



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
MC 61-53 IGCN 1003
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

TO: Interested Parties / Applicant
DATE: November 27, 2007
RE: Bon L Manufacturing Company / 111-18828-00005
FROM: Nisha Sizemore
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval – Effective Immediately

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

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

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

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

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

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

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

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

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

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

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

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



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Part 70 Operating Permit Renewal OFFICE OF AIR QUALITY

**Bon L Manufacturing Company
508 W. Wilson Street
Kentland, Indiana 47951**

(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.

Operation Permit No.: T 111-18828-00005	
Issued by: <i>Original signed by</i> Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: November 27, 2007 Expiration Date: November 27, 2012

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SECTION A

SOURCE SUMMARY

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

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

The Permittee owns and operates an aluminum extrusion and anodizing source.

Source Address:	508 W. Wilson Street, Kentland, Indiana 47951
Mailing Address:	P.O. Box 106, Kentland, Indiana 47951
General Source Phone Number:	(219) 474-5136
SIC Code:	3354, 3471
County Location:	Newton
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD Rules Major Source, Section 112 of the Clean Air Act

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

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

- (a) One (1) electrostatic paint spray booth, identified as paint 1, booth 1, installed in 1984, equipped with electrostatic disc spray guns and dry filters for overspray control, exhausted to stack S-13, capacity: 15,120 pieces of aluminum per hour. Under NESHAP Subpart M, this is part of an existing affected source in the general use subcategory.
- (b) One (1) electrostatic paint spray booth, identified as paint 1, booth 2, installed in 1984, equipped with electrostatic disc spray guns and dry filters for overspray control, exhausted to stack S-14, capacity: 15,120 pieces of aluminum per hour. Under NESHAP Subpart M, this is part of an existing affected source in the general use subcategory.
- (c) One (1) anodizing line, identified as ANOD-1, installed in 1984, exhausted to stacks S-15 and S-16, consisting of the following twenty-seven (27) tanks containing various liquids, maximum capacity: 30,000 pounds of aluminum parts per hour:
 - (1) One (1) acid etch tank containing ammonium fluoride, hydrofluoric acid and water, identified as tank 9, equipped with a voluntary scrubber.
 - (2) Two (2) anodizing tanks containing sulfuric acid and water, identified as tanks 13 and 15, equipped with a voluntary scrubber.
 - (3) One (1) color tank containing sulfuric acid and stannous sulfate solution and water, identified as tank 19.
 - (4) One (1) acid cleaner tank containing sulfuric acid and water, identified as tank 11.
 - (5) Three (3) seal tanks each containing nickel and hydrogen fluoride and water, identified as tanks 22, 25 and 26.
 - (6) One (1) alkaline cleaner tank, identified as tank 1.

- (7) One (1) etch tank containing NaOH and water, equipped with a voluntary scrubber, identified as tank 3.
- (8) One (1) desmut tank containing sulfuric acid and water, identified as tank 6.
- (9) Sixteen (16) rinse tanks, using only water and obtaining materials from upstream processing tanks as part of the rinsing operation, identified as tanks 2, 4, 5, 7, 8, 10, 12, 14, 16, 17, 18, 20, 21, 23, 24, and 27.
- (d) One (1) anodizing boiler, identified as ANOD-2, fueled by natural gas and propane as a backup fuel, installed in 1984, exhausted to stack S-12, heat input capacity: 8.4 million British thermal units per hour.
- (e) One (1) paint bake oven, identified as paint 3, paint bake oven P, fueled by natural gas and propane as a backup fuel, installed in 1984, exhausted to stack S-11, heat input capacity: 9.0 million British thermal units 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):

Degreasing operations that do not exceed 145 gallons per twelve (12) months, except if subject to 326 IAC 20-6. One (1) self-contained parts washer, installed after January 1, 1980, equipped with a remote solvent reservoir. [326 IAC 8-3-2]

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

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

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

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, T 111-18828-00005, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

and

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either

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

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

- (b) In addition to the nonapplicability determinations set forth in Sections D of this permit, the IDEM, OAQ has made the determinations in Attachment A, regarding this source.
- (c) 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.
- (d) 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.
- (e) 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.
- (f) 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).
- (g) 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)]
- (h) 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 111-18828-00005 and issued pursu-

ant to permitting programs approved into the state implementation plan have been either:

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

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

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

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

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

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

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

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

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

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

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

- (1) That this permit contains a material mistake.
- (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

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

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

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

Request for renewal shall be submitted to:

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

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

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

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

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

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

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

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

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

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

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

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

and

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

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

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

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

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

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

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

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

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

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

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

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

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

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;

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

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

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

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

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

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

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

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 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]

- (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]

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)]

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

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

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

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

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

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

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

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

C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on April 11, 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.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

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

C.14 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

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

- (1) monitoring results;
 - (2) review of operation and maintenance procedures and records;
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
- (1) monitoring data;
 - (2) monitor performance data, if applicable; and
 - (3) corrective actions taken.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

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

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

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

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

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

The statement must be submitted to:

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

Indianapolis, Indiana 46204-2251

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

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

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

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

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

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

- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

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

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

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

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

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

SECTION D.1 FACILITY OPERATION CONDITIONS

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

- (a) One (1) electrostatic paint spray booth, identified as paint 1, booth 1, installed in 1984, equipped with electrostatic disc spray guns and dry filters for overspray control, exhausted to stack S-13, capacity: 15,120 pieces of aluminum per hour. Under NESHAP Subpart M MMMM, this is part of an existing affected source in the general use subcategory.
- (b) One (1) electrostatic paint spray booth, identified as paint 1, booth 2, installed in 1984, equipped with electrostatic disc spray guns and dry filters for overspray control, exhausted to stack S-14, capacity: 15,120 pieces of aluminum per hour. Under NESHAP Subpart M MMMM, this is part of an existing affected source in the general use subcategory.

(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 Compound (VOC) [326 IAC 8-2-9]

- (a) Pursuant to 326 IAC 8-2-9, the volatile organic compound (VOC) content delivered to the applicators at the two (2) electrostatic paint spray booths, identified as booths 1 and 2, shall be limited to three and five-tenths (3.5) pounds per gallon of coating less water for forced warm air dried coatings.
- (b) Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment of booths 1 and 2 during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

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

Pursuant to CP 111-2823-00005, issued on November 5, 1993, the total VOC usage, including coatings, solvents and cleaners, at the two (2) electrostatic paint spray booths, identified as booths 1 and 2, shall be less than 246 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This will limit the potential to emit of VOC to less than 246 tons per year from the two (2) electrostatic paint spray booths and less than 250 tons per year from the entire source. Compliance with this limit renders 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

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

Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating processes shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications. This shall also render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), not applicable.

D.1.4 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 their control devices.

Compliance Determination Requirements

D.1.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

Compliance with the VOC content limit in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings for each twenty-four (24) hour block, with

twenty-four (24)-hour blocks running consecutively. This volume weighted average shall be determined by the following equation:

$$A = [3 (C \times U) / 3 U]$$

Where: A is the volume weighted average in pounds VOC per gallon less water as applied;
C is the VOC content of the coating in pounds VOC per gallon less water as applied; and U
is the usage rate of the coating in gallons per twenty-four (24)-hour block.

D.1.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

Compliance with the VOC usage limitation contained in Condition D.1.2 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 or by preparing the equivalent information. 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.1.7 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 stacks (S13 and S14) while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

D.1.8 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken for each twenty-four (24)-hour block and shall be complete and sufficient to establish compliance with the VOC emission limits established in Condition D.1.1. Records necessary to demonstrate compliance shall be available within thirty (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 for each twenty-four (24)-hour block, with twenty-four (24)-hour blocks running consecutively.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

- (3) The volume weighted VOC content of the coatings used for each twenty-four (24)-hour block, with twenty-four (24)-hour blocks running consecutively.
- (b) To document compliance with Condition D.1.2, the Permittee shall also maintain monthly records in accordance with (1) through (2) in (a) of this condition and (1) through (3) below. Records maintained shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Condition D.1.2. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.
 - (1) The cleanup solvent usage for each month;
 - (2) The total VOC usage for each month; and
 - (3) The weight of VOCs emitted for each compliance period.
- (c) To document compliance with Conditions D.1.3 and D.1.7, the Permittee shall maintain a log of weekly overspray observations, and daily and monthly inspections.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.2 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).

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-7-5(1)]

D.1.10 General Provisions Relating to NESHAP MMMM [326 IAC 20-1] [40 CFR Part 63, Subpart A]

Pursuant to 40 CFR 63.3901, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1 for the two (2) electrostatic paint spray booths, identified as booths 1 and 2, as specified in Table 2 of 40 CFR Part 63, Subpart MMMM in accordance with schedule in 40 CFR 63 Subpart MMMM.

D.1.11 NESHAP MMMM Requirements [40 CFR Part 63, Subpart MMMM]

Pursuant to CFR Part 63, Subpart MMMM, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart MMMM, as specified as follows:

What This Subpart Covers

§ 63.3880 What is the purpose of this subpart?

This subpart establishes national emission standards for hazardous air pollutants (NESHAP) for miscellaneous metal parts and products surface coating facilities. This subpart also establishes requirements to demonstrate initial and continuous compliance with the emission limitations.

§ 63.3881 Am I subject to this subpart?

(a) Miscellaneous metal parts and products include, but are not limited to, metal components of the following types of products as well as the products themselves: motor vehicle parts and accessories, bicycles and sporting goods, recreational vehicles, extruded aluminum structural components, railroad cars, heavy duty trucks, medical equipment, lawn and garden equipment, electronic equipment, magnet wire, steel drums, industrial machinery, metal pipes, and numerous other industrial, household, and consumer products. Except as provided in paragraph (c) of this section, the source

category to which this subpart applies is the surface coating of any miscellaneous metal parts or products, as described in paragraph (a)(1) of this section, and it includes the subcategories listed in paragraphs (a)(2) through (6) of this section.

(1) Surface coating is the application of coating to a substrate using, for example, spray guns or dip tanks. When application of coating to a substrate occurs, then surface coating also includes associated activities, such as surface preparation, cleaning, mixing, and storage. However, these activities do not comprise surface coating if they are not directly related to the application of the coating. Coating application with handheld, non-refillable aerosol containers, touch-up markers, marking pens, or the application of paper film or plastic film which may be pre-coated with an adhesive by the manufacturer are not coating operations for the purposes of this subpart.

(2) The general use coating subcategory includes all surface coating operations that are not high performance, magnet wire, rubber-to-metal, or extreme performance fluoropolymer coating operations.

(b) You are subject to this subpart if you own or operate a new, reconstructed, or existing affected source, as defined in §63.3882, that uses 946 liters (250 gallons (gal)) per year, or more, of coatings that contain hazardous air pollutants (HAP) in the surface coating of miscellaneous metal parts and products defined in paragraph (a) of this section; and that is a major source, is located at a major source, or is part of a major source of emissions of HAP. A major source of HAP emissions is any stationary source or group of stationary sources located within a contiguous area and under common control that emits or has the potential to emit any single HAP at a rate of 9.07 megagrams (Mg) (10 tons) or more per year or any combination of HAP at a rate of 22.68 Mg (25 tons) or more per year. You do not need to include coatings that meet the definition of non-HAP coating contained in §63.3981 in determining whether you use 946 liters (250 gal) per year, or more, of coatings in the surface coating of miscellaneous metal parts and products.

§ 63.3882 What parts of my plant does this subpart cover?

(a) This subpart applies to each new, reconstructed, and existing affected source within each of the four subcategories listed in §63.3881(a).

(b) The affected source is the collection of all of the items listed in paragraphs (b)(1) through (4) of this section that are used for surface coating of miscellaneous metal parts and products within each subcategory.

(1) All coating operations as defined in §63.3981;

(2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;

(3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and

(4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.

(e) An affected source is existing if it is not new or reconstructed.

§ 63.3883 When do I have to comply with this subpart?

The date by which you must comply with this subpart is called the compliance date. The compliance date for each type of affected source is specified in paragraphs (a) through (c) of this section. The compliance date begins the initial compliance period during which you conduct the initial compliance demonstration described in §§63.3940, 63.3950, and 63.3960.

(b) For an existing affected source, the compliance date is the date 3 years after January 2, 2004.

(d) You must meet the notification requirements in §63.3910 according to the dates specified in that section and in subpart A of this part. Some of the notifications must be submitted before the compliance dates described in paragraphs (a) through (c) of this section.

Emission Limitations

§ 63.3890 What emission limits must I meet?

(b) For an existing affected source, you must limit organic HAP emissions to the atmosphere from the affected source to the applicable limit specified in paragraphs (b)(1) through (5) of this section, except

as specified in paragraph (c) of this section, determined according to the requirements in §63.3941, §63.3951, or §63.3961.

(1) For each existing general use coating affected source, limit organic HAP emissions to no more than 0.31 kg (2.6 lb) organic HAP per liter (gal) coating solids used during each 12-month compliance period.

§ 63.3891 What are my options for meeting the emission limits?

You must include all coatings (as defined in §63.3981), thinners and/or other additives, and cleaning materials used in the affected source when determining whether the organic HAP emission rate is equal to or less than the applicable emission limit in §63.3890. To make this determination, you must use at least one of the three compliance options listed in paragraphs (a) through (c) of this section. You may apply any of the compliance options to an individual coating operation, or to multiple coating operations as a group, or to the entire affected source. You may use different compliance options for different coating operations, or at different times on the same coating operation. You may employ different compliance options when different coatings are applied to the same part, or when the same coating is applied to different parts. However, you may not use different compliance options at the same time on the same coating operation. If you switch between compliance options for any coating operation or group of coating operations, you must document this switch as required by §63.3930(c), and you must report it in the next semiannual compliance report required in §63.3920.

(b) *Emission rate without add-on controls option.* Demonstrate that, based on the coatings, thinners and/or other additives, and cleaning materials used in the coating operation(s), the organic HAP emission rate for the coating operation(s) is less than or equal to the applicable emission limit in §63.3890, calculated as a rolling 12-month emission rate and determined on a monthly basis. You must meet all the requirements of §§63.3950, 63.3951, and 63.3952 to demonstrate compliance with the emission limit using this option.

§ 63.3892 What operating limits must I meet?

(a) For any coating operation(s) on which you use the compliant material option or the emission rate without add-on controls option, you are not required to meet any operating limits.

§ 63.3893 What work practice standards must I meet?

(a) For any coating operation(s) on which you use the compliant material option or the emission rate without add-on controls option, you are not required to meet any work practice standards.

General Compliance Requirements

§ 63.3900 What are my general requirements for complying with this subpart?

(a) You must be in compliance with the emission limitations in this subpart as specified in paragraphs (a)(1) and (2) of this section.

(1) Any coating operation(s) for which you use the compliant material option or the emission rate without add-on controls option, as specified in §63.3891(a) and (b), must be in compliance with the applicable emission limit in §63.3890 at all times.

(b) You must always operate and maintain your affected source, including all air pollution control and monitoring equipment you use for purposes of complying with this subpart, according to the provisions in §63.6(e)(1)(i).

§ 63.3901 What parts of the General Provisions apply to me?

Table 2 to this subpart shows which parts of the General Provisions in §§63.1 through 63.15 apply to you.

Notifications, Reports, and Records

§ 63.3910 What notifications must I submit?

(a) *General.* You must submit the notifications in §§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.* You must submit the initial notification required by §63.9(b) for a new or reconstructed affected source no later than 120 days after initial startup or 120 days after January 2, 2004, whichever is later. For an existing affected source, you must submit the initial notification no later than 1 year after January 2, 2004. If you are using compliance with the Surface Coating of Automobiles and Light-Duty Trucks NESHAP (subpart IIII of this part) as provided for under §63.3881(d) to constitute compliance with this subpart for any or all of your metal parts coating operations, then you must include a statement to this effect in your initial notification, and no other notifications are required under this subpart in regard to those metal parts coating operations. If you are complying with another NESHAP that constitutes the predominant activity at your facility under §63.3881(e)(2) to constitute compliance with this subpart for your metal parts coating operations, then you must include a statement to this effect in your initial notification, and no other notifications are required under this subpart in regard to those metal parts coating operations.

(c) *Notification of compliance status.* You must submit the notification of compliance status required by §63.9(h) no later than 30 calendar days following the end of the initial compliance period described in §§63.3940, 63.3950, or 63.3960 that applies to your affected source. The notification of compliance status must contain the information specified in paragraphs (c)(1) through (11) of this section and in §63.9(h).

(1) Company name and address.

(2) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.

(3) Date of the report and beginning and ending dates of the reporting period. The reporting period is the initial compliance period described in §§63.3940, 63.3950, or 63.3960 that applies to your affected source.

(4) Identification of the compliance option or options specified in §63.3891 that you used on each coating operation in the affected source during the initial compliance period.

(5) Statement of whether or not the affected source achieved the emission limitations for the initial compliance period.

(6) If you had a deviation, include the information in paragraphs (c)(6)(i) and (ii) of this section.

(i) A description and statement of the cause of the deviation.

(ii) If you failed to meet the applicable emission limit in §63.3890, include all the calculations you used to determine the kg (lb) of organic HAP emitted per liter (gal) coating solids used. You do not need to submit information provided by the materials' suppliers or manufacturers, or test reports.

(7) For each of the data items listed in paragraphs (c)(7)(i) through (iv) of this section that is required by the compliance option(s) you used to demonstrate compliance with the emission limit, include an example of how you determined the value, including calculations and supporting data. Supporting data may include a copy of the information provided by the supplier or manufacturer of the example coating or material, or a summary of the results of testing conducted according to §63.3941(a), (b), or (c). You do not need to submit copies of any test reports.

(i) Mass fraction of organic HAP for one coating, for one thinner and/or other additive, and for one cleaning material.

(ii) Volume fraction of coating solids for one coating.

(iii) Density for one coating, one thinner and/or other additive, and one leaning material, except that if you use the compliant material option, only the example coating density is required.

(iv) The amount of waste materials and the mass of organic HAP contained in the waste materials for which you are claiming an allowance in Equation 1 of §63.3951.

(8) The calculation of kg (lb) of organic HAP emitted per liter (gal) coating solids used for the compliance option(s) you used, as specified in paragraphs (c)(8)(i) through (iii) of this section.

(ii) For the emission rate without add-on controls option, provide the calculation of the total mass of organic HAP emissions for each month; the calculation of the total volume of coating solids used each month; and the calculation of the 12-month organic HAP emission rate using Equations 1 and 1A through 1C, 2, and 3, respectively, of §63.3951.

§ 63.3920 What reports must I submit?

(a) *Semiannual compliance reports.* You must submit semiannual compliance reports for each

affected source according to the requirements of paragraphs (a)(1) through (7) of this section. The semiannual compliance reporting requirements may be satisfied by reports required under other parts of the Clean Air Act (CAA), as specified in paragraph (a)(2) of this section.

(1) *Dates.* Unless the Administrator has approved or agreed to a different schedule for submission of reports under §63.10(a), you must prepare and submit each semiannual compliance report according to the dates specified in paragraphs (a)(1)(i) through (iv) of this section. Note that the information reported for each of the months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.

(i) The first semiannual compliance report must cover the first semiannual reporting period which begins the day after the end of the initial compliance period described in §63.3940, §63.3950, or §63.3960 that applies to your affected source and ends on June 30 or December 31, whichever date is the first date following the end of the initial compliance period.

(ii) Each subsequent semiannual compliance report must cover the subsequent semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.

(iii) Each semiannual compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.

(iv) For each affected source that is subject to permitting regulations pursuant to 40 CFR part 70 or 40 CFR part 71, and if the permitting authority has established dates for submitting semiannual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), you may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the date specified in paragraph (a)(1)(iii) of this section.

(2) *Inclusion with title V report.* Each affected source that has obtained a title V operating permit pursuant to 40 CFR part 70 or 40 CFR part 71 must report all deviations as defined in this subpart in the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A). If an affected source submits a semiannual compliance report pursuant to this section along with, or as part of, the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), and the semiannual compliance report includes all required information concerning deviations from any emission limitation in this subpart, its submission will be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a semiannual compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permitting authority.

(3) *General requirements.* The semiannual compliance report must contain the information specified in paragraphs (a)(3)(i) through (vii) of this section, and the information specified in paragraphs (a)(4) through (7) and (c)(1) of this section that is applicable to your affected source.

(i) Company name and address.

(ii) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.

(iii) Date of report and beginning and ending dates of the reporting period. The reporting period is the 6-month period ending on June 30 or December 31. Note that the information reported for each of the 6 months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.

(iv) Identification of the compliance option or options specified in §63.3891 that you used on each coating operation during the reporting period. If you switched between compliance options during the reporting period, you must report the beginning and ending dates for each option you used.

(v) If you used the emission rate without add-on controls or the emission rate with add-on controls compliance option (§63.3891(b) or (c)), the calculation results for each rolling 12-month organic HAP emission rate during the 6-month reporting period.

