



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P. O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

June 23, 2004

Mr. Dan Miller
Precision Painting, Inc.
P.O. Box 214
Bremen, Indiana 46506

Re: Significant Source Modification No:
099-18778-00096

Dear Mr. Miller:

Precision Painting, Inc. applied for a Part 70 Operating Permit on January 29, 2004 for a recreational vehicle (RV) and other automobile painting source. An application to modify the source was received on January 29, 2004. Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for construction at the source:

- (a) One (1) paint spray booth, identified as Paint Booth A, equipped with HVLP spray applicators and dry filters for particulate control, exhausting to Stack S1, maximum capacity: 1.0 recreational vehicle per hour.
- (b) One (1) paint spray booth, identified as Paint Booth B, equipped with HVLP spray applicators and dry filters for particulate control, exhausting to Stack S2, maximum capacity: 1.0 recreational vehicle per hour.

The Significant Source Modification approval will be incorporated into the pending Part 70 permit application pursuant to 326 IAC 2-7-10.5(l)(3). If there are no changes to the proposed construction of the emission units, the source may begin operating on the date that IDEM receives an affidavit of construction pursuant to 326 IAC 2-7-10.5(h). If there are any changes to the proposed construction the source can not operate until an Operation Permit Validation Letter is issued.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Edward A. Longenberger, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, at 631-691-3395, ext. 20 or in Indiana at 1-800-451-6027 (ext 631-691-3395).

Sincerely,

Original signed by

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
EAL/MES

cc: File - Marshall County
U.S. EPA, Region V
Marshall County Health Department
Northern Regional Office
Air Compliance Section Inspector - Rick Reynolds
Administrative and Development Section
Technical Support and Modeling - Michele Boner



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PART 70 SIGNIFICANT SOURCE MODIFICATION OFFICE OF AIR QUALITY

**Precision Painting, Inc.
218 East 2nd Street
730 High Road
Bremen, Indiana 46506**

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this approval.

This approval 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.

Significant Source Modification No.: 099-18778-00096	
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: June 23, 2004

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in Conditions A.1 through A.4 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

The Permittee owns and operates a stationary recreational vehicle (RV) and other automobile painting source.

Authorized individual:	Vice President
Source Address:	218 East 2nd Street and 730 High Road, Bremen, Indiana 46506
Mailing Address:	P.O. Box 214, Bremen, Indiana 46506
General Source Phone:	(574) 546 - 4773
SIC Code:	7532
Source Location Status:	Marshall
Source Status:	Attainment for all criteria pollutants Part 70 Permit Program Minor Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

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

This recreational vehicle (RV) and other automobile painting company consists of two (2) plants:

- (a) Plant 1 is located at 218 East 2nd Street, Bremen, Indiana; and
- (b) Plant 2 is located at 730 High Road, Bremen, Indiana.

Since the two (2) plants are located on contiguous or adjacent properties, belong to the same industrial grouping, and are under common control of the same entity, they will be considered one (1) source, effective from the date of issuance of this Part 70 Significant Source Modification.

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

This stationary source is approved to construct and operate the following emission units and pollution control devices:

Plant Two (730 High Road)

- (a) One (1) paint spray booth, identified as Paint Booth A, equipped with HVLP spray applicators and dry filters for particulate control, exhausting to Stack S1, maximum capacity: 1.0 recreational vehicle per hour.
- (b) One (1) paint spray booth, identified as Paint Booth B, equipped with HVLP spray applicators and dry filters for particulate control, exhausting to Stack S2, maximum capacity: 1.0 recreational vehicle per hour.

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

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

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

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

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

SECTION B GENERAL CONDITIONS

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

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

B.2 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

B.3 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.4 Significant Source Modification [326 IAC 2-7-10.5(h)]

