



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant
DATE: February 3, 2005
RE: ELSA, L.L.C. / 095-19454-00048
FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this approval 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 13-15-7-3 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 Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. 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.

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.

Enclosures
FNPER-MOD.dot 1/10/05



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

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Indianapolis, Indiana 46206-6015
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February 3, 2005

Mr. Sam Wason
ELSA, L.L.C.
1240 South Street Road 37
Elwood, Indiana 46036

Re: 095-19454-00048
First Minor Source Modification to
Part 70 Permit No.: T095-7668-00048

Dear Mr. Wason:

ELSA, LLC was issued Part 70 Operating Permit T095-19494-00048 on April 17, 1998 for an automotive fuel tank and exhaust systems manufacturing plant. An application to modify the source was received on June 15, 2004. Pursuant to the provisions of 326 IAC 2-7-10.5, the following emission units are approved for modification and construction at the source:

- (a) Addition of a robotic spray arm for paint application to one (1) existing paint booth, identified as top coat, with a maximum capacity of 40 fuel tanks per hour, with dry filters for overspray control, and exhausting to stack 15.
- (b) One (1) new paint booth identified as Ford Final, with a maximum capacity of 75 fuel tanks per hour with dry filters for overspray control, and exhausting to stack 42.
- (c) Use of different types of paints in booth 16, and exhausting to stack 16. The new paints shall comply with the VOC content limit of 3.5 pounds per gallon, which was established in the source's Part 70 permit. There is no increase in emissions as result of this change.

The following construction conditions are applicable to the proposed project:

- 1. General Construction Conditions
The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
- 2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
- 3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
- 4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.
6. Pursuant to 326 IAC 2-7-10.5(l) the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

The source may begin construction and operation when the minor source modification has been issued. Operating conditions shall be incorporated into the Part 70 operating permit as a minor permit modification in accordance with 326 IAC 2-7-10.5(l)(2) and 326 IAC 2-7-12.

Pursuant to Contract No. A305-0-00-36, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Sanobar Durrani, ERG, Morrisville, North Carolina 27560, or call (919) 468-7810 to speak directly to Ms. Durrani. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (800) 451-6027, and ask for Duane Van Laningham, or extension 3-6878, or dial (317) 233-6878.

Sincerely,
Original signed by

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

ERG/SD

cc: File - Madison County
Madison County Health Department
Anderson Office of Air Quality
Air Compliance Section Inspector - D. J. Knotts
Compliance Data Section
Administrative and Development
Technical Support and Modeling - Michele Boner



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**PART 70 OPERATING PERMIT
 OFFICE OF AIR QUALITY
 and
 Anderson Office of Air Quality**

**ELSA, L.L.C.
 1240 South SR 37
 Elwood, Indiana 46036**

(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.

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 and 326 IAC 2-1-3.2 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.: T095-7668-00048	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: April 17, 1998 Expiration Date: April 17, 2003

First Administrative Amendment No.: 095-15742-00048, issued on July 26, 2002.
 Second Administrative Amendment No.: 095-16128-00048, issued on November 25, 2002.
 Third Administrative Amendment No.: 095-17348-00048, issued on July 25, 2003.

First Significant Source Modification No.: 095-19454-00048	Affected Pages: 2, 3, 4, 6-10
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: February 3, 2005



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)]

The Permittee owns and operates a stationary automobile fuel tank and exhaust systems manufacturing operation.

Responsible Official: Erl Haapanen
Source Address: 1240 South SR 37, Elwood, IN 46036
Mailing Address: 1240 South SR 37, Elwood, IN 46036
SIC Code: 3714
County Location: Madison County
Status: Nonattainment for ozone under the 8-hour standard
Attainment for all other criteria pollutants
Source Status: Part 70 Permit Program Major 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) open top vapor degreaser utilizing trichloroethylene, identified as facility ID AN01, with a maximum capacity of 2.3 gal/hr, and exhausting to stack 3.
- (b) One (1) paint booth, identified as PVC paint, with a maximum capacity of 25 units/hr, with dry filters for overspray control, and exhausting to stack 14.
- (c) One (1) paint booth, identified as top coat, with a maximum capacity of 25 fuel tanks/hr, using a robotic spray arm and equipped with dry filters for overspray control, and exhausting to stack 15.
- (d) One (1) paint booth, identified as touch-up, with a maximum capacity of 25 fuel tanks/hr, with dry filters for overspray control, and exhausting to stack 16.
- (e) One (1) paint booth, identified as BU, with a maximum capacity of 31 units/hr, with dry filters for overspray control, and exhausting to stack 17.
- (f) One (1) paint booth, identified as wax robot, with a maximum capacity of 36 fuel tanks/hr, with dry filters for overspray control, and exhausting to stack 34.
- (g) One (1) paint booth, identified as wax touch up, with a maximum capacity of 36 fuel tanks/hr, with dry filters for overspray control, and exhausting to stack 35.
- (h) One (1) paint booth, identified as BV, with a maximum capacity of 38 units/hr, with dry filters for overspray control, and exhausting to stack 41.
- (i) One (1) paint booth, identified as PSU Tank Final, with a maximum capacity of 25 fuel tanks/hour, with dry filters for overspray control, and exhausting to stack 42.

