



*Mitchell E. Daniels, Jr.*  
Governor

*Thomas W. Easterly*  
Commissioner

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

TO: Interested Parties / Applicant  
DATE: November 13, 2007  
RE: Bremen Corporation / 099-18654-00033  
FROM: Nisha Sizemore  
Chief, Permits Branch  
Office of Air Quality

### **Notice of Decision: Approval – Effective Immediately**

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

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

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

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

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

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

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

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

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

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

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

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



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100 North Senate Avenue  
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(800) 451-6027  
www.in.gov/idem

## New Source Review and Part 70 Operating Permit Renewal OFFICE OF AIR QUALITY

**Bremen Corporation  
405 North Industrial Drive  
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 2-2 and 326 IAC 2-7-10.5, applicable to those conditions.

Operation Permit No.: T 099-18654-00033	
Original signed by:  Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: November 13, 2007  Expiration Date: November 13, 2012

## TABLE OF CONTENTS

<b>SECTION A</b>	<b>SOURCE SUMMARY</b> .....	4
A.1	General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]	
A.2	Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]	
A.3	Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]	
A.4	Part 70 Permit Applicability [326 IAC 2-7-2]	
<b>SECTION B</b>	<b>GENERAL CONDITIONS</b> .....	6
B.1	Definitions [326 IAC 2-7-1]	
B.2	Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5] [326 IAC 2-7-4(a)(1)(D)] [IC 13-15-3-6(a)]	
B.3	Term of Conditions [326 IAC 2-1.1-9.5]	
B.4	Enforceability [326 IAC 2-7-7]	
B.5	Severability [326 IAC 2-7-5(5)]	
B.6	Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]	
B.7	Duty to Provide Information [326 IAC 2-7-5(6)(E)]	
B.8	Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]	
B.9	Annual Compliance Certification [326 IAC 2-7-6(5)]	
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]	
B.11	Emergency Provisions [326 IAC 2-7-16]	
B.12	Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]	
B.13	Prior Permits Superseded [326 IAC 2-1.1-9.5] [326 IAC 2-7-10.5]	
B.14	Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]	
B.15	Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]	
B.16	Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]	
B.17	Permit Renewal [326 IAC 2-7-3] [326 IAC 2-7-4] [326 IAC 2-7-8(e)]	
B.18	Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12] [40 CFR 72]	
B.19	Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12(b)(2)]	
B.20	Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]	
B.21	Source Modification Requirement [326 IAC 2-7-10.5] [326 IAC 2-2-2] [326 IAC 2-3-2]	
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]	
B.23	Transfer of Ownership or Operational Control [326 IAC 2-7-11]	
B.24	Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] [326 IAC 2-1.1-7]	
B.25	Credible Evidence [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [62 FR 8314] [326 IAC 1-1-6]	
<b>SECTION C</b>	<b>SOURCE OPERATION CONDITIONS</b> .....	16
	<b>Emission Limitations and Standards [326 IAC 2-7-5(1)]</b>	
C.1	Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]	
C.2	Opacity [326 IAC 5-1]	
C.3	Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.4	Incineration [326 IAC 4-2] [326 IAC 9-1-2]	
C.5	Fugitive Dust Emissions [326 IAC 6-4]	
C.6	Stack Height [326 IAC 1-7]	
C.7	Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
	<b>Testing Requirements [326 IAC 2-7-6(1)]</b>	
C.8	Performance Testing [326 IAC 3-6]	

**Compliance Requirements [326 IAC 2-1.1-11]**

C.9 Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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

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

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

C.15 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

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

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

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

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2]  
[326 IAC 2-3]

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2]  
[326 IAC 2-3]

**Stratospheric Ozone Protection**

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

**D.1 FACILITY OPERATION CONDITIONS: Surface Coating ..... 24**

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

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

D.1.2 PSD Minor Limits [326 IAC 2-2]

D.1.3 Particulate [326 IAC 6-3-2(d)]

D.1.4 HAPs Limit [326 IAC 2-4.1-1] [40 CFR 63]

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

**Compliance Determination Requirements**

D.1.6 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) Control

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

D.1.8 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs)  
[326 IAC 8-1-4] [326 IAC 8-1-2(a)]

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

D.1.9 Monitoring [40 CFR 64]

D.1.10 Parametric Monitoring [40 CFR 64]

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

D.1.11 Record Keeping Requirements

D.1.12 Reporting Requirements

**Certification ..... 30**

**Emergency Occurrence Report ..... 31**

**Part 70 Quarterly Reports ..... 33**

**Quarterly Deviation and Compliance Monitoring Report ..... 38**

## 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 vinyl-coated foam product manufacturing source.

Source Address:	405 North Industrial Drive, Bremen, Indiana 46506
Mailing Address:	405 North Industrial Drive, Bremen, Indiana 46506
General Source Phone Number:	219-546-4238
SIC Code:	3069
County Location:	Marshall
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Major Source, under PSD Rules Minor 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) dip room, identified as Process 2, consisting of four (4) dip tanks and one (1) cleaning station, constructed prior to 1985, exhausting to a catalytic oxidizer with a heat input capacity of 4.6 million British thermal units per hour, and exiting at stack 1 (Oxidizer #1), capacity: 3,162 pounds of paint, topcoat and cleaning blend per hour.
- (b) One (1) final finish area, identified as Process 3, constructed in 1994 and modified in 2005, consisting of two (2) hand-spray painting booths, identified as Booths 3a and 3b, constructed in 1994, and two (2) hand-spray painting booths, identified as Booths 3c and 3d, constructed in 2005, all equipped with airless spray guns, all exhausting to dry filters and a catalytic oxidizer with a heat input capacity of 4.6 million British thermal units per hour, and exiting at stack 1 (Oxidizer #1), capacity: 373.70 pounds of coatings per hour.
- (c) One (1) paint mixing process, identified as Process 4, for mixing existing paints, constructed prior to 1985, exhausting to a catalytic oxidizer with a heat input capacity of 4.6 million British thermal units per hour, and exiting at stack 1 (Oxidizer #1), with no particulate emissions, capacity: 12,671 pounds of coatings mixed per hour.
- (d) One (1) assembly area, identified as Area 2, constructed prior to 1985, consisting of hand application of adhesive, exhausting to stack 13, capacity: 14.9 pounds of adhesives per hour.
- (e) One (1) final finish area, identified as Area 3, constructed prior to 1985, consisting of one (1) automatic silk screener and one (1) manual silk screener, capacity: 25 foam products per hour.
- (f) One (1) roll coater, identified as Process 5, constructed in 2000, capacity: 106.6 pounds of adhesive per hour.

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

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million British thermal units per hour:
  - (1) One (1) natural gas fired air makeup unit, capacity: 5.0 million British thermal units per hour.
  - (2) One (1) natural gas fired air makeup unit, capacity: 1.75 million British thermal units per hour.
  - (3) One (1) natural gas fired air makeup unit, capacity: 7.5 million British thermal units per hour.
  - (4) Four (4) natural gas fired heaters, capacity: 0.2 million British thermal units per hour, each.
  - (5) Two (2) natural gas fired office heaters, capacity: 1.0 million British thermal units per hour, each.
- (b) One (1) above ground storage tank, capacity: 4,000 gallons of MEK and toluene.

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 099-18654-00033, 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 13-15-3-3. 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 099-18654-00033 and issued pursuant to permitting programs approved into the state implementation plan have been

either:

- (1) incorporated as originally stated,
  - (2) revised under 326 IAC 2-7-10.5, or
  - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

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

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

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

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

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

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

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

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

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

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

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

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

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

Request for renewal shall be submitted to:

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

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

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

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

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

Bremen Corporation  
Bremen, Indiana  
Permit Reviewer: CAP

Page 13 of 43  
T 099-18654-00033

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)]**

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- (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]**

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- (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] [326 IAC 2-2-2]**

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- (a) A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.
- (b) Any modification at an existing major source is governed by the requirements of 326 IAC 2-2-2.

**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]**

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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. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

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

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

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

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

**C.6 Stack Height [326 IAC 1-7]**

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted by using ambient air quality modeling pursuant to 326 IAC 1-7-4.

**C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]**

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 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.8 Performance Testing [326 IAC 3-6]

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- (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.9 Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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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 or permit revision shall be implemented when operation begins.

**C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

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

**C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

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

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

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

---

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

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on October 20, 2000.
- (b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

**C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]**

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

**C.15 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]**

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

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

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

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

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

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

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

- (a) Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit by July 1 of each year 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.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2]

- (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) If there is a “project” (as defined in 326 IAC 2-2-1 (qq)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a “major modification” (as defined in 326 IAC 2-2-1(ee)) and the Permittee elects to utilize the “projected actual emissions” (as defined in 326 IAC 2-2-1(rr)), the Permittee shall comply with following:
- (1) Before beginning actual construction of the “project” (as defined in 326 IAC 2-2-1(qq)) at an existing emissions unit, document and maintain the following records:
- (A) A description of the project.
- (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
- (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
- (i) Baseline actual emissions;
- (ii) Projected actual emissions;
- (iii) Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2) (A)(iii); and
- (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.

- (2) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and
- (3) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2]

- (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.
- (f) If the Permittee is required to comply with the record keeping provisions of (c) in Section C - General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1(qq) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:
  - (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C - General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C - General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1(xx)), for that regulated NSR pollutant, and
  - (2) The emissions differ from the preconstruction projection as documented and maintained under Section C - General Record Keeping Requirements (c)(1)(C)(ii).

- (g) The report for project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:
- (1) The name, address, and telephone number of the major stationary source.
  - (2) The annual emissions calculated in accordance with (c)(2) and (3) in Section C - General Record Keeping Requirements.
  - (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3).
  - (4) Any other information that the Permittee deems fit to include in this report.

