equipped with manual spray guns and dry filters for overspray control, exhausting to stack S-6, capacity: 10 grams of coating per minute.
- (j) One (1) spray booth, identified as B-13, constructed in August 2004, equipped with manual spray applicators and dry filters for overspray control, exhausting to stack S-13, capacity: 10 grams of coating per minute.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source does not currently have any specifically regulated insignificant activities, as defined in 326 IAC 2-7-1(21) that have applicable requirements.

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

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

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

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, T 099-18590-00041, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

and

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

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

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

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

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

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

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

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

Facsimile Number: 317-233-6865

Northern Regional Office phone: (574) 245-4870; fax: (574) 245-4877

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

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

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

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

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

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

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

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

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

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

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

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

- (a) All terms and conditions of permits established prior to T 099-18590-00041 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this combined permit, all previous registrations and permits are superseded by this combined new source review and part 70 operating permit.

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

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

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

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

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

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

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

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

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

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

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

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

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

Request for renewal shall be submitted to:

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

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

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

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

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

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

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

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

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

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

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

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

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

and

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

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

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

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

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

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

- (c) Emission Trades [326 IAC 2-7-20(c)]

The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]

The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

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

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

All required notifications shall be submitted to:

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

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

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

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

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

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

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

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

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

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

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

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

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

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

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

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

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

C.11 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 September 20, 1999.
- (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.12 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.13 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 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.14 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 2004 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
 - (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
 - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

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

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

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

C.15 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.16 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

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

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

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

Stratospheric Ozone Protection

C.17 Compliance with 40 CFR 82 and 326 IAC 22-1

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

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

SECTION D.1 FACILITY OPERATION CONDITIONS

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

- (a) One (1) spray booth, identified as B-5, constructed in December 2006, equipped with manual spray guns and dry filters for overspray control, exhausting to stack S-5, capacity: 10 grams of coating per minute.
- (b) One (1) spray booth, identified as B-12, constructed in August 2003, equipped with manual spray applicators and dry filters for overspray control, exhausting to stack S-12, capacity: 10 grams of coating per minute.
- (c) One (1) spray booth, identified as B-7, constructed in September 1993, equipped with robotic spray applicators and dry filters for overspray control, exhausting to stack S-7, capacity: 30 grams of coating per minute.
- (d) One (1) spray booth, identified as B-8, constructed in December 2006, equipped with robotic spray applicators and dry filters for overspray control, exhausting to stack S-8, capacity: 10 grams of coating per minute.
- (e) One (1) spray booth, identified as B-9, constructed in December 2006, equipped with robotic spray applicators and dry filters for overspray control, exhausting to stack S-9, capacity: 10 grams of coating per minute.
- (f) One (1) spray booth, identified as B-10, constructed in December 2006, equipped with robotic spray applicators and dry filters for overspray control, exhausting to stack S-10, capacity: 10 grams of coating per minute.
- (g) One (1) spray booth, identified as B-14, constructed in September 1999 and modified in 2004, equipped with robotic spray applicators and dry filters for overspray control, exhausting to stack S-14, capacity: 10 grams of coating per minute.
- (h) One (1) spray booth, identified as B-11, constructed in August 1999, equipped with manual spray applicators and dry filters for overspray control, exhausting to stack S-11, capacity: 10 grams of coating per minute.
- (i) One (1) spray booth, identified as B-6, constructed in June 2004, equipped with manual spray guns and dry filters for overspray control, exhausting to stack S-6, capacity: 10 grams of coating per minute.
- (j) One (1) spray booth, identified as B-13, constructed in August 2004, equipped with manual spray applicators and dry filters for overspray control, exhausting to stack S-13, capacity: 10 grams of coating per minute.

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

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

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

Pursuant to CP 099-4049-00041 issued on January 25, 1995, the Best Available Control Technology (BACT) for the one (1) spray booth, identified as B-7, is the continued use of robotic high volume low pressure (HVLV) coating application equipment. The Permittee shall make all efforts to explore viable options for the use of low VOC, water-based coatings to further reduce VOC emissions from the

coating operations. Reports of findings shall be submitted to the OAQ at the end of each calendar year. When these coatings become available, the Permittee shall substitute them for the current solvent-based coatings.

HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.1.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the one (1) spray booth, identified as B-7.

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

D.1.3 Reporting Requirements

An annual report of viable options for the use of low-VOC, water-based coatings at the one (1) spray booth, identified as B-7, to document compliance with Condition D.1.1, shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, within thirty (30) days after the end of the calendar year 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).

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

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Nishikawa Standard Company
Source Address: 501 High Road, Bremen, Indiana 46506
Mailing Address: 324 Morrow Street, Topeka, Indiana 46571
Part 70 Permit No.: T 099-18590-00041

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
MC61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Nishikawa Standard Company
Source Address: 501 High Road, Bremen, Indiana 46506
Mailing Address: 324 Morrow Street, Topeka, Indiana 46571
Part 70 Permit No.: T 099-18590-00041

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

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

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

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

Page 2 of 2

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

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

A certification is not required for this report.