- (j) One (1) paint booth, identified as Mazda PVC, with a maximum capacity of 23 fuel tanks/hr, with dry filters for overspray control, and exhausting to stack 44.
- (k) Welding operations consisting of the following:
 - (1) Eight (8) metal inert gas (MIG) welders identified as AB-2, AB-4, AB-5, AB-6, AB-7, AB-8, AB-10, and AB-16 exhausting to stack 1.
 - (2) Twenty-two (22) metal inert gas (MIG) welders identified as AJ-2, AJ-3, AJ-4, AJ5, AJ-6, AJ-7, AJ-8, AJ-12, AX-1, AX-2, AX-3, AX-4-1, AX-5, AX-6, AX-7-1, AX8, AX-9, AX-10-1, AX-11, AX-13-2, AX-14-1, and AX-15-1, exhausting to stack 2.
 - (3) One (1) oxyacetylene welder identified as AC-2 exhausting to stack 4.
 - (4) Four (4) metal inert gas (MIG) welders identified as AE-8, AE-10, AE-11, and AE-12 exhausting to stack 5.
 - (5) Eight (8) metal inert gas (MIG) welders identified as AP-5, AP-8, AP-10, AP-18, AP-28, AP-30, AP-33, and AP-37, exhausting to stack 6.
 - (6) Fifteen (15) metal inert gas (MIG) welders identified as AF-2, AF-3, AF-7, AF-8, AF-10, AF-11, AF-16-1, AF-16-2, AF-19-1, AA-03, AA-04, AA-05, AA-06, AA08-1, and AA-10 exhausting to stack 7.
 - (7) Three (3) metal inert gas (MIG) welders identified as AT-06, AT-08, AT-09 and one (1) tungsten inert gas (TIG) welder identified as AT-10 exhausting to stack 8.
 - (8) Eight (8) metal inert gas (MIG) welders identified as AG-2, AG-10, AG-11, AG01, AG-04, AH-02, AH-03, and AH-08 exhausting to stack 28.
 - (9) Seventeen (17) metal inert gas (MIG) welders identified as AI-05, AI-06, AI-09, AI-11, AI-13, AI-15, AI-16, AI-17, AI-18, AI-20, AI-21, AI-21, AS-05, AS-06, AS13, AS-15-1, and AS-16-2 exhausting to stack 29.
 - (10) Forty-two (42) metal inert gas (MIG) welders identified as BD-01, BD-02, BD-03, BD-04, BD-05, BD-06, BD-08, BD-12, BD-13, BD-14, BK-01, BK-02, BK-03, BK-05, BK-06, BK-07, BK-13, BL-04, BL-05, BL-06, BL-09, BL-10, BL-11, BL13, BL-16, BL-18, BL-23, BL-24, BL-25, BL-26, BL-27, BL-28, BL-29, BL-31, BL-32, BL-33, BL-35, BV-9-2, BV-10, BV-11, BV-13, and BV-13-1 exhausting to stack 33.
 - (11) Eleven (11) metal inert gas (MIG) welders identified as AK-01, AK-02, AK-03, AY-1-1, AY-02, AY-03, AY-05, AY-06, AY-7-1, AY-7-2, AY-9-1 exhausting to stack 37.
 - (12) Twenty-seven (27) metal inert gas (MIG) welders identified as BJ-01, BJ-02, BJ-04, BJ-06, BJ-09, BJ-10, BM-01, BM-02, BM-03, BM-04, BN-01, BN-2-2, BN-23, BN-04, BN-05, BN-8-2, BN-11, BO-01, BO-02, BO-03, BO-05, BU-31, BU33, BU-32, BU-34-1, BU-35-1, and BU-35-2, exhausting to stack 38.
 - (13) Twenty-one (21) metal inert gas (MIG) welders identified as BB-01, BB-02, BB-03, BG-01, BG-02, BG-03, BG-04, BP-05, BO-01, BO-02, and BO-03, exhausting to stack 39.

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

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

- (a) Natural gas-fired combustion source with heat input equal to or less than ten (10) million Btu per hour, identified as Sh-1 (3.8 MMBtu/hr) and exhausting to stack 10.
- (b) Natural gas-fired combustion source with heat input equal to or less than ten (10) million Btu per hour, identified as Sh-2 (3.8 MMBtu/hr) and exhausting to stack 11.
- (c) Natural gas-fired combustion source with heat input equal to or less than ten (10) million Btu per hour, identified as Rec-3 (3.8 MMBtu/hr) and exhausting to stack 13.
- (d) Natural gas-fired combustion source with heat input equal to or less than ten (10) million Btu per hour, identified as dry-off, bake oven (4.5 MMBtu/hr) and exhausting to stack 18 and 19.
- (e) Natural gas-fired combustion source with heat input equal to or less than ten (10) million Btu per hour, identified as washer B (1.75 MMBtu/hr) and exhausting to stack 20 and 21.
- (f) Natural gas-fired combustion source with heat input equal to or less than ten (10) million Btu per hour, identified as washer C (1.75 MMBtu/hr) and exhausting to stack 22 and 23.
- (g) Natural gas-fired combustion source with heat input equal to or less than ten (10) million Btu per hour, identified as J washer (1.0 MMBtu/hr) and exhausting to stack 30.
- (h) Natural gas-fired combustion source with heat input equal to or less than ten (10) million Btu per hour, identified as Ford washer C (2.5 MMBtu/hr) and exhausting to stack 31 and 32.
- (i) Natural gas-fired combustion source with heat input equal to or less than ten (10) million Btu per hour, identified as wax bake oven (2.75 MMBtu/hr) and exhausting to stack 36.
- (j) Natural gas-fired combustion source with heat input equal to or less than ten (10) million Btu per hour, identified as drying oven (0.74 MMBtu/hr) and exhausting to stack 45.
- (k) Natural gas-fired combustion source with heat input equal to or less than ten (10) million Btu per hour, identified as drying oven (1.00 MMBtu/hr) and exhausting to stack 47.
- (l) One (1) paint burn-off oven. This unit was installed in 2002.
- (m) Two (2) overhead heaters, constructed in 2003, using natural gas as fuel, each with a maximum heat input rate of 0.12 MMBtu/hr, exhausting to stacks 120 and 121, respectively.
- (n) One (1) spinning converter oven, constructed in 2003, using natural gas as fuel, with a maximum heat input rate of 0.9 MMBtu/hr, exhausting to stack 122.

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); and

(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).

A.5 Prior Permit Conditions Superseded [326 IAC 2]

The terms and conditions of this permit incorporate all the current applicable requirements for all emission units located at this source, and supersede all terms and conditions in all registrations and permits, including construction permits, issued prior to the date of issuance of this permit. All terms and conditions in such registrations and permits are no longer in effect.

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description:

- (b) One (1) paint booth, identified as PVC paint, with a maximum capacity of 25 units/hr, with dry filters for overspray control, and exhausting to stack 14.
- (c) One (1) paint booth, identified as top coat, with a maximum capacity of 25 fuel tanks/hr, using a robotic spray arm and equipped with dry filters for overspray control, and exhausting to stack 15.
- (d) One (1) paint booth, identified as touch-up, with a maximum capacity of 25 fuel tanks/hr, with dry filters for overspray control, and exhausting to stack 16.
- (e) One (1) paint booth, identified as BU, with a maximum capacity of 31 units/hr, with dry filters for overspray control, and exhausting to stack 17.
- (f) One (1) paint booth, identified as wax robot, with a maximum capacity of 36 fuel tanks/hr, with dry filters for overspray control, and exhausting to stack 34.
- (g) One (1) paint booth, identified as wax touch up, with a maximum capacity of 36 fuel tanks/hr, with dry filters for overspray control, and exhausting to stack 35.
- (h) One (1) paint booth, identified as BV, with a maximum capacity of 38 units/hr, with dry filters for overspray control, and exhausting to stack 41.
- (i) One (1) paint booth, identified as PSU Tank Final, with a maximum capacity of 25 fuel tanks/hour, with dry filters for overspray control, and exhausting to stack 42.
- (j) One (1) paint booth, identified as Mazda PVC, with a maximum capacity of 23 fuel tanks/hr, with dry filters for overspray control, and exhausting to stack 44.