Reports required in this part shall be submitted to:

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

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

### **Stratospheric Ozone Protection**

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

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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)]: Surface Coating

- (a) One (1) dip room, identified as Process 2, consisting of four (4) dip tanks and one (1) cleaning station, constructed prior to 1985, exhausting to a catalytic oxidizer with a heat input capacity of 4.6 million British thermal units per hour, and exiting at stack 1 (Oxidizer #1), capacity: 3,162 pounds of paint, topcoat and cleaning blend per hour.
- (b) One (1) final finish area, identified as Process 3, constructed in 1994 and modified in 2005, consisting of two (2) hand-spray painting booths, identified as Booths 3a and 3b, constructed in 1994, and two (2) hand-spray painting booths, identified as Booths 3c and 3d, constructed in 2005, all equipped with airless spray guns, all exhausting to dry filters and a catalytic oxidizer with a heat input capacity of 4.6 million British thermal units per hour, and exiting at stack 1 (Oxidizer #1), capacity: 373.70 pounds of coatings per hour.
- (c) One (1) paint mixing process, identified as Process 4, for mixing existing paints, constructed prior to 1985, exhausting to a catalytic oxidizer with a heat input capacity of 4.6 million British thermal units per hour, and exiting at stack 1 (Oxidizer #1), with no particulate emissions, capacity: 12,671 pounds of coatings mixed per hour.
- (d) One (1) assembly area, identified as Area 2, constructed prior to 1985, consisting of hand application of adhesive, exhausting to stack 13, capacity: 14.9 pounds of adhesives per hour.
- (e) One (1) final finish area, identified as Area 3, constructed prior to 1985, consisting of one (1) automatic silk screener and one (1) manual silk screener, capacity: 25 foam products per hour.
- (f) One (1) roll coater, identified as Process 5, constructed in 2000, capacity: 106.6 pounds of adhesive per hour.

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

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

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

- (a) Pursuant to Significant Source Modification 099-10314-00033, issued on September 14, 1999, Significant Permit Modification 099-19959-00033, issued on December 14, 2005, and 326 IAC 8-1-6 (New facilities; General reduction requirements), Processes 2, 3 and 4, and Areas 2 and 3 shall use the Best Available Control Technology (BACT). Best Available Control Technology (BACT) for these facilities is all of the following:
  - (1) A catalytic oxidizer shall be used at all times when Process 2, Process 3 or Process 4 is in operation. When operating, the catalytic oxidizer shall maintain a minimum operating temperature of 550 degrees Fahrenheit or the operating temperature determined in the most recent stack test to maintain at least ninety-five percent (95%) overall control efficiency (capture and destruction) of VOC. In addition, the catalytic oxidizer shall be tested once every two and one half (2.5) years for overall control efficiency using methods approved by the Commissioner.
  - (2) Only dip coating shall be used at Process 2.
  - (3) Airless or high volume, low pressure (HVLP) spray guns or an application with a higher transfer efficiency shall be used at all spray applications. 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.

- (4) The maximum VOC content of all coatings used shall not exceed 6.98 pounds per gallon of coating less water.
- (b) The one (1) roll coater, identified as Process 5, shall use less than a total of twenty-five (25) tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period, with compliance determined at the end of each month. Compliance with this limit renders the requirements of 326 IAC 8-1-6 (New facilities: general reduction requirements) and 326 IAC 2-2, PSD, not applicable to the one (1) roll coater, identified as Process 5.

#### D.1.2 PSD Minor Limits [326 IAC 2-2]

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- (a) Pursuant to SSM 099-10314-00033, issued on September 14, 1999, and T 099-7476-00033, issued on December 9, 1999, the VOC usage at the one (1) dip room (Process 2), one (1) mixing process (Process 4), one (1) assembly area (Area 2), one (1) final finish area (Area 3), and the two (2) booths, identified as Booths 3a and 3b at the one (1) final finish area (Process 3) shall be limited such that the total emissions from those processes are less than 249 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. The oxidizer shall be operated at an overall control efficiency of no less than ninety-five percent (95%) for VOC and control emissions from Processes 2 and 4, and Booths 3a and 3b at Process 3, at all times when Processes 2 and 4, and Booths 3a and 3b at Process 3, are in operation. Total VOC emissions shall be calculated based on the following equation:

VOC usage at Area 2 + VOC usage at Area 3 + (VOC usage at Processes 2 and 4 and Booths 3a and 3b at Process 3 \* (1 - 0.95)) = VOC emissions

This limits the potential to emit VOC from the source existing on September 14, 1999, to less than 250 tons per year and renders the requirements of 326 IAC 2-2, PSD, not applicable.

- (b) Pursuant to Significant Source Modification 099-10314-00033, issued on September 14, 1999, and T 099-7476-00033, issued on December 9, 1999, the PM and PM<sub>10</sub> emissions from Booths 3a and 3b at Process 3 shall be limited to fifty-four and three tenths (54.3) pounds per hour. This will be achieved by using dry filters at all times when the coating operations of Booths 3a and 3b at Process 3 are in operation and the control efficiency shall not be less than ninety-eight percent (98.0%). This limits the potential to emit PM and PM<sub>10</sub> from the source existing on September 14, 1999, to less than two hundred fifty (250) tons per year and renders the requirements of 326 IAC 2-2, PSD, not applicable.
- (c) Pursuant to Significant Permit Modification 099-19959-00033, issued on December 14, 2005, the total VOC usage at the two (2) hand-spray paint booths, identified as Booths 3c and 3d, constructed in 2005, at Process 3, shall in no case exceed seven hundred ninety-nine (799) tons per twelve (12) consecutive month period, with compliance determined at the end of each month, and the catalytic oxidizer shall be operated at an overall control efficiency of no less than ninety-five percent (95%) for VOC and control emissions at Process 3 at all times when Process 3 is in operation. This limits the potential to emit VOC from the two (2) hand-spray booths constructed in 2005 to less than forty (40) tons per year and renders the requirements of 326 IAC 2-2, PSD, not applicable.
- (d) Pursuant to Significant Permit Modification 099-19959-00033, issued on December 14, 2005, the PM and PM<sub>10</sub> emissions from the two (2) hand-spray paint booths, identified as Booths 3c

and 3d, constructed in 2005, at Process 3, shall be limited to three and forty-two hundredths (3.42) pounds per hour. This will be achieved by using dry filters at all times when the coating operations at Process 3 are in operation and the control efficiency shall not be less than ninety-eight percent (98.0%). This limits the potential to emit PM and PM<sub>10</sub> from the two (2) hand-spray booths constructed in 2005 to less than fifteen (15) tons per year, and renders the requirements of 326 IAC 2-2, PSD, not applicable.

**D.1.3 Particulate [326 IAC 6-3-2(d)]**

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

**D.1.4 HAPs Limit [326 IAC 2-4.1-1] [40 CFR 63]**

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Pursuant to Significant Permit Modification 099-23398-00033, issued on April 17, 2007, the following limits are applicable:

- (a) The usage of each individual HAP at the one (1) dip room (Process 2), one (1) mixing process (Process 4), one (1) assembly area (Area 2), one (1) final finish area (Area 3), one (1) final finish area (Process 3), and one (1) roll coater (Process 5) shall be limited such that the emissions are less than nine and eighty-two hundredths (9.82) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. The oxidizer shall be operated at a control efficiency of no less than ninety percent (90%) for each individual HAP and control emissions from Processes 2, 3 and 4, at all times when Processes 2, 3 and 4 are in operation. Individual HAP emissions shall be calculated based on the following equation:

Individual HAP usage at Process 5 + Individual HAP usage at Area 2 + Individual HAP usage at Area 3 + (Individual HAP usage at Processes 2, 3 and 4 \* (1 - 0.90)) = Individual HAP emissions

- (b) The usage of any combination of HAPs at the one (1) dip room (Process 2), one (1) mixing process (Process 4), one (1) assembly area (Area 2), one (1) final finish area (Area 3), one (1) final finish area (Process 3), and one (1) roll coater (Process 5) shall be limited such that the emissions are less than twenty-four and seven-tenths (24.7) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. The oxidizer shall be operated at a control efficiency of no less than ninety percent (90%) for total HAPs and control emissions from Processes 2, 3 and 4, at all times when Processes 2, 3 and 4 are in operation. Total HAP emissions shall be calculated based on the following equation:

Total HAP usage at Process 5 + Total HAP usage at Area 2 + Total HAP usage at Area 3 + (Total HAP usage at Processes 2, 3 and 4 \* (1 - 0.90)) = Total HAP emissions

These limitations shall make the requirements of 326 IAC 2-4.1-1, New Source Toxics Control, not applicable to the one (1) roll coater (Process 5). Compliance with these limits, in conjunction with HAP emissions from other units at the source shall make the source an area source for HAPs, and render the requirements of 40 CFR 63, Subpart PPPP, not applicable.

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

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

**Compliance Determination Requirements**

**D.1.6 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) Control**

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The catalytic oxidizer, identified as Oxidizer #1, shall be in operation and control emissions from

Processes 2, 3 and 4, at all times when Processes 2, 3 and/or 4 are in operation.

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

- (a) In order to demonstrate compliance with Conditions D.1.1(a)(1) and D.1.2(a) and (c), no later than January 6, 2009, the Permittee shall perform inlet and outlet VOC testing of the catalytic oxidizer to determine the overall VOC control efficiency (capture and destruction). Testing of the catalytic oxidizer shall be repeated at least once every two and one half (2.5) years for overall control efficiency using methods approved by the Commissioner. Testing shall be conducted in accordance with Section C – Performance Testing.
- (b) Pursuant to Significant Permit Modification 099-23398-00033, issued on April 17, 2007, in order to demonstrate compliance with Condition D.1.4, on or before October 13, 2007, the Permittee shall perform inlet and outlet HAP testing of the catalytic oxidizer, utilizing Method 18 or other methods as approved by the Commissioner, for toluene or the HAP used at the source that has the lowest destruction efficiency, as estimated by the manufacturer and approved by IDEM. This test shall be repeated at least once every two and one-half (2.5) years. Testing shall be conducted in accordance with Section C – Performance Testing.