(4) *No deviations.* If there were no deviations from the emission limitations in §§63.3890, 63.3892, and 63.3893 that apply to you, the semiannual compliance report must include a statement that there were no deviations from the emission limitations during the reporting period. If you used the emission rate with add-on controls option and there were no periods during which the continuous parameter monitoring systems (CPMS) were out-of-control as specified in §63.8(c)(7), the semiannual compliance report must include a statement that there were no periods during which the CPMS were out-of-control during the reporting period.

(6) *Deviations: Emission rate without add-on controls option.* If you used the emission rate without add-on controls option and there was a deviation from the applicable emission limit in §63.3890, the semiannual compliance report must contain the information in paragraphs (a)(6)(i) through (iii) of this section.

(i) The beginning and ending dates of each compliance period during which the 12-month organic HAP emission rate exceeded the applicable emission limit in §63.3890.

(ii) The calculations used to determine the 12-month organic HAP emission rate for the compliance period in which the deviation occurred. You must submit the calculations for Equations 1, 1A through 1C, 2, and 3 of §63.3951; and if applicable, the calculation used to determine mass of organic HAP in waste materials according to §63.3951(e)(4). You do not need to submit background data supporting these calculations (e.g., information provided by materials suppliers or manufacturers, or test reports).

(iii) A statement of the cause of each deviation.

§ 63.3930 What records must I keep?

You must collect and keep records of the data and information specified in this section. Failure to collect and keep these records is a deviation from the applicable standard.

(a) A copy of each notification and report that you submitted to comply with this subpart, and the documentation supporting each notification and report. If you are using the predominant activity alternative under §63.3890(c), you must keep records of the data and calculations used to determine the predominant activity. If you are using the facility-specific emission limit alternative under §63.3890(c), you must keep records of the data used to calculate the facility-specific emission limit for the initial compliance demonstration. You must also keep records of any data used in each annual predominant activity determination and in the calculation of the facility-specific emission limit for each 12-month compliance period included in the semi-annual compliance reports.

(b) A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP and density for each coating, thinner and/or other additive, and cleaning material, and the volume fraction of coating solids for each coating. If you conducted testing to determine mass fraction of organic HAP, density, or volume fraction of coating solids, you must keep a copy of the complete test report. If you use information provided to you by the manufacturer or supplier of the material that was based on testing, you must keep the summary sheet of results provided to you by the manufacturer or supplier. You are not required to obtain the test report or other supporting documentation from the manufacturer or supplier.

(c) For each compliance period, the records specified in paragraphs (c)(1) through (4) of this section.

(1) A record of the coating operations on which you used each compliance option and the time periods (beginning and ending dates and times) for each option you used.

(2) For the compliant material option, a record of the calculation of the organic HAP content for each coating, using Equation 2 of §63.3941.

(3) For the emission rate without add-on controls option, a record of the calculation of the total mass of organic HAP emissions for the coatings, thinners and/or other additives, and cleaning materials used each month using Equations 1, 1A through 1C, and 2 of §63.3951; and, if applicable, the calculation used to determine mass of organic HAP in waste materials according to §63.3951(e)(4); the calculation of the total volume of coating solids used each month using Equation 2 of §63.3951; and the calculation of each 12-month organic HAP emission rate using Equation 3 of §63.3951.

(d) A record of the name and volume of each coating, thinner and/or other additive, and cleaning material used during each compliance period. If you are using the compliant material option for all coatings at the source, you may maintain purchase records for each material used rather than a record of the volume used.

(e) A record of the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during each compliance period unless the material is tracked by weight.

(f) A record of the volume fraction of coating solids for each coating used during each compliance period.

(g) If you use either the emission rate without add-on controls or the emission rate with add-on controls compliance option, the density for each coating, thinner and/or other additive, and cleaning

material used during each compliance period.

(h) If you use an allowance in Equation 1 of §63.3951 for organic HAP contained in waste materials sent to or designated for shipment to a treatment, storage, and disposal facility (TSDF) according to §63.3951(e)(4), you must keep records of the information specified in paragraphs (h)(1) through (3) of this section.

(1) The name and address of each TSDF to which you sent waste materials for which you use an allowance in Equation 1 of §63.3951; a statement of which subparts under 40 CFR parts 262, 264, 265, and 266 apply to the facility; and the date of each shipment.

(2) Identification of the coating operations producing waste materials included in each shipment and the month or months in which you used the allowance for these materials in Equation 1 of §63.3951.

(3) The methodology used in accordance with §63.3951(e)(4) to determine the total amount of waste materials sent to or the amount collected, stored, and designated for transport to a TSDF each month; and the methodology to determine the mass of organic HAP contained in these waste materials. This must include the sources for all data used in the determination, methods used to generate the data, frequency of testing or monitoring, and supporting calculations and documentation, including the waste manifest for each shipment.

(j) You must keep records of the date, time, and duration of each deviation.

§ 63.3931 In what form and for how long must I keep my records?

(a) Your records must be in a form suitable and readily available for expeditious review, according to §63.10(b)(1). Where appropriate, the records may be maintained as electronic spreadsheets or as a database.

(b) As specified in §63.10(b)(1), you must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

(c) You must keep each record on-site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record according to §63.10(b)(1). You may keep the records off-site for the remaining 3 years.

Compliance Requirements for the Emission Rate Without Add-On Controls Option

§ 63.3950 By what date must I conduct the initial compliance demonstration?

You must complete the initial compliance demonstration for the initial compliance period according to the requirements of §63.3951. The initial compliance period begins on the applicable compliance date specified in §63.3883 and ends on the last day of the 12th month following the compliance date. If the compliance date occurs on any day other than the first day of a month, then the initial compliance period extends through the end of that month plus the next 12 months. You must determine the mass of organic HAP emissions and volume of coating solids used each month and then calculate an organic HAP emission rate at the end of the initial compliance period. The initial compliance demonstration includes the calculations according to §63.3951 and supporting documentation showing that during the initial compliance period the organic HAP emission rate was equal to or less than the applicable emission limit in §63.3890.

§ 63.3951 How do I demonstrate initial compliance with the emission limitations?

You may use the emission rate without add-on controls option for any individual coating operation, for any group of coating operations in the affected source, or for all the coating operations in the affected source. You must use either the compliant material option or the emission rate with add-on controls option for any coating operation in the affected source for which you do not use this option. To demonstrate initial compliance using the emission rate without add-on controls option, the coating operation or group of coating operations must meet the applicable emission limit in §63.3890, but is not required to meet the operating limits or work practice standards in §§63.3892 and 63.3893, respectively. You must conduct a separate initial compliance demonstration for each general use, magnet wire, rubber-to-metal, and extreme performance fluoropolymer coating operation unless you are demonstrating compliance with a predominant activity or facility-specific emission limit as provided in §63.3890(c). If you are demonstrating compliance with a predominant activity or facility-specific emission limit as provided in §63.3890(c), you must demonstrate that all coating operations included

in the predominant activity determination or calculation of the facility-specific emission limit comply with that limit. You must meet all the requirements of this section. When calculating the organic HAP emission rate according to this section, do not include any coatings, thinners and/or other additives, or cleaning materials used on coating operations for which you use the compliant material option or the emission rate with add-on controls option. You do not need to redetermine the mass of organic HAP in coatings, thinners and/or other additives, or cleaning materials that have been reclaimed on-site (or reclaimed off-site if you have documentation showing that you received back the exact same materials that were sent off-site) and reused in the coating operation for which you use the emission rate without add-on controls option. If you use coatings, thinners and/or other additives, or cleaning materials that have been reclaimed on-site, the amount of each used in a month may be reduced by the amount of each that is reclaimed. That is, the amount used may be calculated as the amount consumed to account for materials that are reclaimed.

(a) *Determine the mass fraction of organic HAP for each material.* Determine the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during each month according to the requirements in §63.3941(a).

(b) *Determine the volume fraction of coating solids.* Determine the volume fraction of coating solids (liter (gal) of coating solids per liter (gal) of coating) for each coating used during each month according to the requirements in §63.3941(b).

(c) *Determine the density of each material.* Determine the density of each liquid coating, thinner and/or other additive, and cleaning material used during each month from test results using ASTM Method D1475–98, “Standard Test Method for Density of Liquid Coatings, Inks, and Related Products” (incorporated by reference, see §63.14), information from the supplier or manufacturer of the material, or reference sources providing density or specific gravity data for pure materials. If you are including powder coatings in the compliance determination, determine the density of powder coatings, using ASTM Method D5965–02, “Standard Test Methods for Specific Gravity of Coating Powders” (incorporated by reference, see §63.14), or information from the supplier. If there is disagreement between ASTM Method D1475–98 or ASTM Method D5965–02 test results and other such information sources, the test results will take precedence unless, after consultation you demonstrate to the satisfaction of the enforcement agency that the formulation data are correct. If you purchase materials or monitor consumption by weight instead of volume, you do not need to determine material density. Instead, you may use the material weight in place of the combined terms for density and volume in Equations 1A, 1B, 1C, and 2 of this section.

(d) *Determine the volume of each material used.* Determine the volume (liters) of each coating, thinner and/or other additive, and cleaning material used during each month by measurement or usage records. If you purchase materials or monitor consumption by weight instead of volume, you do not need to determine the volume of each material used. Instead, you may use the material weight in place of the combined terms for density and volume in Equations 1A, 1B, and 1C of this section.

(e) *Calculate the mass of organic HAP emissions.* The mass of organic HAP emissions is the combined mass of organic HAP contained in all coatings, thinners and/or other additives, and cleaning materials used during each month minus the organic HAP in certain waste materials. Calculate the mass of organic HAP emissions using Equation 1 of this section.

$$H_e = A + B + C - R_w \quad (\text{Eq. 1})$$

Where:

H_e = Total mass of organic HAP emissions during the month, kg.

A = Total mass of organic HAP in the coatings used during the month, kg, as calculated in Equation 1A of this section.

B = Total mass of organic HAP in the thinners and/or other additives used during the month, kg, as calculated in Equation 1B of this section.

C = Total mass of organic HAP in the cleaning materials used during the month, kg, as calculated in Equation 1C of this section.

R_w = Total mass of organic HAP in waste materials sent or designated for shipment to a hazardous waste TSD for treatment or disposal during the month, kg, determined according to paragraph (e)(4) of this section. (You may assign a value of zero to R_w if you do not wish to use this allowance.)

(1) Calculate the kg organic HAP in the coatings used during the month using Equation 1A of this section:

$$A = \sum_{i=1}^m (Vol_{c,i})(D_{c,i})(W_{c,i}) \quad (Eq. 1A)$$

Where:

A = Total mass of organic HAP in the coatings used during the month, kg.

Vol_{c,i}= Total volume of coating, i, used during the month, liters.

D_{c,i}= Density of coating, i, kg coating per liter coating.

W_{c,i}= Mass fraction of organic HAP in coating, i, kg organic HAP per kg coating. For reactive adhesives as defined in §63.3981, use the mass fraction of organic HAP that is emitted as determined using the method in appendix A to subpart PPPP of this part.

m = Number of different coatings used during the month.

(2) Calculate the kg of organic HAP in the thinners and/or other additives used during the month using Equation 1B of this section:

$$B = \sum_{j=1}^n (Vol_{t,j})(D_{t,j})(W_{t,j}) \quad (Eq. 1B)$$

Where:

B = Total mass of organic HAP in the thinners and/or other additives used during the month, kg.

Vol_{t,j}= Total volume of thinner and/or other additive, j, used during the month, liters.

D_{t,j}= Density of thinner and/or other additive, j, kg per liter.

W_{t,j}= Mass fraction of organic HAP in thinner and/or other additive, j, kg organic HAP per kg thinner and/or other additive. For reactive adhesives as defined in §63.3981, use the mass fraction of organic HAP that is emitted as determined using the method in appendix A to subpart PPPP of this part.

n = Number of different thinners and/or other additives used during the month.

(3) Calculate the kg organic HAP in the cleaning materials used during the month using Equation 1C of this section:

$$C = \sum_{k=1}^p (Vol_{s,k})(D_{s,k})(W_{s,k}) \quad (Eq. 1C)$$

Where:

C = Total mass of organic HAP in the cleaning materials used during the month, kg.

Vol_{s,k}= Total volume of cleaning material, k, used during the month, liters.

D_{s,k}= Density of cleaning material, k, kg per liter.

W_{s,k}= Mass fraction of organic HAP in cleaning material, k, kg organic HAP per kg material.

p = Number of different cleaning materials used during the month.

(4) If you choose to account for the mass of organic HAP contained in waste materials sent or designated for shipment to a hazardous waste TSDF in Equation 1 of this section, then you must determine the mass according to paragraphs (e)(4)(i) through (iv) of this section.

(i) You may only include waste materials in the determination that are generated by coating operations in the affected source for which you use Equation 1 of this section and that will be treated or disposed of by a facility that is regulated as a TSDF under 40 CFR part 262, 264, 265, or 266. The TSDF may be either off-site or on-site. You may not include organic HAP contained in wastewater.

(ii) You must determine either the amount of the waste materials sent to a TSDF during the month or the amount collected and stored during the month and designated for future transport to a TSDF. Do not include in your determination any waste materials sent to a TSDF during a month if you have already included them in the amount collected and stored during that month or a previous month.

(iii) Determine the total mass of organic HAP contained in the waste materials specified in paragraph (e)(4)(ii) of this section.

(iv) You must document the methodology you use to determine the amount of waste materials and the total mass of organic HAP they contain, as required in §63.3930(h). If waste manifests include this information, they may be used as part of the documentation of the amount of waste materials and mass of organic HAP contained in them.

(f) Calculate the total volume of coating solids used. Determine the total volume of coating solids used, liters, which is the combined volume of coating solids for all the coatings used during each month, using Equation 2 of this section:

$$V_{st} = \sum_{i=1}^m (Vol_{c,i}) (V_{s,i}) \quad (Eq. 2)$$

Where:

V_{st} = Total volume of coating solids used during the month, liters.

$Vol_{c,i}$ = Total volume of coating, i, used during the month, liters.

$V_{s,i}$ = Volume fraction of coating solids for coating, i, liter solids per liter coating, determined according to §63.3941(b).

m = Number of coatings used during the month.

(g) *Calculate the organic HAP emission rate.* Calculate the organic HAP emission rate for the compliance period, kg (lb) organic HAP emitted per liter (gal) coating solids used, using Equation 3 of this section:

$$H_{yr} = \frac{\sum_{y=1}^n H_e}{\sum_{y=1}^n V_{st}} \quad (Eq. 3)$$

Where:

H_{yr} = Average organic HAP emission rate for the compliance period, kg organic HAP emitted per liter coating solids used.

H_e = Total mass of organic HAP emissions from all materials used during month, y, kg, as calculated by Equation 1 of this section.

V_{st} = Total volume of coating solids used during month, y, liters, as calculated by Equation 2 of this section.

y = Identifier for months.

n = Number of full or partial months in the compliance period (for the initial compliance period, n equals 12 if the compliance date falls on the first day of a month; otherwise n equals 13; for all following compliance periods, n equals 12).

(h) *Compliance demonstration.* The organic HAP emission rate for the initial compliance period calculated using Equation 3 of this section must be less than or equal to the applicable emission limit for each subcategory in §63.3890 or the predominant activity or facility-specific emission limit allowed in §63.3890(c). You must keep all records as required by §§63.3930 and 63.3931. As part of the notification of compliance status required by §63.3910, you must identify the coating operation(s) for which you used the emission rate without add-on controls option and submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the initial compliance period because the organic HAP emission rate was less than or equal to the applicable emission limit in §63.3890, determined according to the procedures in this section.

§ 63.3952 How do I demonstrate continuous compliance with the emission limitations?

(a) To demonstrate continuous compliance, the organic HAP emission rate for each compliance period, determined according to §63.3951(a) through (g), must be less than or equal to the applicable emission limit in §63.3890. A compliance period consists of 12 months. Each month after the end of the initial compliance period described in §63.3950 is the end of a compliance period consisting of that month and the preceding 11 months. You must perform the calculations in §63.3951(a) through (g) on a monthly basis using data from the previous 12 months of operation. If you are complying with a facility-specific emission limit under §63.3890(c), you must also perform the calculation using Equation 1 in §63.3890(c)(2) on a monthly basis using the data from the previous 12 months of operation.

(b) If the organic HAP emission rate for any 12-month compliance period exceeded the applicable emission limit in §63.3890, this is a deviation from the emission limitation for that compliance period and must be reported as specified in §§63.3910(c)(6) and 63.3920(a)(6).

(c) As part of each semiannual compliance report required by §63.3920, you must identify the coating operation(s) for which you used the emission rate without add-on controls option. If there were no deviations from the emission limitations, you must submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the reporting period because the

organic HAP emission rate for each compliance period was less than or equal to the applicable emission limit in §63.3890, determined according to §63.3951(a) through (g).
(d) You must maintain records as specified in §§63.3930 and 63.3931.

Other Requirements and Information

§ 63.3980 Who implements and enforces this subpart?

(a) This subpart can be implemented and enforced by us, the U.S. Environmental Protection Agency (EPA), or a delegated authority such as your State, local, or tribal agency. If the Administrator has delegated authority to your State, local, or tribal agency, then that agency (as well as the EPA) has the authority to implement and enforce this subpart. You should contact your EPA Regional Office to find out if implementation and enforcement of this subpart is delegated to your State, local, or tribal agency.

(b) In delegating implementation and enforcement authority of this subpart to a State, local, or tribal agency under subpart E of this part, the authorities contained in paragraph (c) of this section are retained by the Administrator and are not transferred to the State, local, or tribal agency.

(c) The authorities that will not be delegated to State, local, or tribal agencies are listed in paragraphs (c)(1) through (4) of this section:

(1) Approval of alternatives to the requirements in §63.3881 through 3883 and §63.3890 through 3893.

(2) Approval of major alternatives to test methods under §63.7(e)(2)(ii) and (f) and as defined in §63.90.

(3) Approval of major alternatives to monitoring under §63.8(f) and as defined in §63.90.

(4) Approval of major alternatives to recordkeeping and reporting under §63.10(f) and as defined in §63.90.

§ 63.3981 What definitions apply to this subpart?

Terms used in this subpart are defined in the CAA, in 40 CFR 63.2, and in this section as follows:

Additive means a material that is added to a coating after purchase from a supplier (e.g., catalysts, activators, accelerators).

Add-on control means an air pollution control device, such as a thermal oxidizer or carbon adsorber, that reduces pollution in an air stream by destruction or removal before discharge to the atmosphere.

Adhesive, adhesive coating means any chemical substance that is applied for the purpose of bonding two surfaces together. Products used on humans and animals, adhesive tape, contact paper, or any other product with an adhesive incorporated onto or in an inert substrate shall not be considered adhesives under this subpart.

Assembled on-road vehicle coating means any coating operation in which coating is applied to the surface of some component or surface of a fully assembled motor vehicle or trailer intended for on-road use including, but not limited to, components or surfaces on automobiles and light-duty trucks that have been repaired after a collision or otherwise repainted, fleet delivery trucks, and motor homes and other recreational vehicles (including camping trailers and fifth wheels). Assembled on-road vehicle coating includes the concurrent coating of parts of the assembled on-road vehicle that are painted off-vehicle to protect systems, equipment, or to allow full coverage. Assembled on-road vehicle coating does not include surface coating operations that meet the applicability criteria of the automobiles and light-duty trucks NESHAP. Assembled on-road vehicle coating also does not include the use of adhesives, sealants, and caulks used in assembling on-road vehicles.

Capture device means a hood, enclosure, room, floor sweep, or other means of containing or collecting emissions and directing those emissions into an add-on air pollution control device.

Capture efficiency or capture system efficiency means the portion (expressed as a percentage) of the pollutants from an emission source that is delivered to an add-on control device.

Capture system means one or more capture devices intended to collect emissions generated by a coating operation in the use of coatings or cleaning materials, both at the point of application and at subsequent points where emissions from the coatings and cleaning materials occur, such as flashoff, drying, or curing. As used in this subpart, multiple capture devices that collect emissions generated by a coating operation are considered a single capture system.

Cleaning material means a solvent used to remove contaminants and other materials, such as dirt, grease, oil, and dried or wet coating (e.g., depainting or paint stripping), from a substrate before or after coating application or from equipment associated with a coating operation, such as spray booths, spray guns, racks, tanks, and hangers. Thus, it includes any cleaning material used on substrates or

equipment or both.

Coating means a material applied to a substrate for decorative, protective, or functional purposes. Such materials include, but are not limited to, paints, sealants, liquid plastic coatings, caulks, inks, adhesives, and maskants. Decorative, protective, or functional materials that consist only of protective oils for metal, acids, bases, or any combination of these substances, or paper film or plastic film which may be pre-coated with an adhesive by the film manufacturer, are not considered coatings for the purposes of this subpart. A liquid plastic coating means a coating made from fine particle-size polyvinyl chloride (PVC) in solution (also referred to as a plastisol).