- (a) The attached affidavit of construction shall be submitted to the Office of Air Quality (OAQ), Permits Branch. If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
- (b) The Permittee will receive an Operation Permit Validation Letter from the Permits Branch authorizing the operation of all or part of each emissions unit covered by the affirmation in the affidavit of construction. The letter shall be attached to this source modification approval.
- (c) Prior to receiving an Operation Permit Validation Letter, the Permittee may begin operating in accordance with the conditions in this approval the emissions units covered in this Significant Source Modification approval on the date the affidavit of construction is postmarked or hand delivered to IDEM if the emissions units were constructed as proposed in the application.
- (d) If actual construction of the emissions units differs from the construction proposed in the application, the source may not begin operation until the source modification has been revised pursuant to 326 IAC 2-7-11 or 326 IAC 2-7-12 and an Operation Permit Validation Letter is issued.
- (e) In the event that the Part 70 application is being processed at the same time as this application, the following additional procedures shall be followed for obtaining the right to operate:
 - (1) If the Part 70 draft permit has not gone on public notice, then the change/addition covered by the Significant Source Modification will be included in the Part 70 draft.
 - (2) If the Part 70 permit has gone through final EPA proposal and would be issued ahead of the Significant Source Modification, the Significant Source Modification will go through a concurrent 45 day EPA review. Then the Significant Source Modification will be incorporated into the final Part 70 permit at the time of issuance.
 - (3) If the Part 70 permit has gone through public notice, but has not gone through final EPA review and would be issued after the Significant Source Modification is issued, then the Modification would be added to the proposed Part 70 permit, and the Title V permit will be issued after EPA review.

SECTION C GENERAL OPERATION CONDITIONS

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

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

C.2 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 prepare and maintain Preventive Maintenance Plans (PMPs) when operation begins, 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.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP extension notification does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs, including any required record keeping as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

C.3 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

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

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

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

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)]

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

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

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

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

Compliance Requirements [326 IAC 2-1.1-11]

C.7 Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.8 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

If required by Section D, all monitoring and record keeping requirements shall be implemented when operation begins. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

C.9 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (d) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
- (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:

- (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (e) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.10 Emergency Provisions [326 IAC 2-7-16]

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

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967
Northern Regional Office: 574-245-4870, Facsimile Number: 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, P. O. Box 6015

Indianapolis, Indiana 46206-6015

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

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

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

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

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

C.11 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

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

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

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

C.12 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

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

C.13 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The 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, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (b) 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.
- (c) 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).
- (d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Paint Booth A and Paint Booth B

Plant Two (730 High Road)

- (a) One (1) paint spray booth, identified as Paint Booth A, equipped with HVLP spray applicators and dry filters for particulate control, exhausting to Stack S1, maximum capacity: 1.0 recreational vehicle per hour.
- (b) One (1) paint spray booth, identified as Paint Booth B, equipped with HVLP spray applicators and dry filters for particulate control, exhausting to Stack S2, maximum capacity: 1.0 recreational vehicle 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]

The use of VOC, including coatings, dilution solvents, and cleaning solvents, at each of the two (2) paint booths (Paint Booth A and Paint Booth B) shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Compliance with this limit makes 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) not applicable.

D.1.2 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 12 to 40 CFR Part 63, Subpart PPPP] [40 CFR 63.4501]

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

D.1.3 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products [40 CFR Part 63, Subpart PPPP] [40 CFR 63.4481] [40 CFR 63.4482]

- (a) The provisions of 40 CFR Part 63, Subpart PPPP (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products) apply to the affected source. A copy of this rule is available on the U.S. EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/plastic/plasticpg.html>. Pursuant to 40 CFR 63.4483(b), the Permittee must comply with these requirements on and after the date 3 years after the effective date of 40 CFR Part 63, Subpart PPPP.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.
- (c) The following emissions units comprise the affected source that is subject to 40 CFR 63,

Subpart PPPP:

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

D.1.4 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to 40 CFR 52 Subpart P, the particulate from the two (2) paint booths (Paint Booth A and Paint Booth B) shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

D.1.5 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the two (2) paint booths (Paint Booth A and Paint Booth B) 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.1.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.1.7 Volatile Organic Compounds (VOC)[326 IAC 8-1-2][326 IAC 8-1-4]

Compliance with the VOC usage limitation contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.1.8 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (S1 and S2) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

D.1.9 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, 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 established in Condition D.1.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) The VOC content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on 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; and
 - (5) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.8, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.10 Notification Requirements [40 CFR 63.4510]

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

D.1.11 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]

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

- (a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Part 70 permit the applicable requirements of 40 CFR 63, Subpart PPPP, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.
- (b) The significant permit modification application shall be submitted no later than twenty-seven months after the effective date of 40 CFR 63, Subpart PPPP.
- (c) The significant permit modification application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

D.1.12 Reporting Requirements

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

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

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Precision Painting, Inc.
Source Address: 218 East 2nd Street and 730 High Road, Bremen, Indiana
Mailing Address: P.O. Box 214, Bremen, Indiana 46506
Part 70 SSM No.: SSM 099-18778-00096