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

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

Source Name: Nishikawa Standard Company
Source Address: 501 High Road, Bremen, Indiana 46506
Mailing Address: 324 Morrow Street, Topeka, Indiana 46571
Part 70 Permit No.: T 099-18590-00041

Months: _____ to _____ Year: _____

Page 1 of 2

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<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

Technical Support Document (TSD) for New Source Review and a
Part 70 Operating Permit Renewal

Source Background and Description

Source Name:	Nishikawa Standard Company
Source Location:	501 High Road, Bremen, Indiana 46506
County:	Marshall
SIC Code:	3069
Permit Renewal No.:	T 099-18590-00041
Permit Reviewer:	CarrieAnn Paukowits

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Nishikawa Standard Company relating to the operation of a stationary rubber automotive parts coating source.

History

On February 25, 2004, Nishikawa Standard Company submitted an application to the OAQ requesting to renew its operating permit. Nishikawa Standard Company was issued a Part 70 Operating Permit on December 14, 1999.

Permitted Emission Units and Pollution Control Equipment

- (a) One (1) spray booth, identified as B-5, constructed in December 2006, equipped with manual spray guns and dry filters for overspray control, exhausting to stack S-5, capacity: 10 grams of coating per minute.
- (b) One (1) spray booth, identified as B-12, constructed in August 2003, equipped with manual spray applicators and dry filters for overspray control, exhausting to stack S-12, capacity: 10 grams of coating per minute.
- (c) One (1) spray booth, identified as B-7, constructed in September 1993, equipped with robotic spray applicators and dry filters for overspray control, exhausting to stack S-7, capacity: 30 grams of coating per minute.
- (d) One (1) spray booth, identified as B-8, constructed in December 2006, equipped with robotic spray applicators and dry filters for overspray control, exhausting to stack S-8, capacity: 10 grams of coating per minute.
- (e) One (1) spray booth, identified as B-9, constructed in December 2006, equipped with robotic spray applicators and dry filters for overspray control, exhausting to stack S-9, capacity: 10 grams of coating per minute.
- (f) One (1) spray booth, identified as B-10, constructed in December 2006, equipped with robotic spray applicators and dry filters for overspray control, exhausting to stack S-10, capacity: 10 grams of coating per minute.
- (g) One (1) spray booth, identified as B-14, constructed in September 1999 and modified in 2004, equipped with robotic spray applicators and dry filters for overspray control, exhausting to stack S-14, capacity: 10 grams of coating per minute.

B-5 was previously identified as HS-5, B-12 was previously identified as WB-1, B-7 was previously identified as RS-7, B-8 was previously identified as RS-8, B-9 was previously identified as RS-9, and B-14 was previously identified as AS-2.

Emission Units and Pollution Control Equipment Constructed and/or Operated without a Permit

The source also consists of the following emission units that were constructed and/or operated without a permit:

- (a) One (1) spray booth, identified as B-11, constructed in August 1999, equipped with manual spray applicators and dry filters for overspray control, exhausting to stack S-11, capacity: 10 grams of coating per minute.
- (b) One (1) spray booth, identified as B-6, constructed in June 2004, equipped with manual spray guns and dry filters for overspray control, exhausting to stack S-6, capacity: 10 grams of coating per minute.
- (c) One (1) spray booth, identified as B-13, constructed in August 2004, equipped with manual spray applicators and dry filters for overspray control, exhausting to stack S-13, capacity: 10 grams of coating per minute.

Spray booths B-11 and B-6 have emissions less than that which require construction and operation approval. Spray booth B-13 should have been permitted with the addition of spray booth B-12 and the modification to spray booth B-14 in Administrative Amendment No. 099-19162-00041, issued on June 11, 2004. According to that amendment, the potential to emit PM and PM₁₀ was 1.14 tons per year and the potential to emit VOC was 4.30 tons per year. Including B-13, the emissions are 1.53 tons of PM and PM₁₀ and 10 tons of VOC. Thus, that construction and operation required a minor source and minor permit modification rather than an administrative amendment.

Emission Units and Pollution Control Equipment Removed From the Source

- (a) Three (3) spray booths, identified as HS-1, HS-2, and HS-4, constructed in 1989, equipped with dry filters for overspray control, exhausted through Stacks S-1, S-2, and S-4, respectively, capacity: 90 rubber automotive parts per hour, each.
- (b) One (1) vertical spray application booth, identified as AS-1, constructed in 1999, equipped with high volume, low pressure (HVLP) spray applicators and dry filters for overspray control, exhausted through Stack S-4, capacity: 120 rubber weather-stripping parts for automobile applications per hour.

The following insignificant activities:

- (a) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
- (b) Units emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP: parts washer emissions and combined rubber curing.

Insignificant Activities

- (a) Units emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP: structural and production welding and hand brush-on applications of coating materials.

- (b) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, not including any boilers.
- (c) Any operation using aqueous solutions containing less than 1 percent by weight of VOCs excluding HAPs.
- (d) Water based adhesives that are less than or equal to 5 percent by volume of VOCs excluding HAPs.
- (e) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (f) Paved roads and parking lots with public access.
- (g) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (h) Emergency generators as follows:

One (1) natural gas-fired, reciprocating emergency generator, constructed in July 1992, heat input capacity: 1.4 million British thermal units per hour.
- (i) Filter or coalescer media changeout.
- (j) Units emitting less than 3 pounds per hour but less than 15 pounds per day of VOC: bonding line.