D.1.8 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.2(a) and (c) and the HAP emission limitations contained in Condition D.1.4 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.1.9 Monitoring [40 CFR 64]

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack (Stack 1) while Process 3 is in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

D.1.10 Parametric Monitoring [40 CFR 64]

- (a) Continuous records of the catalytic oxidizer internal combustion zone temperature shall be kept using a chart recorder when Process 2, 3, or 4 is in operation. When operating, the catalytic oxidizer shall maintain a minimum operating temperature of five hundred fifty (550) degrees Fahrenheit or the operating temperature determined in the most recent stack test to maintain at least ninety-five percent (95%) overall control efficiency (capture and destruction) of VOC and ninety percent (90%) overall control efficiency (capture and destruction) for each individual HAP and total HAPs. The Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the three-hour average temperature of the thermal oxidizer is below the three-hour average temperature as observed during the compliant stack test. A three-hour average temperature that is below the three-hour average temperature as observed during the compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

- (b) The Permittee shall determine the appropriate duct pressure or fan amperage from the most recent valid stack test that demonstrates compliance with the minimum control efficiency in Conditions D.1.1, D.1.2 and D.1.4, as approved by IDEM. When for any one reading, the duct pressure or fan amperage is outside the normal range as established in the most recent compliant stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A reading that is outside the range as established in the most recent compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

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

#### **D.1.11 Record Keeping Requirements**

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- (a) To document compliance with Conditions D.1.1 and D.1.2(a) and (c), the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Conditions D.1.1 and D.1.2(a) and (c).
- (1) The VOC content of each coating material and solvent used.
  - (2) The amount of each coating material and solvent less water used on a monthly basis.
    - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
    - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
  - (3) The cleanup solvent usage for each month;
  - (4) The total VOC usage for each month at each booth; and
  - (5) The total weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.4, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP usage limits established in Condition D.1.4.
- (1) The HAP content of each coating material and solvent used.
  - (2) The amount of each coating material and solvent less water used on a monthly basis.
    - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
    - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
  - (3) The total usage of each individual HAP and total HAPs for each month; and

- (4) The weight of each individual HAP and total HAPs emitted for each compliance period.
- (c) To document compliance with Condition D.1.9, the Permittee shall maintain a log of weekly overspray observations, and daily and monthly inspections.
- (d) To document compliance with Conditions D.1.1, D.1.2(a) and (c), D.1.4 and D.1.10, the Permittee shall maintain continuous records of the internal combustion zone temperature of the catalytic oxidizer. The Permittee shall include in the record documentation of times when the temperature is not recorded and the reason for the lack of a record (e.g., Processes 2, 3, and 4 are not operating).
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.12 Reporting Requirements

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A quarterly summary of the information to document compliance with Conditions D.1.1(b), D.1.2(a) and (c) and D.1.4 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1 (34).

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

**PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: Bremen Corporation  
Source Address: 405 North Industrial Drive, Bremen, Indiana 46506  
Mailing Address: 405 North Industrial Drive, Bremen, Indiana 46506  
Part 70 Permit No.: T 099-18654-00033

**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: Bremen Corporation  
Source Address: 405 North Industrial Drive, Bremen, Indiana 46506  
Mailing Address: 405 North Industrial Drive, Bremen, Indiana 46506  
Part 70 Permit No.: T 099-18654-00033

**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 <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

A certification is not required for this report.

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

**Part 70 Quarterly Report**

Source Name: Bremen Corporation  
Source Address: 405 North Industrial Drive, Bremen, Indiana 46506  
Mailing Address: 405 North Industrial Drive, Bremen, Indiana 46506  
Part 70 Permit No.: T 099-18654-00033  
Facility: Process 5  
Parameter: VOC usage  
Limit: Less than 25 tons per twelve (12) consecutive month period, with compliance determined at the end of each month

QUARTER: \_\_\_\_\_ YEAR: \_\_\_\_\_

Month	VOC Usage (tons)	VOC Usage (tons)	VOC Usage (tons)
	This Month	Previous 11 Months	12 Month Total

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

Submitted by: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

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

**Part 70 Quarterly Report**

Source Name: Bremen Corporation  
Source Address: 405 North Industrial Drive, Bremen, Indiana 46506  
Mailing Address: 405 North Industrial Drive, Bremen, Indiana 46506  
Part 70 Permit No.: T 099-18654-00033  
Facilities: Two (2) hand-spray paint booths, identified as Booths 3c and 3d, constructed in 2005, at Process 3  
Parameter: VOC usage  
Limit: 799 tons per twelve (12) consecutive month period, with compliance determined at the end of each month

QUARTER: \_\_\_\_\_ YEAR: \_\_\_\_\_

Month	VOC Usage (tons)	VOC Usage (tons)	VOC Usage (tons)
	This Month	Previous 11 Months	12 Month Total

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

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

Attach a signed certification to complete this report.

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

**Part 70 Quarterly Report**

Source Name: Bremen Corporation  
 Source Address: 405 North Industrial Drive, Bremen, Indiana 46506  
 Mailing Address: 405 North Industrial Drive, Bremen, Indiana 46506  
 Part 70 Permit No.: T 099-18654-00033  
 Facilities: Processes 2 and 4, Booths 3a and 3b of Process 3, and Areas 2 and 3  
 Parameter: VOC emissions  
 Limit: Less than 249 tons per twelve (12) consecutive month period, with compliance determined at the end of each month, according to the following equation:

$$\text{VOC usage at Area 2} + \text{VOC usage at Area 3} + (\text{VOC usage at Processes 2 and 4 and Booths 3a and 3b at Process 3} * (1 - 0.95)) = \text{VOC emissions}$$

QUARTER: \_\_\_\_\_ YEAR: \_\_\_\_\_

Month	VOC Emissions (tons)	VOC Emissions (tons)	VOC Emissions (tons)
	This Month	Previous 11 Months	12 Month Total

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

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

Attach a signed certification to complete this report.

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

**Part 70 Quarterly Report**

Source Name: Bremen Corporation  
 Source Address: 405 North Industrial Drive, Bremen, Indiana 46506  
 Mailing Address: 405 North Industrial Drive, Bremen, Indiana 46506  
 Part 70 Permit No.: T 099-18654-00033  
 Facilities: Processes 2, 3 and 4 and Areas 2 and 3  
 Parameter: Worst-case individual HAP emissions  
 Limit: Less than 9.82 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Individual HAP emissions = Individual HAP usage at Process 5 + Individual HAP usage at Area 2 + Individual HAP usage at Area 3 + (Individual HAP usage at Processes 2, 3 and 4 \* (1 - 0.90))

QUARTER: \_\_\_\_\_ YEAR: \_\_\_\_\_

Month	Worst-case individual HAP emissions (tons)	Worst-case individual HAP emissions (tons)	Worst-case individual HAP emissions (tons)
	This Month	Previous 11 Months	12 Month Total

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

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

Attach a signed certification to complete this report.

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

**Part 70 Quarterly Report**

Source Name: Bremen Corporation  
Source Address: 405 North Industrial Drive, Bremen, Indiana 46506  
Mailing Address: 405 North Industrial Drive, Bremen, Indiana 46506  
Part 70 Permit No.: T 099-18654-00033  
Facilities: Processes 2, 3 and 4 and Areas 2 and 3  
Parameter: Total HAP emissions  
Limit: Less than 24.7 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Total HAP emissions = Total HAP usage at Process 5 + Total HAP usage at Area 2 + Total HAP usage at Area 3 + (Total HAP usage at Processes 2, 3 and 4 \* (1 - 0.90))

QUARTER: \_\_\_\_\_ YEAR: \_\_\_\_\_

Month	Total HAP emissions (tons)	Total HAP emissions (tons)	Total HAP emissions (tons)
	This Month	Previous 11 Months	12 Month Total

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

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

Attach a signed certification to complete this report.

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

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

Source Name: Bremen Corporation  
 Source Address: 405 North Industrial Drive, Bremen, Indiana 46506  
 Mailing Address: 405 North Industrial Drive, Bremen, Indiana 46506  
 Part 70 Permit No.: T 099-18654-00033

**Months:** \_\_\_\_\_ **to** \_\_\_\_\_ **Year:** \_\_\_\_\_

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

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

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 a New Source Review and  
Part 70 Operating Permit Renewal

**Source Background and Description**

<b>Source Name:</b>	Bremen Corporation
<b>Source Location:</b>	405 North Industrial Drive, Bremen, Indiana 46506
<b>County:</b>	Marshall
<b>SIC Code:</b>	3069
<b>Permit Renewal No.:</b>	T 099-18654-00033
<b>Permit Reviewer:</b>	CarrieAnn Paukowits

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Bremen Corporation relating to the operation of a vinyl-coated foam product manufacturing source.

**History**

On March 10, 2004, Bremen Corporation submitted an application to the OAQ requesting to renew its operating permit. Bremen Corporation was issued a Part 70 Operating Permit on December 9, 1999.