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

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

D.2.1 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 2 to 40 CFR Part 63, Subpart M] [40 CFR 63.3901]

- (a) The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart M. The Permittee must comply with these requirements on and after January 2, 2007.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition, except as otherwise provided in this condition. The permit shield applies to Condition D.2.11, Notification Requirements.

D.2.2 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products [40 CFR Part 63, Subpart M] [40 CFR 63.3882] [40 CFR 63.3883] [40 CFR 63.3980]

- (a) The provisions of 40 CFR Part 63, Subpart M (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/misc/miscpg.html>. Pursuant to 40 CFR 63.3883(b), the Permittee must comply with these requirements on and after January 2, 2007.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition, except as otherwise provided in this condition. The permit shield applies to Condition D.2.11, Notification Requirements.
- (c) The affected source is the collection of all of the items listed in 40 CFR 63.3882, paragraphs (b)(1) through (4) that are used for surface coating of miscellaneous metal parts and products within each subcategory as defined in 40 CFR 63.3881(a), paragraphs (2) through (6).
 - (1) All paint booths performing coating operations as defined in 40 CFR 63.3981;
 - (2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
 - (3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and
 - (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.
- (d) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.3980, and are applicable to the affected source.

D.2.3 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating), the volatile organic compound (VOC) content of coating delivered to the applicator at the paint booths shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.
- (b) Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.2.4 PSD Minor Modification [326 IAC 2-2] [40 CFR 52.21]

- (a) Any change or modification which may increase the volatile organic compound (VOC) emissions from the BV and PSU Tank Final paint booths to 40 tons per year or more must be approved by IDEM, OAQ before any such change may occur.
- (b) Any change or modification which may increase the volatile organic compound (VOC) emissions from the Mazda PVC paint booth to 40 tons per year or more must be approved by IDEM, OAQ before any such change may occur.

D.2.5 Particulate Matter (PM) [40 CFR 52, Subpart P]

Pursuant to 40 CFR 52, Subpart P, the PM from each of the paint booths shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

D.2.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.2.7 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.2.3 and D.2.4 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.2.8 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to CP 095-7134-00048, issued on June 9, 1997, the particulate from the paint booths shall be controlled by dry filters and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.2.9 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily observations shall be made of the overspray while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.
- (d) The overspray from the paint booths shall be considered in compliance provided that the overspray is not:
 - (1) visibly detectable at the exhaust;
 - (2) detectable on the rooftops; or
 - (3) causing any nuisance problems.

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

D.2.10 Record Keeping Requirements

(a) To document compliance with Conditions D.2.3 and D.2.4, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.2.3 and D.2.4. Records necessary to demonstrate compliance shall be available within 30 days at the end of each compliance period.

- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
- (2) A log of the dates of use;
- (3) The volume weighted VOC content of the coatings used for each day that any coating with VOC content greater than 3.5 pounds per gallon, less water, is used, by:

$$\frac{\text{lb VOC}}{\text{gallon less water}} = \frac{3 \text{ coatings } [Dc * O * Q / [1-W * Dc / Dw]]}{3 C}$$

Dc = density of coating, lb/gal
Dw = density of water, lb/gal
O = weight percent organics, %
Q = quantity of coating, gal/unit
W = percent volume water, %
C = total of coatings used, gal/unit

- (4) The cleanup solvent usage for each day;
 - (5) The total VOC usage for each day; and
 - (6) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.2.9, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping.

D.2.11 Notification Requirements [40 CFR 63.3910]

- (a) General. The Permittee must submit the applicable notifications in 40 CFR Part 63, Sections 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) by the dates specified in those sections, except as provided in 40 CFR 63.3910, paragraphs (b) and (c).
- (b) Initial notification. The Permittee must submit the initial notification required by 40 CFR 63.9(b) for a new or reconstructed affected source no later than 120 days after initial startup or 120 days after January 2, 2004, whichever is later. For an existing affected source, the Permittee must submit the initial notification no later than January 2, 2005. If using compliance with the Surface Coating of Automobiles and Light-Duty Trucks NESHAP (40 CFR Part 63, Subpart IIII) as provided for under 40 CFR 63.3881(d) to constitute compliance with this subpart for any or all of the metal parts coating operations,

then the Permittee must include a statement to this effect in the initial notification, and no other notifications are required under this subpart in regard to those metal parts coating operations. If complying with another NESHAP that constitutes the predominant activity at the facility under 40 CFR 63.3881(e)(2) to constitute compliance with this subpart for the metal parts coating operations, then the Permittee must include a statement to this effect in the initial notification, and no other notifications are required under this subpart in regard to those metal parts coating operations.

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

D.2.12 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]

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

- (a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Part 70 permit the applicable requirements of 40 CFR 63, Subpart M, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.
- (b) The significant permit modification application shall be submitted no later than April 2, 2006.
- (c) The significant permit modification application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015
and
Anderson Office of Air Quality
P.O. Box 2100
120 East 8th Street
Anderson, Indiana 46011

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

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

Source Background and Description

Source Name:	ELSA, LLC.
Source Location:	1240 South SR 37, Elwood, IN 46036
County:	Madison
SIC Code:	3714
Operation Permit No.:	095-7668-00048
Operation Permit Issuance Date:	April 17, 1998
Significant Source Modification No.:	095-19454-00048
Significant Permit Modification No.:	095-20388-00048
Permit Reviewer:	ERG/SD

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

- (a) Addition of robotic spray arm for paint application to one (1) existing paint booth, identified as top coat, with a maximum capacity of 25 fuel tanks per hour, with dry filters for overspray control, and exhausting to stack 15.
- (b) One new (1) paint booth identified as PSU Tank Final, with a maximum capacity of 25 fuel tanks per hour with dry filters for overspray control, and exhausting to stack 42.
- (c) Use of Penguin Coat 1605 paint in paint booth 16, and exhausting to stack 16. The new paint shall comply with the VOC content limit of 3.5 pounds per gallon, which was established in the source's Part 70 permit. There is no increase in emissions as result of this change.