Existing Approvals

Since the issuance of the Part 70 Operating Permit T 099-7539-00041 on December 14, 1999, the source has constructed or has been operating under the following approvals as well:

- (a) Reopening No. 099-13416-00041, issued on February 12, 2002;
- (b) Administrative Amendment No. 099-19162-00041, issued on June 11, 2004;
- (c) Minor Source Modification No. 099-22676-00041, issued on May 18, 2006;
- (d) Minor Permit Modification No. 099-22954-00041, issued on July 18, 2006; and
- (e) Administrative Amendment No. 099-24391-00041, issued on March 9, 2007.

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 determined no longer applicable; therefore, they were not incorporated into this **Part 70 Operating Permit Renewal**:

- (a) Conditions D.1.2 and D.2.2(b): Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating, shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.

Reason not incorporated: The potential particulate emissions from each of the ten (10) spray paint booths, identified as B-5 through B-14, are less than 0.551 pounds per hour. Therefore, pursuant to 326 IAC 6-3-1(b)(14), the spray paint booths are exempt from the requirements of 326 IAC 6-3-2. The monitoring for dry filter performance will also be removed from the permit.

- (b) Condition D.2.1: Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator shall:
- (1) Equip the cleaner with a cover;
 - (2) Equip the cleaner with a facility for draining cleaned parts;
 - (3) Close the degreaser cover whenever parts are not being handled in the cleaner;
 - (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
 - (5) Provide a permanent, conspicuous label summarizing the operation requirements;
 - (6) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

Reason not incorporated: There is no parts washer at this source.

- (c) Condition D.2.2(a): Pursuant to 326 IAC 6-3-2 (Particulate Limitations for Manufacturing Processes), the particulate emission rate from the welding, grinding and machining operations shall not exceed particulate emission rate based on the following equation:

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

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

Reason not incorporated: The welding at this source consumes less than 625 pounds of weld wire or rod per day. Therefore, pursuant to 326 IAC 6-3-1(b)(9), the welding is exempt from the requirements of 326 IAC 6-3. In addition, there are no grinding and machining activities at this source.

Enforcement Issue

IDEM is aware that equipment (spray booth B-13) has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled "Emission Units and Pollution Control Equipment Constructed and/or Operated without a Permit". IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
S-5	Spray booth B-5	30.5	2.00	210	77.0
S-6	Spray booth B-6	29.5	2.00	210	77.0
S-7	Spray booth B-7	38.0	3.00	300	77.0
S-8	Spray booth B-8	33.5	2.50	240	77.0
S-9	Spray booth B-9	30.0	2.50	210	77.0
S-10	Spray booth B-10	31.0	2.50	240	77.0
S-11	Spray booth B-11	33.0	2.50	240	77.0
S-12	Spray booth B-12	32.0	2.00	180	77.0
S-13	Spray booth B-13	33.5	2.00	135	77.0
S-14	Spray booth B-14	34.0	2.50	240	77.0

Emission Calculations

See Appendix A of this document for detailed emission calculations (7 pages).

County Attainment Status

The source is located in Marshall County

Pollutant	Status
PM ₁₀	attainment
PM _{2.5}	attainment
SO ₂	attainment
NO _x	attainment
8-hour Ozone	attainment
CO	attainment
Lead	attainment

- (a) Marshall County has been classified as attainment for PM_{2.5}. 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 PM_{2.5} emissions, it has directed states to regulate PM₁₀ emissions as a surrogate for PM_{2.5} emissions. See the State Rule Applicability – Entire Source section.
- (b) Volatile organic compounds (VOC) and nitrogen oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC emissions and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Marshall County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.

- (c) Marshall County has been classified as attainment or unclassifiable in Indiana for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.
- (d) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.
- (e) 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 emissions are not counted toward determination of PSD applicability.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	tons/year
PM	8.37
PM ₁₀	8.96
SO ₂	0.062
VOC	43.7
CO	9.89
NO _x	11.0

HAPs	tons/year
Xylenes	3.13
Toluene	26.8
Ethyl benzene	0.001
Glycol Ethers	1.16
Manganese	0.103
Benzene	0.001
Formaldehyde	0.015
Methanol	0.001
Hexane	0.184
1,1,2,2-Tetrachloroethane, 1,1,2-Trichloroethane, 1,3-Butadiene, 1,3-Dichloropropene, Acetaldehyde, Acrolein, Carbon Tetrachloride, Chlorobenzene, Chloroform, Ethylene Dibromide, Methylene Chloride, Naphthalene, Styrene, Vinyl Chloride, Dichlorobenzene, Lead, Cadmium, Chromium and Nickel	< 0.001, each
Total	31.4

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all criteria pollutants is less than one hundred (<100) tons per year.
- (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.

Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-7, fugitive emissions are not counted toward the determination of Part 70 applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2003 OAQ emission data and the 2005 TRI data for HAPs.