Coating operation means equipment used to apply cleaning materials to a substrate to prepare it for coating application (surface preparation) or to remove dried coating; to apply coating to a substrate (coating application) and to dry or cure the coating after application; or to clean coating operation equipment (equipment cleaning). A single coating operation may include any combination of these types of equipment, but always includes at least the point at which a given quantity of coating or cleaning material is applied to a given part and all subsequent points in the affected source where organic HAP are emitted from the specific quantity of coating or cleaning material on the specific part. There may be multiple coating operations in an affected source. Coating application with handheld, non-refillable aerosol containers, touch-up markers, or marking pens is not a coating operation for the purposes of this subpart.

Coatings solids means the nonvolatile portion of the coating that makes up the dry film.

Continuous parameter monitoring system (CPMS) means the total equipment that may be required to meet the data acquisition and availability requirements of this subpart, used to sample, condition (if applicable), analyze, and provide a record of coating operation, or capture system, or add-on control device parameters.

Controlled coating operation means a coating operation from which some or all of the organic HAP emissions are routed through an emission capture system and add-on control device.

Deviation means any instance in which an affected source subject to this subpart, or an owner or operator of such a source:

- (1) Fails to meet any requirement or obligation established by this subpart including but not limited to, any emission limit or operating limit or work practice standard;
- (2) Fails to meet any term or condition that is adopted to implement an applicable requirement in this subpart and that is included in the operating permit for any affected source required to obtain such a permit; or
- (3) Fails to meet any emission limit, or operating limit, or work practice standard in this subpart during startup, shutdown, or malfunction, regardless of whether or not such failure is permitted by this subpart.

Emission limitation means the aggregate of all requirements associated with a compliance option including emission limit, operating limit, work practice standard, etc.

Enclosure means a structure that surrounds a source of emissions and captures and directs the emissions to an add-on control device.

Exempt compound means a specific compound that is not considered a VOC due to negligible photochemical reactivity. The exempt compounds are listed in 40 CFR 51.100(s).

Extreme performance fluoropolymer coating means coatings that are formulated systems based on fluoropolymer resins which often contain bonding matrix polymers dissolved in non-aqueous solvents as well as other ingredients. Extreme performance fluoropolymer coatings are typically used when one or more critical performance criteria are required including, but not limited to a nonstick low-energy surface, dry film lubrication, high resistance to chemical attack, extremely wide operating temperature, high electrical insulating properties, or that the surface comply with government (e.g., USDA, FDA) or third party specifications for health, safety, reliability, or performance. Once applied to a substrate, extreme performance fluoropolymer coatings undergo a curing process that typically requires high temperatures, a chemical reaction, or other specialized technology.

Facility maintenance means the routine repair or renovation (including the surface coating) of the tools, equipment, machinery, and structures that comprise the infrastructure of the affected facility and that are necessary for the facility to function in its intended capacity.

General use coating means any material that meets the definition of coating but does not meet the definition of high performance coating, rubber-to-metal coating, magnet wire coating, or extreme

performance fluoropolymer coating as defined in this section.

High performance architectural coating means any coating applied to architectural subsections which is required to meet the specifications of Architectural Aluminum Manufacturer's Association's publication number AAMA 605.2-2000.

High performance coating means any coating that meets the definition of high performance architectural coating or high temperature coating in this section.

High temperature coating means any coating applied to a substrate which during normal use must withstand temperatures of at least 538 degrees Celsius (1000 degrees Fahrenheit).

Hobby shop means any surface coating operation, located at an affected source, that is used exclusively for personal, noncommercial purposes by the affected source's employees or assigned personnel.

Magnet wire coatings, commonly referred to as magnet wire enamels, are applied to a continuous strand of wire which will be used to make turns (windings) in electrical devices such as coils, transformers, or motors. Magnet wire coatings provide high dielectric strength and turn-to-turn conductor insulation. This allows the turns of an electrical device to be placed in close proximity to one another which leads to increased coil effectiveness and electrical efficiency.

Magnet wire coating machine means equipment which applies and cures magnet wire coatings.

Manufacturer's formulation data means data on a material (such as a coating) that are supplied by the material manufacturer based on knowledge of the ingredients used to manufacture that material, rather than based on testing of the material with the test methods specified in §63.3941. Manufacturer's formulation data may include, but are not limited to, information on density, organic HAP content, volatile organic matter content, and coating solids content.

Mass fraction of organic HAP means the ratio of the mass of organic HAP to the mass of a material in which it is contained, expressed as kg of organic HAP per kg of material.

Month means a calendar month or a pre-specified period of 28 days to 35 days to allow for flexibility in recordkeeping when data are based on a business accounting period.

Non-HAP coating means, for the purposes of this subpart, a coating that contains no more than 0.1 percent by mass of any individual organic HAP that is an OSHA-defined carcinogen as specified in 29 CFR 1910.1200(d)(4) and no more than 1.0 percent by mass for any other individual HAP.

Organic HAP content means the mass of organic HAP emitted per volume of coating solids used for a coating calculated using Equation 2 of §63.3941. The organic HAP content is determined for the coating in the condition it is in when received from its manufacturer or supplier and does not account for any alteration after receipt. For reactive adhesives in which some of the HAP react to form solids and are not emitted to the atmosphere, organic HAP content is the mass of organic HAP that is emitted, rather than the organic HAP content of the coating as it is received.

Permanent total enclosure (PTE) means a permanently installed enclosure that meets the criteria of Method 204 of appendix M, 40 CFR part 51, for a PTE and that directs all the exhaust gases from the enclosure to an add-on control device.

Personal watercraft means a vessel (boat) which uses an inboard motor powering a water jet pump as its primary source of motive power and which is designed to be operated by a person or persons sitting, standing, or kneeling on the vessel, rather than in the conventional manner of sitting or standing inside the vessel.

Protective oil means an organic material that is applied to metal for the purpose of providing lubrication or protection from corrosion without forming a solid film. This definition of protective oil includes, but is not limited to, lubricating oils, evaporative oils (including those that evaporate completely), and extrusion oils. Protective oils used on miscellaneous metal parts and products include magnet wire lubricants and soft temporary protective coatings that are removed prior to installation or further assembly of a part or component.

Reactive adhesive means adhesive systems composed, in part, of volatile monomers that react during the adhesive curing reaction, and, as a result, do not evolve from the film during use. These volatile components instead become integral parts of the adhesive through chemical reaction. At least 70 percent of the liquid components of the system, excluding water, react during the process.

Research or laboratory facility means a facility whose primary purpose is for research and development of new processes and products, that is conducted under the close supervision of technically trained personnel, and is not engaged in the manufacture of final or intermediate products

for commercial purposes, except in a *de minimis* manner.

Responsible official means responsible official as defined in 40 CFR 70.2.

Rubber-to-metal coatings are coatings that contain heat-activated polymer systems in either solvent or water that, when applied to metal substrates, dry to a non-tacky surface and react chemically with the rubber and metal during a vulcanization process.

Startup, initial means the first time equipment is brought online in a facility.

Surface preparation means use of a cleaning material on a portion of or all of a substrate. This includes use of a cleaning material to remove dried coating, which is sometimes called depainting.

Temporary total enclosure means an enclosure constructed for the purpose of measuring the capture efficiency of pollutants emitted from a given source as defined in Method 204 of appendix M, 40 CFR part 51.

Thinner means an organic solvent that is added to a coating after the coating is received from the supplier.

Total volatile hydrocarbon (TVH) means the total amount of nonaqueous volatile organic matter determined according to Methods 204 and 204A through 204F of appendix M to 40 CFR part 51 and substituting the term TVH each place in the methods where the term VOC is used. The TVH includes both VOC and non-VOC.

Uncontrolled coating operation means a coating operation from which none of the organic HAP emissions are routed through an emission capture system and add-on control device.

Volatile organic compound (VOC) means any compound defined as VOC in 40 CFR 51.100(s).

Volume fraction of coating solids means the ratio of the volume of coating solids (also known as the volume of nonvolatiles) to the volume of a coating in which it is contained; liters (gal) of coating solids per liter (gal) of coating.

Wastewater means water that is generated in a coating operation and is collected, stored, or treated prior to being discarded or discharged.

Table 2 to Subpart M of Part 63—Applicability of General Provisions to Subpart M of Part 63

You must comply with the applicable General Provisions requirements according to the following table:

Citation	Subject	Applicable to subpart M	Explanation
§63.1(a)(1)–(14)	General Applicability	Yes	
§63.1(b)(1)–(3)	Initial Applicability Determination	Yes	Applicability to subpart M is also specified in §63.3881.
§63.1(c)(1)	Applicability After Standard Established	Yes	
§63.1(c)(2)–(3)	Applicability of Permit Program for Area Sources	No	Area sources are not subject to subpart M.
§63.1(c)(4)–(5)	Extensions and Notifications	Yes	
§63.1(e)	Applicability of Permit Program Before Relevant Standard is Set	Yes	
§63.2	Definitions	Yes	Additional definitions are specified in §63.3981.
§63.1(a)–(c)	Units and Abbreviations	Yes	
§63.4(a)(1)–(5)	Prohibited Activities	Yes	

Citation	Subject	Applicable to subpart MMMM	Explanation
§63.4(b)–(c)	Circumvention/Severability	Yes	
§63.5(a)	Construction/Reconstruction	Yes	
§63.5(b)(1)–(6)	Requirements for Existing Newly Constructed, and Reconstructed Sources	Yes	
§63.5(d)	Application for Approval of Construction/Reconstruction	Yes	
§63.5(e)	Approval of Construction/Reconstruction	Yes	
§63.5(f)	Approval of Construction/Reconstruction Based on Prior State Review	Yes	
§63.6(a)	Compliance With Standards and Maintenance Requirements—Applicability	Yes	
§63.6(b)(1)–(7)	Compliance Dates for New and Reconstructed Sources	Yes	Section 63.3883 specifies the compliance dates.
§63.6(c)(1)–(5)	Compliance Dates for Existing Sources	Yes	Section 63.3883 specifies the compliance dates.
§63.6(e)(1)–(2)	Operation and Maintenance	Yes	
§63.6(e)(3)	Startup, Shutdown, and Malfunction Plan	Yes	Only sources using an add-on control device to comply with the standard must complete startup, shutdown, and malfunction plans.
§63.6(f)(1)	Compliance Except During Startup, Shutdown, and Malfunction	Yes	Applies only to sources using an add-on control device to comply with the standard.
§63.6(f)(2)–(3)	Methods for Determining Compliance.	Yes	
§63.6(g)(1)–(3)	Use of an Alternative Standard	Yes	
§63.6(h)	Compliance With Opacity/Visible Emission Standards	No	Subpart MMMM does not establish opacity standards and does not require continuous opacity monitoring systems (COMS).
§63.6(i)(1)–(16)	Extension of Compliance	Yes	
§63.6(j)	Presidential Compliance Exemption	Yes	
§63.7(a)(1)	Performance Test Requirements—Applicability	Yes	Applies to all affected sources. Additional requirements for performance testing are specified in §§63.3964, 63.3965, and 63.3966.

Citation	Subject	Applicable to subpart MMMM	Explanation
§63.7(a)(2)	Performance Test Requirements—Dates	Yes	Applies only to performance tests for capture system and control device efficiency at sources using these to comply with the standard. Section 63.3960 specifies the schedule for performance test requirements that are earlier than those specified in §63.7(a)(2).
§63.7(a)(3)	Performance Tests Required By the Administrator	Yes	
§63.7(b)–(e)	Performance Test Requirements—Notification, Quality Assurance, Facilities Necessary for Safe Testing, Conditions During Test	Yes	Applies only to performance tests for capture system and add-on control device efficiency at sources using these to comply with the standard.
§63.7(f)	Performance Test Requirements—Use of Alternative Test Method	Yes	Applies to all test methods except those used to determine capture system efficiency.
§63.7(g)–(h)	Performance Test Requirements—Data Analysis, Recordkeeping, Reporting, Waiver of Test	Yes	Applies only to performance tests for capture system and add-on control device efficiency at sources using these to comply with the standard.
§63.8(a)(1)–(3)	Monitoring Requirements—Applicability	Yes	Applies only to monitoring of capture system and add-on control device efficiency at sources using these to comply with the standard. Additional requirements for monitoring are specified in §63.3968.
§63.8(a)(4)	Additional Monitoring Requirements	No	Subpart MMMM does not have monitoring requirements for flares.
§63.8(b)	Conduct of Monitoring	Yes	
§63.8(c)(1)–(3)	Continuous Monitoring Systems (CMS) Operation and Maintenance	Yes	Applies only to monitoring of capture system and add-on control device efficiency at sources using these to comply with the standard. Additional requirements for CMS operations and maintenance are specified in §63.3968.
§63.8(c)(4)	CMS	No	§63.3968 specifies the requirements for the operation of CMS for capture systems and add-on control devices at sources using these to comply.
§63.8(c)(5)	COMS	No	Subpart MMMM does not have opacity or visible emission standards.
§63.8(c)(6)	CMS Requirements	No	Section 63.3968 specifies the requirements for monitoring systems for capture systems and add-on control devices at sources using these to comply.
§63.8(c)(7)	CMS Out-of-Control Periods	Yes	

Citation	Subject	Applicable to subpart MMMM	Explanation
§63.8(c)(8)	CMS Out-of-Control Periods and Reporting	No	§63.3920 requires reporting of CMS out-of-control periods.
§63.8(d)–(e)	Quality Control Program and CMS Performance Evaluation	No	Subpart MMMM does not require the use of continuous emissions monitoring systems.
§63.8(f)(1)–(5)	Use of an Alternative Monitoring Method	Yes	
§63.8(f)(6)	Alternative to Relative Accuracy Test	No	Subpart MMMM does not require the use of continuous emissions monitoring systems.
§63.8(g)(1)–(5)	Data Reduction	No	Sections 63.3967 and 63.3968 specify monitoring data reduction.
§63.9(a)–(d)	Notification Requirements	Yes	
§63.9(e)	Notification of Performance Test	Yes	Applies only to capture system and add-on control device performance tests at sources using these to comply with the standard.
§63.9(f)	Notification of Visible Emissions/Opacity Test	No	Subpart MMMM does not have opacity or visible emissions standards.
§63.9(g)(1)–(3)	Additional Notifications When Using CMS	No	Subpart MMMM does not require the use of continuous emissions monitoring systems.
§63.9(h)	Notification of Compliance Status	Yes	Section 63.3910 specifies the dates for submitting the notification of compliance status.
§63.9(i)	Adjustment of Submittal Deadlines	Yes	
§63.9(j)	Change in Previous Information	Yes	
§63.10(a)	Recordkeeping/Reporting—Applicability and General Information	Yes	
§63.10(b)(1)	General Recordkeeping Requirements	Yes	Additional requirements are specified in §§63.3930 and 63.3931.
§63.10(b)(2)(i)–(v)	Recordkeeping Relevant to Startup, Shutdown, and Malfunction Periods and CMS	Yes	Requirements for startup, shutdown, and malfunction records only apply to add-on control devices used to comply with the standard.
§63.10(b)(2)(vi)–(xi)		Yes	
§63.10(b)(2)(xii)	Records	Yes	
§63.10(b)(2)(xiii)		No	Subpart MMMM does not require the use of continuous emissions monitoring systems.
§63.10(b)(2)(xiv)		Yes	

Citation	Subject	Applicable to subpart MMMM	Explanation
§63.10(b)(3)	Recordkeeping Requirements for Applicability Determinations	Yes	
§63.10(c) (1)–(6)	Additional Recordkeeping Requirements for Sources with CMS	Yes	
§63.10(c) (7)–(8)		No	The same records are required in §63.3920(a)(7).
§63.10(c) (9)–(15)		Yes	
§63.10(d)(1)	General Reporting Requirements	Yes	Additional requirements are specified in §63.3920.
§63.10(d)(2)	Report of Performance Test Results	Yes	Additional requirements are specified in §63.3920(b).
§63.10(d)(3)	Reporting Opacity or Visible Emissions Observations	No	Subpart MMMM does not require opacity or visible emissions observations.
§63.10(d)(4)	Progress Reports for Sources With Compliance Extensions	Yes	
§63.10(d)(5)	Startup, Shutdown, and Malfunction Reports	Yes	Applies only to add-on control devices at sources using these to comply with the standard.
§63.10(e) (1)–(2)	Additional CMS Reports	No	Subpart MMMM does not require the use of continuous emissions monitoring systems.
§63.10(e) (3)	Excess Emissions/CMS Performance Reports	No	Section 63.3920 (b) specifies the contents of periodic compliance reports.
§63.10(e) (4)	COMS Data Reports	No	Subpart MMMMM does not specify requirements for opacity or COMS.
§63.10(f)	Recordkeeping/Reporting Waiver	Yes	
§63.11	Control Device Requirements/Flares	No	Subpart MMMM does not specify use of flares for compliance.
§63.12	State Authority and Delegations	Yes	
§63.13	Addresses	Yes	
§63.14	Incorporation by Reference	Yes	
§63.15	Availability of Information/Confidentiality	Yes	

Table 3 to Subpart MMMM of Part 63—Default Organic HAP Mass Fraction for Solvents and Solvent Blends

You may use the mass fraction values in the following table for solvent blends for which you do not have test data or manufacturer's formulation data and which match either the solvent blend name or the chemical abstract series (CAS) number. If a solvent blend matches both the name and CAS number for an entry, that entry's organic HAP mass fraction must be used for that solvent blend. Otherwise, use the organic HAP mass fraction for the entry matching either the solvent blend name or CAS number, or use the organic HAP mass fraction from table 4 to this subpart if neither the name or CAS number match.

Solvent/solvent blend	CAS. No.	Average organic HAP mass fraction	Typical organic HAP, percent by mass
1. Toluene	108-88-3	1.0	Toluene.
2. Xylene(s)	1330-20-7	1.0	Xylenes, ethylbenzene.
3. Hexane	110-54-3	0.5	n-hexane.
4. n-Hexane	110-54-3	1.0	n-hexane.
5. Ethylbenzene	100-41-4	1.0	Ethylbenzene.
6. Aliphatic 140		0	None.
7. Aromatic 100		0.02	1% xylene, 1% cumene.
8. Aromatic 150		0.09	Naphthalene.
9. Aromatic naphtha	64742-95-6	0.02	1% xylene, 1% cumene.
10. Aromatic solvent	64742-94-5	0.1	Naphthalene.
11. Exempt mineral spirits	8032-32-4	0	None.
12. Ligroines (VM & P)	8032-32-4	0	None.
13. Lactol spirits	64742-89-6	0.15	Toluene.
14. Low aromatic white spirit	64742-82-1	0	None.
15. Mineral spirits	64742-88-7	0.01	Xylenes.
16. Hydrotreated naphtha	64742-48-9	0	None.
17. Hydrotreated light distillate	64742-47-8	0.001	Toluene.
18. Stoddard solvent	8052-41-3	0.01	Xylenes.
19. Super high-flash naphtha	64742-95-6	0.05	Xylenes.
20. Varsol [®] solvent	8052-49-3	0.01	0.5% xylenes, 0.5% ethylbenzene.
21. VM & P naphtha	64742-89-8	0.06	3% toluene, 3% xylene.
22. Petroleum distillate mixture	68477-31-6	0.08	4% naphthalene, 4% biphenyl.

Table 4 to Subpart MMMM of Part 63—Default Organic HAP Mass Fraction for Petroleum Solvent Groups^a

You may use the mass fraction values in the following table for solvent blends for which you do not have test data or manufacturer's formulation data.

Solvent type	Average organic HAP mass fraction	Typical organic HAP, percent by mass
Aliphatic ^b	0.03	1% Xylene, 1% Toluene, and 1% Ethylbenzene.
Aromatic ^c	0.06	4% Xylene, 1% Toluene, and 1% Ethylbenzene.

^aUse this table only if the solvent blend does not match any of the solvent blends in Table 3 to this subpart by either solvent blend name or CAS number and you only know whether the blend is aliphatic or aromatic.

^bMineral Spirits 135, Mineral Spirits 150 EC, Naphtha, Mixed Hydrocarbon, Aliphatic Hydrocarbon, Aliphatic Naphtha, Naphthol Spirits, Petroleum Spirits, Petroleum Oil, Petroleum Naphtha, Solvent Naphtha, Solvent Blend.

^cMedium-flash Naphtha, High-flash Naphtha, Aromatic Naphtha, Light Aromatic Naphtha, Light Aromatic Hydrocarbons, Aromatic Hydrocarbons, Light Aromatic Solvent.