**Permitted Emission Units and Pollution Control Equipment**

- (a) One (1) dip room, identified as Process 2, consisting of four (4) dip tanks and one (1) cleaning station, constructed prior to 1985, exhausting to a catalytic oxidizer with a heat input capacity of 4.6 million British thermal units per hour, and exiting at stack 1 (Oxidizer #1), capacity: 3,162 pounds of paint, topcoat and cleaning blend per hour.
- (b) One (1) final finish area, identified as Process 3, constructed in 1994 and modified in 2005, consisting of two (2) hand-spray painting booths, identified as Booths 3a and 3b, constructed in 1994, and two (2) hand-spray painting booths, identified as Booths 3c and 3d, constructed in 2005, all equipped with airless spray guns, all exhausting to dry filters and a catalytic oxidizer with a heat input capacity of 4.6 million British thermal units per hour, and exiting at stack 1 (Oxidizer #1), capacity: 373.70 pounds of coatings per hour.
- (c) One (1) paint mixing process, identified as Process 4, for mixing existing paints, constructed prior to 1985, exhausting to a catalytic oxidizer with a heat input capacity of 4.6 million British thermal units per hour, and exiting at stack 1 (Oxidizer #1), with no particulate emissions, capacity: 12,671 pounds of coatings mixed per hour.
- (d) One (1) assembly area, identified as Area 2, constructed prior to 1985, consisting of hand application of adhesive, exhausting to stack 13, capacity: 14.9 pounds of adhesives per hour.
- (e) One (1) final finish area, identified as Area 3, constructed prior to 1985, consisting of one (1) automatic silk screener and one (1) manual silk screener, capacity: 25 foam products per hour.
- (f) One (1) roll coater, identified as Process 5, constructed in 2000, capacity: 106.6 pounds of adhesive per hour.

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

There are no unpermitted facilities at this source.

### **Emission Units and Pollution Control Equipment Removed From the Source**

The following insignificant activities have been removed:

- (a) Two (2) natural gas fired hot water boilers, capacity: 0.28 million British thermal unit per hour, each.
- (b) Two (2) natural gas fired heaters, capacity: 0.2 million British thermal units per hour, each.
- (c) One (1) natural gas fired conveyor line, capacity: 0.2 million British thermal units per hour.

### **Insignificant Activities**

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million British thermal units per hour:
  - (1) One (1) natural gas fired air makeup unit, capacity: 5.0 million British thermal units per hour.
  - (2) One (1) natural gas fired air makeup unit, capacity: 1.75 million British thermal units per hour.
  - (3) One (1) natural gas fired air makeup unit, capacity: 7.5 million British thermal units per hour.
  - (4) Four (4) natural gas fired heaters, capacity: 0.2 million British thermal units per hour, each.
  - (5) Two (2) natural gas fired office heaters, capacity: 1.0 million British thermal units per hour, each.
- (b) One (1) above ground storage tank, capacity: 4,000 gallons of MEK and toluene.
- (c) The following foam processing operations, each with a maximum throughput less than one hundred (100) pounds per hour:
  - (1) Four (4) presses.
  - (2) One (1) slicer.
  - (3) One (1) blanker.
  - (4) One (1) buffing booth.
  - (5) One (1) saw cutter.
  - (6) Two (2) saws.
  - (7) One (1) C&C contour saw.
  - (8) One (1) hand contour saw.
  - (9) Two (2) fusion mold ovens.
  - (10) One (1) compression form oven.
  - (11) One (1) compression form press.
  - (12) One (1) fusion mold press.
  - (13) One (1) infrared oven.

- (d) One (1) cutting table, with a maximum throughput less than one hundred (100) pounds of plastic or cardboard per hour.
- (e) Two (2) C & C routers, equipped with a baghouse, each with a maximum throughput less than one hundred (100) pounds of PVC or wood per hour.

### Existing Approvals

Since the issuance of the Part 70 Operating Permit T 099-7476-00033 on December 9, 1999, the source has constructed or has been operating under the following approvals as well:

- (a) Minor Source Modification 099-12268-00033, issued on July 12, 2000;
- (b) Significant Permit Modification 099-12119-00033, issued on July 18, 2000;
- (c) Minor Permit Modification 099-12291-00033, issued on August 1, 2000;
- (d) Reopening 099-13409-00033, issued on November 13, 2001;
- (e) Administrative Amendment 099-15681-00033, issued on April 1, 2002;
- (f) Administrative Amendment 099-18923-00033, issued on April 16, 2004;
- (g) Review Request 099-16382-00033, issued on November 12, 2004;
- (h) Significant Source Modification 099-20282-00033, issued on November 30, 2005;
- (i) Significant Permit Modification 099-19959-00033, issued on December 14, 2005; and
- (j) Significant Permit Modification 099-23398-00033, issued on April 17, 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 revised in this Part 70 Operating Permit Renewal:

- (a) Condition D.1.2(a): Pursuant to SSM 099-10314-00033, issued on September 14, 1999, Process 2, Process 3 and Process 4 will be controlled by the catalytic oxidizer, and the VOC usage and VOC emissions shall be limited such that:

$$\text{VOC usage at Area 2} + \text{VOC usage at Area 3} + (\text{VOC usage at Processes 2, 3 and 4} * (1 - 0.95)) = \text{VOC emissions}$$

The total VOC usage shall in no case exceed 4,980 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. The VOC emissions, as determined by the equation, shall be limited to less than 249 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This will limit the potential to emit VOC to less than 250 tons per year from Areas 1, 2 and 3, and Processes 2, 3, and 4.

Reason revised: The VOC emissions from Processes 2 and 4, Booths 3a and 3b at Process 3 and Areas 2 and 3 are still limited to 249 tons per year. Pursuant to Significant Permit Modification 099-19959-00033, issued on December 14, 2005, the total VOC

emissions at the two (2) hand-spray paint booths, identified as Booths 3c and 3d, are limited to less than forty (40) tons per year. Those booths are limited separately because they were new units, and they were a modification to an existing major source. In addition, the statement "the total VOC usage shall in no case exceed 4,980 tons per twelve (12) consecutive month period, with compliance determined at the end of each month" has been removed from the condition. 4,980 tons is the maximum VOC usage resulting in 249 tons of VOC emitted per year if all the VOC is controlled by the oxidizer ( $4,980 \text{ tons} \times (1-0.95) = 249 \text{ tons}$ ). If the Permittee complies with the emission limitation of 249 tons per twelve (12) consecutive month period, with compliance determined at the end of each month, the VOC usage could not have exceeded 4,980 tons. However, if VOC usage exceeds 4,980 tons, the Permittee did not necessarily comply with the 249 ton per year emission limitation that renders 326 IAC 2-2, PSD, not applicable. Therefore, the usage limitation is unnecessary and has been removed from the permit.

- (b) Condition D.1.2(b): Pursuant to SSM 099-10314-00033, issued on September 14, 1999, the PM and PM<sub>10</sub> emissions shall be limited to 54.3 pounds per hour. This will be achieved by using dry filters at all times when the coating operations at Process 3 are in operation and the control efficiency shall not be less than ninety-eight percent (98.0%). Pursuant to 326 IAC 2-2, the PM and PM<sub>10</sub> emissions shall be less than 250 tons per year.

Reason revised: The PM and PM<sub>10</sub> Booths 3a and 3b at Process 3 are still limited to 54.3 pounds per hour. Pursuant to Significant Permit Modification 099-19959-00033, issued on December 14, 2005, the PM and PM<sub>10</sub> emissions at the two (2) hand-spray paint booths, identified as Booths 3c and 3d, are limited to 3.42 pounds per hour, which is equivalent to less than fifteen (15) tons per year. Those booths are limited separately because they were new units, and they were a modification to an existing major source.

The following terms and conditions from previous approvals have been determined no longer applicable; therefore, were not incorporated into this **Part 70 Operating Permit Renewal**:

- (a) Condition D.1.4: Pursuant to 326 IAC 8-3-2 (Organic Solvent Degreasing Operations: Cold Cleaner Operation) and SSM 099-10314-00033, issued on September 14, 1999, the owner or operator of the cold cleaning facility shall: Equip the cleaner with a cover; equip the cleaner with a facility for draining cleaned parts; close the degreaser cover whenever parts are not being handled in the cleaner; drain cleaned parts for at least fifteen (15) seconds or until dripping ceases; provide a permanent, conspicuous label summarizing the operating requirements; and 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: The degreaser has been removed from this source.

- (b) Condition D.2.1: Pursuant to 326 IAC 6-2-4(a), for Q less than 10 million British thermal units per hour, Pt shall not exceed 0.6. Therefore, the PM emissions from the two (2) natural gas fired hot water boilers, with a heat input capacity of 0.28 million British thermal units per hour, each, shall be limited to 0.6 pounds per million British thermal unit.

Reason not incorporated: The boilers have been removed from this source.

**Enforcement Issue**

- (a) Notice of Violation, Case No. 2006-15396-A, was signed May 12, 2006. The Permittee failed to conduct the Oxidizer #1 testing within the time frame required by Condition D.1.8 of the permit. An Agreed Order was signed on November 6, 2006, assigning a civil, monetary penalty.
- (b) There are no enforcement actions pending.

**Stack Summary**

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (EF)
S1	Oxidizer 1	25.0	3.5	20,000	130

**Emission Calculations**

See Appendix A of this document for detailed emission calculations (5 pages).

**County Attainment Status**

The source is located in Marshall County

Pollutant	Status
PM <sub>10</sub>	attainment
PM <sub>2.5</sub>	attainment
SO <sub>2</sub>	attainment
NO <sub>x</sub>	attainment
8-hour Ozone	attainment
CO	attainment
Lead	attainment

- (a) Marshall County has been classified as attainment for PM<sub>2.5</sub>. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM<sub>2.5</sub> emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM<sub>2.5</sub> emissions, it has directed states to regulate PM<sub>10</sub> emissions as a surrogate for PM<sub>2.5</sub> emissions. See the State Rule Applicability – Entire Source section.
- (b) Volatile organic compounds (VOC) and nitrogen oxides (NO<sub>x</sub>) 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<sub>x</sub> 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<sub>x</sub> 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	573
PM <sub>10</sub>	574
SO <sub>2</sub>	0.057
VOC	15,966
CO	7.97
NO <sub>x</sub>	9.48

HAPs	tons/year
Toluene	14,586
MIBK	15,508
Xylenes	4,434
Dimethylformamide	19.7
Ethylbenzene	790
Glycol Ethers	3,872
Isopherone	10.1
Naphthalene	0.745
Cumene	0.004
Formaldehyde	0.007
Hexane	0.171
Benzene, Dichlorobenzene, Lead, Cadmium, Chromium, Manganese & Nickel	< 0.001, each
<b>Total</b>	<b>15,528</b>

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM<sub>10</sub> and VOC are equal to or greater than one hundred (100) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all other criteria pollutants are less than one hundred (<100) tons per year.