Pollutant	Actual Emissions (tons/year)
PM	not reported
PM ₁₀	0
SO ₂	0
VOC	40
CO	0
NO _x	0
HAP (Toluene)	21.2

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 assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Potential to Emit After Issuance

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

Process/Emission Unit	Potential to Emit (tons/year)						
	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	Other (HAPs)
Spray Booth B-5	0.391	0.391	0.000	5.72	0.000	0.000	4.83 toluene; 5.23 total
Spray Booth B-6	0.391	0.391	0.000	4.37	0.000	0.000	0.586 toluene; 0.977 total
Spray Booth B-7	1.17	1.17	0.000	17.9	0.000	0.000	15.2 toluene; 17.2 total
Spray Booth B-8	0.422	0.422	0.000	0.058	0.000	0.000	0.00
Spray Booth B-9	0.422	0.422	0.000	0.058	0.000	0.000	0.00
Spray Booth B-10	0.422	0.422	0.000	0.058	0.000	0.000	0.00
Spray Booth B-11	0.391	0.391	0.000	4.37	0.000	0.000	0.731 toluene; 1.12 total
Spray Booth B-12	1.38	1.38	0.000	0.221	0.000	0.000	0.00
Spray Booth B-13	0.391	0.391	0.000	5.72	0.000	0.000	4.84 toluene; 5.52 total
Spray Booth B-14	0.391	0.391	0.000	4.65	0.000	0.000	0.586 toluene; 0.977 total
Insignificant Activities (combustion, welding, hand brush-on coating, bonding line)	2.60	3.19	0.062	0.574	9.89	11.0	0.184 hexane; 0.192 total
Total	8.37	8.96	0.062	43.7	9.89	11.0	26.8 toluene; 31.4 total
Major PSD Source Threshold	250	250	250	250	250	250	-

- (a) The potential to emit values in this table are equivalent to the unrestricted potential emissions. There are no limitations on the potential to emit.
- (b) This existing stationary source is not major for PSD because the emissions of each criteria pollutant are less than two hundred fifty (<250) tons per year, and it is not one of the twenty-eight (28) listed source categories.

Federal Rule Applicability

- (a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to a pollutant-specific emission unit that meets the following criteria:
 - (1) has a potential to emit before controls equal to or greater than the major source threshold for the pollutant involved;
 - (2) is subject to an emission limitation or standard for that pollutant; and
 - (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

The following table is used to identify the applicability of each of the criteria, under 40 CFR 64.1, to each existing emission unit and specified pollutant subject to CAM:

Emission Unit / Pollutant	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	Major Source Threshold (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
Spray Booth B-5 (PM/PM ₁₀)	dry filters	N	0.391	0.020	100	N	N
Spray Booth B-6 (PM/PM ₁₀)	dry filters	N	0.391	0.020	100	N	N
Spray Booth B-7 (PM/PM ₁₀)	dry filters	N	1.17	0.059	100	N	N
Spray Booth B-8 (PM/PM ₁₀)	dry filters	N	0.422	0.021	100	N	N
Spray Booth B-9 (PM/PM ₁₀)	dry filters	N	0.422	0.021	100	N	N
Spray Booth B-10 (PM/PM ₁₀)	dry filters	N	0.422	0.021	100	N	N
Spray Booth B-11 (PM/PM ₁₀)	dry filters	N	0.391	0.020	100	N	N
Spray Booth B-12 (PM/PM ₁₀)	dry filters	N	1.38	0.069	100	N	N
Spray Booth B-13 (PM/PM ₁₀)	dry filters	N	0.391	0.020	100	N	N
Spray Booth B-14 (PM/PM ₁₀)	dry filters	N	0.391	0.020	100	N	N

In addition, there are no VOC or HAPs control devices required for this source. Based on this evaluation, the requirements of 40 CFR Part 64, CAM are not applicable to any of the existing units as part of this Part 70 Permit Renewal.

- (b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.
- (c) This source does not apply any coatings to metal nor does it use any rubber to metal adhesive. Therefore, the requirements of the National Emission Standards for Hazardous

Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR Part 63, Subpart Mmmm, are not included in the permit.

- (d) This source does not apply any coatings to plastic. Therefore, the requirements of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products, 40 CFR 63, Subpart Pppp, are not included in the permit.
- (e) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit renewal.

State Rule Applicability - Entire Source

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

The source submitted an Emergency Reduction Plan (ERP) on September 20, 1999. The ERP has been verified to fulfill the requirements of 326 IAC 1-5-2 (Emergency Reduction Plans).

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

The unrestricted potential emissions of each criteria pollutant are less than 250 tons per year. Therefore, the potential to emit is less than 250 tons per year and the requirements of 326 IAC 2-2, PSD, are not applicable.

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

- (a) The one (1) spray booth, identified as B-7, with potential individual HAP (toluene) emissions greater than ten (10) tons per year was constructed prior to July 27, 1997. Therefore, the requirements of 326 IAC 2-4.1-1 are not applicable.
- (b) The other paint booths at this source have potential individual HAP emissions less than ten (10) tons per year and total HAP emissions less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 2-4.1-1 are not applicable.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting) because it is required to have an operating permit under 326 IAC 2-7, Part 70 program. Pursuant to this rule, the Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. This source does not have the potential to emit 2,500 tons per year of CO, NO_x or SO₂, or 250 tons per year of VOC or PM₁₀. Therefore, pursuant to 326 IAC 2-6-3(a)(2), an emission statement must be submitted triennially rather than annually. In accordance with the compliance schedule specified in 326 IAC 2-6-3, an emission statement must be submitted triennially by July 1 beginning in 2004 and every 3 years after. Therefore, the next emission statement for this source must be submitted by July 1, 2010. 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.

State Rule Applicability – Individual Facilities

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

- (a) The potential particulate emissions from the ten (10) spray paint booths, identified as B-5 through B-14, are each less than 0.551 pounds per hour. Therefore, pursuant to 326 IAC 6-3-1(b)(14), the spray paint booths are exempt from the requirements of 326 IAC 6-3-2.
- (b) The insignificant structural and production welding operations at this source consume less than 625 pounds of weld wire or rod per day. Therefore, pursuant to 326 IAC 6-3-1(b)(9), the welding operations are exempt from the requirements of 326 IAC 6-3-2.