History

ELSA, LLC is an existing automotive fuel tanks and exhaust systems manufacturing plant. A Part 70 permit (T095-7668-00048) was issued to this source on April 17, 1998 and they submitted a Part 70 permit renewal application on August 22, 2002, which is currently being drafted. On June 15, 2004, the source submitted an application to the IDEM, OAQ requesting the following:

- (a) Modification to paint booth 15 to change the application method from hand spray to robotic spray arm.
- (b) Modification to paint booth 16 to change the type of coating used.
- (c) Construction of one new (1) paint booth identified as PSU Tank Final and exhausting to stack 42.

- (d) During source review, the Permittee identified the maximum capacity of the PVC and touch-up booths as 25 fuel tanks per hour, and not 40 fuel tanks per hour as previously described.

Note: An Administrative Amendment No.: 095-15742-00048 removed the Ford Final paint booth from the source's permit. Although this paint booth was simply shut down and will be used for the new PSU Tank Final booth, it is still considered as new construction for the purpose of rule applicability.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

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

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

An application for the purposes of this review was received on June 15, 2004. Additional information was received on October 28, 2004 and November 29, 2004.

Emission Calculations

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

Potential To Emit of Modification

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

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

Pollutant	Potential To Emit (tons/year)
PM	107
PM10	107
SO ₂	0.00
VOC	20.2
CO	0.00
NO _x	0.00

There are no HAP emissions associated with this modification.

Justification for Modification

The Part 70 Operating permit is being modified through a Part 70 Significant Source Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5(f)(4)(a) because the potential to emit of PM/PM10 from the modification is greater than twenty-five (25) tons per year. The Part

70 Operating permit is being modified through a Part 70 Significant Permit Modification pursuant to 326 IAC 2-7-12(d) because the modification involves a significant change to existing monitoring, reporting, or record keeping requirements in the permit.

County Attainment Status

The source is located in Madison County.

Pollutant	Status
PM10	Attainment
SO ₂	Attainment
NO ₂	Attainment
1-hour Ozone	Attainment
8-hour Ozone	Nonattainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. Madison County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for nonattainment new source review.
- (b) Madison County has been classified as attainment in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) Fugitive Emissions
 Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

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

Pollutant	Emissions (tons/year)
PM	>250
PM10	>250
SO ₂	<100
VOC	>250
CO	<100
NOx	<100
HAPs	>10 and 25 for single and combination respectively

- (a) This existing source is a major stationary source because a nonattainment regulated pollutant (VOC) is emitted at a rate of 100 tons per year or more.
- (b) This existing source is a major source because an attainment regulated pollutant (PM/PM10) is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories.
- (c) These emissions are based upon the potential to emit for the source as given in T095-7668-000048, issued April 17, 1998.

Potential to Emit of Modification After Issuance

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

Emission Unit	Potential to Emit (tons/year)						
	PM	PM10	SO ₂	VOC	CO	NO _x	HAPs
Paint Booth 15	0.51	0.51	0.00	9.71	0.00	0.00	0.00
Paint Booth 16	0.04	0.04	0.00	0.78	0.00	0.00	0.00
*PSU Tank Final Paint Booth 42	0.51	0.51	0.00	9.71	0.00	0.00	0.00
Total Emissions from Modification	1.07	1.07	0.00	20.2	0.00	0.00	0.00
New Source Review Threshold	25	15	40	40	100	40	0.00

* The PTE of PM/PM10 are after controls.

This modification to an existing major stationary source is not major because the emissions increase is less than the Nonattainment New Source Review significant levels for VOC, and zero for NO_x; and less than PSD significant levels for all other criteria pollutants. Therefore, pursuant to 326 IAC 2-1.1-5 and 326 IAC 2-2, the Nonattainment New Source Review and PSD requirements do not apply.

Federal Rule Applicability

- (a) This significant modification does not involve a pollutant-specific emissions unit:
 - (1) with the potential to emit before controls equal to or greater than one hundred (100) tons per year, and
 - (2) that is subject to an emission limit and has a control device that is necessary to meet that limit.

Therefore, the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not applicable.

- (b) The requirements of New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) are not applicable to this proposed modification.
- (c) ELSA was issued a Part 70 permit on April 17, 1998. The Permittee submitted a permit renewal application to IDEM, OAQ on August 22, 2002, which is currently being drafted.

The source performs metal coatings operations and is subject to the requirements of 40 CFR Part 63, Subpart Mmmm - National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products, which was promulgated on January 2, 2004. Although the modifications to the paint booths do not result in HAP emissions, the provisions of the NESHAP will be included in the permit because the rule was promulgated after issuance of the TV permit and because this is the first permit modification to the TV.

General Provisions

- (1) The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart Mmmm. The Permittee must comply with these requirements on and after January 2, 2004.
- (2) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15, does not apply to paragraph (c)(1) of this condition, except as otherwise provided in this condition. The permit shield applies to Notification Requirements (paragraph (c)(6)).

National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and products

- (3) The provisions of 40 CFR Part 63, Subpart Mmmm (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/misc/mispcpg.html>. Pursuant to 40 CFR 63.3883(b), the Permittee must comply with these requirements on and after January 2, 2007.
- (4) The affected source is the collection of all of the items listed in 40 CFR 63.3882, paragraphs (b)(1) through (4) that are used for surface coating of miscellaneous metal parts and products within each subcategory as defined in 40 CFR 63.3881(a), paragraphs (2) through (6).
 - (A) All coating operations as defined in 40 CFR 63.3981;
 - (B) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
 - (C) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and
 - (D) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.
- (5) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.3980, and are applicable to the affected source.

Notification Requirements [40 CFR 63.3910]

- (6) General. The Permittee must submit the applicable notifications in 40 CFR Part 63, Sections 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) by the dates specified in those sections, except as provided in 40 CFR 63.3910, paragraphs (b) and (c).
- (7) Initial notification. The Permittee must submit the initial notification required by 40 CFR 63.9(b) for a new or reconstructed affected source no later than 120 days

after initial startup or 120 days after January 2, 2004, whichever is later. For an existing affected source, the Permittee must submit the initial notification no later than January 2, 2005. If using compliance with the Surface Coating of Automobiles and Light-Duty Trucks NESHAP (40 CFR Part 63, Subpart IIII) as provided for under 40 CFR 63.3881(d) to constitute compliance with this subpart for any or all of the metal parts coating operations, then the Permittee must include a statement to this effect in the initial notification, and no other notifications are required under this subpart in regard to those metal parts coating operations. If complying with another NESHAP that constitutes the predominant activity at the facility under 40 CFR 63.3881(e)(2) to constitute compliance with this subpart for the metal parts coating operations, then the Permittee must include a statement to this effect in the initial notification, and no other notifications are required under this subpart in regard to those metal parts coating operations.