D.1.12 One Time Deadlines Relating to NESHAP MMMM

The Permittee shall comply with the following requirements by the dates listed:

Requirement	Rule Cite	Deadline
Initial Notification	40 CFR 63.3910	January 2, 2005
Notification of Compliance Status	40 CFR 63.3910	March 1, 2008

SECTION D.2

FACILITY OPERATION CONDITIONS

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

- (c) One (1) anodizing line, identified as ANOD-1, installed in 1984, exhausted to stacks S-15 and S-16, consisting of the following twenty-seven (27) tanks containing various liquids, maximum capacity: 30,000 pounds of aluminum parts per hour:
- (1) One (1) acid etch tank containing ammonium fluoride, hydrofluoric acid and water, identified as tank 9, equipped with a voluntary scrubber.
 - (2) Two (2) anodizing tanks containing sulfuric acid and water, identified as tanks 13 and 15, equipped with a voluntary scrubber.
 - (3) One (1) color tank containing sulfuric acid and stannous sulfate solution and water, identified as tank 19.
 - (4) One (1) acid cleaner tank containing sulfuric acid and water, identified as tank 11.
 - (5) Three (3) seal tanks each containing nickel and hydrogen fluoride and water, identified as tanks 22, 25 and 26.
 - (6) One (1) alkaline cleaner tank, identified as tank 1.
 - (7) One (1) etch tank containing NaOH and water, equipped with a voluntary scrubber, identified as tank 3.
 - (8) One (1) desmut tank containing sulfuric acid and water, identified as tank 6.
 - (9) Sixteen (16) rinse tanks, using only water and obtaining materials from upstream processing tanks as part of the rinsing operation, identified as tanks 2, 4, 5, 7, 8, 10, 12, 14, 16, 17, 18, 20, 21, 23, 24, and 27.

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

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

D.2.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emission rate from the one (1) anodizing line, identified as ANOD-1, shall not exceed 25.2 pounds per hour when operating at a process weight rate of 15 tons per hour.

The pounds per hour limitation was calculated with the following equation:

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:

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

SECTION D.3

FACILITY OPERATION CONDITIONS

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

- (d) One (1) anodizing boiler, identified as ANOD-2, fueled by natural gas and propane as a backup fuel, installed in 1984, exhausted to stack S-12, heat input capacity: 8.4 million British thermal units 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.3.1 Particulate [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating: Emission limitations for facilities specified in 326 IAC 6-2-1(d)), the PM emissions from the one (1) anodizing boiler, identified as ANOD-2, shall not exceed 0.6 pound per million British thermal units heat input (lb/MMBtu). This limitation was calculated using the following equation:

$$Pt = 1.09/Q^{0.26}$$

where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu) heat input

Q = Total source maximum operating capacity rating in million British thermal units per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

SECTION D.4

FACILITY OPERATION CONDITIONS

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

- (i) Degreasing operations that do not exceed 145 gallons per twelve (12) months, except if subject to 326 IAC 20-6. One (1) self-contained parts washer, installed after January 1, 1980, equipped with a remote solvent reservoir. [326 IAC 8-3-2]

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

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

D.4.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) 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.

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

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Bon L Manufacturing Company
Source Address: 508 W. Wilson Street, Kentland, Indiana 47951
Mailing Address: P.O. Box 106, Kentland, Indiana 47951
Part 70 Permit No.: T 111-18828-00005

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: Bon L Manufacturing Company
Source Address: 508 W. Wilson Street, Kentland, Indiana 47951
Mailing Address: P.O. Box 106, Kentland, Indiana 47951
Part 70 Permit No.: T 111-18828-00005

This form consists of 2 pages

Page 1 of 2

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

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

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

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

Page 2 of 2

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

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

A certification is not required for this report.

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

Part 70 Quarterly Report

Source Name: Bon L Manufacturing Company
Source Address: 508 W. Wilson Street, Kentland, Indiana 47951
Mailing Address: P.O. Box 106, Kentland, Indiana 47951
Part 70 Permit No.: T 111-18828-00005
Facilities: Two (2) electrostatic paint spray booths, identified as booths 1 and 2
Parameter: VOC Usage
Limit: Less than 246 per twelve (12) consecutive month period, total, 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 month.
- Deviation/s occurred in this month.
Deviation has been reported on: _____

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

Attach a signed certification to complete this report.

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

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

Source Name: Bon L Manufacturing Company
 Source Address: 508 W. Wilson Street, Kentland, Indiana 47951
 Mailing Address: P.O. Box 106, Kentland, Indiana 47951
 Part 70 Permit No.: T 111-18828-00005

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

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

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

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

ATTACHMENT A OF T 111-18828-00005

DETERMINATION OF INAPPLICABILITY

Source Name: Bon L Manufacturing Company
Source Location: 508 W. Wilson Street, Kentland, Indiana 47951
County: Newton
SIC Code: 3354, 3471
Permit Renewal No.: T 111-18828-00005
Permit Reviewer: CarrieAnn Paukowits

The following regulatory requirements have been determined inapplicable to the Bon L Manufacturing Company plant in Kentland, Indiana (the source), based on the information submitted by Bon L Manufacturing Company in the permit application, as of the date of issuance of this Title V Operating Permit Renewal, T 111-18828-00005 (the permit), for the following emission units:

SIGNIFICANT EMISSION UNITS

- (a) One (1) electrostatic paint spray booth, identified as paint 1, booth 1, installed in 1984, equipped with electrostatic disc spray guns and dry filters for overspray control, exhausted to stack S-13, capacity: 15,120 pieces of aluminum per hour. Under NESHAP Subpart MMMM, this is part of an existing affected source in the general use subcategory.
- (b) One (1) electrostatic paint spray booth, identified as paint 1, booth 2, installed in 1984, equipped with electrostatic disc spray guns and dry filters for overspray control, exhausted to stack S-14, capacity: 15,120 pieces of aluminum per hour. Under NESHAP Subpart MMMM, this is part of an existing affected source in the general use subcategory.
- (c) One (1) anodizing line, identified as ANOD-1, installed in 1984, exhausted to stacks S-15 and S-16, consisting of the following twenty-seven (27) tanks containing various liquids, maximum capacity: 30,000 pounds of aluminum parts per hour:
 - (1) One (1) acid etch tank containing ammonium fluoride, hydrofluoric acid and water, identified as tank 9, equipped with a voluntary scrubber.
 - (2) Two (2) anodizing tanks containing sulfuric acid and water, identified as tanks 13 and 15, equipped with a voluntary scrubber.
 - (3) One (1) color tank containing sulfuric acid and stannous sulfate solution and water, identified as tank 19.
 - (4) One (1) acid cleaner tank containing sulfuric acid and water, identified as tank 11.
 - (5) Three (3) seal tanks each containing nickel and hydrogen fluoride and water, identified as tanks 22, 25 and 26.
 - (6) One (1) alkaline cleaner tank, identified as tank 1.

- (7) One (1) etch tank containing NaOH and water, equipped with a voluntary scrubber, identified as tank 3.
- (8) One (1) desmut tank containing sulfuric acid and water, identified as tank 6.
- (9) Sixteen (16) rinse tanks, using only water and obtaining materials from upstream processing tanks as part of the rinsing operation, identified as tanks 2, 4, 5, 7, 8, 10, 12, 14, 16, 17, 18, 20, 21, 23, 24, and 27.
- (d) One (1) anodizing boiler, identified as ANOD-2, fueled by natural gas and propane as a backup fuel, installed in 1984, exhausted to stack S-12, heat input capacity: 8.4 million British thermal units per hour.
- (e) One (1) paint bake oven, identified as paint 3, paint bake oven P, fueled by natural gas and propane as a backup fuel, installed in 1984, exhausted to stack S-11, heat input capacity: 9.0 million British thermal units per hour.

INSIGNIFICANT ACTIVITIES

- (a) The following natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, and propane for liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) British thermal units per hour.
 - (1) One (1) billet heater, identified as EXTR-1, heater F, fueled by natural gas and propane as a backup fuel, installed in 1985, exhausted to stack S-1, heat input capacity: 5.3 million British thermal units per hour.
 - (2) One (1) billet heater, identified as EXTR-1, heater G, fueled by natural gas and propane as a backup fuel, installed in 1985, exhausted to stack S-2, heat input capacity: 5.5 million British thermal units per hour.
 - (3) One (1) billet heater, identified as EXTR-1, heater H, fueled by natural gas and propane as a backup fuel, installed in 2001, exhausted to stack S-3, heat input capacity: 5.9 million British thermal units per hour.
 - (4) One (1) aging oven, identified as EXTR-2, aging oven I, fueled by natural gas and propane as a backup fuel, installed in 1972, exhausted to stack S-4, heat input capacity: 1.8 million British thermal units per hour.
 - (5) One (1) aging oven, identified as EXTR-2, aging oven J, fueled by natural gas and propane as a backup fuel, installed in 1998, exhausted to stack S-5, heat input capacity: 4.0 million British thermal units per hour.
 - (6) One (1) aging oven, identified as EXTR-2, aging oven K, installed in 2005, equipped with low-NO_x burners and fueled by natural gas with propane as a backup fuel, with all emissions exhausted through stack S-17, capacity: 10 million British thermal units per hour.

- (7) One (1) pretreatment tank heater, identified as PREPAINT 1, heater K, fueled by natural gas and propane as a backup fuel installed in 1972, exhausted to stack S-6, heat input capacity: 6.0 million British thermal units per hour.
 - (8) One (1) pretreatment tank heater, identified as PREPAINT 1, heater L, fueled by natural gas and propane as a backup fuel, installed in 1984, exhausted to stack S-7, heat input capacity: 4.5 million British thermal units per hour.
 - (9) One (1) dry off oven, identified as PREPAINT 2, oven O, fueled by natural gas and propane as a backup fuel, installed in 1984, exhausted to stack S-10, heat input capacity: 2.6 million British thermal units per hour.
 - (10) One (1) building heater, identified as HEAT-1, heater A, fueled by natural gas and propane as a backup fuel, installed in 1984, heat input capacity: 4.5 million British thermal units per hour.
 - (11) One (1) building heater, identified as HEAT-1, heater B, fueled by natural gas and propane as a backup fuel, installed in 1980, heat input capacity: 5.3 million British thermal units per hour.
 - (12) One (1) building heater, identified as HEAT-1, heater C, fueled by natural gas and propane as a backup fuel, installed in 1984, heat input capacity: 5.5 million British thermal units per hour.
 - (13) One (1) building heater, identified as HEAT-1, heater D, fueled by natural gas and propane as a backup fuel, installed in 1984, heat input capacity: 5.5 million British thermal units per hour.
 - (14) One (1) building heater, identified as HEAT-1, heater E, fueled by natural gas and propane as a backup fuel, installed in 1972, heat input capacity: 4.9 million British thermal units per hour.
- (b) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 British thermal units per hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 British thermal units per hour.
 - (c) Combustion source flame safety purging on startup.
 - (d) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons. This facility was constructed in 1997, and consists of a 300-gallon tank, with a maximum monthly throughput rate of 300 gallons.
 - (e) A petroleum fuel, other than gasoline, dispensing facility having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month. This facility was constructed in 1997, and consists of a 300-gallon tank for diesel fuel and a 300-gallon tank for kerosene, with maximum monthly throughput rates of 5,000 and 500 gallons, respectively.
 - (f) The following VOC and HAP storage containers:

- (1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
- (2) Vessels storing lubricating oil, hydraulic oils, machining oils, and machining fluids.
- (g) Application of oils, greases lubricants or other nonvolatile materials applied as temporary protective coatings.
- (h) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (i) Degreasing operations that do not exceed 145 gallons per twelve (12) months, except if subject to 326 IAC 20-6. One (1) self-contained parts washer, installed after January 1, 1980, equipped with a remote solvent reservoir. [326 IAC 8-3-2]
- (j) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (k) Closed loop heating and cooling systems.
- (l) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to one percent (1%) by volume.
- (m) Any operation using aqueous solutions containing less than one percent (1%) by weight of VOCs excluding HAPs.
- (n) Noncontact cooling tower systems with the following:
 - Forced and induced draft cooling tower system not regulated under a NESHAP.
- (o) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (p) Paved and unpaved roads and parking lots with public access.
- (q) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
- (r) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (s) Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling tower.
- (t) On-site fire and emergency response training approved by the department.
- (u) A laboratory as defined in 326 IAC 2-7-1(21)(D).
- (v) The following miscellaneous metal-working processes:

- (1) Eight (8) extrusion sawing stations, capacity: 5.0 tons per hour, each.
- (2) One (1) debridging sawing operation, capacity: 3.5 tons per hour.
- (3) One (1) extrusion chop saw, capacity: 5.0 tons per hour.
- (4) Drilling and machining operations, capacity: 2.5 tons per hour, total.
- (5) One (1) deburring machine, installed in 1997, capacity: 0.25 tons per hour.
- (w) Paint pretreatment system, using a five-stage spray washer with no VOC but using hydrofluoric acid.
- (x) One (1) thermal barrier and line flush.
- (y) One (1) woodworking saw, capacity: 0.25 tons per hour.
- (z) Two (2) 30,000-gallon propane storage tanks, constructed in 1974 and 1979, storing propane under pressure.

The reasons for inapplicability of each rule are set forth herein:

I. STATE REGULATIONS

The determinations are based on information submitted by Bon L Manufacturing Company in the permit application. Any change or modification to any equipment listed in the permit may require a permit modification and may affect the following applicability determinations.

Article 2

- (a) The requirements of 326 IAC 2-4.1 do not apply to the facilities at this source at the time this Part 70 permit is issued, because the owner or operator did not construct or reconstruct a major source of hazardous air pollutants (HAPs), as defined in 40 CFR 63.41, after July 27, 1997.
- (b) To the extent it falls within the definition of an "applicable requirement" as that term is defined in 326 IAC 2-7-1(6), the requirements of 326 IAC 2-2, Prevention of Significant Deterioration, do not apply to this source at the time this Part 70 permit is issued, because this source is not a "major PSD source" as that term is defined by 326 IAC 2-2-1(p).
- (c) To the extent it falls within the definition of an "applicable requirement" as that term is defined in 326 IAC 2-7-1(6), the requirements of 326 IAC 2-3 do not apply to this source at the time this Part 70 permit is issued, because this source is not located in an area designated as nonattainment as referenced by 326 IAC 1-4-1.
- (d) Pursuant to 326 IAC 2-5.1-1(a)(2), this source is exempt from the requirements of 326 IAC 2-5.1 because the source is an existing source operating pursuant to a Part 70 permit issued under 326 IAC 2-7.
- (e) Pursuant to 326 IAC 2-5.5-1(a)(2)(A), this source is exempt from the requirements of 326 IAC 2-5.5 because the source is an existing source operating pursuant to a Part 70 permit issued under 326 IAC 2-7.
- (f) Pursuant to 326 IAC 2-6.1-1(2)(A), this source is exempt from the requirements of 326 IAC 2-6.1 because the source is an existing source operating pursuant to a Part 70 permit issued under 326 IAC 2-7.
- (g) The requirements of 326 IAC 2-8 do not apply to this source, because the source did not apply to the commissioner for a Federally Enforceable State Operating Permit (FESOP) instead of a Part

- 70 permit under 326 IAC 2-7.
- (h) The requirements of 326 IAC 2-11, Permit by Rule for Specific Source Categories, do not apply to this source, because the source does not include any of the following specific source categories: retail or commercial gasoline dispensing operations; grain elevators; or grain processing or milling.
 - (i) The requirements of 326 IAC 2-12 do not apply to this source because, pursuant to 326 IAC 2-12-1(a), the rule does not apply to permits issued under 326 IAC 2-7.

Article 6:

- (a) 326 IAC 6.5-1 is not applicable to this source because the source is not located in a county listed in 326 IAC 6.5-1(a).
- (b) 326 IAC 6-2 is only applicable to the one (1) anodizing boiler, identified as ANOD-2, in Section D.3 of the permit, because there are no other indirect heating facilities at this source.
- (c) 326 IAC 6-5 is not applicable to this source because the source is not considered a new source of fugitive particulate matter.
- (d) 326 IAC 6-6 is not applicable because the source is not specifically named under 326 IAC 6-6-4 and 326 IAC 6-6-5.

Article 7

- (a) 326 IAC 7-1.1, 326 IAC 7-2 and 326 IAC 7-3 of 326 IAC Article 7 do not apply to the source because the source does not operate any facilities or activities with a potential to emit twenty-five (25) tons per year or ten (10) pounds per hour or more of sulfur dioxide.
- (b) 326 IAC 7-4 is not applicable because the source is not in a county specified by this rule.

Article 8

- (a) 326 IAC 8-1-6, New facilities general reduction requirements, is not applicable to this source since all facilities with a potential VOC emissions of twenty-five (25) tons per year or more are regulated by other provisions of 326 IAC 8.
- (b) 326 IAC 8-2-2 does not apply because there are no automobile and light duty truck surface coating operations at the source.
- (c) 326 IAC 8-2-3 does not apply because there are no can coating operations at the source.
- (d) 326 IAC 8-2-4 does not apply because there are no coil coating operations at the source.
- (e) 326 IAC 8-2-5 does not apply because there are no paper coating operations at the source.
- (f) 326 IAC 8-2-6 does not apply because there are no metal furniture surface coating operations at the source.
- (g) 326 IAC 8-2-7 does not apply because there are no large appliance coating operations at the source.
- (h) 326 IAC 8-2-8 does not apply because there are no magnet wire coating operations at the source.
- (i) 326 IAC 8-2-10 does not apply because the source does not manufacture or surface finish flat wood panels.
- (j) 326 IAC 8-2-11 does not apply because there are no fabric and vinyl coating operations at the source.
- (k) 326 IAC 8-2-12 does not apply because there are no wood furniture and cabinet coating operations at the source.
- (l) With the exception of 326 IAC 8-3-2 (cold cleaner operation), the provisions of 326 IAC 8-3 do not apply to this source because the source does not have an open top vapor degreaser or a conveyorized degreaser, and the cold cleaner is equipped with a remote solvent reservoir.
- (m) 326 IAC 8-4 is not applicable to this source because this source is not a petroleum refinery, bulk gasoline terminals, bulk gasoline plants, or gasoline transport, the petroleum storage facilities at this source have capacities less than 39,000 gallons, and the gasoline storage tank for the

- dispensing operations has a capacity less than five hundred seventy-five (575) gallons.
- (n) 326 IAC 8-5 is not applicable to his source because the source does not have the miscellaneous operations listed in Rule 8-5 (asphalt paving, pharmaceutical manufacturing, pneumatic rubber tire manufacturing, graphic arts operations and fuel grade ethanol production at dry mills).
 - (o) 326 IAC 8-6 is not applicable because none of the VOC-emitting equipment at the source commenced operation between Oct. 7, 1974 and Jan. 1, 1980 and because the VOC-emitting equipment is regulated by other provisions in Article 8.
 - (p) 326 IAC 8-7 is not applicable because this source does not have facilities with VOC emissions located in Lake, Porter, Clark or Floyd County.
 - (q) 326 IAC 8-8 is not applicable because the source is not a municipal solid waste landfill.
 - (r) 326 IAC 8-9 is not applicable because this source does not have stationary vessels, used to store volatile organic liquid, that are located in Clark, Floyd, Lake or Porter County.
 - (s) 326 IAC 8-10 is not applicable because this source does not have facilities that sell or manufacture refinishing coatings, or sell, lease, or operate a facility that refinishes motor vehicles or mobile equipment.
 - (t) 326 IAC 8-11 is not applicable because the source does not perform wood furniture manufacturing operations in Lake, Porter, Clark, or Floyd County.
 - (u) 326 IAC 8-12 is not applicable because the source does not build or repair ships.
 - (v) 326 IAC 8-13 is not applicable because the source does not contain a sintering processes.
 - (w) 326 IAC 8-2-9 applies only to the two (2) paint booths, identified as booth 1 and booth 2, with electrostatic disc spray guns and dry filters for overspray control listed in Section D.1 of the permit, because there are no other miscellaneous metal coating operations at this source.
 - (x) 326 IAC 8-3-2 applies only to the one (1) insignificant parts washer listed in Condition D.4.1 of the permit, because there are no other organic degreasing operations at this source.

Article 10

- (a) 326 IAC 10-1 is not applicable because the source is not located in Clark or Floyd County.
- (b) 326 IAC 10-3 is not applicable because the source does not have a cement kiln, a listed boiler or a blast furnace gas fired boiler with a heat input greater than 250 MMBtu/hr.
- (c) 326 IAC 10-4 is not applicable because this source does not have an electricity generating units or a large affected unit as described in 326 IAC 10-4-2.
- (d) 326 IAC 10-5 is not applicable because this source does not have any large NO_x SIP call engines.

Article 11

The requirements of 326 IAC 11 do not apply to the source because the source does not operate any of the following: foundries; sulfuric acid plants; coke oven batteries; fiberglass insulation manufacturing activities; hospital/medical/infectious waste incinerators; municipal waste combustors; or commercial or industrial solid waste incineration units.