326 IAC 8-1-6 (New facilities; General reduction requirements)

- (a) Pursuant to CP 099-4049-00041 issued on January 25, 1995, the Best Available Control Technology (BACT) for the one (1) spray booth, identified as B-7, is the continued use of robotic high volume low pressure (HVLP) coating application equipment. The Permittee shall make all efforts to explore viable options for the use of low VOC, water-based coatings to further reduce VOC emissions from the coating operations. Reports of findings shall be submitted to the OAQ at the end of each calendar year. When these coatings become available, the Permittee shall substitute them for the current solvent-based coatings.

HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

The Permittee has reduced potential VOC emissions from this facility as required by the BACT for the facility. Although the potential VOC emissions are now less than twenty-five (25) tons per year from this booth, the reduction is a result of BACT and this rule will remain applicable.

- (b) The potential VOC emissions from the other coating facilities at this source are less than 25 tons per year, each. Therefore, the requirements of 326 IAC 8-1-6 are not applicable to those facilities.

326 IAC 8-2 (Surface Coating Emission Limitations)

Only rubber parts are coated at this source. Therefore, this source does not perform any surface coating regulated under 326 IAC 8-2, and the requirements of 326 IAC 8-2 are not applicable.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements 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 enforce-

ment 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.

There are no compliance determination requirements or compliance monitoring requirements in the proposed permit. A Preventive Maintenance Plan is required for the one (1) spray booth, identified as B-7, because that booth must comply with 326 IAC 8-1-6. The other spray booths are not subject to any rules or emission limitations in this permit.

Recommendation

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

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

An application for the purposes of this review was received on February 25, 2004. Additional information was received on April 2, April 27, May 31 and June 6, 2007.

Conclusion

The operation of this rubber automotive parts coating source shall be subject to the conditions of the attached Part 70 Operating Permit Renewal No. T 099-18590-00041.

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

Company Name: Nishikawa Standard Company
Address City IN Zip: 501 High Street, Bremen, Indiana 46506
Permit Number: T 099-18590-00041
Reviewer: CarrieAnn Paukowitz
Date: June 4, 2007

Material	Density (lbs/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Usage (grams/min)	Usage (lbs/hr)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential tons per year	Transfer Efficiency
B-5															
FKZ	6.73	73.00%	0.0%	73.0%	0.0%	27.00%	10.00	1.322	4.91	4.91	0.965	23.154	4.226	0.391	75%
Fum Primer	7.38	98.30%	0.0%	98.3%	0.0%	1.70%	10.00	1.322	7.25	7.25	1.299	31.179	5.690	0.025	75%
Toluene (cleanup)	7.24	100.00%	0.0%	100.0%	0.0%	0.00%	0.06	0.008	7.24	7.24	0.008	0.182	0.033	0.000	75%
Worst-case Total											1.31	31.36	5.72	0.391	
B-6															
FKZ	6.73	73.00%	0.0%	73.0%	0.0%	27.00%	10.00	1.322	4.91	4.91	0.965	23.154	4.226	0.391	75%
Isopropyl Alcohol (cleanup)	6.59	100.00%	0.0%	100.0%	0.0%	0.00%	0.25	0.033	6.59	6.59	0.033	0.793	0.145	0.000	75%
Total											1.00	23.95	4.37	0.391	
B-7															
Fum	7.60	83.40%	0.0%	83.4%	0.0%	16.60%	30.00	3.965	6.34	6.34	3.307	79.359	14.483	0.721	75%
Fum Primer	7.38	98.30%	0.0%	98.3%	0.0%	1.70%	30.00	3.965	7.25	7.25	3.897	93.537	17.070	0.074	75%
FKZ	6.73	73.00%	0.0%	73.0%	0.0%	27.00%	30.00	3.965	4.91	4.91	2.894	69.463	12.677	1.172	75%
TWO	8.58	100.00%	30.0%	70.0%	30.0%	0.00%	30.00	3.965	8.58	6.01	2.775	66.608	12.156	0.000	75%
Toluene (gun 3 cleanup)	7.24	100.00%	0.0%	100.0%	0.0%	0.00%	0.87	0.114	7.24	7.24	0.114	2.747	0.501	0.000	75%
Toluene (gun 1 cleanup)	7.24	100.00%	0.0%	100.0%	0.0%	0.00%	0.49	0.065	7.24	7.24	0.065	1.568	0.286	0.000	75%
Isopropyl Alcohol (gun 1 cleanup)	6.59	100.00%	0.0%	100.0%	0.0%	0.00%	0.49	0.065	6.59	6.59	0.065	1.568	0.286	0.000	75%
Worst-case Total											4.08	97.85	17.86	1.17	
B-8															
FKWD	8.35	70.83%	69.8%	1.00%	0.0%	29.17%	10.00	1.322	0.08	0.08	0.013	0.317	0.058	0.422	75%
B-9															
FKWD	8.35	70.83%	69.8%	1.00%	0.0%	29.17%	10.00	1.322	0.08	0.08	0.013	0.317	0.058	0.422	75%
B-10															
FKWD	8.35	70.83%	69.8%	1.00%	0.0%	29.17%	10.00	1.322	0.08	0.08	0.013	0.317	0.058	0.422	75%
B-11															
FKZ	6.73	73.00%	0.0%	73.0%	0.0%	27.00%	10.00	1.322	4.91	4.91	0.965	23.154	4.226	0.391	75%
Toluene (cleanup)	7.24	100.00%	0.0%	100.0%	0.0%	0.00%	0.25	0.033	7.24	7.24	0.033	0.793	0.145	0.000	75%
Total											1.00	23.95	4.37	0.391	
B-12															
FKWD	8.35	70.83%	69.8%	1.00%	0.0%	29.17%	10.00	1.322	0.08	0.08	0.013	0.317	0.058	0.422	75%
Mean Green (cleanup)	8.54	4.10%	0.0%	4.1%	0.0%	Unknown	6.88	0.909	0.35	0.35	0.037	0.894	0.163	0.954	75%
Total											0.05	1.21	0.221	1.38	
B-13															
Fum Primer	7.38	98.30%	0.0%	98.3%	0.0%	1.70%	10.00	1.322	7.25	7.25	1.299	31.179	5.690	0.025	75%
FKZ	6.73	73.00%	0.0%	73.0%	0.0%	27.00%	10.00	1.322	4.91	4.91	0.965	23.154	4.226	0.391	75%
TWO	8.58	100.00%	30.0%	70.0%	30.0%	0.00%	10.00	1.322	8.58	6.01	0.925	22.203	4.052	0.000	75%
Toluene (cleanup)	7.24	100.00%	0.0%	100.0%	0.0%	0.00%	0.06	0.008	7.24	7.24	0.008	0.182	0.033	0.000	75%
Worst-case Total											1.307	31.361	5.72	0.391	
B-14															
FKZ	6.73	73.00%	0.0%	73.0%	0.0%	27.00%	10.00	1.322	4.91	4.91	0.965	23.154	4.226	0.391	75%
Isopropyl Alcohol (cleanup)	6.59	100.00%	0.0%	100.0%	0.0%	0.00%	0.74	0.097	6.59	6.59	0.097	2.333	0.426	0.000	75%
Total											1.06	25.49	4.65	0.391	
Total:											9.84	236.12	43.09	5.77	
Control Efficiency:											0.00%	0.00%	0.00%	95.00%	
Total after Control:											9.84	236.12	43.09	0.288	