- (c) 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.
- (d) 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 and 2004 Toxic Release Inventory (TRI) emission data.

Pollutant	Actual Emissions (tons/year)
PM	Not reported
PM <sub>10</sub>	0
SO <sub>2</sub>	0
VOC	9
CO	0
NO <sub>x</sub>	0
HAP (Toluene)	7.6

### 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)						Other (HAPs)
	PM	PM <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	
Processes 2 & 4 and Booths 3a and 3b at Process 3	238	238	0.00	249	0.00	0.00	<9.82 individual; <24.7 total
Areas 2 and 3	0.00	0.00	0.00		0.00	0.00	
Booths 3c and 3d at Process 3	< 15.0	<15.0	0.00	< 40	0.00	0.00	
Process 5	0.00	0.00	0.00	< 25.0	0.00	0.00	
Combustion	0.180	0.721	0.057	0.522	7.97	9.48	0.171 individual (hexane); 0.179 total
Storage	0.00	0.00	0.00	0.358	0.00	0.00	0.028 individual (toluene); 0.028 total
Other insignificant (routers and cutting table)	0.230	0.131	0.00	0.00	0.00	0.00	0.00
<b>Total</b>	<b>253</b>	<b>254</b>	<b>0.057</b>	<b>314</b>	<b>7.97</b>	<b>9.48</b>	<b>&lt; 10 individual; 24.9 total</b>
<b>Major Source Threshold</b>	<b>250</b>	<b>250</b>	<b>250</b>	<b>250</b>	<b>250</b>	<b>250</b>	-

- (a) This existing stationary source is major for PSD because the emissions of at least one attainment pollutant are greater than two hundred fifty (>250) tons per year, and it is not one of the twenty-eight (28) listed source categories.
- (b) The values in this table represent the limited potential to emit of this source as described under 326 IAC 2-2 in the State Rule Applicability - Entire Source section of this document. HAP emission limitations are described in the Federal Rule Applicability section of this document.

**Federal Rule Applicability**

- (a) Pursuant to Significant Permit Modification 099-23398-00033, issued on April 17, 2007, the potential to emit each individual HAP is limited to less than ten (10) tons per year and total HAPs to less than twenty-five (25) tons per year. As a result of the limits, this source is an area source of HAPs prior to the April 19, 2007, compliance date for 40 CFR 63, Subpart PPPP, National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products. Therefore, the requirements of that rule are not included in the permit. The following limits result in this source being an area source of HAPs:
  - (1) The usage of each individual HAP at the one (1) dip room (Process 2), one (1) mixing process (Process 4), one (1) assembly area (Area 2), one (1) final finish area (Area 3), one (1) final finish area (Process 3), and one (1) roll coater (Process 5), shall be limited such that the emissions are less than nine and eighty-two tenths (9.82) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Processes 2, 3 and 4 shall be controlled by the catalytic oxidizer and the catalytic oxidizer shall be operated at a minimum operating temperature of five hundred fifty (550) degrees Fahrenheit or a temperature determined in the most recent stack test to maintain at least ninety percent (90%) overall control efficiency (capture and destruction) of each

individual HAP at all times when Processes 2, 3 or 4 are in operation. Individual HAP emissions shall be calculated based on the following equation:

Individual HAP usage at Process 5 + Individual HAP usage at Area 2 + Individual HAP usage at Area 3 + (Individual HAP usage at Processes 2, 3 and 4 \* (1 - 0.90)) = Individual HAP emissions

This will limit the potential to emit each individual HAP to less than ten (10) tons per year from Areas 2 and 3, Processes 2, 3, 4 and 5, and the insignificant activities (worst-case individual HAP from insignificant activities = 0.171 tons per year of hexane).

- (2) The usage of any combination of HAPs at the one (1) dip room (Process 2), one (1) mixing process (Process 4), one (1) assembly area (Area 2), one (1) final finish area (Area 3), one (1) final finish area (Process 3), and one (1) roll coater (Process 5) shall be limited such that the emissions are less than twenty-four and seven tenths (24.7) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Processes 2, 3 and 4 shall be controlled by the catalytic oxidizer and the catalytic oxidizer shall be operated at a minimum operating temperature of five hundred fifty (550) degrees Fahrenheit or a temperature determined in the most recent stack test to maintain at least ninety percent (90%) overall control efficiency (capture and destruction) of total HAPs at all times when Processes 2, 3 or 4 are in operation. Total HAP emissions shall be calculated based on the following equation:

Total HAP usage at Process 5 + Total HAP usage at Area 2 + Total HAP usage at Area 3 + (Total HAP usage at Processes 2, 3 and 4 \* (1 - 0.90)) = Total HAP emissions

This will limit the potential to emit total HAPs to less than twenty-five (25) tons per year from Areas 2 and 3, Processes 2, 3, 4 and 5, and the insignificant activities (total HAPs from Insignificant Activities = 0.179 tons per year from combustion + 0.028 tons per year from storage = 0.207 tons per year).

- (b) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to existing emission units that involve a pollutant-specific emission unit and meet 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)
One (1) dip room, identified as Process 2 - VOC	Oxidizer #1	Y	4,980	249	100	Y	Y
One (1) final finish area, identified as Process 3 - VOC	Oxidizer #1	Y	1,637	288	100	Y	Y
One (1) final finish area, identified as Process 3 - PM <sub>10</sub>	Dry filters	Y	573	2.86	100	Y	N
One (1) assembly area, identified as Area 2 - VOC	None	Y	358	17.9	100	N	N
One (1) final finish area, identified as Area 3 - VOC	None	Y	21.9	21.9	100	N	N
One (1) Roll Coater, identified as Process 5 - VOC	None	Y	< 25.0	< 25.0	100	N	N

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are applicable to Processes 2 and 3 for VOC and Process 3 for PM<sub>10</sub>. A CAM plan has been submitted and the Compliance Determination and Monitoring Requirements section includes a detailed description of the CAM requirements. The CAM Plan includes continuous operating temperature monitoring for the catalytic oxidizer and inspection and maintenance activities for the dry filters.

**State Rule Applicability - Entire Source**

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

(a) Pursuant to Significant Source Modification 099-10314-00033, issued on September 14, 1999, and T 099-7476-00033, issued on December 9, 1999, the following limits rendered the source a minor source pursuant to 326 IAC 2-2, PSD:

- (1) Process 2, Process 3 and Process 4 shall be controlled by the catalytic oxidizer and the catalytic oxidizer shall be operated at a minimum operating temperature of five hundred fifty (550) degrees Fahrenheit or a temperature determined in the most recent stack test to maintain at least ninety-five percent (95%) overall control efficiency (capture and destruction) of VOC.
- (2) The total VOC emissions, as determined by the following equation, shall not exceed two hundred forty-nine (249) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

$$\text{VOC usage at Area 2} + \text{VOC usage at Area 3} + (\text{VOC usage at Processes 2 and 4 and Booths 3a and 3b at Process 3} * (1 - 0.95)) = \text{VOC emissions}$$

This limited the potential to emit VOC to less than two hundred fifty (250) tons per year from Processes 2 and 4, Booths 3a and 3b at Process 3, and Areas 2 and 3, and rendered 326 IAC 2-2, PSD, not applicable to the source, based on VOC emissions.

- (b) Pursuant to Significant Source Modification 099-10314-00033, issued on September 14, 1999, and T 099-7476-00033, issued on December 9, 1999, the PM and PM<sub>10</sub> emissions from Booths 3a and 3b at Process 3 shall be limited to fifty-four and three tenths (54.3) pounds per hour. This limited the PM and PM<sub>10</sub> emissions to less than two hundred fifty (250) tons per year from the entire source at the time the permit was issued and rendered 326 IAC 2-2, PSD, not applicable to the source, based on PM and PM<sub>10</sub> emissions.
- (c) Pursuant to Minor Permit Modification 099-12291-00033, issued on August 1, 2000, the VOC usage at the one (1) roll coater, identified as Process 5, is limited to less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month, in order to render 326 IAC 8-1-6 not applicable to the facility. This limit also limits VOC emissions to less than two hundred fifty (250) tons per year and renders 326 IAC 2-2, PSD, not applicable to this modification. Thus, this modification was a minor modification to an existing minor source, which made the source a major source pursuant to 326 IAC 2-2, PSD.
- (d) Pursuant to Significant Permit Modification 099-19959-00033, issued on December 14, 2005, the total VOC usage at the two (2) hand-spray paint booths, identified as Booths 3c and 3d, constructed in 2005, at Process 3, shall in no case exceed seven hundred ninety-nine (799) tons per twelve (12) consecutive month period, with compliance determined at the end of each month, and the catalytic oxidizer shall be operated at a minimum operating temperature of five hundred fifty (550) degrees Fahrenheit or a temperature determined in the most recent stack test to maintain at least ninety-five percent (95%) overall control efficiency (capture and destruction) of VOC at all times when Process 3 is in operation. This limits the potential to emit VOC from the two (2) hand-spray booths constructed in 2005 to less than forty (40) tons per year ( $799 \text{ tons/yr} \times (1-0.95) = 39.95 \text{ tons/yr}$ ). Therefore, this limit rendered 326 IAC 2-2, PSD, not applicable to the 2005 modification.
- (e) Pursuant to Significant Permit Modification 099-19959-00033, issued on December 14, 2005, the PM and PM<sub>10</sub> emissions from the two (2) hand-spray paint booths, identified as Booths 3c and 3d, constructed in 2005, at Process 3, shall be limited to three and forty-two tenths (3.42) pounds per hour. This limits the potential to emit PM and PM<sub>10</sub> to less than fifteen (15) tons per year. Therefore, this limit rendered 326 IAC 2-2, PSD, not applicable to the 2005 modification based on PM and PM<sub>10</sub> emissions.