**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
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Precision Painting, Inc.
Source Address: 218 East 2nd Street and 730 High Road, Bremen, Indiana
Mailing Address: P.O. Box 214, Bremen, Indiana 46506
Part 70 SSM No.: SSM 099-18778-00096

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) C The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and C The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.
--

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

Part 70 Quarterly Report

Source Name: Precision Painting, Inc.
Source Address: 218 East 2nd Street and 730 High Road, Bremen, Indiana
Mailing Address: P.O. Box 214, Bremen, Indiana 46506
Part 70 SSM No.: SSM 099-18778-00096
Facility: Paint Booth A
Parameter: VOC Usage
Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month

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: Precision Painting, Inc.
Source Address: 218 East 2nd Street and 730 High Road, Bremen, Indiana
Mailing Address: P.O. Box 214, Bremen, Indiana 46506
Part 70 SSM No.: SSM 099-18778-00096
Facility: Paint Booth B
Parameter: VOC Usage
Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month

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.

Mail to: Permit Administration & Development Section
Office of Air Quality
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015

Precision Painting, Inc.
P.O. Box 214
Bremen, Indiana 46506

Affidavit of Construction

I, _____, being duly sworn upon my oath, depose and say:
(Name of the Authorized Representative)

- 1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
- 2. I hold the position of _____ for _____.
(Title) (Company Name)
- 3. By virtue of my position with _____, I have personal knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of _____.
(Company Name)
- 4. I hereby certify that Precision Painting, Inc., 218 East 2nd Street and 730 High Road, Bremen, Indiana, completed construction of Paint Booth A and Paint Booth B on _____ in conformity with the requirements and intent of the Part 70 Source Modification application received by the Office of Air Quality on April 8, 2004 and as permitted pursuant to the Part 70 Significant Source Modification No. **SSM 099-18778**, **Plant ID No. 099-00096** issued on _____.

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature

Date

STATE OF INDIANA)
)SS

COUNTY OF _____)

Subscribed and sworn to me, a notary public in and for _____ County and State of Indiana on this _____ day of _____, 20 _____.

My Commission expires: _____.

Signature

Name (typed or printed)

issued June 23, 2004

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Part 70 Significant Source Modification

Source Background and Description

Source Name:	Precision Painting, Inc.
Source Location:	218 East 2nd Street and 730 High Road, Bremen, Indiana
County:	Marshall
SIC Code:	7532
Operation Permit No.:	T 099-18454-00096
Operation Permit Issuance Date:	Not Yet Issued
Significant Source Modification No.:	SSM 099-18778-00096
Permit Reviewer:	Edward A. Longenberger

The Office of Air Quality (OAQ) has reviewed a modification application from Precision Painting, Inc. relating to the construction and operation of the following emission units and pollution control devices:

- (a) One (1) paint spray booth, identified as Paint Booth A, equipped with HVLP spray applicators and dry filters for particulate control, exhausting to Stack S1, maximum capacity: 1.0 recreational vehicle per hour.
- (b) One (1) paint spray booth, identified as Paint Booth B, equipped with HVLP spray applicators and dry filters for particulate control, exhausting to Stack S2, maximum capacity: 1.0 recreational vehicle per hour.

History

On January 29, 2004, Precision Paint submitted an application to IDEM, OAQ for permission to construct two (2) additional paint booths at their existing source. The existing equipment was constructed in August of 2002. The Part 70 Operating Permit for this source is pending.

Existing Approvals

The source applied for a Part 70 Operating Permit T 099-18454-00096 on January 29, 2004. The source has no previous IDEM, OAQ approvals.

Source Definition

This recreational vehicle (RV) and other automobile painting company consists of two (2) plants:

- (a) Plant 1 is located at 218 East 2nd Street, Bremen, Indiana; and
- (b) Plant 2 is located at 730 High Road, Bremen, Indiana.

Since the two (2) plants are located on contiguous properties, have the same SIC codes and are owned by one (1) company, they will be considered one (1) source.

Stack Summary

Stack ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temperature (°F)
S1	Paint Booth A	36.0	2.3	20,000	Ambient
S2	Paint Booth B	36.0	2.3	20,000	Ambient

Recommendation

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

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

An administratively incomplete application for the purposes of this review was received on January 29, 2004. Additional information received on March 2, 2004 made the application administratively complete. Additional information was received on March 18 and April 8, 2004.