Article 14

With the exception of 326 IAC 14-10 (Emission Standards for Asbestos; Demolition and Renovation Operations), the source is not subject to the provisions of 326 IAC Article 14 because the source does not belong to any of the following categories or sources regulated by Article 14:

- (a) sources of asbestos as listed in section 14-2-1;
- (b) sources of beryllium as listed in section 14-3-1;
- (c) rocket motor test sites as listed in section 14-4-1;
- (d) sources of mercury as listed in section 14-5-1;
- (e) sources of vinyl chloride as listed in section 14-6-1;
- (f) fugitive emission sources of benzene as listed in section 14-7-1;
- (g) general fugitive emission sources from equipment leaks as listed in section 14-8-1; and

- (h) coke by-product recovery plants as described in section 14-9-1.

Article 15

The requirements of 326 IAC 15 do not apply to the source because the source is not specifically listed in Section 15-1-2.

II. FEDERAL REGULATIONS

The determinations are based on information submitted by Capitol Products Corp. in the permit application. Any change or modification to any equipment listed in the permit shall require a permit modification.

40 CFR Part 55

The requirements of 40 CFR Part 55 do not apply because the source is not an "OCS source" as that term is defined at 40 CFR § 55.2.

40 CFR Part 60

- (a) One (1) of the two (2) propane storage tanks was constructed after June 11, 1973, and prior to May 19, 1978. The tank has a capacity less than 40,000 gallons. Therefore, the requirements of 40 CFR Part 60, Subpart K, Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978, are not included in the permit.
- (b) One (1) of the two (2) propane storage tanks was constructed after May 18, 1978 and prior to July 23, 1984. The tank has a capacity less than 40,000 gallons. Therefore, the requirements of 40 CFR Part 60, Subpart Ka, Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984, are not included in the permit.
- (c) The gasoline, diesel and kerosene tanks were constructed after July 23, 1984. The tanks each have a capacity less than 75 cubic meters. Therefore, the requirements of 40 CFR Part 60, Subpart Kb, Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984, are not included in the permit.
- (d) The one (1) anodizing boiler, identified as ANOD-2, constructed in 1984, has a maximum capacity of 8.4 million British thermal units per hour, which is less than 250 million British thermal units per hour. Therefore, the requirements of 40 CFR Part 60, Subpart D, Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction Is Commenced After August 17, 1971, and Subpart Da, Standards of Performance for Electric Utility Steam Generating Units for Which Construction is Commenced After September 18, 1978, are not included in the permit.
- (e) The one (1) anodizing boiler, identified as ANOD-2, constructed in 1984, has a maximum capacity of 8.4 million British thermal units per hour, which is less than 100 million British thermal units per hour. Therefore, the requirements of 40 CFR Part 60, Subpart Db, Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units, are not included in the permit.
- (f) The one (1) anodizing boiler, identified as ANOD-2, was constructed prior to June 9, 1989. Therefore, the requirements of 40 CFR Part 60, Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, are not included in the permit.
- (g) The source is not subject to the following Subparts of 40 CFR Part 60 because the source does not contain any equipment belonging to any of the source categories regulated by these standards:
- (1) Subparts E and Ec – Incinerators;
 - (2) Subpart Ea and Eb – Municipal Waste Combustors;

- (3) Subpart F – Portland Cement Plants;
- (4) Subpart G – Nitric Acid Plants;
- (5) Subpart H – Sulfuric Acid Plants;
- (6) Subpart I – Hot Mix Asphalt Facilities;
- (7) Subpart J – Petroleum Refineries;
- (8) Subpart L – Secondary Lead Smelters;
- (9) Subpart M – Secondary Brass and Bronze Production Plants;
- (10) Subparts N and Na – Basic Oxygen Process Furnaces;
- (11) Subpart O – Sewage Treatment Plants;
- (12) Subpart P – Primary Copper Smelters;
- (13) Subpart Q – Primary Zinc Smelters;
- (14) Subpart R – Primary Lead Smelters;
- (15) Subpart S – Primary Aluminum Reduction Plants;
- (16) Subpart T – Wet-Process Phosphoric Acid Plants;
- (17) Subpart U – Superphosphoric Acid Plants;
- (18) Subpart V – Diammonium Phosphate Plants;
- (19) Subpart W – Triple Superphosphate Plants;
- (20) Subpart X – Granular Triple Superphosphate Storage Facilities;
- (21) Subpart Y – Coal Preparation Plants;
- (22) Subpart Z – Ferroalloy Production Facilities;
- (23) Subparts AA and AAa – Electric Arc Furnaces;
- (24) Subpart BB – Kraft Pulp Mills;
- (25) Subpart CC – Glass Manufacturing Plants;
- (26) Subpart DD – Grain Elevators;
- (27) Subpart EE – Surface Coating of Metal Furniture;
- (28) Subpart GG – Stationary Gas Turbines;
- (29) Subpart HH – Lime Manufacturing Plants;
- (30) Subpart KK – Lead-Acid Battery Manufacturing Plants;
- (31) Subpart LL – Metallic Mineral Processing plants;
- (32) Subpart MM – Automobile and Light Duty Truck Surface Coating Operations;
- (33) Subpart NN – Phosphate Rock Plants;
- (34) Subpart PP – Ammonium Sulfate Manufacture;
- (35) Subpart QQ – Publication Rotogravure Printing;
- (36) Subpart RR – Pressure Sensitive Tape and Label Surface Coating Operations;
- (37) Subpart SS – Industrial Surface Coating: Large Appliances;
- (38) Subpart TT – Metal Coil Surface Coating;
- (39) Subpart UU – Asphalt Processing and Asphalt Roofing Manufacture;
- (40) Subpart VV – Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry;
- (41) Subpart WW – Beverage Can Surface Coating Industry;
- (42) Subpart XX – Bulk Gasoline Terminals;
- (43) Subpart AAA – New Residential Wood Heaters;
- (44) Subpart BBB – Rubber Tire Manufacturing Industry;
- (45) Subpart DDD – Volatile Organic Compound (VOC) Emissions from the Polymer Manufacturing Industry;
- (46) Subpart FFF – Flexible Vinyl and Urethane Coating and Printing;
- (47) Subpart GGG – Equipment Leaks of VOC in Petroleum Refineries;
- (48) Subpart HHH – Synthetic Fiber Production Facilities;
- (49) Subpart III – Synthetic Organic Chemical Manufacturing Industry (SOCMI) Air Oxidation Unit Processes;
- (50) Subpart JJJ – Petroleum Dry Cleaners;

- (51) Subpart KKK – Equipment Leaks of VOC From Onshore Natural Gas Processing Plants;
- (52) Subpart LLL – Onshore Natural Gas Processing;
- (53) Subpart NNN – Synthetic Organic Chemical Manufacturing Industry (SOCMI) Distillation Operations;
- (54) Subpart OOO – Nonmetallic Mineral Processing Plants;
- (55) Subpart PPP – Wool Fiberglass Insulation Manufacturing Plants;
- (56) Subpart QQQ – Petroleum Refinery Wastewater Systems;
- (57) Subpart RRR – Synthetic Organic Chemical Manufacturing Industry (SOCMI) Reactor Processes;
- (58) Subpart SSS – Magnetic Tape Coating Facilities;
- (59) Subpart TTT – Surface Coating of Plastic Parts for Business Machines;
- (60) Subpart UUU – Calciners and Dryers in Mineral Industries;
- (61) Subpart VVV – Polymeric Coating of Supporting Substrates Facilities;
- (62) Subpart WWW – Municipal Solid Waste Landfills;
- (63) Subpart AAAA - Small Municipal Waste Combustion Units For Which Construction Is Commenced After August 30, 1999 Or For Which Modification Or Reconstruction Is Commenced After June 6, 2001;
- (64) Subpart BBBB - Emission Guidelines And Compliance Times For Small Municipal Waste Combustion Units Constructed On Or Before August 30, 1999;
- (65) Subpart CCCC - Commercial And Industrial Solid Waste Incineration Units For Which Construction Is Commenced After November 30, 1999 Or For Which Modification Or Reconstruction Is Commenced On Or After June 1, 2001;
- (66) Subpart DDDD - Emissions Guidelines And Compliance Times For Commercial And Industrial Solid Waste Incineration Units That Commenced Construction On Or Before November 30, 1999;
- (67) Subpart EEEE - Other Solid Waste Incineration Units For Which Construction Is Commenced After December 9, 2004, Or For Which Modification Or Reconstruction Is Commenced On Or After June 16, 2006;
- (68) Subpart FFFF - Emission Guidelines and Compliance Times for Other Solid Waste Incineration Units That Commenced Construction On or Before December 9, 2004;
- (69) Subpart HHHH - Emission Guidelines And Compliance Times For Coal-Fired Electric Steam Generating Units;
- (70) Subpart IIII - Stationary Compression Ignition Internal Combustion Engines; and
- (71) Subpart KKKK - Stationary Combustion Turbines.

40 CFR Part 61

- (a) The requirements of 40 CFR § 61.142 are not applicable because the source is not an asbestos mill, 40 CFR § 61.144 is not applicable because the source does not perform manufacturing using asbestos, 40 CFR § 61.146 is not applicable because the source does not spray asbestos-containing materials, 40 CFR § 61.147 is not applicable because the source does not perform fabricating using asbestos-containing materials, 40 CFR § 61.149, 40 CFR § 61.151, and 40 CFR § 61.154 are not applicable because the source is not an active or inactive waste disposal site, and 40 CFR § 61.155 is not applicable because the source does not convert asbestos-containing materials to non-asbestos.
- (b) The source is not subject to the following Subparts of 40 CFR Part 61 because the source does not belong to any of the source categories regulated by these standards:
 - (1) Subpart B – Radon Emissions From Underground Uranium Mines;
 - (2) Subpart C – Beryllium;
 - (3) Subpart D – Beryllium Rocket Motor Firing;
 - (4) Subpart E – Mercury;
 - (5) Subpart F – Vinyl Chloride;

- (6) Subpart H – Radionuclides Other Than Radon From Department of Energy Facilities;
- (7) Subpart I – Radionuclide Emissions From Federal Facilities Other Than Nuclear Regulatory Commission Licensees and Not Covered by Subpart H;
- (8) Subpart J – Equipment Leaks (Fugitive Emission Sources) of Benzene;
- (9) Subpart K – Radionuclide Emissions from Phosphorous Plants;
- (10) Subpart L – Benzene Emissions from Coke Oven By-product Recovery Plants;
- (11) Subpart N – Inorganic Arsenic Emissions From Glass Manufacturing Plants;
- (12) Subpart O – Inorganic Arsenic Emissions From Primary Copper Smelters;
- (13) Subpart P – Inorganic Arsenic Emissions From Arsenic Trioxide; and Metallic Arsenic Production Facilities;
- (14) Subpart Q – Radon Emissions From Department of Energy Facilities;
- (15) Subpart R – Radon Emissions From Phosphogypsum Stacks;
- (16) Subpart T – Radon Emissions from the Disposal of Uranium Mill Tailings;
- (17) Subpart V – Equipment Leaks (Fugitive Emission Sources);
- (18) Subpart W – Radon Emissions From Operating Mill Tailings;
- (19) Subpart Y – Benzene Emissions From Benzene Storage Vessels;
- (20) Subpart BB – Benzene Emissions From Benzene Transfer Operations;
- (21) Subpart FF – Benzene Waste Operations.

40 CFR Part 63

- (a) All insignificant internal combustion engines at this source are either mobile engines or limited use engines. Therefore, the requirements of 40 CFR 63, Subpart ZZZZ, are not included in the permit.
- (b) The source is not subject to the following Subparts of 40 CFR Part 63 because the source does not contain any equipment belonging to any of the source categories regulated by these standards:
 - (1) Subpart F – Synthetic Organic Chemical Manufacturing Industry;
 - (2) Subpart G – Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater;
 - (3) Subpart H – Equipment Leaks;
 - (4) Subpart I – Certain Processes Subject to the Negotiated Regulation for Equipment Leaks;
 - (5) Subpart L – Coke Oven Batteries;
 - (6) Subpart M – Dry Cleaning Facilities;
 - (7) Subpart N – Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks;
 - (8) Subpart O – Sterilization Facilities;
 - (9) Subpart Q – Industrial Process Cooling Towers;
 - (10) Subpart R – Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations);
 - (11) Subpart S – Processes that Produce Pulp or Paper;
 - (12) Subpart T – Halogenated Solvent Cleaning;
 - (13) Subpart U – Group I Polymers and Resins;
 - (14) Subpart W – Epoxy Resins Production and Non-Nylon Polyamides Production;
 - (15) Subpart X – Secondary Lead Smelting;
 - (16) Subpart Y – Marine Tank Vessel Tank Loading Operations;
 - (17) Subpart CC – Petroleum Refineries;
 - (18) Subpart DD – Off-Site Waste and Recovery Operations;
 - (19) Subpart EE – Magnetic Tape Manufacturing Operations;
 - (20) Subpart GG – Aerospace Manufacturing and Rework Facilities;
 - (21) Subpart II – Shipbuilding and Ship Repair (Surface Coating);

- (22) Subpart JJ – Wood Furniture Manufacturing Operations;
- (23) Subpart KK – Printing and Publishing Industry;
- (24) Subpart LL – Primary Aluminum Reduction Plants;
- (25) Subpart OO – Tanks—Level 1;
- (26) Subpart PP – Containers;
- (27) Subpart QQ – Surface Impoundments;
- (28) Subpart RR – Individual Drain Systems;
- (29) Subpart VV – Oil-Water Separators and Organic-Water Separators;
- (30) Subpart EEE – Hazardous Waste Combustors;
- (31) Subpart GGG – Pharmaceuticals Production;
- (32) Subpart III – Flexible Polyurethane Foam Production;
- (33) Subpart JJJ – Group IV Polymers and Resins;
- (34) Subpart LLL - The Portland Cement Manufacturing Industry
- (35) Subpart MMM - Pesticide Active Ingredient Production
- (36) Subpart NNN - Wool Fiberglass Manufacturing
- (37) Subpart OOO - Manufacture Of Amino/Phenolic Resins
- (38) Subpart PPP - Polyether Polyols Production
- (39) Subpart QQQ - Primary Copper Smelting
- (40) Subpart RRR - Secondary Aluminum Production
- (41) Subpart TTT - Primary Lead Smelting
- (42) Subpart UUU - Petroleum Refineries: Catalytic Cracking Units, Catalytic Reforming Units, And Sulfur Recovery Units
- (43) Subpart VVV - Publicly Owned Treatment Works
- (44) Subpart XXX - Ferroalloys Production: Ferromanganese And Silicomanganese
- (45) Subpart AAAA - Municipal Solid Waste Landfills
- (46) Subpart CCCC - Manufacturing Of Nutritional Yeast
- (47) Subpart DDDD - Plywood And Composite Wood Products
- (48) Subpart EEEE - Organic Liquids Distribution (Non-Gasoline)
- (49) Subpart FFFF - Miscellaneous Organic Chemical Manufacturing
- (50) Subpart GGGG - Solvent Extraction For Vegetable Oil Production
- (51) Subpart HHHH - Wet-Formed Fiberglass Mat Production
- (52) Subpart IIII - Surface Coating Of Automobiles And Light-Duty Trucks
- (53) Subpart JJJJ - Paper And Other Web Coating
- (54) Subpart KKKK - Surface Coating Of Metal Cans
- (55) Subpart NNNN - Surface Coating Of Large Appliances
- (56) Subpart OOOO - Printing, Coating, And Dyeing Of Fabrics And Other Textiles
- (57) Subpart PPPP - Surface Coating Of Plastic Parts And Products
- (58) Subpart QQQQ - Surface Coating Of Wood Building Products
- (59) Subpart RRRR - Surface Coating Of Metal Furniture
- (60) Subpart SSSS - Surface Coating Of Metal Coil
- (61) Subpart TTTT - Leather Finishing Operations
- (62) Subpart UUUU - Cellulose Products Manufacturing
- (63) Subpart VVVV - Boat Manufacturing
- (64) Subpart WWWW - Reinforced Plastic Composites Production
- (65) Subpart XXXX - Rubber Tire Manufacturing
- (66) Subpart YYYYY - Stationary Combustion Turbines
- (68) Subpart AAAAA - Lime Manufacturing Plants
- (69) Subpart BBBBB - Semiconductor Manufacturing
- (70) Subpart CCCCC - Coke Ovens: Pushing, Quenching, And Battery Stacks
- (72) Subpart EEEEE - Iron And Steel Foundries
- (73) Subpart FFFFF - Integrated Iron And Steel Manufacturing Facilities

- (74) Subpart GGGGG - Site Remediation
- (75) Subpart HHHHH - Miscellaneous Coating Manufacturing
- (76) Subpart IIIII - Mercury Emissions From Mercury Cell Chlor-Alkali Plants
- (77) Subpart JJJJJ - Brick And Structural Clay Products Manufacturing
- (78) Subpart KKKKK - Clay Ceramics Manufacturing
- (79) Subpart LLLLL - Asphalt Processing And Asphalt Roofing Manufacturing
- (80) Subpart MMMMM - Flexible Polyurethane Foam Fabrication Operations
- (81) Subpart NNNNN - Hydrochloric Acid Production
- (82) Subpart PPPPP - Engine Test Cells/Stand
- (83) Subpart QQQQQ - Friction Materials Manufacturing Facilities
- (84) Subpart RRRRR - Taconite Iron Ore Processing
- (85) Subpart SSSSS - Refractory Products Manufacturing
- (86) Subpart TTTTT - For Primary Magnesium Refining

40 CFR Part 72

The requirements of 40 CFR Part 72 do not apply to the source because it does not contain any of the following "affected units" or "affected sources:"

- (1) a unit listed in Table 1 of 40 CFR 73.10(a);
- (2) an existing unit that is identified in Table 2 or 3 of 40 CFR 73.10 and any other existing utility unit;
or
- (3) a utility unit.

40 CFR Part 73

The requirements of 40 CFR Part 73 do not apply to the source because it is not one of the applicable parties as set out in 40 CFR § 73.2.

40 CFR Part 74

The requirements of 40 CFR Part 74 do not apply to the source because it is not a combustion or process source that submitted an opt-in permit application to become an opt-in source under 40 CFR § 74.2.

40 CFR Part 75

The requirements of 40 CFR Part 75 do not apply to the source because it is not subject to the requirements of the Acid Rain Program.

40 CFR Part 76

The requirements of 40 CFR Part 76 do not apply to the source because it contains no coal-fired utility units that are subject to an Acid Rain emission limitations or reduction requirements for SO₂ under Phase I or Phase II pursuant to sections 404, 405, or 409 of the Act.

40 CFR Part 77

The requirements of 40 CFR Part 77 do not apply to the source because it is not subject to the requirements of the Acid Rain Program.

40 CFR Part 78

The requirements of 40 CFR Part 78 do not apply to the source because it is not subject to the requirements of the Acid Rain Program.

40 CFR Part 82

40 CFR Part 82 Subpart A does not apply because the source does not produce, transform, destroy, import or export a controlled substance or import a controlled product as those terms are defined in 40 CFR § 82.3. Subpart B does not apply because the source does not perform services on any motor

vehicle air conditioners. Subpart C does not apply because the source does not sell or distribute any Class I or Class II products as defined in appendices A and B to Subpart A of 40 CFR Part 82. Subpart D does not apply because neither the Permittee nor the source is federal department, agency, or instrumentality as defined in 40 CFR § 82.82. Subpart E does not apply because the source does not make or package Class I or Class II substances, does not make any products containing a Class I or Class II substance, and does not make any products with a Class I or Class II substance. Subpart G does not apply because the source does not produce, introduce into commerce, or use any substances that are "alternatives" or "substitutes" as defined in 40 CFR § 82.172. Subpart H does not apply because the source does not test, service, maintain, repair or dispose of equipment that contains halons or use such equipment during technician training as 40 CFR §§ 82.250 and 82.260.

* * *

DISCLAIMER

This Determination of Inapplicability is not exclusive. The omission of any requirement that constitutes an "applicable requirement" as that term is defined in 326 IAC 2-7-1(6) from this Determination will not be deemed a conclusion or determination by the OAM or an admission by the source that such requirement does apply to the source. The determinations are based on information submitted by Capitol Products Corp. in the permit application. Any change or modification to any equipment listed in the permit may require a permit modification and may affect the following applicability determinations.

Indiana Department of Environmental Management Office of Air Quality

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

Source Name: Bon L Manufacturing Company
Source Location: 508 W. Wilson Street, Kentland, Indiana 47951
County: Newton
SIC Code: 3354, 3471
Permit Renewal No.: T 111-18828-00005
Permit Reviewer: CarrieAnn Paukowits

On October 4, 2007, the Office of Air Quality (OAQ) had a notice published in the Newton County Enterprise, Kentland, Indiana, stating that Bon L Manufacturing Company had applied for a Part 70 Operating Permit Renewal to continue to operate an aluminum extrusion and anodizing source. The notice also stated that OAQ proposed to issue a Part 70 Operating Permit for this operation and provided information on how the public could review the proposed Part 70 Operating Permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this Part 70 Operating Permit should be issued as proposed.