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

All facilities were constructed prior to July 27, 1997, with the exception of the one (1) roll coater (Process 5). Pursuant to Minor Permit Modification 099-12291-00033, issued on August 1, 2000, the HAP usage at the one (1) roll coater (Process 5) is limited to less than ten (10) tons per consecutive twelve (12) month period of a single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1-1 does not apply. Significant Permit Modification 099-23398-00033, issued on April 17, 2007, contains limits (see the Federal Rule Applicability section of this document) that make the source an area source of HAPs, as stated in the Federal Rule Applicability Determination section of this document. Those limits will ensure that the requirements of 326 IAC 2-4.1-1 are not applicable to the roll coater, and separate HAP limits for the roll coater (Process 5) are not necessary.

#### 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. In accordance with the compliance schedule specified in 326 IAC 2-6-3, an emission statement must be submitted annually by July 1 because VOC emissions are greater than two hundred fifty (250) tons per year. 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 one (1) dip room, identified as Process 2, uses dip coating only. Therefore, pursuant to 326 IAC 6-3-2(b)(5), Process 2 is exempt from the requirements of 326 IAC 6-3.
- (b) The one (1) paint mixing process, identified as Process 4, does not have particulate emissions. Therefore, the requirements of 326 IAC 6-3 are not applicable.
- (c) The one (1) assembly area, identified as Area 2, and the one (1) final finish area, identified as Area 3, emit less than 0.551 pounds per hour of particulate, each. Therefore, pursuant to 326 IAC 6-3-1(b)(14), the requirements of 326 IAC 6-3 are not applicable.
- (d) The one (1) roll coater, identified as Process 5, uses rollers to apply coatings. Therefore, pursuant to 326 IAC 6-3-1(b)(6), the requirements of 326 IAC 6-3 are not applicable.
- (e) The one (1) final finish area, identified as Process 3, is subject to the requirements of 326 IAC 6-3-2(d). Particulate from the surface coating process shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (f) The potential PM emissions from the insignificant routers and cutting table are less than five hundred fifty-one hundredths (0.551) pounds per hour. Therefore, pursuant to 326 IAC 6-3-1(b)(14), the requirements of 326 IAC 6-3 are not applicable.

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

- (a) Processes 2, 3, and 4, and Areas 2 and 3 were all constructed after January 1, 1980, and each have potential VOC emissions greater than twenty-five (25) tons per year. Pursuant to 326 IAC 8-1-6 (New facilities; General reduction requirements), these facilities shall use the Best Available Control Technology (BACT). Pursuant to Significant Source Modification 099-10314-00033, issued on September 14, 1999, and Significant Permit Modification 099-19959-00033, issued on December 14, 2005, the Best Available Control Technology (BACT) for this source is all of the following:

- (1) A catalytic oxidizer shall be used at all times when Process 2, Process 3 or Process 4 is in operation. When operating, the catalytic oxidizer shall maintain a minimum operating temperature of five hundred fifty (550) degrees Fahrenheit or the operating temperature determined in the most recent stack test to maintain at least ninety-five percent (95%) overall control efficiency (capture and destruction) of VOC. In addition, the catalytic oxidizer shall be tested once every two and one half (2.5) years for overall control efficiency using methods approved by the Commissioner.
- (2) Only dip coating shall be used at Process 2.
- (3) Airless or high volume, low pressure (HVLP) spray guns or an application with a higher transfer efficiency shall be used at all spray applications. 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.
- (4) The maximum VOC content of all coatings used shall not exceed six and ninety-eight tenths (6.98) pounds per gallon of coating less water.

Processes 2, 3 and 4, and Areas 2 and 3 were all included in the BACT analysis.

- (b) Pursuant to Minor Permit Modification 099-12291-00033, issued on August 1, 2000, the roll coater identified as Process 5 shall use less than a total of twenty-five (25) tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period, with compliance determined at the end of each month. This usage limit is required to limit the potential to emit of VOC to less than twenty-five (25) tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 8-1-6 (New facilities: general reduction requirements) not applicable to Process 5.

### **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 enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance determination requirements applicable to this source are as follows:

- (a) The one (1) dip room (Process 2), one (1) mixing process (Process 4), one (1) assembly area (Area 2), one (1) final finish area (Area 3), one (1) final finish area (Process 3), and

one (1) roll coater (Process 5) have applicable compliance determination conditions as specified below:

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

- (b) The one (1) dip room (Process 2), one (1) mixing process (Process 4), and one (1) final finish area (Process 3) also have applicable compliance determination conditions as specified below:
- (1) The catalytic oxidizer, identified as Oxidizer #1, shall be in operation and control emissions from Processes 2, 3 and 4, at all times when Processes 2, 3 and/or 4 are in operation.
  - (2) In order to demonstrate compliance with the VOC emission limitations in the permit, no later than January 6, 2009, the Permittee shall perform inlet and outlet VOC testing of the catalytic oxidizer to determine the overall VOC control efficiency (capture and destruction). Testing of the catalytic oxidizer shall be repeated at least once every two and one half (2.5) years for overall control efficiency using methods approved by the Commissioner.
  - (3) Pursuant to Significant Permit Modification 099-23398-00033, issued on April 17, 2007, in order to demonstrate compliance the HAP limitations in the permit, on or before October 13, 2007, the Permittee shall perform inlet and outlet HAP testing of the catalytic oxidizer, utilizing Method 18 or other methods as approved by the Commissioner, for toluene or the HAP used at the source that has the lowest destruction efficiency, as estimated by the manufacturer and approved by IDEM. This test shall be repeated at least once every two and one-half (2.5) years using methods approved by the Commissioner.

The compliance monitoring requirements applicable to this source are as follows:

- (a) The one (1) dip room (Process 2), one (1) mixing process (Process 4), and one (1) final finish area (Process 3) have applicable compliance monitoring conditions as specified below:
- (1) Continuous records of the catalytic oxidizer internal combustion zone temperature shall be kept using a chart recorder when Process 2, 3, or 4 is in operation. When operating, the catalytic oxidizer shall maintain a minimum operating temperature of five hundred fifty (550) degrees Fahrenheit or the operating temperature determined in the most recent stack test to maintain at least ninety-five percent (95%) overall control efficiency (capture and destruction) of VOC and ninety percent (90%) overall control efficiency (capture and destruction) for each individual HAP and total HAPs. The Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the three-hour average temperature of the thermal oxidizer is below the three-hour average temperature as observed during the compliant stack test. A three-hour average temperature that is below the three-hour average temperature as observed during the compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

- (2) The Permittee shall determine the appropriate duct pressure or fan amperage from the most recent valid stack test that demonstrates compliance with the minimum control efficiency in Conditions D.1.1, D.1.2 and D.1.5, as approved by IDEM. When for any one reading, the duct pressure or fan amperage is outside the normal range as established in the most recent compliant stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A reading that is outside the range as established in the most recent compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

These monitoring conditions are necessary because the oxidizer for the Process 2, Process 3 and Process 4 must operate properly to ensure compliance with 40 CFR 64, Compliance Assurance Monitoring (CAM) and 326 IAC 2-7 (Part 70) and the limits that render 326 IAC 2-2, PSD and 40 CFR 63, Subpart PPPP, not applicable.

- (b) The one (1) final finish area (Process 3) also has applicable compliance monitoring conditions as specified below:
  - (1) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack (Stack 1) while Process 3 is in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
  - (2) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

These monitoring conditions are necessary because the dry filters for Process 3 must operate properly to ensure compliance with 40 CFR 64, Compliance Assurance Monitoring (CAM), 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-7 (Part 70) and the limits that render 326 IAC 2-2, PSD, not applicable.

## **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 March 10, 2004. Additional information was received on May 24 and May 31, 2007.

## **Conclusion**

The operation of this vinyl-coated foam product manufacturing source shall be subject to the conditions of the attached **Part 70 Operating Permit Renewal No. T 099-18654-00033**.