Emission Calculations

See pages 1 through 3 of Appendix A of this document for detailed emissions calculations.

Potential To Emit of Modification

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

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	45.4
PM ₁₀	45.4
SO ₂	-
VOC	274
CO	-
NO _x	-

HAPs	Potential To Emit (tons/year)
Xylene	140
Toluene	105
MIBK	7.76
Ethylbenzene	24.8
Glycol Ethers	33.2
MEK	105
TOTAL	209

Justification for Modification

- (a) The Part 70 Operating Permit is being modified through a Part 70 Significant Source Modification to a yet to be issued Part 70 Operating Permit because the potential to emit before controls of this modification exceeds twenty five (25) tons of VOC per year. This modification is being performed pursuant to 326 IAC 2-7-10.5(f)(4).
- (b) Since the Part 70 Operating Permit for this source has not been issued yet, the approval of this Significant Source Modification will allow the source to construct and operate.

County Attainment Status

The source is located in Marshall County.

Pollutant	Status
PM ₁₀	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Marshall County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Marshall County has been classified as attainment or unclassifiable for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (c) **Fugitive Emissions**
 Since this type of operation is not one of the 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 PM emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	4.56
PM ₁₀	4.62
SO ₂	0.006
VOC	27.4
CO	0.901
NO _x	1.07

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.
- (b) These emissions are based upon information in the pending Part 70 permit application.

Potential to Emit of Modification After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.

Process/facility	Potential to Emit (tons/year)						
	PM	PM₁₀	SO₂	VOC	CO	NO_x	HAPs
Proposed Modification	4.54	4.54	-	Less than 50.0	-	-	Less than 50.0
PSD Threshold Level	250	250	250	250	250	250	-

This modification to an existing minor stationary source is not major because the emission increase is less than the PSD threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply. VOC emissions are limited to less than fifty (50) tons per year because each paint booth is limited to less than twenty-five (25) tons per year of VOC in order to render the requirements of 326 IAC 8-1-6 no applicable. Since the HAP content of each coating is equal to or

less than the VOC content, this limit will also have the effect of limiting combination HAPs emissions from the two (2) paint booths to less than fifty (50) tons per year.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source has submitted their Part 70 (T 099-18454-00096) application on January 29, 2004. The two (2) paint spray booths being reviewed under this permit shall be incorporated in the submitted Part 70 application.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.
- (b) The two (2) paint booths (Paint Booth A and Paint Booth B) are not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR Part 63.3080, Subpart IIII (Automobile and Light Duty Truck Surface Coating), because this source is not an automobile or light-duty truck manufacturing facility. This source paints vehicles which are manufactured elsewhere.
- (c) The plastic parts surface coating operations are subject to the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products, 40 CFR 63, Subpart PPPP. The two (2) paint booths (Paint Booth A and Paint Booth B) are considered an existing affected source pursuant to 40 CFR 63.4482 since they will be constructed at a source where plastic parts surface coating has previously been performed. The U.S. EPA Administrator has signed and will publish a final Maximum Achievable Control Technology Standard (MACT) at 40 CFR 63, Subpart PPPP, for Surface Coating of Plastic Parts and Products. A copy of the signed version of the MACT is currently available on the U.S. EPA website, <http://www.epa.gov/ttn/oarpg/t3pfpr.html>, and will be published in the Federal Register.

The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the affected source described in this section except when otherwise specified in 40 CFR 63 Subpart PPPP.

This rule has a future compliance date; therefore, the specific details of the rule and how the Permittee will demonstrate compliance are not provided in the permit. The Permittee shall submit an application for a significant permit modification nine months prior to the compliance date for the MACT that will specify the option or options for the emission limitations and standards and methods for determining compliance chosen by the Permittee. At that time, IDEM, OAQ will include the specific details of the rule and how the Permittee will demonstrate compliance. In addition, pursuant to 40 CFR 63, Subpart PPPP, the Permittee shall submit:

- (1) An Initial Notification containing the information specified in 40 CFR 63.9(b)(2) no later than one (1) year after the effective date of 40 CFR 63, Subpart PPPP.
- (2) A Notification of Compliance Status containing the information required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR 63.4540, 40 CFR 63.4550, or 40 CFR 63.4560 that applies to your affected source.

State Rule Applicability

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

The two (2) paint booths (Paint Booth A and Paint Booth B) are specifically regulated by a standard under Section 112(d) of the Clean Air Act (40 CFR 63, Subpart PPPP, National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products), therefore, the requirements of 326 IAC 2-4.1 do not apply.