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

Requirement to Submit a Significant Permit Modification Application

- (9) The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information regarding which compliance option or options will be chosen in the Part 70 permit.
- (A) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Part 70 permit the applicable requirements of 40 CFR 63, Subpart Mmmm, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.
- (B) The significant permit modification application shall be submitted no later than April 2, 2006.
- (C) The significant permit modification application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015
and
Anderson Office of Air Quality
P.O. Box 2100
120 East 8th Street
Anderson, Indiana 46011

State Rule Applicability - Entire Source

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

Title V No.: 095-7668-00048, issued April 17, 1998 identifies the source as a major source of VOC and particulate under PSD. This status includes activities at the source that are considered insignificant. As of June 15, 2004, Madison County has been designated as nonattainment under the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to 326 IAC 2-1.1-5 (Nonattainment NSR).

On June 15, 2004 the Permittee submitted an application requesting modifications to paint booth 15 to change the application method from hand spray to robotic spray arm; to paint booth 16 to change the type of coating used; and construction of one (1) PSU Tank Final paint booth. The potential to emit of PM/PM10 from these modifications is equal to 1.07 tons per year after controls. Therefore, the modifications to the paint booths are not subject to the provisions of 326 IAC 2-2 (PSD).

The potential to emit of SO₂ and CO remain less than 250 tons per year.

326 IAC 2-1.1-5 (Nonattainment New Source Review)

This source is located in Madison County. As of June 15, 2004, Madison County has been designated as nonattainment under the 8-hour ozone standard. This source is a major source because the potential to emit of VOC is greater than one hundred (100) tons per year. The potential to emit of NO_x is less than 100 tons per year.

On June 15, 2004 the Permittee submitted an application requesting modifications to paint booth 15 to change the application method from hand spray to robotic spray arm; to paint booth 16 to change the type of coating used; and construction of one (1) PSU Tank Final paint booth. The potential to emit of VOC from these modifications is equal to 20.2 tons per year. Therefore, the modifications to this existing major source is not major for VOC because the potential to emit of VOC from PSU Tank Final paint booth, paint booth 15 and 16 are less than 40 tons per year. There are no NO_x emissions from the modifications to the paint booths.

Therefore, these modifications are not subject to the provisions of 326 IAC 2-1.1-5 (Nonattainment New Source Review).

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

This modification is not subject to the requirements of 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAPs)) because the modifications to the three (3) paint booths do not result in HAP emissions. However, pursuant to Title V No.: 095-7668-00048, issued April 17, 1998, the source is subject to 40 CFR Part 63, Subpart T and since the source performs metal coatings, it is now subject to the requirements of 40 CFR 63, Subpart M, which was promulgated on January 2, 2004.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity for sources 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 non-overlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Paint Booths

326 IAC 6-3-2 (Process Operations)

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

Pursuant to 40 CFR 52 Subpart P, the particulate matter (PM) from the PSU Tank Final paint booth, paint booth 15, and paint booth 16 shall be limited by the following:

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

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

Under the rule revision, particulate from the PSU Tank Final paint booth, paint booth 15, and paint booth 16 shall be controlled by a dry particulate filters at all times the PSU Tank Final paint booth, paint booth 15, and paint booth 16 are in operation, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

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

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the paint booths (42, 15, 16) 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 spray booths are in compliance with this requirement.

Compliance Requirements

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

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

The compliance monitoring requirements applicable to these modifications are as described in Condition D.2.8 (now Condition D.2.9) in Title V No. 095-7668-00048, issued April 17, 1998.

Proposed Changes

Note: Due to format inconsistency, the emission units in Sections A.2, A.3, D.1, D.2, and D.3 have been renumbered according to IDEM format. Also, IDEM OAM has been corrected throughout the permit to IDEM, OAQ. The Table of Contents has been changed as necessary. Bold language has been added and language with a line through it has been deleted.

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

The Permittee owns and operates a stationary automobile fuel tank and exhaust systems manufacturing operation.

Responsible Official: Erl Haapanen
Source Address: 1240 South SR 37, Elwood, IN 46036
Mailing Address: 1240 South SR 37, Elwood, IN 46036
SIC Code: 3714
County Location: Madison County
Status: **Nonattainment for ozone under the 8-hour standard**
Attainment for all **other** criteria pollutants
Source Status: Part 70 Permit Program Major 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:

- (~~1a~~) One (1) open top vapor degreaser utilizing trichloroethylene, identified as facility ID AN01, with a maximum capacity of 2.3 gal/hr, and exhausting to stack 3.
- (~~2b~~) One (1) paint booth, identified as PVC paint, with a maximum capacity of ~~28~~ **25** units/hr, with dry filters for overspray control, and exhausting to stack 14.
- (~~3c~~) One (1) paint booth, identified as top coat, with a maximum capacity of ~~40~~ **25** fuel tanks/hr, **using a robotic spray arm and equipped** with dry filters for overspray control, and exhausting to stack 15.
- (~~4d~~) One (1) paint booth, identified as touch-up, with a maximum capacity of ~~40~~ **25** fuel tanks/hr, with dry filters for overspray control, and exhausting to stack 16.
- (~~5e~~) One (1) paint booth, identified as BU, with a maximum capacity of 31 units/hr, with dry filters for overspray control, and exhausting to stack 17.
- (~~6f~~) One (1) paint booth, identified as wax robot, with a maximum capacity of 36 fuel tanks/hr, with dry filters for overspray control, and exhausting to stack 34.
- (~~7g~~) One (1) paint booth, identified as wax touch up, with a maximum capacity of 36 fuel tanks/hr, with dry filters for overspray control, and exhausting to stack 35.
- (~~8h~~) One (1) paint booth, identified as BV, with a maximum capacity of 38 units/hr, with dry filters for overspray control, and exhausting to stack 41.
- (**i**) **One (1) paint booth, identified as PSU Tank Final, with a maximum capacity of 25 fuel tanks/hour, with dry filters for overspray control, and exhausting to stack 42.**
- (~~9j~~) One (1) paint booth, identified as Mazda PVC, with a maximum capacity of 23 fuel tanks/hr, with dry filters for overspray control, and exhausting to stack 44.