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

**Company Name: Bremen Corporation  
Address City IN Zip: 405 North Industrial Drive, Bremen, Indiana 46506  
Part 70 Renewal No.: T 099-18654-00033  
Reviewer: CarrieAnn Paukowits  
Date: September 5, 2007**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Maximum 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 (ton/yr)	Transfer Efficiency
<b>Process 2</b>													
Solvent Blend	6.95	100.00%	0.0%	100.0%	0.0%	3162.0	6.95	6.95	3162.00	75888.00	13849.56	0.00	100%
MIBK	6.67	100.00%	0.0%	100.0%	0.0%	3162.0	6.67	6.67	3162.00	75888.00	13849.56	0.00	100%
Toluene	7.3	100.00%	0.0%	100.0%	0.0%	3162.0	7.25	7.25	3162.00	75888.00	13849.56	0.00	100%
F861	9.2	9.50%	0.0%	9.5%	0.0%	3162.0	0.87	0.87	300.39	7209.36	1315.71	0.00	100%
F760	7.0	96.10%	0.0%	96.1%	0.0%	3162.0	6.73	6.73	3038.68	72928.37	13309.43	0.00	100%
DM Topcoat	12.5	0.00%	0.0%	0.0%	0.0%	3162.0	0.00	0.00	0.00	0.00	0.00	0.00	100%
CF1400/ADCTI1675/F827	8.7	66.00%	55.0%	11.0%	55.0%	3162.0	2.13	0.96	347.82	8347.68	1523.45	0.00	100%
F856 Urethane Topcoat	7.26	83.80%	0.0%	83.8%	0.0%	3162.0	6.08	6.08	2649.76	63594.14	11605.93	0.00	100%
<b>Process 3</b>													
Solvent Blend	6.95	100.00%	0.0%	100.0%	0.0%	373.7	6.95	6.95	373.70	8968.80	1636.81	0.00	65%
MIBK	6.67	100.00%	0.0%	100.0%	0.0%	373.7	6.67	6.67	373.70	8968.80	1636.81	0.00	65%
Xylene	7.25	100.00%	0.0%	100.0%	0.0%	373.7	7.25	7.25	373.70	8968.80	1636.81	0.00	65%
CF1400/ADCTI1675/F827	8.7	66.00%	55.0%	11.0%	0.0%	373.7	0.96	0.96	41.11	986.57	180.05	194.78	65%
F830	7.58	89.00%	37.0%	52.0%	0.0%	373.7	3.94	3.94	194.32	4663.78	851.14	63.02	65%
F861	9.20	9.50%	0.0%	9.5%	0.0%	373.7	0.87	0.87	35.50	852.04	155.50	518.46	65%
F700	8.97	8.00%	0.0%	8.0%	0.0%	373.7	0.72	0.72	29.90	717.50	130.94	527.05	65%
F760	7.00	96.10%	0.0%	96.1%	0.0%	373.7	6.73	6.73	359.13	8619.02	1572.97	22.34	65%
DM Topcoat	12.5	0.00%	0.0%	0.0%	0.0%	373.7	0.00	0.00	0.00	0.00	0.00	572.88	65%
F717	8.97	8.00%	0.0%	8.0%	0.0%	373.7	0.72	0.72	29.90	717.50	130.94	527.05	65%
F856 Urethane Topcoat	7.26	83.80%	0.0%	83.8%	0.0%	373.7	6.08	6.08	313.16	7515.85	1371.64	92.81	65%
<b>Process 4</b>													
Since the coatings mixed at Process 4 are used at Processes 2 and 3, and all VOC used is assumed to be emitted in the calculations above, the emissions from Process 4 are already accounted for above.													
<b>Process 5</b>													
Vynabond	7.06	83.90%	0.0%	83.9%	0.0%	106.6	5.92	5.92	89.44	2146.50	391.74	0.00	100%
<b>Area 2</b>													
MEK	6.72	100.00%	0.0%	100.0%	0.0%	14.9	6.72	6.72	14.90	357.60	65.26	0.00	100%
CF1400/ADCTI1675/F827	8.70	66.00%	55.0%	11.0%	0.0%	14.9	0.96	0.96	1.64	39.34	7.18	0.00	100%
Vynabond	7.06	83.90%	0.0%	83.9%	0.0%	14.9	5.92	5.92	12.50	300.03	54.75	0.00	100%
<b>Area 3</b>													
MIBK	6.67	100.00%	0.0%	100.0%	0.0%	5.0	6.67	6.67	5.00	120.00	21.90	0.00	100%
Ink	12.0	0.76%	0.0%	0.8%	0.0%	5.0	0.09	0.09	0.04	0.91	0.17	0.00	100%

PM Control Efficiency for Process 3: 99.50%  
VOC Control Efficiency for Processes 2, 3 & 4: 95.00%

<b>Unrestricted from Processes 2, 3 &amp; 4:</b>	<b>3536</b>	<b>84857</b>	<b>15486</b>	<b>573</b>
<b>Controlled from Processes 2, 3 &amp; 4:</b>	<b>177</b>	<b>4243</b>	<b>774</b>	<b>2.86</b>
<b>Unrestricted from Process 5 and Areas 2 &amp; 3:</b>	<b>109</b>	<b>2624</b>	<b>479</b>	<b>0.00</b>
<b>Unrestricted Total:</b>	<b>3645</b>	<b>87481</b>	<b>15965</b>	<b>573</b>
<b>Controlled Total:</b>	<b>286</b>	<b>6867</b>	<b>1253</b>	<b>2.86</b>

**METHODOLOGY**

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

**The Permittee is required to limit usage and use the control devices in order to comply with the VOC limitations in the permit.**

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

**Company Name:** Bremen Corporation  
**Address City IN Zip:** 405 North Industrial Drive, Bremen, Indiana 46506  
**Part 70 Renewal No.:** T 099-18654-00033  
**Reviewer:** CarrieAnn Paukowits  
**Date:** September 5, 2007

Material	Density (Lb/Gal)	Material Usage (lbs/hr)	Weight % Toluene	Weight % MIBK	Weight % Xylene	Weight % Dimethyl-formamide	Weight % Ethylbenzene	Weight % Glycol Ethers	Weight % Isopherone	Weight % Naphthalene	Weight % Cumene	Toluene Emissions (ton/yr)	MIBK Emissions (ton/yr)	Xylene Emissions (ton/yr)	Dimethyl-formamide Emissions (ton/yr)	Ethylbenzene Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Isopherone Emissions (ton/yr)	Naphthalene Emissions (ton/yr)	Cumene Emissions (ton/yr)	Total Emissions (ton/yr)	
<b>Process 2</b>																						
Solvent Blend	6.95	3162.000	45.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	6232.30	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	6232.30	
MIBK	6.67	3162.000	0.00%	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	13849.56	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	13849.56
Toluene	7.3	3162.000	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	13849.56	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	13849.56
F861	9.2	3162.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
F760	7.0	3162.000	22.20%	32.90%	20.20%	0.00%	5.10%	0.00%	0.00%	0.00%	0.00%	3074.60	4556.51	2797.61	0.00	706.33	0.00	0.00	0.00	0.00	0.00	11135.05
DM Topcoat	12.5	3162.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
CF1400/ADCT11675/F827	8.7	3162.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
F856 Urethane Topcoat	7.26	3162.000	30.00%	0.00%	0.00%	0.00%	0.00%	25.00%	0.00%	0.00%	0.00%	4154.87	0.00	0.00	0.00	0.00	3462.39	0.00	0.00	0.00	0.00	7617.26
<b>Process 3</b>																						
Solvent Blend	6.95	373.700	45.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	736.56	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	736.56
MIBK	6.67	373.700	0.00%	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	1636.81	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1636.81
Xylene	7.25	373.700	0.00%	0.00%	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	1636.81	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1636.81
CF1400/ADCT11675/F827	8.7	373.700	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
F830	7.58	373.700	26.00%	0.00%	10.00%	0.00%	3.00%	0.00%	0.00%	0.00%	0.00%	425.57	0.00	163.68	0.00	49.10	0.00	0.00	0.00	0.00	0.00	638.35
F861	9.20	373.700	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
F700	8.97	373.700	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
F760	7.00	373.700	22.20%	32.90%	20.20%	0.00%	5.10%	0.00%	0.00%	0.00%	0.00%	363.37	538.51	330.63	0.00	83.48	0.00	0.00	0.00	0.00	0.00	1315.99
DM Topcoat	12.5	373.700	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
F717	8.97	373.700	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
F856 Urethane Topcoat	7.26	373.700	30.00%	0.00%	0.00%	0.00%	0.00%	25.00%	0.00%	0.00%	0.00%	491.04	0.00	0.00	0.00	0.00	409.20	0.00	0.00	0.00	0.00	900.24
<b>Process 4</b>																						
Since the coatings mixed at Process 4 are used at Processes 2 and 3, and all HAP used is assumed to be emitted in the calculations above, the emissions from Process 4 are already accounted for above.																						
<b>Process 5</b>																						
Vynabond	7.06	106.600	0.00%	0.00%	0.00%	3.70%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	17.28	0.00	0.00	0.00	0.00	0.00	0.00	17.28
<b>Area 2</b>																						
MEK	6.72	14.900	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
CF1400/ADCT11675/F827	8.70	14.900	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Vynabond	7.06	14.900	0.00%	0.00%	0.00%	3.70%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	2.41	0.00	0.00	0.00	0.00	0.00	0.00	2.41
<b>Area 3</b>																						
MIBK	6.67	5.000	0.00%	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	21.90	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	21.90
Ink	12.0	5.000	0.00%	0.00%	0.02%	0.00%	0.00%	0.00%	46.00%	3.40%	0.02%	0.00	0.00	0.00	0.00	0.00	0.00	10.07	0.74	0.00	0.00	10.83
												14586	15486	4434	0.00	790	3872	0.00	0.00	0.00	0.00	15486
												90.00%	90.00%	90.00%	90.00%	90.00%	90.00%	90.00%	90.00%	90.00%	90.00%	90.00%
												1459	1549	443	0.00	79.0	387.16	0.00	0.00	0.00	0.00	1549
												0.00	21.90	0.00	19.7	0.00	0.00	10.1	0.745	0.00	0.00	41.6
<b>Unrestricted Total:</b>												14586	15508	4434	19.7	790	3872	10.1	0.745	0.00	0.00	15528
<b>Controlled Total:</b>												1459	1571	443	19.7	79.0	387	10.1	0.745	0.00	0.00	1590

**METHODOLOGY**

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

The Permittee is required to limit usage and use the control device in order to comply with the HAP limitations in the permit.

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

**Company Name: Bremen Corporation  
Address City IN Zip: 405 North Industrial Drive, Bremen, Indiana 46506  
Part 70 Renewal No.: T 099-18654-00033  
Reviewer: CarrieAnn Paukowits  
Date: September 5, 2007**

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		

\*PM emission factor is filterable PM only. PM-10 emission factor is filterable and condensable PM-10 combined.