326 IAC 6-3-2 (Process Operations)

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

Pursuant to 40 CFR 52, Subpart P the particulate from the two (2) paint booths (Paint Booth A and Paint Booth B) shall be limited by the following:

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

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

Under the rule revision, particulate from the two (2) paint booths 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.

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

The VOC usage at each of the two (2) paint booths (Paint Booth A and Paint Booth B) is limited to less than twenty-five (25) tons per twelve consecutive month period, with compliance determined at the end of each month. Therefore, the requirements of 326 IAC 8-1-6 are not applicable.

Compliance Requirements

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

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitor-

ing 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 two (2) paint booths (Paint Booth A and Paint Booth B) have applicable compliance monitoring conditions as specified below:

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (S1 and S2) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the dry filters for the paint booths must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

Conclusion

The construction and operation of the proposed Paint Booth A and Paint Booth B shall be subject to the conditions of the attached proposed Significant Source Modification No. 099-18778-00096.

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations at Plant 2**

**Company Name: Precision Painting, Inc.
Address City IN Zip: 218 East 2nd Street and 730 High Road, Bremen, Indiana, 46506
SSM: 099-18778
Plt ID: 099-00096
Reviewer: Edward A. Longenberger
Application Date: January 29, 2004**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Paint Booth A																
Worst Case Reducer	7.31	99.0%	0.0%	99.0%	0.0%	0.00%	4.32000	1.000	7.24	7.24	31.26	750.32	136.93	0.35	N/A	75%
Worst Case Basecoat	7.24	97.0%	0.0%	97.0%	0.0%	2.50%	4.34000	1.000	7.02	7.02	30.48	731.49	133.50	1.03	280.91	75%
Worst Case Clearcoat	7.88	49.0%	0.0%	49.0%	0.0%	50.59%	1.25000	1.000	3.86	3.86	4.83	115.84	21.14	5.50	7.63	75%
Worst Case Promoter	7.29	80.0%	0.0%	80.0%	0.0%	19.06%	0.11000	1.000	5.83	5.83	0.64	15.40	2.81	0.18	30.60	75%
Filler	8.84	61.0%	0.0%	61.0%	0.0%	38.76%	0.24000	1.000	5.39	5.39	1.29	31.06	5.67	0.91	13.91	75%
Hardener	9.60	0.0%	0.0%	0.0%	0.0%	98.21%	2.16000	1.000	0.00	0.00	0.00	0.00	0.00	22.71	0.00	75%
Worst Case Paint	7.78	78.0%	0.0%	78.0%	0.0%	66.66%	4.98000	1.000	6.07	6.07	30.22	725.30	132.37	9.33	9.10	75%
Paint Booth B																
Worst Case Reducer	7.31	99.0%	0.0%	99.0%	0.0%	0.00%	4.32000	1.000	7.24	7.24	31.26	750.32	136.93	0.35	N/A	75%
Worst Case Basecoat	7.24	97.0%	0.0%	97.0%	0.0%	2.50%	4.34000	1.000	7.02	7.02	30.48	731.49	133.50	1.03	280.91	75%
Worst Case Clearcoat	7.88	49.0%	0.0%	49.0%	0.0%	50.59%	1.25000	1.000	3.86	3.86	4.83	115.84	21.14	5.50	7.63	75%
Worst Case Promoter	7.29	80.0%	0.0%	80.0%	0.0%	19.06%	0.11000	1.000	5.83	5.83	0.64	15.40	2.81	0.18	30.60	75%
Filler	8.84	61.0%	0.0%	61.0%	0.0%	38.76%	0.24000	1.000	5.39	5.39	1.29	31.06	5.67	0.91	13.91	75%
Hardener	9.60	0.0%	0.0%	0.0%	0.0%	98.21%	2.16000	1.000	0.00	0.00	0.00	0.00	0.00	22.71	0.00	75%
Worst Case Paint	7.78	78.0%	0.0%	78.0%	0.0%	66.66%	4.98000	1.000	6.07	6.07	30.22	725.30	132.37	9.33	9.10	75%

PM Control Efficiency: 90.00%

State Potential Emissions	Add worst case coating to all solvents				
		Uncontrolled	62.53	1500.64	273.87
		Controlled	62.53	1500.64	273.87
				45.41	4.54