- (40k) Welding operations consisting of the following:
- (i1) Eight (8) metal inert gas (MIG) welders identified as AB-2, AB-4, AB-5, AB-6, AB-7, AB-8, AB-10, and AB-16 exhausting to stack 1.
 - (ii2) Twenty-two (22) metal inert gas (MIG) welders identified as AJ-2, AJ-3, AJ-4, AJ5, AJ-6, AJ-7, AJ-8, AJ-12, AX-1, AX-2, AX-3, AX-4-1, AX-5, AX-6, AX-7-1, AX8, AX-9, AX-10-1, AX-11, AX-13-2, AX-14-1, and AX-15-1, exhausting to stack 2.
 - (iii3) One (1) oxyacetylene welder identified as AC-2 exhausting to stack 4.
 - (iv4) Four (4) metal inert gas (MIG) welders identified as AE-8, AE-10, AE-11, and AE-12 exhausting to stack 5.
 - (v5) Eight (8) metal inert gas (MIG) welders identified as AP-5, AP-8, AP-10, AP-18, AP-28, AP-30, AP-33, and AP-37, exhausting to stack 6.
 - (vi6) Fifteen (15) metal inert gas (MIG) welders identified as AF-2, AF-3, AF-7, AF-8, AF-10, AF-11, AF-16-1, AF-16-2, AF-19-1, AA-03, AA-04, AA-05, AA-06, AA08-1, and AA-10 exhausting to stack 7.
 - (vii7) Three (3) metal inert gas (MIG) welders identified as AT-06, AT-08, AT-09 and one (1) tungsten inert gas (TIG) welder identified as AT-10 exhausting to stack 8.
 - (viii8) Eight (8) metal inert gas (MIG) welders identified as AG-2, AG-10, AG-11, AG01, AG-04, AH-02, AH-03, and AH-08 exhausting to stack 28.
 - (ix9) Seventeen (17) metal inert gas (MIG) welders identified as AI-05, AI-06, AI-09, AI-11, AI-13, AI-15, AI-16, AI-17, AI-18, AI-20, AI-21, AI-21, AS-05, AS-06, AS13, AS-15-1, and AS-16-2 exhausting to stack 29.
 - (x10) Forty-two (42) metal inert gas (MIG) welders identified as BD-01, BD-02, BD-03, BD-04, BD-05, BD-06, BD-08, BD-12, BD-13, BD-14, BK-01, BK-02, BK-03, BK-05, BK-06, BK-07, BK-13, BL-04, BL-05, BL-06, BL-09, BL-10, BL-11, BL13, BL-16, BL-18, BL-23, BL-24, BL-25, BL-26, BL-27, BL-28, BL-29, BL-31, BL-32, BL-33, BL-35, BV-9-2, BV-10, BV-11, BV-13, and BV-13-1 exhausting to stack 33.
 - (xi11) Eleven (11) metal inert gas (MIG) welders identified as AK-01, AK-02, AK-03, AY-1-1, AY-02, AY-03, AY-05, AY-06, AY-7-1, AY-7-2, AY-9-1 exhausting to stack 37.
 - (xii12) Twenty-seven (27) metal inert gas (MIG) welders identified as BJ-01, BJ-02, BJ-04, BJ-06, BJ-09, BJ-10, BM-01, BM-02, BM-03, BM-04, BN-01, BN-2-2, BN-23, BN-04, BN-05, BN-8-2, BN-11, BO-01, BO-02, BO-03, BO-05, BU-31, BU33, BU-32, BU-34-1, BU-35-1, and BU-35-2, exhausting to stack 38.
 - (xiii13) Twenty-one (21) metal inert gas (MIG) welders identified as BB-01, BB-02, BB-03, BG-01, BG-02, BG-03, BG-04, BP-05, BO-01, BO-02, and BO-03, exhausting to stack 39.
- (11) — One (1) paint burn off oven.

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):

- (1a) Natural gas-fired combustion source with heat input equal to or less than ten (10) million Btu per hour, identified as Sh-1 (3.8 MMBtu/hr) and exhausting to stack 10.
- (2b) Natural gas-fired combustion source with heat input equal to or less than ten (10) million Btu per hour, identified as Sh-2 (3.8 MMBtu/hr) and exhausting to stack 11.
- (3c) Natural gas-fired combustion source with heat input equal to or less than ten (10) million Btu per hour, identified as Rec-3 (3.8 MMBtu/hr) and exhausting to stack 13.
- (4d) Natural gas-fired combustion source with heat input equal to or less than ten (10) million Btu per hour, identified as dry-off, bake oven (4.5 MMBtu/hr) and exhausting to stack 18 and 19.
- (5e) Natural gas-fired combustion source with heat input equal to or less than ten (10) million Btu per hour, identified as washer B (1.75 MMBtu/hr) and exhausting to stack 20 and 21.
- (6f) Natural gas-fired combustion source with heat input equal to or less than ten (10) million Btu per hour, identified as washer C (1.75 MMBtu/hr) and exhausting to stack 22 and 23.
- (7g) Natural gas-fired combustion source with heat input equal to or less than ten (10) million Btu per hour, identified as J washer (1.0 MMBtu/hr) and exhausting to stack 30.
- (8h) Natural gas-fired combustion source with heat input equal to or less than ten (10) million Btu per hour, identified as Ford washer C (2.5 MMBtu/hr) and exhausting to stack 31 and 32.
- (9i) Natural gas-fired combustion source with heat input equal to or less than ten (10) million Btu per hour, identified as wax bake oven (2.75 MMBtu/hr) and exhausting to stack 36.
- (10j) Natural gas-fired combustion source with heat input equal to or less than ten (10) million Btu per hour, identified as drying oven (0.74 MMBtu/hr) and exhausting to stack 45.
- (11k) Natural gas-fired combustion source with heat input equal to or less than ten (10) million Btu per hour, identified as drying oven (1.00 MMBtu/hr) and exhausting to stack 47.
- (l) **One (1) paint burn-off oven. This unit was installed 2002.**
- (12m) Two (2) overhead heaters, constructed in 2003, using natural gas as fuel, each with a maximum heat input rate of 0.12 MMBtu/hr, exhausting to stacks 120 and 121, respectively.
- (13n) One (1) spinning converter oven, constructed in 2003, using natural gas as fuel, with a maximum heat input rate of 0.9 MMBtu/hr, exhausting to stack 122.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description:

- (1a) One (1) open top vapor degreaser utilizing trichloroethylene, identified as facility ID AN01, with

a maximum capacity of 2.3 gal/hr, and exhausting to stack 3.