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

Equipment	Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr	Potential Emission in tons/yr					
			PM*	PM10*	SO2	NOx	VOC	CO
Catalytic Oxidizer	4.60	40.296	0.038	0.153	0.012	2.015	0.111	1.692
Three (3) Air Makeup Units	14.25	124.83	0.119	0.474	0.037	6.242	0.343	5.243
Five (5) Heaters	0.80	7.008	0.007	0.027	0.002	0.350	0.019	0.294
One (1) Office Heater	2.00	17.52	0.017	0.067	0.005	0.876	0.048	0.736
<b>Total</b>	<b>21.65</b>	<b>190</b>	<b>0.180</b>	<b>0.721</b>	<b>0.057</b>	<b>9.48</b>	<b>0.522</b>	<b>7.97</b>

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 0.0021	Dichlorobenzene 0.0012	Formaldehyde 0.0750	Hexane 1.8000	Toluene 0.0034
Potential Emission in tons/yr	0.0002	0.0001	0.007	0.171	0.0003

HAPs - Metals

Emission Factor in lb/MMcf	Lead 0.0005	Cadmium 0.0011	Chromium 0.0014	Manganese 0.0004	Nickel 0.0021	Total HAPs
Potential Emission in tons/yr	0.00005	0.0001	0.0001	0.00004	0.0002	<b>0.179</b>

**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

**Appendix A: Emission Calculations  
Insignificant Particulate Emissions**

**Company Name: Bremen Corporation**  
**Address City IN Zip: 405 North Industrial Drive, Bremen, Indiana 46506**  
**Part 70 Renewal No.: T 099-18654-00033**  
**Reviewer: CarrieAnn Paukowits**  
**Date: September 5, 2007**

Process	Maximum Throughput lbs/hr	PM Emission Factor (lb/ton)	PM10 Emission Factor (lb/ton)	PM Emissions (lbs/hr)	PM10 Emissions (lbs/hr)	PM Emissions (tons/yr)	PM10 Emissions (tons/yr)
Two (2) routers (wood or PVC)	200	0.35	0.20	0.035	0.020	0.153	0.088
One (1) cutting table (plastic or cardboard)	100	0.35	0.20	0.018	0.010	0.077	0.044
						<b>0.230</b>	<b>0.131</b>

**Methodology**

Emission factors from FIRES 6.23, SCC 3-07-008-02 for sawing, which would be conservative for the routers and cutting table.

PM/PM10 Emissions (lbs/hr) = Maximum Throughput (lbs/hr) x 1 ton/2,000 lbs x Emission Factor (lbs/ton)

PM/PM10 Emissions (tons/yr) = Emissions (lbs/hr) x 8,760 hrs/yr x 1 lb/2,000 tons

**Appendix A: Emission Calculations  
Summary**

**Company Name:** Bremen Corporation  
**Address City IN Zip:** 405 North Industrial Drive, Bremen, Indiana 46506  
**Part 70 Renewal No.:** T 099-18654-00033  
**Reviewer:** CarrieAnn Paukowits  
**Date:** September 5, 2007

**Unrestricted Potential Emissions**

Process	PM (tons/yr)	PM10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)
Processes 2, 3 & 4	573	573	0.000	0.00	15486	0.00
Process 5 & Areas 2 & 3	0.000	0.000	0.000	0.00	479	0.00
Combustion	0.180	0.721	0.057	9.48	0.522	7.97
Storage	0.000	0.000	0.000	0.00	0.056	0.00
Routers and Cutting Table	0.230	0.131	0.000	0.00	0.000	0.00
<b>Total</b>	<b>573</b>	<b>574</b>	<b>0.057</b>	<b>9.48</b>	<b>15966</b>	<b>7.97</b>

Process	Toluene Emissions (ton/yr)	MBK Emissions (ton/yr)	Xylene Emissions (ton/yr)	Dimethyl-formamide Emissions (ton/yr)	Ethylbenzene Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Isophorone Emissions (ton/yr)	Naphthalene Emissions (ton/yr)	Cumene Emissions (ton/yr)	Benzene Emissions (ton/yr)	Dichloro-benzene Emissions (ton/yr)	Form-aldehyde Emissions (ton/yr)	Hexane Emissions (ton/yr)	Lead Emissions (ton/yr)	Cadmium Emissions (ton/yr)	Chromium Emissions (ton/yr)	Manganese Emissions (ton/yr)	Nickel Emissions (ton/yr)	Total Emissions (ton/yr)
Processes 2, 3 & 4	14586	15486	4434	0.00	790	3872	0.00	0.00	0.000	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	15486
Process 5 & Areas 2 & 3	0.00	21.9	0.00	19.7	0.00	0.00	10.1	0.745	0.004	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	41.6
Combustion	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.0002	0.0001	0.007	0.171	0.00005	0.0001	0.0001	0.00004	0.0002	0.179
Storage	0.028	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.028
Routers and Cutting Table	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
<b>Total</b>	<b>14586</b>	<b>15508</b>	<b>4434</b>	<b>19.7</b>	<b>790</b>	<b>3872</b>	<b>10.1</b>	<b>0.745</b>	<b>0.004</b>	<b>0.0002</b>	<b>0.0001</b>	<b>0.007</b>	<b>0.171</b>	<b>0.00005</b>	<b>0.0001</b>	<b>0.0001</b>	<b>0.00004</b>	<b>0.0002</b>	<b>15528</b>

**Controlled Potential Emissions**

Process	PM (tons/yr)	PM10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)
Processes 2, 3 & 4	2.86	2.86	0.00	0.00	774	0.00
Process 5 & Areas 2 & 3	0.00	0.00	0.00	0.00	479	0.00
Combustion	0.180	0.721	0.057	9.48	0.522	7.97
Storage	0.00	0.00	0.00	0.00	0.056	0.00
Routers and Cutting Table	0.230	0.131	0.000	0.00	0.000	0.00
<b>Total</b>	<b>3.04</b>	<b>3.59</b>	<b>0.057</b>	<b>9.48</b>	<b>1254</b>	<b>7.97</b>

Process	Toluene Emissions (ton/yr)	MBK Emissions (ton/yr)	Xylene Emissions (ton/yr)	Dimethyl-formamide Emissions (ton/yr)	Ethylbenzene Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Isophorone Emissions (ton/yr)	Naphthalene Emissions (ton/yr)	Cumene Emissions (ton/yr)	Benzene Emissions (ton/yr)	Dichloro-benzene Emissions (ton/yr)	Form-aldehyde Emissions (ton/yr)	Hexane Emissions (ton/yr)	Lead Emissions (ton/yr)	Cadmium Emissions (ton/yr)	Chromium Emissions (ton/yr)	Manganese Emissions (ton/yr)	Nickel Emissions (ton/yr)	Total Emissions (ton/yr)
Processes 2, 3 & 4	1459	1549	443	0.00	79.0	387	0.00	0.00	0.000	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Process 5 & Areas 2 & 3	0.00	21.9	0.00	19.7	0.00	0.00	10.1	0.745	0.004	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	41.6
Combustion	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.0002	0.0001	0.007	0.171	0.00005	0.0001	0.0001	0.00004	0.0002	0.179
Storage	0.028	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.028
Routers and Cutting Table	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
<b>Total</b>	<b>1459</b>	<b>1571</b>	<b>443</b>	<b>19.7</b>	<b>79.0</b>	<b>387</b>	<b>10.1</b>	<b>0.745</b>	<b>0.004</b>	<b>0.0002</b>	<b>0.0001</b>	<b>0.007</b>	<b>0.171</b>	<b>0.00005</b>	<b>0.0001</b>	<b>0.0001</b>	<b>0.00004</b>	<b>0.0002</b>	<b>42</b>

**Limited Potential to Emit**

Process	PM (tons/yr)	PM10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)
Processes 2 & 4 and Booths 3a and 3b at Process 3	237.8	237.8	0.00	0.00	249	0.00
Areas 2 and 3	0.00	0.00	0.00	0.00		0.00
Booths 3c and 3d at Process 3	14.98	14.98	0.00	0.00	39	0.00
Process 5	0.00	0.00	0.00	0.00	25.0	0.00
Combustion	0.180	0.721	0.057	9.48	0.522	7.97
Storage	0.00	0.00	0.00	0.00	0.358	0.00
Routers and Cutting Table	0.230	0.131	0.000	0.00	0.000	0.00
<b>Total</b>	<b>253</b>	<b>254</b>	<b>0.057</b>	<b>9.48</b>	<b>314</b>	<b>7.97</b>

Process	Toluene Emissions (ton/yr)	MBK Emissions (ton/yr)	Xylene Emissions (ton/yr)	Dimethyl-formamide Emissions (ton/yr)	Ethylbenzene Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Isophorone Emissions (ton/yr)	Naphthalene Emissions (ton/yr)	Cumene Emissions (ton/yr)	Benzene Emissions (ton/yr)	Dichloro-benzene Emissions (ton/yr)	Form-aldehyde Emissions (ton/yr)	Hexane Emissions (ton/yr)	Lead Emissions (ton/yr)	Cadmium Emissions (ton/yr)	Chromium Emissions (ton/yr)	Manganese Emissions (ton/yr)	Nickel Emissions (ton/yr)	Total Emissions (ton/yr)
Processes 2, 3 & 4*	9.82	9.82	9.82	9.82	9.82	9.82	9.82	9.82	9.82	9.82	9.82	9.82	9.82	0.00	0.00	0.00	0.00	0.00	24.7
Process 5 & Areas 2 & 3*														0.00	0.00	0.00	0.00	0.00	
Combustion	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.0002	0.0001	0.007	0.171	0.00005	0.0001	0.0001	0.00004	0.0002	0.179
Storage	0.028	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.028
Routers and Cutting Table	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total</b>	<b>9.85</b>	<b>9.82</b>	<b>9.82</b>	<b>9.82</b>	<b>9.82</b>	<b>9.82</b>	<b>9.82</b>	<b>9.82</b>	<b>9.82</b>	<b>9.82</b>	<b>9.82</b>	<b>9.83</b>	<b>10.0</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>24.9</b>

Emissions are limited to less than 9.82 tons of each individual HAP. Therefore, the total for Hexane is less than 10 tons per year.