METHODOLOGY

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

Appendix A: Emission Calculations
HAP Emission Calculations
From Surface Coating Operations

Company Name: Nishikawa Standard Company
Address City IN Zip: 501 High Street, Bremen, Indiana 46506
Permit Number: T 099-18590-00041
Reviewer: CarrieAnn Paukowits
Date: June 4, 2007

Material	Density (Lb/Gal)	Usage (lbs/hr)	Weight % Xylene	Weight % Toluene	Weight % Glycol Ethers	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Total Emissions (ton/yr)
B-5									
FKZ	6.73	1.321586	6.75%	10.13%	0.00%	0.39	0.59	0.00	0.98
Fum Primer	7.38	1.321586	0.00%	83.00%	0.00%	0.00	4.80	0.00	4.80
Toluene (cleanup)	7.24	0.007572	0.00%	100.00%	0.00%	0.00	0.03	0.00	0.03
Worst-case Total						0.39	4.84	0.00	5.23
B-6									
FKZ	6.73	1.321586	6.75%	10.13%	0.00%	0.39	0.59	0.00	0.98
Isopropyl Alcohol (cleanup)	6.59	0.033040	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
Total						0.39	0.59	0.00	0.98
B-7									
Fum	7.6	3.964758	0.00%	43.00%	0.00%	0.00	7.47	0.00	7.47
Fum Primer	7.38	3.964758	0.00%	83.00%	0.00%	0.00	14.41	0.00	14.41
FKZ	6.73	3.964758	6.75%	10.13%	0.00%	1.17	1.76	0.00	2.93
TWO	8.58	3.964758	0.00%	0.00%	5.00%	0.00	0.00	0.87	0.87
Toluene (gun 3 cleanup)	7.24	0.114446	0.00%	100.00%	0.00%	0.00	0.50	0.00	0.50
Toluene (gun 1 cleanup)	7.24	0.065345	0.00%	100.00%	0.00%	0.00	0.29	0.00	0.29
Isopropyl Alcohol (gun 1 cleanup)	6.59	0.065345	0.00%	100.00%	0.00%	0.00	0.29	0.00	0.29
Worst-case Total						1.17	15.20	0.87	17.24
B-8									
FKWD	8.35	1.321586	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
B-9									
FKWD	8.35	1.321586	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
B-10									
FKWD	8.35	1.321586	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
B-11									
FKZ	6.73	1.321586	6.75%	10.13%	0.00%	0.39	0.59	0.00	0.98
Toluene (cleanup)	7.24	0.033040	0.00%	100.00%	0.00%	0.00	0.14	0.00	0.14
Total						0.39	0.73	0.00	1.12
B-12									
FKWD	8.35	1.321586	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
Mean Green (cleanup)	8.54	0.908590	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
Total						0.00	0.00	0.00	0.00
B-13									
Fum Primer	7.38	1.321586	0.00%	83.00%	0.00%	0.00	4.80	0.00	4.80
FKZ	6.73	1.321586	6.75%	10.13%	0.00%	0.39	0.59	0.00	0.98
TWO	8.58	1.321586	0.00%	0.00%	5.00%	0.00	0.00	0.29	0.29
Toluene (cleanup)	7.24	0.007572	0.00%	100.00%	0.00%	0.00	0.03	0.00	0.03
Worst-case Total						0.39	4.84	0.29	5.52
B-14									
FKZ	6.73	1.321586	6.75%	10.13%	0.00%	0.39	0.59	0.00	0.98
Isopropyl Alcohol (cleanup)	6.59	0.097219	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
Total						0.39	0.59	0.00	0.98