On November 2, 2007, Steve Portteus of Bon L Manufacturing Company submitted a comment on the proposed Part 70 Operating Permit Renewal. The comment is as follows (The permit language, if changed, has deleted language as ~~strikeouts~~ and new language **bolded**):

Comment:

Pursuant to 40 CFR 63.3910(c), the Notification of Compliance Status for NESHAP Subpart M MMM is due thirty (30) days after the end of the initial compliance period described in 40 CFR 63.3950. The initial compliance period for this source ends on January 31, 2008. Therefore, the Notification of Compliance Status is due by March 1, 2008.

Response:

Condition D.1.12 has been revised as follows:

D.1.12 One Time Deadlines Relating to NESHAP MMMM

The Permittee shall comply with the following requirements by the dates listed:

Requirement	Rule Cite	Deadline
Initial Notification	40 CFR 63.3910	January 2, 2005
Notification of Compliance Status	40 CFR 63.3910	January 31, 2008 March 1, 2008

Indiana Department of Environmental Management
Office of Air Quality

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

Source Background and Description

Source Name: Bon L Manufacturing Company
Source Location: 508 W. Wilson Street, Kentland, Indiana 47951
County: Newton
SIC Code: 3354, 3471
Permit Renewal No.: T 111-18828-00005
Permit Reviewer: CarrieAnn Paukowits

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Bon L Manufacturing Company relating to the operation of an aluminum extrusion and anodizing source.

History

On April 5, 2004, Bon L Manufacturing Company submitted an application to the OAQ requesting to renew its operating permit. Bon L Manufacturing Company was issued a Part 70 Operating Permit on January 6, 2001.

Permitted Emission Units and Pollution Control Equipment

- (a) One (1) electrostatic paint spray booth, identified as paint 1, booth 1, installed in 1984, equipped with electrostatic disc spray guns and dry filters for overspray control, exhausted to stack S-13, capacity: 15,120 pieces of aluminum per hour. Under NESHAP Subpart MMMM, this is part of an existing affected source in the general use subcategory.
- (b) One (1) electrostatic paint spray booth, identified as paint 1, booth 2, installed in 1984, equipped with electrostatic disc spray guns and dry filters for overspray control, exhausted to stack S-14, capacity: 15,120 pieces of aluminum per hour. Under NESHAP Subpart MMMM, this is part of an existing affected source in the general use subcategory.
- (c) One (1) anodizing line, identified as ANOD-1, installed in 1984, exhausted to stacks S-15 and S-16, consisting of the following twenty-seven (27) tanks containing various liquids, maximum capacity: 30,000 pounds of aluminum parts per hour:
 - (1) One (1) acid etch tank containing ammonium fluoride, hydrofluoric acid and water, identified as tank 9, equipped with a voluntary scrubber.
 - (2) Two (2) anodizing tanks containing sulfuric acid and water, identified as tanks 13 and 15, equipped with a voluntary scrubber.
 - (3) One (1) color tank containing sulfuric acid and stannous sulfate solution and water, identified as tank 19.
 - (4) One (1) acid cleaner tank containing sulfuric acid and water, identified as tank 11.
 - (5) Three (3) seal tanks each containing nickel and hydrogen fluoride and water, identified as tanks 22, 25 and 26.
 - (6) One (1) alkaline cleaner tank, identified as tank 1.

- (7) One (1) etch tank containing NaOH and water, equipped with a voluntary scrubber, identified as tank 3.
- (8) One (1) desmut tank containing sulfuric acid and water, identified as tank 6.
- (9) Sixteen (16) rinse tanks, using only water and obtaining materials from upstream processing tanks as part of the rinsing operation, identified as tanks 2, 4, 5, 7, 8, 10, 12, 14, 16, 17, 18, 20, 21, 23, 24, and 27.
- (d) One (1) anodizing boiler, identified as ANOD-2, fueled by natural gas and propane as a backup fuel, installed in 1984, exhausted to stack S-12, heat input capacity: 8.4 million British thermal units per hour.
- (e) One (1) paint bake oven, identified as paint 3, paint bake oven P, fueled by natural gas and propane as a backup fuel, installed in 1984, exhausted to stack S-11, heat input capacity: 9.0 million British thermal units per hour.

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

There are no emission units that were constructed and operated without a permit at this source.

Insignificant Activities

- (a) The following natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, and propane for liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) British thermal units per hour.
 - (1) One (1) billet heater, identified as EXTR-1, heater F, fueled by natural gas and propane as a backup fuel, installed in 1985, exhausted to stack S-1, heat input capacity: 5.3 million British thermal units per hour.
 - (2) One (1) billet heater, identified as EXTR-1, heater G, fueled by natural gas and propane as a backup fuel, installed in 1985, exhausted to stack S-2, heat input capacity: 5.5 million British thermal units per hour.
 - (3) One (1) billet heater, identified as EXTR-1, heater H, fueled by natural gas and propane as a backup fuel, installed in 2001, exhausted to stack S-3, heat input capacity: 5.9 million British thermal units per hour.
 - (4) One (1) aging oven, identified as EXTR-2, aging oven I, fueled by natural gas and propane as a backup fuel, installed in 1972, exhausted to stack S-4, heat input capacity: 1.8 million British thermal units per hour.
 - (5) One (1) aging oven, identified as EXTR-2, aging oven J, fueled by natural gas and propane as a backup fuel, installed in 1998, exhausted to stack S-5, heat input capacity: 4.0 million British thermal units per hour.
 - (6) One (1) aging oven, identified as EXTR-2, aging oven K, installed in 2005, equipped with low-NO_x burners and fueled by natural gas with propane as a backup fuel, with all emissions exhausted through stack S-17, capacity: 10 million British thermal units per hour.

- (7) One (1) pretreatment tank heater, identified as PREPAINT 1, heater K, fueled by natural gas and propane as a backup fuel installed in 1972, exhausted to stack S-6, heat input capacity: 6.0 million British thermal units per hour.
 - (8) One (1) pretreatment tank heater, identified as PREPAINT 1, heater L, fueled by natural gas and propane as a backup fuel, installed in 1984, exhausted to stack S-7, heat input capacity: 4.5 million British thermal units per hour.
 - (9) One (1) dry off oven, identified as PREPAINT 2, oven O, fueled by natural gas and propane as a backup fuel, installed in 1984, exhausted to stack S-10, heat input capacity: 2.6 million British thermal units per hour.
 - (10) One (1) building heater, identified as HEAT-1, heater A, fueled by natural gas and propane as a backup fuel, installed in 1984, heat input capacity: 4.5 million British thermal units per hour.
 - (11) One (1) building heater, identified as HEAT-1, heater B, fueled by natural gas and propane as a backup fuel, installed in 1980, heat input capacity: 5.3 million British thermal units per hour.
 - (12) One (1) building heater, identified as HEAT-1, heater C, fueled by natural gas and propane as a backup fuel, installed in 1984, heat input capacity: 5.5 million British thermal units per hour.
 - (13) One (1) building heater, identified as HEAT-1, heater D, fueled by natural gas and propane as a backup fuel, installed in 1984, heat input capacity: 5.5 million British thermal units per hour.
 - (14) One (1) building heater, identified as HEAT-1, heater E, fueled by natural gas and propane as a backup fuel, installed in 1972, heat input capacity: 4.9 million British thermal units per hour.
- (b) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 British thermal units per hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 British thermal units per hour.
 - (c) Combustion source flame safety purging on startup.
 - (d) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons. This facility was constructed in 1997, and consists of a 300-gallon tank, with a maximum monthly throughput rate of 300 gallons.
 - (e) A petroleum fuel, other than gasoline, dispensing facility having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month. This facility was constructed in 1997, and consists of a 300-gallon tank for diesel fuel and a 300-gallon tank for kerosene, with maximum monthly throughput rates of 5,000 and 500 gallons, respectively.
 - (f) The following VOC and HAP storage containers:
 - (1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
 - (2) Vessels storing lubricating oil, hydraulic oils, machining oils, and machining fluids.

- (g) Application of oils, greases lubricants or other nonvolatile materials applied as temporary protective coatings.
- (h) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (i) Degreasing operations that do not exceed 145 gallons per twelve (12) months, except if subject to 326 IAC 20-6. One (1) self-contained parts washer, installed after January 1, 1980, equipped with a remote solvent reservoir. [326 IAC 8-3-2]
- (j) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (k) Closed loop heating and cooling systems.
- (l) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to one percent (1%) by volume.
- (m) Any operation using aqueous solutions containing less than one percent (1%) by weight of VOCs excluding HAPs.
- (n) Noncontact cooling tower systems with the following:
 - Forced and induced draft cooling tower system not regulated under a NESHAP.
- (o) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (p) Paved and unpaved roads and parking lots with public access.
- (q) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
- (r) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (s) Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling tower.
- (t) On-site fire and emergency response training approved by the department.
- (u) A laboratory as defined in 326 IAC 2-7-1(21)(D).
- (v) The following miscellaneous metal-working processes:
 - (1) Eight (8) extrusion sawing stations, capacity: 5.0 tons per hour, each.
 - (2) One (1) debridging sawing operation, capacity: 3.5 tons per hour.
 - (3) One (1) extrusion chop saw, capacity: 5.0 tons per hour.
 - (4) Drilling and machining operations, capacity: 2.5 tons per hour, total.

- (5) One (1) deburring machine, installed in 1997, capacity: 0.25 tons per hour.
- (w) Paint pretreatment system, using a five-stage spray washer with no VOC but using hydro-fluoric acid.
- (x) One (1) thermal barrier and line flush.
- (y) One (1) woodworking saw, capacity: 0.25 tons per hour.
- (z) Two (2) 30,000-gallon propane storage tanks, constructed in 1974 and 1979, storing propane under pressure.

Existing Approvals

Since the issuance of the Part 70 Operating Permit (T 111-5887-00005) on January 6, 2001, the source has constructed or has been operating under the following approvals as well:

- (a) Administrative Amendment No. 111-13880-00005, issued on March 14, 2001;
- (b) Reopening No. 111-13434-00005, issued on December 7, 2001;
- (c) Administrative Amendment No. 111-23366-00005, issued on August 9, 2005;
- (d) Administrative Amendment No. 111-21732-00005, issued on October 3, 2005; and
- (e) Administrative Amendment No. 111-22597-00005, issued on February 14, 2006.

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

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

Condition D.1.3: Pursuant to CP 111-2823-00005, issued on November 5, 1993, the particulate matter (PM) from the two (2) electrostatic paint spray booths shall not exceed the pound per hour emissions 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:

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

Reason Revised: The 326 IAC 6-3 revisions that became effective on June 12, 2002, were approved into the State Implementation Plan on September 23, 2005. This rule replaces the previous version of 326 IAC 6-3 (Process Operations) that had been part of the SIP; therefore, the requirements of the previous version of 326 IAC 6-3-2 are no longer applicable to this source. The two (2) booths are subject to the requirements of the new version of the rule, and those requirements are incorporated into this permit. See "326 IAC 6-3-2" under the *State Rule Applicability - Individual Facilities* section of this document.

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

Condition D.4.2: (a) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the six (6) extrusion sawing stations, one (1) debridging sawing operation, one (1) extrusion chop saw, drilling and machining operations, one (1) wood-working saw, paint pretreatment system, one (1) deburring machine, and the following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment, shall not exceed allowable PM emission rate based on the following equation:

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:

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

Reason Revised: The 326 IAC 6-3 revisions that became effective on June 12, 2002, were approved into the State Implementation Plan on September 23, 2005. This rule replaces the previous version of 326 IAC 6-3 (Process Operations) that had been part of the SIP; therefore, the requirements of the previous version of 326 IAC 6-3-2 are no longer applicable to this source. These facilities are now exempt from the requirements of 326 IAC 6-3-2. See "326 IAC 6-3-2" under the *State Rule Applicability - Individual Facilities* section of this document.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
S-13	paint 1, booth 1	39.0	2.35	21,000	77.0
S-14	paint 1, booth 2	39.0	2.35	21,000	77.0
S-15	ANOD-1	40.0	2.75	27,000	72.0
S-16	ANOD-1	40.0	6.00	35,000	72.0

Emission Calculations

See Appendix A of this document for detailed emission calculations (9 pages).

County Attainment Status

The source is located in Newton County

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

- (a) Newton County has been classified as attainment for PM_{2.5}. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM_{2.5} emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM_{2.5} emissions, it has directed states to regulate PM₁₀ emissions as a surrogate for PM_{2.5} emissions. See the State Rule Applicability – Entire Source section.
- (b) Volatile organic compounds (VOC) and nitrogen oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC emissions and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Newton County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.
- (c) Newton 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 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD applicability.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	tons/year
PM	1,760
PM ₁₀	1,760
SO ₂	3.67
VOC	3,504
CO	32.6
NO _x	78.5

HAPs	tons/year
MIBK	142
Toluene	665
Glycol Ethers	1,371
Formaldehyde	51.4
Ethyl benzene	460
Xylenes	1,672
Naphthalene	120
Cumene	3.40
Hexane	0.628
HF	1.77
Nickel	0.013
Benzene	0.004
Dichlorobenzene, Lead, Cadmium, Chromium & Manganese	< 0.001, each
Total	2,800

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM₁₀ and VOC is 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/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

Fugitive Emissions

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

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2003 OAQ emission data and the 2005 EPA Toxics Release Inventory (TRI) data.

Pollutant	Actual Emissions (tons/year)
PM ₁₀	2
PM _{2.5}	1
SO ₂	0
VOC	146
CO	0
NO _x	0
HAP (Glycol Ethers)	11.7
HAP (Ethyl benzene)	9.40
HAP (Xylenes)	37.5

Part 70 Permit Conditions

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

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

Potential to Emit After Issuance

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

Process/Emission Unit	Potential to Emit (tons/year)						
	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
Two (2) electrostatic paint spray booths (paint 1, booth 1 and paint 1, booth 2)	229	229	0.00	246	0.00	000	246 individual; 246 total
One (1) anodizing line (ANOD-1)	12.56	12.56	3.43	0.00	0.00	000	0.454 HF; 0.468 total
One (1) anodizing boiler (ANOD-2)	0.235	0.280	0.022	0.202	3.09	7.44	0.066 hexane; 0.069 total
One (1) paint bake oven (paint 3, paint bake oven P)	0.252	0.300	0.024	0.217	3.31	7.97	0.071 hexane; 0.074 total
Insignificant Activities (combustion, fuel transfer and dispensing, welding, woodworking, metal working, paint pretreatment, miscellaneous materials usage)	6.92	5.96	0.187	2.04	26.23	63.12	1.31 HF; 1.87 total
Total	249	248	3.67	248	32.6	78.5	246 individual (glycol ethers, xylenes or toluene); 248 total
Major Source Threshold	250	250	250	250	250	250	10/25

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

Federal Rule Applicability

The following federal rules are applicable to the source:

- (a) 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) electrostatic paint spray booth 1, identified as paint 1, booth 1 (PM/PM ₁₀)	dry filters	Y	870	2.90	100	Y	N
One (1) electrostatic paint spray booth 1, identified as paint 1, booth 1 (VOC)	None	Y	246	246	100	N	N
One (1) electrostatic paint spray booth 1, identified as paint 1, booth 1 (HAPs)	None	N	246	246	25	N	N
One (1) electrostatic paint spray booth 2, identified as paint 1, booth 2 (PM/PM ₁₀)	dry filters	Y	870	2.90	100	Y	Y

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) electrostatic paint spray booth 2, identified as paint 1, booth 2 (VOC)	None	Y	246	246	100	N	N
One (1) electrostatic paint spray booth 2, identified as paint 1, booth 2 (HAPs)	None	N	246	246	25	N	N
One (1) anodizing line, identified as ANOD-1 (PM/PM ₁₀)	Scrubber (not required for compliance)	Y	12.6	3.21	100	N	N
One (1) anodizing line, identified as ANOD-1 (HF)	Scrubber (not required for compliance)	Y	0.454	0.454	10	N	N
One (1) anodizing line, identified as ANOD-1 (Ni)	Scrubber (not required for compliance)	Y	0.013	0.013	10	N	N
One (1) anodizing line, identified as ANOD-1 (SO ₂)	Scrubber (not required for compliance)	Y	3.43	2.77	100	N	N
One (1) anodizing boiler, identified as ANOD-2 (PM/PM ₁₀)	None	Y	0.280	0.280	100	N	N
One (1) anodizing boiler, identified as ANOD-2 (SO ₂)	None	N	0.022	0.022	100	N	N
One (1) anodizing boiler, identified as ANOD-2 (VOC)	None	N	0.202	0.202	100	N	N

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) anodizing boiler, identified as ANOD-2 (NO _x)	None	N	7.44	7.44	100	N	N
One (1) anodizing boiler, identified as ANOD-2 (CO)	None	N	3.09	3.09	100	N	N
One (1) paint bake oven, identified as paint 3, paint bake oven P (PM/PM ₁₀)	None	N	0.300	0.300	100	N	N
One (1) paint bake oven, identified as paint 3, paint bake oven P (SO ₂)	None	N	0.024	0.024	100	N	N
One (1) paint bake oven, identified as paint 3, paint bake oven P (VOC)	None	N	0.217	0.217	100	N	N
One (1) paint bake oven, identified as paint 3, paint bake oven P (NO _x)	None	N	7.97	7.97	100	N	N
One (1) paint bake oven, identified as paint 3, paint bake oven P (CO)	None	N	1.34	1.34	100	N	N

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are applicable to the one (1) electrostatic paint spray booth 1, identified as paint 1, booth 1, and the one (1) electrostatic paint spray booth 2, identified as paint 1, booth 2 for PM₁₀. A CAM plan has been submitted and the Compliance Determination and Monitoring Requirements section includes a detailed description of the CAM requirements. CAM includes inspections of the emissions from the dry filters.

- (b) One (1) of the two (2) propane storage tanks was constructed after June 11, 1973, and prior to May 19, 1978. The tank has a capacity less than 40,000 gallons. Therefore, the requirements of 40 CFR Part 60, Subpart K, Standards of Performance for Storage

Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978, are not included in the permit.

- (c) One (1) of the two (2) propane storage tanks was constructed after May 18, 1978 and prior to July 23, 1984. The tank has a capacity less than 40,000 gallons. Therefore, the requirements of 40 CFR Part 60, Subpart Ka, Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984, are not included in the permit.
- (d) The gasoline, diesel and kerosene tanks were constructed after July 23, 1984. The tanks each have a capacity less than 75 cubic meters. Therefore, the requirements of 40 CFR Part 60, Subpart Kb, Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984, are not included in the permit.
- (e) The one (1) anodizing boiler, identified as ANOD-2, was constructed prior to June 9, 1989. Therefore, the requirements of 40 CFR Part 60, Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, are not included in the permit.
- (f) This source does not perform any chromium electroplating or chromium anodizing. Therefore, the requirements of 40 CFR 63, Subpart N, National Emission Standards for Chromium Emissions From Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks, are not included in the permit.
- (g) The one (1) self-contained parts washer does not use any halogenated solvents. Therefore, the requirements of 40 CFR 63, Subpart T, National Emission Standards for Halogenated Solvent Cleaning, are not included in the permit.
- (h) The one (1) anodizing boiler, identified as ANOD-2, would have been subject to the requirements of the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD. However, on June 8, 2007, the United States Court of appeals for the District of Columbia Circuit (in NRDC v. EPA, no. 04-1386) vacated in its entirety the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD. Additionally, since the state rule at 326 IAC 20-95 incorporated the requirements of the NESHAP 40 CFR 63, Subpart DDDDD by reference, the requirements of 326 IAC 20-95 are no longer effective. Therefore, the requirements of 40 CFR 63, Subpart DDDDD and 326 IAC 20-95 are not included in the permit.
- (i) All insignificant internal combustion engines at this source are mobile engines. Therefore, the requirements of 40 CFR 63, Subpart ZZZZ, are not included in the permit.
- (j) This source performs metal coating operations and is a major source of HAPs. Therefore, this source is subject to the requirements of 40 CFR 63, Subpart MMMM, National Emission Standards for Miscellaneous Metal Parts and Products Surface Coating Operations.

Construction of this affected source commenced prior to August 13, 2002. Therefore, this is an existing affected source.