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

Appendix A: Emission Calculations
HAP Emission Calculations
From Surface Coating Operations at Plant 2

Company Name: Precision Painting, Inc.
Address City IN Zip: 218 East 2nd Street and 730 High Road, Bremen, Indiana, 46506
SSM: 099-18778
Pit ID: 099-00096
Permit Reviewer: Edward A. Longenberger
Application Date: January 29, 2004

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % MIBK	Weight % Ethylbenzene	Weight % Glycol Ethers	Weight % MEK	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	MIBK Emissions (ton/yr)	Ethylbenzene Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	MEK Emissions (ton/yr)	Total HAPs (ton/yr)
Paint Booth A																
Reducer US-1	6.75	4.32	1.00	0.00%	0.00%	2.00%	0.00%	0.00%	30.00%	0.00	0.00	2.55	0.00	0.00	38.32	40.87
Reducer US-2	6.92	4.32	1.00	0.00%	0.00%	1.00%	0.00%	0.00%	40.00%	0.00	0.00	1.31	0.00	0.00	52.37	53.68
Reducer US-3	7.08	4.32	1.00	0.00%	0.00%	1.00%	0.00%	0.00%	20.00%	0.00	0.00	1.34	0.00	0.00	26.79	28.13
Reducer US-4	7.31	4.32	1.00	0.00%	0.00%	0.00%	0.00%	12.00%	0.00%	0.00	0.00	0.00	0.00	16.60	0.00	16.60
Basecoat BCS-600	7.25	4.34	1.00	32.00%	38.00%	0.00%	6.00%	0.00%	0.00%	44.10	52.37	0.00	8.27	0.00	0.00	104.74
Basecoat BCS-605	7.24	4.34	1.00	51.00%	0.00%	0.00%	9.00%	0.00%	0.00%	70.19	0.00	0.00	12.39	0.00	0.00	82.58
Clearcoat CC-633	7.88	1.25	1.00	0.00%	0.00%	9.00%	0.00%	0.00%	16.00%	0.00	0.00	3.88	0.00	0.00	6.90	10.79
Clearcoat UH-80	9.03	1.25	1.00	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
Promoter S63	7.20	0.11	1.00	3.00%	54.00%	0.00%	0.00%	0.00%	0.00%	0.104	1.87	0.00	0.00	0.00	0.00	1.98
Promoter S65	7.29	0.11	1.00	12.00%	0.00%	1.00%	2.00%	0.00%	0.00%	0.421	0.00	0.035	0.070	0.00	0.00	0.527
Filler E2G980	8.84	0.24	1.00	4.00%	5.00%	9.00%	0.00%	10.00%	0.00%	0.372	0.465	0.836	0.00	0.929	0.00	2.60
Hardener	9.60	2.16	1.00	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
Paint U7000	7.78	4.98	1.00	28.00%	0.00%	0.00%	5.00%	0.00%	0.00%	47.52	0.00	0.00	8.49	0.00	0.00	56.00
Paint U7001	7.79	4.98	1.00	28.00%	0.00%	0.00%	5.00%	0.00%	0.00%	47.58	0.00	0.00	8.50	0.00	0.00	56.07
Paint U7002	7.78	4.98	1.00	28.00%	0.00%	0.00%	5.00%	0.00%	0.00%	47.52	0.00	0.00	8.49	0.00	0.00	56.00
Paint U7004	7.92	4.98	1.00	29.00%	0.00%	0.00%	5.00%	0.00%	0.00%	50.10	0.00	0.00	8.64	0.00	0.00	58.74
Paint U7005	7.89	4.98	1.00	29.00%	0.00%	0.00%	5.00%	0.00%	0.00%	49.91	0.00	0.00	8.60	0.00	0.00	58.51
Paint U7006	7.78	4.98	1.00	28.00%	0.00%	0.00%	5.00%	0.00%	0.00%	47.52	0.00	0.00	8.49	0.00	0.00	56.00
Paint U7007	7.89	4.98	1.00	29.00%	0.00%	0.00%	5.00%	0.00%	0.00%	49.91	0.00	0.00	8.60	0.00	0.00	58.51
Paint U7012	7.75	4.98	1.00	29.00%	0.00%	0.00%	5.00%	0.00%	0.00%	49.02	0.00	0.00	8.45	0.00	0.00	57.48
Total State Potential Emissions										Single HAP	70.19	52.37	3.88	12.39	16.60	52.37