3.13 26.78 1.16 31.06

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP

**Appendix A: Emission Calculations
Insignificant Welding and Material Usage**

**Company Name: Nishikawa Standard Company
Address City IN Zip: 501 High Street, Bremen, Indiana 46506
Permit Number: T 099-18590-00041
Reviewer: CarrieAnn Paukowits
Date: June 4, 2007**

Insignificant Activities

	Maximum Usage (lbs/yr)	Weight % VOC	Weight % Xylene	Weight % Ethyl benzene	PTE VOC (tons/yr)	PTE Xylene (tons/yr)	PTE Ethyl benzene (tons/yr)	PTE Total HAPs (tons/yr)
Hand brush-on coatings								
Thixon 814-1-EF	25	80.0%	13.0%	4.0%	0.01	0.002	0.0005	0.002
Bonding Line								
Black Max	1	2.0%	0.0%	0.0%	0.00001	0.00	0.00	0.000

Methodology

PTE (tons/yr) = Maximum usage (lbs/yr) x Weight % x 1 ton/2,000 pounds

PROCESS	Max. electrode consumption per (lbs/day)	EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (tons/yr)				HAPS (lbs/hr)
		PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
WELDING										
Stick (E7018 electrode)	625	0.0211	0.0009			2.407	0.103	0.000	0.000	0.103

METHODOLOGY

*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.

Welding emissions, tons/yr:(max. lbs of electrode used/day)x(emission factor, lb. pollutant/lb. of electrode used)x365 days/yr x 1ton/2,000

**Appendix A: Emission Calculations
Emergency Generator**

**Company Name: Nishikawa Standard Company
Address City IN Zip: 501 High Street, Bremen, Indiana 46506
Permit Number: T 099-18590-00041
Reviewer: CarrieAnn Paukowits
Date: June 4, 2007**

Four stroke Rich Burn Engines
Heat Input Capacity
MM Btu/hr

1.4

Emission Factor in lb/MMBtu	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
	9.50E-03	1.94E-02	5.88E-04	2.21E+00	2.96E-02	3.72E+00
Potential Emission in tons/yr	0.003	0.007	0.0002	0.774	0.010	1.302

HAP	Emission Factor Four stroke rich burn (lb/MMBtu)	Potential to Emit (tons/yr)
1,1,2,2-Tetrachloroethane	0.00003	0.00001
1,1,2-Trichloroethane	0.00002	0.00001
1,3-Butadiene	0.00066	0.00023
1,3-Dichloropropene	0.00001	0.000004
Acetaldehyde	0.00279	0.00098
Acrolein	0.00263	0.00092
Benzene	0.00158	0.00055
Carbon Tetrachloride	0.00002	0.00001
Chlorobenzene	0.00001	0.000005
Chloroform	0.00001	0.000005
Ethylbenzene	0.00002	0.00001
Ethylene Dibromide	0.00002	0.00001
Formaldehyde	0.02050	0.00718
Methanol	0.00306	0.00107
Methylene Chloride	0.00004	0.00001
Naphthalene	0.00010	0.00003
Styrene	0.00001	0.000004
Toluene	0.00056	0.00020
Vinyl Chloride	0.00001	0.000003
Xylene	0.00020	0.00007
Total HAPs:	0.011	

Methodology

Emission Factors are from AP 42 Tables 3.2-1, 3.2-2 and 3.2-3, revised July 2000

Emission (tons/yr) = [Heat input rate (MMBtu/hr) x Emission Factor (lb/MMBtu)] * 500 hr/yr / (2,000 lb/ton)

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

Company Name: Nishikawa Standard Company
Address City IN Zip: 501 High Street, Bremen, Indiana 46506
Permit Number: T 099-18590-00041
Reviewer: CarrieAnn Paukowits
Date: June 4, 2007

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

23.3

204

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.90	7.60	0.600	100	5.50	84.0
				**see below		
Potential Emission in tons/yr	0.194	0.777	0.061	10.2	0.562	8.59

*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

Emission Factor in lb/MMcf	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
	0.00210	0.00120	0.07500	1.80000	0.00340
Potential Emission in tons/yr	0.0002	0.0001	0.0077	0.184	0.0003

Emission Factor in lb/MMcf	HAPs - Metals					Total
	Lead	Cadmium	Chromium	Manganese	Nickel	
	0.0005	0.0011	0.0014	0.0004	0.0021	
Potential Emission in tons/yr	0.00005	0.0001	0.0001	0.00004	0.0002	0.193

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

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
Emissions Summary**

Company Name: Nishikawa Standard Company
Address City IN Zip: 501 High Street, Bremen, Indiana 46506
Permit Number: T 099-18590-00041
Reviewer: CarrieAnn Paukowits
Date: June 4, 2007