The processes currently existing at this source subject to the rule include metal coating operations and the associated storage containers and mixing vessels, manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials, storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation. The specific facilities subject to this rule include the following:

- (1) One (1) electrostatic paint spray booth, identified as paint 1, booth 1, installed in 1984, equipped with electrostatic disc spray guns and dry filters for overspray control, exhausted to stack S-13, capacity: 15,120 pieces of aluminum per hour. Under NESHAP Subpart M MMM, this is part of an existing affected source in the general use subcategory.
- (2) One (1) electrostatic paint spray booth, identified as paint 1, booth 2, installed in 1984, equipped with electrostatic disc spray guns and dry filters for overspray control, exhausted to stack S-14, capacity: 15,120 pieces of aluminum per hour. Under NESHAP Subpart M MMM, this is part of an existing affected source in the general use subcategory.

These processes fall into the general use coating subcategory because they are not high performance, magnet wire, rubber-to-metal, or extreme performance fluoropolymer coating operations. Non applicable portions of the NESHAP will not be included in the permit. The facilities are subject to the following portions of Subpart M MMM:

- (1) 63.3880
- (2) 63.3881(a)(1) and (2) and (b)
- (3) 63.3882(a), (b) and (e)
- (4) 63.3883(b) and (d)
- (5) 63.3890(b)(1)
- (6) 63.3891(a)
- (7) 63.3892(a)
- (8) 63.3893(a)
- (9) 63.3900(a)(1) and (b)
- (10) 63.3901
- (11) 63.3910(a), (b), (c)(1) through (7) and (8)(ii)
- (12) 63.3920(a)(1) through (3)(v), (4) and (6)
- (13) 63.3930(a), (b), (c)(1) through (3), (d), (e), (f), (g) and (j)
- (14) 63.3931
- (15) 63.3950
- (16) 63.3951

- (17) 63.3952
- (18) 63.3980
- (19) 63.3981
- (20) Tables 2, 3 and 4

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

State Rule Applicability - Entire Source

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

The source has submitted an Emergency Reduction Plan (ERP) on April 11, 2000. The ERP has been verified to fulfill the requirements of 326 IAC 1-5-2 (Emergency Reduction Plans).

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

This source has unrestricted PM, PM₁₀ and VOC emissions greater than 250 tons per year. The Permittee has agreed to limit the potential to emit to less than the PSD major source levels in order to render the requirements of 326 IAC 2-2, PSD, not applicable.

- (a) Pursuant to 326 IAC 6-3-2, particulate from the two (2) electrostatic paint spray booths, identified as booths 1 and 2, shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications. This will also limit the potential to emit PM and PM₁₀ from the entire source to less than 250 tons per year (see Appendix A of this document) and render 326 IAC 2-2 not applicable.
- (b) Pursuant to CP 111-2823-00005, issued on November 5, 1993, the VOC usage, including coatings, solvents and cleaners, at the two (2) electrostatic paint spray booths, identified as booths 1 and 2, shall be limited to less than 246 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month. This will limit the potential to emit of VOC to less than 246 tons per year from the two (2) paint booths and less than 250 tons per year from the entire source and render 326 IAC 2-2 not applicable.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting) because it is required to have an operating permit under 326 IAC 2-7, Part 70 program. Pursuant to this rule, the Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. This source does not have the potential to emit 2,500 tons per year of CO, NO_x or SO₂, or 250 tons per year of VOC or PM₁₀ after the limitations in the permit. Therefore, pursuant to 326 IAC 2-6-3(a)(2), an emission statement must be submitted triennially rather than annually. In accordance with the compliance schedule specified in 326 IAC 2-6-3, an emission statement must be submitted triennially by July 1 beginning in 2004 and every 3 years every year after. Therefore, the next emission statement for this source must be submitted by July 1, 2010. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), 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 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The two (2) electrostatic paint spray booths, identified as booths 1 and 2, were constructed prior to July 27, 1997. Therefore, the requirements of 326 IAC 2-4.1-1 are not applicable.

326 IAC 6-2-4 (Particulate Emissions Limitations for Sources of Indirect Heating)

The one (1) anodizing boiler, identified as ANOD-2, was constructed after September 21, 1983, in Newton County. Therefore, the one (1) anodizing boiler is subject to the requirements of 326 IAC 6-2-4. The boiler, with a capacity of 8.4 million British thermal units per hour, must comply with the particulate matter emission rate specified by the following equation given in 326 IAC 6-2-4:

$$Pt = 1.09/Q^{0.26}$$

where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu) heat input

Q = Total source maximum operating capacity rating in million British thermal units per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

$$Pt = 1.09/(8.4)^{0.26} = 0.6 \text{ lb/MMBtu heat input}$$

The emissions in terms of pounds of PM per MMBtu are calculated using the AP-42 emission factors for boilers (see pages 5 and 6 of Appendix A), as follows:

Natural gas:

$$1.9 \text{ lbs/MMCF} \times 1 \text{ MMCF}/1,000 \text{ MMBtu} = 0.0019 \text{ lb PM} / \text{ MMBtu}$$

Propane:

$$0.6 \text{ lb/kgal} \times 1 \text{ kgal}/94 \text{ MMBtu} = 0.006 \text{ lb PM} / \text{ MMBtu}$$

Thus, the boiler can comply with the requirements of 326 IAC 6-2-4.

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

- (a) Pursuant to 326 IAC 6-3-2, particulate from the two (2) electrostatic paint spray booths, identified as booths 1 and 2, shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (b) Potential particulate emissions from the insignificant combustion units, the one (1) paint bake oven, identified as paint 3, paint bake oven P, each of the insignificant metal

working operations and the one (1) insignificant woodworking saw are less than 0.551 pounds per hour, each. Therefore, pursuant to 326 IAC 6-3-1(b)(14), these units are exempt from the requirements of 326 IAC 6-3.

- (c) The insignificant welding at this source does not use more than 625 pounds of weld wire or rod per day. Therefore, pursuant to 326 IAC 6-3-1(b)(9), the welding is exempt from the requirements of 326 IAC 6-3.
- (d) The one (1) anodizing boiler, identified as ANOD-2, performs combustion for indirect heating. Therefore, pursuant to 326 IAC 6-3-1(b)(1), the boiler is exempt from the requirements of 326 IAC 6-3.
- (e) Pursuant to 326 IAC 6-3-2, the particulate from the one (1) anodizing line, identified as ANOD-1, shall not exceed 25.2 pounds per hour when operating at a process weight rate of 15 tons per hour. The unrestricted potential particulate emissions from the one (1) anodizing line are 2.83 pounds per hour. Therefore, the one (1) anodizing line can comply with this rule. The limitation is calculated based on the following:

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:

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

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

The one (1) anodizing boiler, identified as ANOD-2, the one (1) paint bake oven, identified as paint 3, paint bake oven P, and the insignificant combustion units have SO₂ emissions less than ten (10) pounds per hour and twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 7-1.1 are not applicable.

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

The two (2) electrostatic paint spray booths, identified as booths 1 and 2, constructed after January 1, 1980, are regulated by 326 IAC 8-2-9. All other facilities have unrestricted potential VOC emissions less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 are not applicable.

326 IAC 8-3-2 (Cold Cleaner Operations)

The one (1) parts washer installed after January 1, 1980, is subject to the requirements of 326 IAC 8-3-2 (Cold Cleaner Operations). Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) 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.

326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)

The one (1) parts washer is equipped with a remote solvent reservoir. Therefore, the requirements of 326 IAC 8-3-5 are not applicable.

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

The two (2) electrostatic paint spray booths, identified as booths 1 and 2, were constructed after November 1, 1980 and have potential VOC emissions greater than twenty-five (25) tons per year. Therefore, the two (2) paint booths, which only perform metal coating, are subject to the requirements of 326 IAC 8-2-9. Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of the coating delivered to the applicator at the two (2) paint booths, identified as booths 1 and 2, shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.

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

Based on the MSDS submitted by the source and calculations made, the paint booths can comply with this rule based on a volume-weighted average for each twenty-four (24)-hour block, with twenty-four (24)-hour blocks running consecutively. Thus, compliance with the VOC content limit shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a twenty-four (24)-hour basis. This volume weighted average shall be determined by the following equation:

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

Where: A is the volume weighted average in pounds VOC per gallon less water as applied;
C is the VOC content of the coating in pounds VOC per gallon less water as applied; and
U is the usage rate of the coating in gallons per twenty-four (24)-hour block.

326 IAC 8-4-3 (Petroleum Liquid Storage Facilities)

The insignificant petroleum storage facilities at this source have capacities less than 39,000 gallons. Therefore, the requirements of 326 IAC 8-4-3 are not applicable.

326 IAC 8-4-6 (Gasoline Dispensing Facilities)

The insignificant gasoline dispensing facility at this source was constructed in 1997 and consists of a 300-gallon tank, with a maximum monthly throughput rate of 300 gallons. Pursuant to 326 IAC 8-4-6(a)(8), a gasoline dispensing facility is any facility where gasoline is dispensed into motor vehicle fuel tanks or portable containers from a storage tank with a capacity of two thousand one hundred seventy-six (2,176) liters (five hundred seventy-five (575) gallons) or more. Diesel fuel and kerosene are not considered to be motor vehicle fuels. The gasoline tank at this source has a capacity less than 575 gallons. Therefore, this is not a gasoline dispensing facility as defined by 326 IAC 8-4-6, and the requirements of 326 IAC 8-4-6 are not applicable.

326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)

The insignificant storage vessels at this source do not store volatile organic liquids in Clark, Floyd, Lake, or Porter Counties. Therefore, the requirements of 326 IAC 8-9 are not applicable.

326 IAC 9-1 (Carbon Monoxide Emission Limits)

This source does not include refuse incineration, ferrous metal smelting or petroleum refining. Therefore, the requirements of 326 IAC 9-1 are not applicable.

326 IAC 10-1 (Nitrogen Oxides Control in Clark and Floyd Counties)

This source is not located in Clark or Floyd County. Therefore, the requirements of 326 IAC 10-1 are not applicable.

326 IAC 10-3 (Nitrogen Oxide Reduction Program for Specific Source Categories)

This source does not have a cement kiln, a listed boiler or a blast furnace gas fired boiler with a heat input greater than 250 million British thermal units per hour. Therefore, the requirements of 326 IAC 10-3 are not applicable.

326 IAC 10-4 (Nitrogen Oxides Budget Trading Program)

This source does not have an electricity generating units or a large affected unit as described in 326 IAC 10-4-2. Therefore, the requirements of 326 IAC 10-4 are not applicable.

Compliance Determination and Monitoring Requirements

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

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

(a) The two (2) electrostatic paint spray booths, identified as booths 1 and 2, have applicable compliance determination conditions as specified below:

- (1) Compliance with the VOC content limit shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings for each twenty-four (24) hour block, with twenty-four (24)-hour blocks running consecutively. This volume weighted average shall be determined by the following equation:

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

Where: A is the volume weighted average in pounds VOC per gallon less water as applied;
C is the VOC content of the coating in pounds VOC per gallon less water as applied; and U is the usage rate of the coating in gallons per twenty-four (24)-hour block.

- (2) Compliance with the VOC usage limitation 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 or by preparing the equivalent information. 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 two (2) electrostatic paint spray booths, identified as booths 1 and 2, have applicable compliance monitoring conditions as specified below:

Emission Unit(s)	Parameter	Frequency
Two (2) electrostatic paint spray booths, identified as booths 1 and 2	Inspections of the dry filters	Daily
	Observations of the overspray from the stacks (S13 and S14), while the booths are in operation.	Weekly
	Inspections of particulate matter on rooftops and nearby ground	Monthly

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 April 5, 2004. Additional information was received on November 30, 2006, May 9, 2007, and August 6 and 7, 2007.

Conclusion

The operation of this aluminum extrusion and anodizing source shall be subject to the conditions of the attached Part 70 Operating Permit Renewal No. T 111-18828-00005.

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

**Company Name: Bon L Manufacturing Company
Plant Location: 508 W. Wilson Street, Kentland, Indiana 47951
Part 70 Renewal No.: T 111-18828-00005
Permit Reviewer: CarrieAnn Paukowits
Date: September 12, 2007**

Electrostatic paint spray booths 1 and 2

Material	Density (lb/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Flash-off (fraction)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential tons per year	lb VOC /gal solids	Transfer Efficiency
Alternate Materials																	
DURANAR sandstone	9.03	68.85%	0.0%	68.9%	0.0%	18.20%	0.00420	30240	1.000	6.22	6.22	789.63	18951.08	3458.57	469.43	34.16	70%
DURANAR Interstate Green	9.08	68.75%	0.0%	68.8%	0.0%	17.70%	0.00420	30240	1.000	6.24	6.24	792.85	19028.34	3472.67	473.55	35.27	70%
DURANAR Pewter	8.88	70.00%	0.0%	70.0%	0.0%	17.80%	0.00420	30240	1.000	6.22	6.22	789.48	18947.56	3457.93	444.59	34.92	70%
River Rouge Red	9.10	67.96%	0.0%	68.0%	0.0%	18.20%	0.00420	30240	1.000	6.18	6.18	785.46	18851.12	3440.33	486.59	33.98	70%
Clear	8.55	72.94%	0.0%	72.9%	0.0%	17.80%	0.00420	30240	1.000	6.24	6.24	792.07	19009.65	3469.26	386.12	35.04	70%
Inhibitive primer	9.05	63.93%	0.0%	63.9%	0.0%	21.40%	0.00420	30240	1.000	5.79	5.79	734.83	17635.82	3218.54	544.78	27.04	70%
Common Materials																	
Polychron III White	11.7	27.64%	0.0%	27.6%	0.0%	56.10%	0.00420	30240	1.000	3.23	3.23	410.03	9840.60	1795.92	1410.48	5.75	70%
Mar Resist Weathershield White	12.1	26.26%	0.0%	26.3%	0.0%	56.67%	0.00420	30240	1.000	3.17	3.17	403.23	9677.50	1766.14	1487.84	5.60	70%
SNE Mar Resistant White	12.1	26.28%	0.0%	26.3%	0.0%	56.67%	0.00420	30240	1.000	3.18	3.18	403.87	9692.88	1768.95	1488.67	5.61	70%
LDA3000 White H/S	11.4	26.70%	0.0%	26.7%	0.0%	58.20%	0.00420	30240	1.000	3.03	3.03	385.23	9245.53	1687.31	1389.66	5.21	70%
New Coradco White H/S Enamel	11.5	28.25%	0.0%	28.3%	0.0%	55.65%	0.00420	30240	1.000	3.25	3.25	412.26	9894.20	1805.69	1375.84	5.83	70%
Polychron III Bronze	9.0	32.40%	0.0%	32.4%	0.0%	66.50%	0.00420	30240	1.000	2.93	2.93	371.59	8918.16	1627.56	1018.73	4.40	70%
Low Gloss Black H/S Enamel	9.5	27.00%	0.0%	27.0%	0.0%	52.50%	0.00420	30240	1.000	2.57	2.57	326.46	7835.07	1429.90	1159.81	4.90	70%
Polychron III Drift wood	11.0	29.26%	0.0%	29.3%	0.0%	55.96%	0.00420	30240	1.000	3.22	3.22	408.79	9810.91	1790.49	1298.63	5.75	70%
Drift wood H/S Enamel	10.6	28.08%	0.0%	28.1%	0.0%	58.06%	0.00420	30240	1.000	2.97	2.97	376.97	9047.20	1651.11	1268.68	5.11	70%
Aluchron Hartford Green	9.4	32.14%	0.0%	32.1%	0.0%	58.47%	0.00420	30240	1.000	3.01	3.01	381.67	9160.09	1671.72	1058.89	5.14	70%
Adobe Bronze H/S Enamel	9.8	32.40%	0.0%	32.4%	0.0%	56.35%	0.00420	30240	1.000	3.18	3.18	404.51	9708.25	1771.76	1108.99	5.65	70%
Polychron III White	11.3	31.50%	0.0%	31.5%	0.0%	51.29%	0.00420	30240	1.000	3.57	3.57	452.89	10869.24	1983.64	1294.09	6.95	70%
Flex Black	8.4	54.84%	0.0%	54.8%	0.0%	36.96%	0.00420	30240	1.000	4.61	4.61	585.07	14041.68	2562.61	633.08	12.46	70%
New Running Board Black	10.0	34.08%	0.0%	34.1%	0.0%	52.88%	0.00420	30240	1.000	3.42	3.42	434.57	10429.79	1903.44	1104.53	6.47	70%
Artic White H/S Enamel	11.7	25.53%	0.0%	25.5%	0.0%	59.02%	0.00420	30240	1.000	2.99	2.99	379.37	9104.98	1661.66	1454.10	5.06	70%
Polychron III Parrette White	13.0	19.78%	0.0%	19.8%	0.0%	73.40%	0.00420	30240	1.000	2.57	2.57	326.59	7838.12	1430.46	1740.41	3.50	70%
Kinco Beige H/S Enamel	11.9	24.59%	0.0%	24.6%	0.0%	60.00%	0.00420	30240	1.000	2.93	2.93	371.96	8927.15	1629.20	1498.88	4.88	70%
Polychron III Norco Beige	9.6	37.39%	0.0%	37.4%	0.0%	51.15%	0.00420	30240	1.000	3.58	3.58	454.46	10907.11	1990.55	999.96	7.00	70%
Quaker Bronze RTS Enamel	11.1	27.00%	0.0%	27.0%	0.0%	65.00%	0.00420	30240	1.000	2.98	2.98	378.93	9094.28	1659.71	1346.21	4.59	70%
Fleetwood White Flex H/S Enamel	11.6	29.26%	0.0%	29.3%	0.0%	52.73%	0.00420	30240	1.000	3.39	3.39	429.97	10319.29	1883.27	1365.92	6.42	70%
Coradco Brown H/S Enamel	9.1	34.97%	0.0%	35.0%	0.0%	56.45%	0.00420	30240	1.000	3.18	3.18	403.29	9678.85	1766.39	985.43	5.62	70%
Polychron III Pewter	9.5	33.18%	0.0%	33.2%	0.0%	57.29%	0.00420	30240	1.000	3.14	3.14	398.66	9567.75	1746.11	1054.93	5.48	70%
Valex Beige #770H/ Enamel	11.5	26.69%	0.0%	26.7%	0.0%	56.67%	0.00420	30240	1.000	3.07	3.07	389.49	9347.83	1705.98	1405.76	5.41	70%
Polychron III Hartford Green	9.8	32.57%	0.0%	32.6%	0.0%	57.09%	0.00420	30240	1.000	3.18	3.18	403.32	9679.76	1766.56	1097.20	5.56	70%
Polyceram 1400 Pella White	11.4	29.37%	0.0%	29.4%	0.0%	53.54%	0.00420	30240	1.000	3.33	3.33	423.38	10161.13	1854.41	1337.86	6.23	70%

Add worst case coating to all solvents

793	19028	3473	1740
------------	--------------	-------------	-------------

										Control Efficiency		Controlled	Controlled	Controlled	Controlled
										VOC	PM	VOC pounds per hour	VOC pounds per day	VOC tons/yr	Particulate tons/yr
										0	0.95				

Controlled Emissions due to Surface Coating Operations and Controls

793 19028 3473 87.0

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) * Flash-off
 Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day) * Flash-off
 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) * Flash-off
 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) * Flash-off
 Total = Worst Coating + Sum of all solvents used

**Appendix A: Emissions Calculations
VOC and HAPs
From Cleanup Operations Associated With Surface Coating**

**Company Name: Bon L Manufacturing Company
Plant Location: 508 W. Wilson Street, Kentland, Indiana 47951
Part 70 Renewal No.: T 111-18828-00005
Permit Reviewer: CarrieAnn Paukowits
Date: September 12, 2007**

Material	Density (lb/gal)	Weight % Volatile (Organics)	Usage Rate (gal/yr)	Weight % Xylene	Weight % Glycol Ether	Weight % Ethyl benzene	Weight % Naphthalene	Potential VOC tons per year	Potential Xylene tons per year	Potential Glycol Ether tons per year	Potential Ethyl benzene tons per year	Potential Naphthalene tons per year	Total HAPs tons per year
Xylene	7.24	100.00%	6855	90.00%	0.00%	25.00%	0.00%	24.82	22.33	0.00	6.20	0.00	24.82
Solvent 150	7.49	100.00%	381	0.00%	0.00%	0.00%	11.00%	1.43	0.00	0.00	0.00	0.16	0.16
Butyl Carbitol	7.95	100.00%	141	0.00%	100.00%	0.00%	0.00%	0.56	0.00	0.56	0.00	0.00	0.56
MEK	6.72	100.00%	737	0.00%	100.00%	0.00%	0.00%	2.48	0.00	2.48	0.00	0.00	2.48
Totals:								29.3	22.3	3.04	6.20	0.157	28.0

METHODOLOGY

Potential VOC Tons per Year = Density of coating (lb/gal) * Weight percent Volatile * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Potential HAP Tons per Year = Density of coating (lb/gal) * Weight percent HAP * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

**Appendix A: Emissions Calculations
Anodizing of Aluminum Parts**

**Company Name: Bon L Manufacturing Company
Plant Location: 508 W. Wilson Street, Kentland, Indiana 47951
Part 70 Renewal No.: T 111-18828-00005
Permit Reviewer: CarrieAnn Paukowits
Date: September 12, 2007**