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

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description:

- (2b) One (1) paint booth, identified as PVC paint, with a maximum capacity of ~~28~~ **25** units/hr, with dry filters for overspray control, and exhausting to stack 14.
- (3c) One (1) paint booth, identified as top coat, with a maximum capacity of ~~40~~ **25** fuel tanks/hr, **using a robotic spray arm and equipped** with dry filters for overspray control, and exhausting to stack 15.
- (4d) One (1) paint booth, identified as touch-up, with a maximum capacity of ~~40~~ **25** fuel tanks/hr, with dry filters for overspray control, and exhausting to stack 16.
- (5e) One (1) paint booth, identified as BU, with a maximum capacity of 31 units/hr, with dry filters for overspray control, and exhausting to stack 17.
- (6f) One (1) paint booth, identified as wax robot, with a maximum capacity of 36 fuel tanks/hr, with dry filters for overspray control, and exhausting to stack 34.
- (7g) One (1) paint booth, identified as wax touch up, with a maximum capacity of 36 fuel tanks/hr, with dry filters for overspray control, and exhausting to stack 35.
- (8h) One (1) paint booth, identified as BV, with a maximum capacity of 38 units/hr, with dry filters for overspray control, and exhausting to stack 41.
- (i) **One (1) paint booth, identified as PSU Tank Final, with a maximum capacity of 25 fuel tanks/hour, with dry filters for overspray control, and exhausting to stack 42.**
- (9j) One (1) paint booth, identified as Mazda PVC, with a maximum capacity of 23 fuel tanks/hr, with dry filters for overspray control, and exhausting to stack 44.

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

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

D.2.1 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 2 to 40 CFR Part 63, Subpart MMMM] [40 CFR 63.3901]

- (a) The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart MMMM. The Permittee must comply with these requirements on and after January 2, 2007.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition, except as otherwise provided in this condition. The permit shield applies to Condition D.2.11, Notification Requirements.

D.2.2 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products [40 CFR Part 63, Subpart M] [40 CFR 63.3882] [40 CFR 63.3883] [40 CFR 63.3980]

- (a) The provisions of 40 CFR Part 63, Subpart M (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/misc/miscpg.html>. Pursuant to 40 CFR 63.3883(b), the Permittee must comply with these requirements on and after January 2, 2007.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition, except as otherwise provided in this condition. The permit shield applies to Condition D.2.11, Notification Requirements.
- (c) The affected source is the collection of all of the items listed in 40 CFR 63.3882, paragraphs (b)(1) through (4) that are used for surface coating of miscellaneous metal parts and products within each subcategory as defined in 40 CFR 63.3881(a), paragraphs (2) through (6).
 - (1) All paint booths performing coating operations as defined in 40 CFR 63.3981;
 - (2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
 - (3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and
 - (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.
- (d) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.3980, and are applicable to the affected source.

D.2.43 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

D.2.24 PSD Minor Modification [326 IAC 2-2] [40 CFR 52.21]

- (a) Any change or modification which may increase the volatile organic compound (VOC) emissions from the BV **and PSU Tank Final** paint booths to 40 tons per year or more must be approved by IDEM, OAQ before any such change may occur.

...

D.2.35 Particulate Matter (PM) [40 CFR 52, Subpart P]

D.2.46 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

D.2.5 Testing Requirements [326 IAC 2-7-6(1)]

Testing of this facility is not specifically required by this permit. However, if testing is required, compliance with the PM and VOC limits specified in Conditions D.2.1 and D.2.3 shall be

~~determined by a performance test conducted in accordance with Section C – Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.~~

D.2.67 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.2.43 and D.2.24 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) and 326 IAC 8-1-2(a)(7) ~~using formulation data supplied by the coating manufacturer~~ **by preparing or obtaining from the manufacturer the copies of the “as supplied” and “as applied” VOC data sheets.** IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.2.78 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to CP 095-7134-00048, issued on June 9, 1997, the **particulate from the paint booths shall be controlled by** dry filters ~~for PM control shall be in operation at all times when the paint booths are in operation and the Permittee shall operate the control device in accordance with manufacturer’s specifications.~~

D.2.89 Monitoring

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

D.2.910 Record Keeping Requirements

(a) To document compliance with Conditions D.2.43 and D.2.4, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.2.43 and D.2.4. **Records necessary to demonstrate compliance shall be available within 30 days at the end of each compliance period.**

...

(b) To document compliance with Condition ~~D.2.7~~ and D.2.9, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

...

D.2.11 Notification Requirements [40 CFR 63.3910]

(a) **General.** The Permittee must submit the applicable notifications in 40 CFR Part 63, Sections 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) by the dates specified in those sections, except as provided in 40 CFR 63.3910, paragraphs (b) and (c).

(b) **Initial notification.** The Permittee must submit the initial notification required by 40 CFR 63.9(b) for a new or reconstructed affected source no later than 120 days after initial startup or 120 days after January 2, 2004, whichever is later. For an existing affected source, the Permittee must submit the initial notification no later than January 2, 2005. If using compliance with the Surface Coating of Automobiles and Light-Duty Trucks NESHAP (40 CFR Part 63, Subpart III) as provided for under 40 CFR 63.3881(d) to constitute compliance with this subpart for any or all of the metal parts coating operations, then the Permittee must include a statement to this effect in the initial notification, and no other notifications are required under this subpart in regard to those metal parts coating operations. If complying with another NESHAP that constitutes the predominant activity at the facility under 40 CFR

63.3881(e)(2) to constitute compliance with this subpart for the metal parts coating operations, then the Permittee must include a statement to this effect in the initial notification, and no other notifications are required under this subpart in regard to those metal parts coating operations.