Unrestricted Potential to Emit

Process	PM	PM10	SO2	VOC	NOx	CO
Spray Booth B-5	0.391	0.391	0.000	5.723	0.000	0.000
Spray Booth B-6	0.391	0.391	0.000	4.370	0.000	0.000
Spray Booth B-7	1.172	1.172	0.000	17.858	0.000	0.000
Spray Booth B-8	0.422	0.422	0.000	0.058	0.000	0.000
Spray Booth B-9	0.422	0.422	0.000	0.058	0.000	0.000
Spray Booth B-10	0.422	0.422	0.000	0.058	0.000	0.000
Spray Booth B-11	0.391	0.391	0.000	4.370	0.000	0.000
Spray Booth B-12	1.376	1.376	0.000	0.221	0.000	0.000
Spray Booth B-13	0.391	0.391	0.000	5.723	0.000	0.000
Spray Booth B-14	0.391	0.391	0.000	4.651	0.000	0.000
<i>Insignificant Activities</i>						
Welding	2.407	2.407	0.000	0.000	0.000	0.000
Hand brush-on coating	0.000	0.000	0.000	0.002	0.000	0.000
Combustion	0.194	0.777	0.061	0.562	10.221	8.586
Emergency Generator	0.003	0.007	0.0002	0.010	0.774	1.302
Bonding Line	0.000	0.000	0.000	0.000	0.000	0.000
Total	8.37	8.96	0.062	43.7	11.0	9.89

Potential to Emit after Controls

Process	PM	PM10	SO2	VOC	NOx	CO
Spray Booth B-5	0.020	0.020	0.000	5.723	0.000	0.000
Spray Booth B-6	0.020	0.020	0.000	4.370	0.000	0.000
Spray Booth B-7	0.059	0.059	0.000	17.858	0.000	0.000
Spray Booth B-8	0.021	0.021	0.000	0.058	0.000	0.000
Spray Booth B-9	0.021	0.021	0.000	0.058	0.000	0.000
Spray Booth B-10	0.021	0.021	0.000	0.058	0.000	0.000
Spray Booth B-11	0.020	0.020	0.000	4.370	0.000	0.000
Spray Booth B-12	0.069	0.069	0.000	0.221	0.000	0.000
Spray Booth B-13	0.020	0.020	0.000	5.723	0.000	0.000
Spray Booth B-14	0.020	0.020	0.000	4.651	0.000	0.000
<i>Insignificant Activities</i>	0.000	0.000	0.000	0.000	0.000	0.000
Welding	2.407	2.407	0.000	0.000	0.000	0.000
Hand brush-on coating	0.000	0.000	0.000	0.002	0.000	0.000
Combustion	0.194	0.777	0.061	0.562	10.221	8.586
Emergency Generator	0.003	0.007	0.000	0.010	0.774	1.302
Bonding Line	0.000	0.000	0.000	0.000	0.000	0.000
Total	2.89	3.48	0.062	43.7	11.0	9.89

The spray booths are controlled by dry filters with 95% control efficiency.

**Appendix A: Emission Calculations
Emissions Summary**

**Company Name: Nishikawa Standard Company
Address City IN Zip: 501 High Street, Bremen, Indiana 46506
Permit Number: T 099-18590-00041
Reviewer: CarrieAnn Paukowits
Date: June 4, 2007**

Unrestricted Potential to Emit

Process	Xylene	Toluene	Ethyl benzene	Glycol Ethers	Manganese	Benzene	Form-aldehyde	Methanol	Hexane	Total
Spray Booth B-5	0.391	4.838	0.000	0.000	0.000	0.000	0.000	0.000	0.000	5.228
Spray Booth B-6	0.391	0.586	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.977
Spray Booth B-7	1.172	15.201	0.000	0.868	0.000	0.000	0.000	0.000	0.000	17.241
Spray Booth B-8	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Spray Booth B-9	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Spray Booth B-10	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Spray Booth B-11	0.391	0.731	0.000	0.000	0.000	0.000	0.000	0.000	0.000	1.122
Spray Booth B-12	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Spray Booth B-13	0.391	4.838	0.000	0.289	0.000	0.000	0.000	0.000	0.000	5.518
Spray Booth B-14	0.391	0.586	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.977
<i>Insignificant Activities</i>										
Welding	0.000	0.000	0.000	0.000	0.103	0.000	0.000	0.000	0.000	0.103
Hand brush-on coating	0.000	0.000	0.0005	0.000	0.000	0.000	0.000	0.000	0.000	0.001
Combustion	0.000	0.0003	0.000	0.000	0.000	0.0002	0.008	0.000	0.184	0.192
Emergency Generator	0.00007	0.0002	0.00001	0.000	0.000	0.0006	0.007	0.001	0.000	0.011
Bonding Line	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Total	3.13	26.8	0.001	1.16	0.103	0.001	0.015	0.001	0.184	31.4

This source also has the potential to emit less than 0.001 tons per year of 1,1,2,2-Tetrachloroethane, 1,1,2-Trichloroethane, 1,3-Butadiene, 1,3-Dichloropropene, Acetaldehyde, Acrolein, Carbon Tetrachloride, Chlorobenzene, Chloroform, Ethylene Dibromide, Methylene Chloride, Naphthalene, Styrene, Vinyl Chloride, Dichlorobenzene, Lead, Cadmium, Chromium and Nickel.