One (1) anodizing line (ANOD-1)

Tank Number	Material	Emissions (lb water/ ft2-hr)	Surface area (ft2)	mol water	mol material	solution strength divided by 100	Adjusted mol water	Adjusted mol material	Mol Fraction	PM Emissions (lbs/hr)	PM Emissions (tons/yr)	PM Control Efficiency (%)	PM Controlled Emissions (lbs/hr)	PM Controlled Emissions (tons/yr)
1	caustic cleaner/ water	0.067	120	3128	190.48	0.50	3227.83	95.24	0.030	0.237	1.04	0.0%	0.237	1.04
3	NaOH/ water	0.067	150	3953.64	133.22	0.50	4101.66	66.61	0.016	0.163	0.715	99.0%	0.002	0.007
6	sulfuric acid/ water	0.067	90	2320.83	58.84	0.93	2483.29	54.73	0.022	0.133	0.582	0.0%	0.133	0.582
9	ammonium bifluoride/water	0.067	120	1362.22	630.28	0.80	2958.93	504.22	0.170	1.370	6.00	99.0%	0.014	0.060
9	hydrogen fluoride/ water	0.067	120	2612.21	48.28	0.67	2645.66	32.34	0.012	0.098	0.430	99.0%	0.001	0.004
11	sulfuric acid/ water	0.067	105	2620.43	74.33	0.80	2853.35	59.47	0.021	0.147	0.64	99.0%	0.001	0.006
13	sulfuric acid/ water	0.067	120	2107	80.18	0.93	2512.99	74.57	0.030	0.239	1.04	99.0%	0.002	0.010
15	sulfuric acid/ water	0.067	120	2107	80.18	0.93	2512.99	74.57	0.030	0.239	1.04	99.0%	0.002	0.010
19	sulfuric acid/ water	0.067	120	2502.86	9.16	0.93	2549.26	8.52	0.003	0.027	0.118	0.0%	0.027	0.118
19	colormax/ water	0.067	120	2221.01	92.82	1.00	2221.01	92.82	0.042	0.336	1.47	0.0%	0.336	1.47
22	hydrogen fluoride/ water	0.067	105	2907.51	0.75	1.00	2907.41	0.75	0.0003	0.002	0.008	0.0%	0.002	0.008
22	nickel fluoride/ water	0.067	105	2975.48	0.43	1.00	2975.58	0.43	0.0001	0.001	0.004	0.0%	0.001	0.004
25	hydrogen fluoride/ water	0.067	105	2907.51	0.75	1.00	2907.51	0.75	0.0003	0.002	0.008	0.0%	0.002	0.008
25	nickel fluoride/ water	0.067	105	2975.58	0.43	1.00	2975.58	0.43	0.0001	0.001	0.004	0.0%	0.001	0.004
26	hydrogen fluoride/ water	0.067	105	2907.51	0.75	1.00	2907.51	0.75	0.0003	0.002	0.008	0.0%	0.002	0.008
26	nickel fluoride/ water	0.067	105	2975.58	0.43	1.00	2975.58	0.43	0.0001	0.001	0.004	0.0%	0.001	0.004
Totals:										2.87	12.56		0.73	3.21

Pollutant	Uncontrolled Emissions (tons/yr)
HF	0.454
Ni	0.013

Pollutant	Uncontrolled Emissions Tanks 6 & 19 (tons/yr)	Uncontrolled Emissions Tanks 11, 13 & 15 (tons/yr)	Uncontrolled Emissions Total (tons/yr)	Control Efficiency Tanks 6 & 19 (%)	Control Efficiency Tanks 11, 13 & 15 (%)	Controlled Emissions Tanks 6 & 19 (tons/yr)	Controlled Emissions Tanks 13 & 15 (tons/yr)	Controlled Emissions Total (tons/yr)
SO2	0.700	2.73	3.43	0.0%	99.0%	2.732	0.034	2.77

Methodology

Emission equations from E. S Thomas "Evacuation Distances for Spills of Hazardous Materials" in Proceedings of the 1984 Hazardous Materials Spills Conference
 Applicant Provided Emissions (lb water/ft2-hr) = 9.69E4*[Vapor pressure water^{4/3} * molecular weight water]^{0.60327}
 Uncontrolled Emissions (lb pollutant/hr) = Emissions (lb water/ ft2-hr) * surface area * adjusted mol fraction
 Controlled Emissions (lb pollutant/hr) = Uncontrolled emissions * (1-control efficiency)
 Emissions (tons/yr) = Emissions (lbs/hr) * 8760 hrs/yr / 2,000 lbs/ton
 These emission factors were approved during the review for T 111-5887-00005, and are more conservative than the AP-42 emission factors for chromium anodizing.

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

**Company Name: Bon L Manufacturing Company
Plant Location: 508 W. Wilson Street, Kentland, Indiana 47951
Part 70 Renewal No.: T 111-18828-00005
Permit Reviewer: CarrieAnn Paukowits
Date: September 12, 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
Boiler ANOD-2	8.40	73.58	0.070	0.280	0.022	3.679	0.202	3.091
Paint bake oven P	9.00	78.84	0.075	0.300	0.024	3.942	0.217	3.311
Insignificant Activities								
Billet Heaters EXTR-1 F-H	16.70	146.29	0.139	0.556	0.044	7.315	0.402	6.144
Aging Ovens EXTR-2 I-J	5.80	50.81	0.048	0.193	0.015	2.540	0.140	2.134
Aging Ovens EXTR-2 K	10.00	87.60	0.083	0.333	0.026	2.190	0.241	3.679
Pretreatment tank heaters PREPAINT-1 K-L	10.50	91.98	0.087	0.350	0.028	4.599	0.253	3.863
Dry off oven PREPAINT-2 O	2.60	22.78	0.022	0.087	0.007	1.139	0.063	0.957
Building heaters HEAT-1 A - E	25.70	225.13	0.214	0.856	0.068	11.257	0.619	9.456
Total	60.40	529	0.738	2.953	0.233	36.661	2.137	32.635

HAPs - Organics

Emission Factor in lb/MMcf	Benzene	Dichloro- benzene	Formaldehyde	Hexane	Toluene
	0.00210	0.00120	0.07500	1.80000	0.00340
ANOD-1	0.0001	0.0000	0.0028	0.0662	0.0001
Paint bake oven P	0.0001	0.0000	0.0030	0.0710	0.0001
Insignificant Activities					
Billet Heaters F-H	0.0002	0.0001	0.0055	0.1317	0.0002
Aging Ovens I-J	0.0001	0.0000	0.0019	0.0458	0.0001
Pretreatment tank heater K - N	0.0001	0.0001	0.0034	0.0828	0.0002
Dry off oven O	0.0000	0.0000	0.0009	0.0205	0.0000
Building heater A - E	0.0002	0.0001	0.0084	0.2026	0.0004

HAPs - Metals

Emission Factor in lb/MMcf	Lead	Cadmium	Chromium	Manganese	Nickel	Total HAPs
	0.0005	0.0011	0.0014	0.0004	0.0021	
ANOD-1	0.0000	0.0000	0.0001	0.00001	0.0001	0.069
Paint bake oven P	0.0000	0.0000	0.0001	0.00001	0.0001	0.074
Insignificant Activities						
Billet Heaters F-H	0.0000	0.0001	0.0001	0.00003	0.0002	0.138
Aging Ovens I-J	0.0000	0.0000	0.0000	0.00001	0.0001	0.048
Pretreatment tank heater K - N	0.0000	0.0001	0.0001	0.00002	0.0001	0.087
Dry off oven O	0.0000	0.0000	0.0000	0.00000	0.0000	0.021
Building heater A - E	0.0001	0.0001	0.0002	0.00004	0.0002	0.212

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

Company Name: **Bon L Manufacturing Company**
 Plant Location: **508 W. Wilson Street, Kentland, Indiana 47951**
 Part 70 Renewal No.: **T 111-18828-00005**
 Permit Reviewer: **CarrieAnn Paukowits**
 Date: **September 12, 2007**

SO2 Emission factor = 0.10 x S
 S = Weight % Sulfur = **0.01**

Emission Factor in lb/kgal	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
	0.6	0.6	0.001 (0.10S)	19.0	0.5 **TOC value	3.2

Anodizing Boiler ANOD-2

Heat Input Capacity MMBtu/hr: **8.4**
 Potential Throughput kgals/year: **782.81**
 SO2 Emission factor = 0.10 x S
 S = Weight % Sulfur = **0.01**

Potential Emission in tons/yr	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
	0.235	0.235	0.0005	7.44	0.196	1.25

Paint Bake Oven P

Heat Input Capacity MMBtu/hr: **9.0**
 Potential Throughput kgals/year: **838.72**
 SO2 Emission factor = 0.10 x S
 S = Weight % Sulfur = **0.01**

Potential Emission in tons/yr	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
	0.252	0.252	0.0005	7.97	0.210	1.34

INSIGNIFICANT ACTIVITIES

Billet Heaters EXTR-1 F, G and H

Heat Input Capacity MMBtu/hr: **16.7**
 Potential Throughput kgals/year: **1556.30**
 SO2 Emission factor = 0.10 x S
 S = Weight % Sulfur = **0.01**

Potential Emission in tons/yr	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
	0.467	0.467	0.0010	14.78	0.389	2.49

Aging Ovens EXTR-2 I, J and K

Heat Input Capacity MMBtu/hr: **15.8**
 Potential Throughput kgals/year: **1472.43**
 SO2 Emission factor = 0.10 x S
 S = Weight % Sulfur = **0.01**

Potential Emission in tons/yr	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
	0.442	0.442	0.0009	13.99	0.368	2.36

Pretreatment Tank Heaters PREPAINT-1 K and L

Heat Input Capacity MMBtu/hr: **10.5**
 Potential Throughput kgals/year: **978.51**
 SO2 Emission factor = 0.10 x S
 S = Weight % Sulfur = **0.01**

Potential Emission in tons/yr	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
	0.294	0.294	0.0006	9.30	0.245	1.57

Dryoff Oven PREPAINT-2 O

Heat Input Capacity MMBtu/hr: **2.6**
 Potential Throughput kgals/year: **242.30**
 SO2 Emission factor = 0.10 x S
 S = Weight % Sulfur = **0.01**

Potential Emission in tons/yr	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
	0.073	0.073	0.0001	2.30	0.061	0.39

Building Heaters HEAT-1 A through E

Heat Input Capacity MMBtu/hr: **25.7**
 Potential Throughput kgals/year: **2395.02**
 SO2 Emission factor = 0.10 x S
 S = Weight % Sulfur = **0.01**

Potential Emission in tons/yr	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
	0.719	0.719	0.0015	22.75	0.599	3.83

Potential Emissions Significant Units	Pollutant						
	TPY	PM	PM10	SO2	NOx	VOC	CO
Potential Emissions Significant Units	TPY	0.486	0.486	0.001	15.405	0.405	2.59
Potential Emissions Insignificant	TPY	1.99	1.99	0.004	63.1	1.66	10.6
Total Potential emissions	TPY	2.48	2.48	0.005	78.5	2.07	13.2

Methodology

1 gallon of LPG has a heating value of 94,000 Btu
 Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.094 MMBtu
 Emission Factors are from AP42, Fifth Edition (January 1995), Table 1.5-2 (SCC #1-02-010-02)
 Emission (tons/yr) = Throughput (kgals/yr) x Emission Factor (lb/kgal) / 2,000 lb/ton

Company Name: Bon L Manufacturing Company
Plant Location: 508 W. Wilson Street, Kentland, Indiana 47951
Part 70 Renewal No.: T 111-18828-00005
Permit Reviewer: CarrieAnn Paukowitz
Date: September 12, 2007

Gasoline Storage and Dispensing

Standing Losses

Working Losses

Source	Tank Size (gallons)	VOC Emissions (lbs/yr)	VOC Emissions (tons/yr)	Act. Annual Throughput (gallons)	Pot. Annual Throughput (gallons)	VOC Emissions (lbs/yr)	VOC Emissions (tons/yr)
Gasoline Storage	280	198.39	0.099	596	3600	37.21	0.019

Vehicle Refueling

Source	Displ. Emission Factor (lbs/1000gal)	Annual Throughput (gallons)	VOC Emissions (lbs/yr)	VOC Emissions (tons/yr)	Spill Emission Factor (lbs/1000gal)	Annual Throughput (gallons)	VOC Emissions (lbs/yr)	VOC Emissions (tons/yr)
Gasoline Dispensing	11.0	3600	39.60	0.020	0.7	3600	2.520	0.0013

Diesel Storage and Dispensing

Standing Losses

Working Losses

Source	Tank Size (gallons)	VOC Emissions (lbs/yr)	VOC Emissions (tons/yr)	Act. Annual Throughput (gallons)	Pot. Annual Throughput (gallons)	VOC Emissions (lbs/yr)	VOC Emissions (tons/yr)
Storage	288	0.11	0.0001	3479	60000	1.21	0.0006

Vehicle Refueling

Source	Emission Factor (lbs/1000gal)	Annual Throughput (gallons)	VOC Emissions (lbs/yr)	VOC Emissions (tons/yr)
Dispensing	0.03	60000	1.8	0.0009

Kerosene Storage and Dispensing

Standing Losses

Working Losses

Source	Tank Size (gallons)	VOC Emissions (lbs/yr)	VOC Emissions (tons/yr)	Act. Annual Throughput (gallons)	Pot. Annual Throughput (gallons)	VOC Emissions (lbs/yr)	VOC Emissions (tons/yr)
Gasoline Storage	288	0.14	0.0001	689	6000	0.17	0.00009

Vehicle Refueling

Source	Emission Factor (lbs/1000gal)	Annual Throughput (gallons)	VOC Emissions (lbs/yr)	VOC Emissions (tons/yr)
Dispensing	0.04	6000	0.24	0.00012

Total VOC Emissions 0.141

HAPs Emissions

HAP	Weight %	Unrestricted PTE (tons/yr)
Benzene	3.00%	0.004
Ethylbenzene	3.00%	0.004
Hexane	5.00%	0.007
Napthalene	3.00%	0.004
Toluene	12.00%	0.017
Xylenes	12.00%	0.017
Total		0.053

Methodology

Storage emissions from Tanks 4.0.9 using the actual throughput and scaled up to the potential throughput
 Dispensing emission factors from AP-42, Chapter 5

**Appendix A: Emissions Calculations
Miscellaneous Insignificant Activities**

**Company Name: Bon L Manufacturing Company
Plant Location: 508 W. Wilson Street, Kentland, Indiana 47951
Part 70 Renewal No.: T 111-18828-00005
Permit Reviewer: CarrieAnn Paukowits
Date: September 12, 2007**

Miscellaneous Materials Usage and Emissions

	VOC tons/yr
Degreasing	0.177
Wastewater treatment	0.005
Waste oil storage	0.00041
AW32 storage	0.00007

Provided by the applicant

	HF Usage (lbs/hr)	HF Usage (tons/yr)
Paint Pretreatment	0.3	1.314

Enclosed chamber

	PM/PM10	
Welding	0.006	tons/yr

Provided by the applicant

Metal Working

Process:	Rate (tons metal/hr)	Pollutant	Emission Factor (lb/ton produced)	PTE before controls (lbs/hr)	PTE before controls (ton/yr)	Type of control	Control Efficiency (%)	PTE after controls (lbs/hr)	PTE after controls (ton/yr)
Metal Sawing	48.5	PM	0.01	0.485	2.124	bag filter	80.00%	0.097	0.425
Source of Criteria		PM-10	0.0045	0.218	0.956	bag filter	80.00%	0.044	0.191
Pollutant Factors:									
FIRE 6.23									
EPA SCC# 3-04-003-60									

Process	Process Weight Rate (tons/hr)	Material Removed (PM/PM10 Emissions) (lbs/hr)	Material Removed (PM/PM10 Emissions) (tons/yr)
Drilling and machining operations.	2.5	0.5	2.19
One (1) deburring machine	0.25	0.05	0.219
			2.41

**Metal Working Total = 4.53 tons PM/yr
3.36 tons PM10/yr**

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)
Woodworking							
Sawing	500	0.35	0.200	0.09	0.050	0.383	0.219

Methodology

Emission factors from FIRES 6.23, SCC 3-07-008-01, 02 and 03

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: Emissions Summary

Company Name: **Bon L Manufacturing Company**
 Plant Location: **508 W. Wilson Street, Kentland, Indiana 47951**
 Part 70 Renewal No.: **T 111-18828-00005**
 Permit Reviewer: **CarrieAnn Paukowits**
 Date: **September 12, 2007**

Unrestricted Potential Emissions (tons/yr)

	PM	PM10	SO2	NOx	VOC	CO	MIBK	Toluene	Glycol Ethers	Form-aldehyde	Ethyl benzene	Xylene	Naph-thalene	Cumene	Hexane	HF	Nickel	Benzene	Total HAPs	
Two (2) paint booths	1740	1740	0.00	0.00	3502	0.00	142	665	1374	51.3	460	1672	120	3.40	0.00	0.00	0.00	0.000	0.000	2800
One (1) anodizing line	12.6	12.6	3.43	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.454	0.013	0.000	0.000	0.468
Anodizing Boiler	0.235	0.280	0.022	7.44	0.202	3.09	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.066	0.00	0.00	0.000	0.000	0.069
Paint bake oven	0.252	0.300	0.024	7.97	0.217	3.31	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.071	0.00	0.00	0.000	0.000	0.074
<i>Insignificant Activities</i>																				
Insignificant Combustion	1.99	2.37	0.187	63.1	1.72	26.2	0.00	0.00	0.00	0.020	0.00	0.00	0.00	0.00	0.483	0.00	0.00	0.000	0.000	0.507
Fuel Transfer and Dispensing	0.00	0.00	0.00	0.00	0.141	0.00	0.00	0.017	0.00	0.00	0.00	0.017	0.00	0.00	0.007	0.00	0.00	0.004	0.004	0.053
Welding	0.006	0.006	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	0.000	0.000	0.00
Woodworking saw	0.383	0.219	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	0.000	0.000	0.00
Metal Working	4.53	3.36	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	0.000	0.000	0.00
Paint pretreatment and miscellaneous materials usage	0.00	0.00	0.00	0.00	0.18	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.31	0.00	0.000	0.000	1.31
<i>Insignificant Activities Total</i>	6.92	5.96	0.187	63.1	2.04	26.2	0.000	0.018	0.000	0.020	0.004	0.017	0.004	0.000	0.490	1.31	0.000	0.004	0.004	1.87
Total	1760	1760	3.67	78.5	3504	32.6	142	665	1374	51.4	460	1672	120	3.40	0.63	1.77	0.013	0.004	0.004	2802

Limited Potential to Emit (tons/yr)

	PM	PM10	SO2	NOx	VOC	CO	MIBK	Toluene	Glycol Ethers	Form-aldehyde	Ethyl benzene	Xylene	Naph-thalene	Cumene	Hexane	HF	Nickel	Benzene	Total HAPs	
Two (2) paint booths	229	229	0.00	0.00	246	0.00	246	246	246	246	246	246	246	246	0.00	0.00	0.00	0.000	0.000	246
One (1) anodizing line	12.6	12.6	3.43	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.454	0.013	0.000	0.000	0.468
Anodizing Boiler	0.235	0.280	0.022	7.44	0.202	3.09	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.066	0.00	0.00	0.000	0.000	0.069
Paint bake oven	0.252	0.300	0.024	7.97	0.217	3.31	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.071	0.00	0.00	0.000	0.000	0.074
<i>Insignificant Activities</i>																				
Insignificant Combustion	1.99	2.37	0.187	63.12	1.72	26.2	0.00	0.00	0.00	0.020	0.00	0.00	0.00	0.00	0.483	0.00	0.00	0.000	0.000	0.507
Fuel Transfer and Dispensing	0.00	0.00	0.00	0.00	0.141	0.00	0.00	0.017	0.00	0.00	0.00	0.017	0.00	0.00	0.007	0.00	0.00	0.004	0.004	0.053
Welding	0.006	0.006	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	0.000	0.000	0.00
Woodworking saw	0.383	0.219	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	0.000	0.000	0.00
Metal Working	4.53	3.36	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	0.000	0.000	0.00
Paint pretreatment and miscellaneous materials usage	0.00	0.00	0.00	0.00	0.182	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.31	0.00	0.000	0.000	1.31
<i>Insignificant Activities Total</i>	6.92	5.96	0.187	63.12	2.04	26.2	0.000	0.018	0.000	0.020	0.004	0.017	0.004	0.000	0.490	1.314	0.000	0.004	0.004	1.87
Total	249.0	248.1	3.67	78.5	248	32.6	246	246	246	246	246	246	246	246	0.628	1.77	0.01	0.00	0.00	248