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

D.2.12 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]

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

- (a) **The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Part 70 permit the applicable requirements of 40 CFR 63, Subpart M, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.**
- (b) **The significant permit modification application shall be submitted no later than April 2, 2006.**
- (c) **The significant permit modification application shall be submitted to:**

**Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015
and
Anderson Office of Air Quality
P.O. Box 2100
120 East 8th Street
Anderson, Indiana 46011**

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description:

~~(10k)~~ Welding operations consisting of the following:

- ~~(i1)~~ Eight (8) metal inert gas (MIG) welders identified as AB-2, AB-4, AB-5, AB-6, AB-7, AB-8, AB-10, and AB-16 exhausting to stack 1.
- ~~(ii2)~~ Twenty-two (22) metal inert gas (MIG) welders identified as AJ-2, AJ-3, AJ-4, AJ5, AJ-6, AJ-7, AJ-8, AJ-12, AX-1, AX-2, AX-3, AX-4-1, AX-5, AX-6, AX-7-1, AX8, AX-9, AX-10-1, AX-11, AX-13-2, AX-14-1, and AX-15-1, exhausting to stack 2.
- ~~(iii3)~~ One (1) oxyacetylene welder identified as AC-2 exhausting to stack 4.
- ~~(iv4)~~ Four (4) metal inert gas (MIG) welders identified as AE-8, AE-10, AE-11, and AE-12 exhausting to stack 5.
- ~~(v5)~~ Eight (8) metal inert gas (MIG) welders identified as AP-5, AP-8, AP-10, AP-18, AP-28, AP-30, AP-33, and AP-37, exhausting to stack 6.
- ~~(vi6)~~ Fifteen (15) metal inert gas (MIG) welders identified as AF-2, AF-3, AF-7, AF-8, AF-10, AF-11, AF-16-1, AF-16-2, AF-19-1, AA-03, AA-04, AA-05, AA-06, AA08-1, and AA-10 exhausting to stack 7.
- ~~(vii7)~~ Three (3) metal inert gas (MIG) welders identified as AT-06, AT-08, AT-09 and one (1) tungsten inert gas (TIG) welder identified as AT-10 exhausting to stack 8.
- ~~(viii8)~~ Eight (8) metal inert gas (MIG) welders identified as AG-2, AG-10, AG-11, AG01, AG-04, AH-02, AH-03, and AH-08 exhausting to stack 28.
- ~~(ix9)~~ Seventeen (17) metal inert gas (MIG) welders identified as AI-05, AI-06, AI-09, AI-11, AI-13, AI-15, AI-16, AI-17, AI-18, AI-20, AI-21, AI-21, AS-05, AS-06, AS13, AS-15-1, and AS-16-2 exhausting to stack 29.
- ~~(x10)~~ Forty-two (42) metal inert gas (MIG) welders identified as BD-01, BD-02, BD-03, BD-04, BD-05, BD-06, BD-08, BD-12, BD-13, BD-14, BK-01, BK-02, BK-03, BK-05, BK-06, BK-07, BK-13, BL-04, BL-05, BL-06, BL-09, BL-10, BL-11, BL13, BL-16, BL-18, BL-23, BL-24, BL-25, BL-26, BL-27, BL-28, BL-29, BL-31, BL-32, BL-33, BL-35, BV-9-2, BV-10, BV-11, BV-13, and BV-13-1 exhausting to stack 33.
- ~~(xi11)~~ Eleven (11) metal inert gas (MIG) welders identified as AK-01, AK-02, AK-03, AY-1-1, AY-02, AY-03, AY-05, AY-06, AY-7-1, AY-7-2, AY-9-1 exhausting to stack 37.
- ~~(xii12)~~ Twenty-seven (27) metal inert gas (MIG) welders identified as BJ-01, BJ-02, BJ-04, BJ-06, BJ-09, BJ-10, BM-01, BM-02, BM-03, BM-04, BN-01, BN-2-2, BN-23, BN-04, BN-05, BN-8-2, BN-11, BO-01, BO-02, BO-03, BO-05, BU-31, BU33, BU-32, BU-34-1, BU-35-1, and BU-35-2, exhausting to stack 38.
- ~~(xiii13)~~ Twenty-one (21) metal inert gas (MIG) welders identified as BB-01, BB-02, BB-03, BG-01, BG-02, BG-03, BG-04, BP-05, BO-01, BO-02, and BO-03, exhausting to stack 39.

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

SECTION D.4 FACILITY OPERATION CONDITIONS

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

Insignificant Activities:

(44)(I) One (1) paint burn-off oven. **This unit was installed in 2002.**

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

Conclusion

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 095-19454-00048 and the proposed Part 70 Significant Permit Modification 095-20388-00048.

**Appendix A: Emissions Calculations
VOC and Particulate
From Paint Booths 16 and 42**

Company Name: ELSA, LLC.
Address: 1240 South Street 37, Elwood, Indiana 46036
MSM No: T095-19454-00048
Reviewer: ERG/SD
Date: 12/09/04

potential operating schedule 8760 hours/year

Material	Density (lb/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Max. Gal of Material (gal/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	PTE of VOC (lbs/hour)	PTE of VOC (lbs/day)	PTE of VOC (tons/ year)	PTE of PM/PM10 (ton/year)	Transfer Efficiency %	Control Efficiency %	Controlled PTE of PM/PM10 (ton/year)		
Booth 15																		
Penguin Coat 1605	12.3	4.50%	0%	4.50%	0.00%	89.5%	4.00	0.55	0.55	2.21	53.14	9.70	51.4	75%	99%	0.51		
Booth 16																		
Penguin Coat 1605	12.3	4.50%	0.00%	4.50%	0.00%	89.5%	0.32	0.55	0.55	0.18	4.25	0.78	4.12	75%	99%	0.04		
Booth 42																		
Penguin Coat 1605	12.3	4.50%	0.00%	4.50%	0.00%	89.5%	4.00	0.55	0.55	2.22	53.18	9.71	51.5	75%	99%	0.51		
Total												20.2	107	1.07				

Notes

Booth 15 is being changed from hand spray application to robotic spray application.
HAP emissions are not provided because the coating used by Booths 15, 16 and 42 do not contain HAPs.

Methodology

Pounds of VOC per Gallon Coating less Water = Density (lb/gal) * Weight % Organics *1/ (1-Volume % Water)
Pounds of VOC per Gallon Coating = Density (lb/gal) * Weight % Organics
PTE of VOC (lbs/hour) = Pounds of VOC per Gallon Coating (lb/gal) * Max. Gal of Material (gal/hour)
PTE of VOC (lbs/day) = Pounds of VOC per Gallon Coating (lb/gal) * Max. Gal of Material (gal/hour) * 24 hours/day
PTE of VOC (ton/year) = Pounds of VOC per Gallon Coating (lb/gal) * Max. Gal of Material (gal/hour) * 8760 hours/year * 1 ton/2000 lbs
PTE of PM/PM10 (ton/year) = Density (lbs/gal) * Max. Gal of Material (gal/hour) * (1- Weight % Volatiles) * (1-Transfer Efficiency%) * 8760 hours/year * 1 ton/2000 lbs