METHODOLOGY

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

**Appendix A: Emission Calculations
HAP Emission Calculations
From Surface Coating Operations at Plant 2**

**Company Name: Precision Painting, Inc.
Address City IN Zip: 218 East 2nd Street and 730 High Road, Bremen, Indiana, 46506
SSM: 099-18778
Pit ID: 099-00096
Permit Reviewer: Edward A. Longenberger
Application Date: January 29, 2004**

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % MIBK	Weight % Ethylbenzene	Weight % Glycol Ethers	Weight % MEK	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	MIBK Emissions (ton/yr)	Ethylbenzene Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	MEK Emissions (ton/yr)	Total HAPs (ton/yr)
Paint Booth B																
Reducer US-1	6.75	4.32	1.00	0.00%	0.00%	2.00%	0.00%	0.00%	30.00%	0.00	0.00	2.55	0.00	0.00	38.32	40.87
Reducer US-2	6.92	4.32	1.00	0.00%	0.00%	1.00%	0.00%	0.00%	40.00%	0.00	0.00	1.31	0.00	0.00	52.37	53.68
Reducer US-3	7.08	4.32	1.00	0.00%	0.00%	1.00%	0.00%	0.00%	20.00%	0.00	0.00	1.34	0.00	0.00	26.79	28.13
Reducer US-4	7.31	4.32	1.00	0.00%	0.00%	0.00%	0.00%	12.00%	0.00%	0.00	0.00	0.00	0.00	16.60	0.00	16.60
Basecoat BCS-600	7.25	4.34	1.00	32.00%	38.00%	0.00%	6.00%	0.00%	0.00%	44.10	52.37	0.00	8.27	0.00	0.00	104.74
Basecoat BCS-605	7.24	4.34	1.00	51.00%	0.00%	0.00%	9.00%	0.00%	0.00%	70.19	0.00	0.00	12.39	0.00	0.00	82.58
Clearcoat CC-633	7.88	1.25	1.00	0.00%	0.00%	9.00%	0.00%	0.00%	16.00%	0.00	0.00	3.88	0.00	0.00	6.90	10.79
Clearcoat UH-80	9.03	1.25	1.00	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
Promoter S63	7.20	0.11	1.00	3.00%	54.00%	0.00%	0.00%	0.00%	0.00%	0.104	1.873	0.00	0.00	0.00	0.00	1.98
Promoter S65	7.29	0.11	1.00	12.00%	0.00%	1.00%	2.00%	0.00%	0.00%	0.421	0.00	0.035	0.070	0.00	0.00	0.527
Filler E2G980	8.84	0.24	1.00	4.00%	5.00%	9.00%	0.00%	10.00%	0.00%	0.372	0.465	0.836	0.00	0.929	0.00	2.60
Hardener	9.60	2.16	1.00	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
Paint U7000	7.78	4.98	1.00	28.00%	0.00%	0.00%	5.00%	0.00%	0.00%	47.52	0.00	0.00	8.49	0.00	0.00	56.00
Paint U7001	7.79	4.98	1.00	28.00%	0.00%	0.00%	5.00%	0.00%	0.00%	47.58	0.00	0.00	8.50	0.00	0.00	56.07
Paint U7002	7.78	4.98	1.00	28.00%	0.00%	0.00%	5.00%	0.00%	0.00%	47.52	0.00	0.00	8.49	0.00	0.00	56.00
Paint U7004	7.92	4.98	1.00	29.00%	0.00%	0.00%	5.00%	0.00%	0.00%	50.10	0.00	0.00	8.64	0.00	0.00	58.74
Paint U7005	7.89	4.98	1.00	29.00%	0.00%	0.00%	5.00%	0.00%	0.00%	49.91	0.00	0.00	8.60	0.00	0.00	58.51
Paint U7006	7.78	4.98	1.00	28.00%	0.00%	0.00%	5.00%	0.00%	0.00%	47.52	0.00	0.00	8.49	0.00	0.00	56.00
Paint U7007	7.89	4.98	1.00	29.00%	0.00%	0.00%	5.00%	0.00%	0.00%	49.91	0.00	0.00	8.60	0.00	0.00	58.51
Paint U7012	7.75	4.98	1.00	29.00%	0.00%	0.00%	5.00%	0.00%	0.00%	49.02	0.00	0.00	8.45	0.00	0.00	57.48

Total State Potential Emissions **Single HAP 70.19 52.37 3.88 12.39 16.60 52.37**

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