



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: March 30, 2005  
RE: Eler Industries, Inc. / SPM 079-19470-00010  
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 permit modification 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) 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.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit 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.



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

---

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Mr. Mark Erler  
Erler Industries, Inc.  
P.O. Box 219  
North Vernon, Indiana 47265

March 30, 2005

Re: 079-19470-00010  
First Significant Permit Modification to  
Part 70 No.: T 079-17195-00010

Dear Mr. Erler:

Erler Industries, Inc., located at 418 Stockwell Street, North Vernon, Indiana 47265; 71 Hayden Pike, North Vernon, Indiana 47265; and 125 West Hayden Pike, North Vernon, Indiana 47265 was issued a Part 70 permit on October 2, 2003 for a stationary surface coating operation that spray paint plastic cell phones and metal parts. A letter requesting changes to this permit was received on June 15, 2004 and August 2, 2004.

Since the source has violated the VOC limits established in the permit to avoid the applicability of 326 IAC 8-1-6 (General Reduction Requirements), the source is now subject to 326 IAC 8-1-6, and Best Available Control Technology (BACT) Analysis will be required. In order to return into compliance, the source proposes as BACT three (3) 3.0 million British thermal units per hour (mmBtu/hr) Regenerative Thermal Oxidizers, which are now installed. Pursuant to the provisions of 326 IAC 2-7-12 a Significant Permit Modification to this permit is hereby approved as described in the attached Technical Support Document.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Aida De Guzman, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0 and ask for extension (3-4972), or dial (317) 233-4972.

Sincerely,

Original signed by  
Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

Attachments  
APD

cc: File – Jennings County  
U.S. EPA, Region V  
U.S. EPA, Region V – Air Enforcement and Compliance Assurance Branch  
Jennings County Health Department  
Air Compliance Section Inspector – Jennifer Dorn  
Compliance Data Section  
Administrative and Development  
IDEM – Office of Enforcement Air Section



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## PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Erler Industries, Inc.**  
**418 Stockwell Street, North Vernon, Indiana 47265**  
**71 Hayden Pike, North Vernon, Indiana 47265**  
**and**  
**125 West Hayden Pike, North Vernon, Indiana 47265**

(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.: T079-17195-00010	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: October 2, 2003 Expiration Date: October 2, 2008
First Significant Permit Modification No.: 079-19470-00010	Pages Affected: All
Issued by: Original signed by Paul Dubenetzky, Chief Permit Branch	Issuance Date: March 30, 2005

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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, A.3, and A.4 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

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The Permittee owns and operates a stationary surface coating operation that spray paints plastic and metal parts, like plastic cell phone parts, plastic knife handles, cosmetic container caps, and miscellaneous plastic automotive parts, like knobs or covers.

Responsible Official:	Mark Erler, President
Source Address:	418 Stockwell Street, North Vernon, Indiana 47265 71 Hayden Pike, North Vernon, Indiana 47265 125 West Hayden Pike, North Vernon, Indiana 47265
Mailing Address:	P.O. Box 219, North Vernon, Indiana 47265
General Source Phone Number:	(812) 346-4421
SIC Code:	3479, 3663
County Location:	Jennings
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Major Source, Section 112 of the Clean Air Act

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

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This surface coating company that spray paints plastic and metal parts consists of five (5) plants:

- (a) Plant 1 is located at 418 Stockwell Street, North Vernon, Indiana 47265;
- (b) Plant 2 is located at 71 Hayden Pike, North Vernon, Indiana 47265
- (c) Plant 3 is located at 125 West Hayden Pike, North Vernon, Indiana 47265;
- (d) Plant 4 is located at 125 West Hayden Pike, North Vernon, Indiana 47265; and
- (e) Plant 5 is located at 125 West Hayden Pike, North Vernon, Indiana 47265.

Since the five (5) plants are located on contiguous or adjacent properties, belong to the same industrial grouping, and under common control of the same entity, they will be considered one (1) source, effective from the date of issuance of Minor Source Modification T079-16570-00010, issued on February 12, 2003.

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

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

(a) Located in Plant 1:

- (1) One (1) surface coating line, identified as Line 1, constructed in 1988, consisting of:
  - (A) Two (2) manual paint booths, identified as EU1 and EU2, each with a maximum capacity of 135 racks per hour, each equipped with dry filters to control particulate overspray, exhausting to stacks S/V1 and S/V2; and
  - (B) Two (2) robot paint booths, constructed in 2000, identified as EU17, exhausting to stack S/V17, and EU18, exhausting to stacks S/V18a and S/V18b, each with a maximum capacity of 135 racks per hour, each equipped with dry filters to control particulate overspray.
- (2) One (1) surface coating line, identified as Line 2, constructed in 1989, consisting of two (2) manual paint booths, identified as EU4 and EU5, with a maximum capacity of 2.5 gallons paint per hour, each equipped with dry filters to control particulate overspray, exhausting to stacks S/V4 and S/V5, respectively.

Plant 1 utilizes four (4) manual air atomization guns and two (2) robotic air atomization guns.

(b) Located in Plant 2:

- (1) One (1) surface coating line, identified as Line A, constructed in 1996, consisting of three (3) manual paint booths, identified as EU6, EU7, and EU8, each equipped with dry filters to control particulate overspray, exhausting to stacks S/V6, S/V7, and S/V8, respectively.
- (2) One (1) surface coating line, identified as Line B, constructed in 1996, consisting of:
  - (A) Two (2) manual paint booths, identified as EU9 and EU10, each equipped with dry filters to control particulate overspray, exhausting to stacks S/V9 and S/V10, respectively; and
  - (B) Two (2) robot paint booths, identified as EU11 and EU12, each equipped with dry filters to control particulate overspray, exhausting to stacks S/V11 and S/V12, respectively.

Line A and Line B each have a maximum capacity of 4.0 gallons of conductive copper paint per hour, a maximum capacity of 2.5 gallons of conductive silver paint per hour, and a maximum capacity of 2.0 gallons of conductive black paint per hour.

Decorative, conductive and clear coatings are used in Plant 2. Plant 2 utilizes eight manual High Volume Low Pressure (HVL) spray guns, two (2) manual air atomization guns, and two (2) robotic air atomization guns.

- (c) Located in Plant 3: One (1) surface coating line, identified as Plant 3, constructed in 1999, consisting of three (3) paint booths, identified as EU13, EU14, and EU15, each with a total maximum capacity of 135 racks per hour, and each equipped with dry filters to control particulate overspray. Plant 3 is equipped with a 3.0 mmBtu/hr Regenerative Thermal Oxidizer, RTO3 to control VOC emissions and exhausts to Stack P3. Plant 3 utilizes three (3) air atomization robotic spray guns.

- (d) Located in Plant 4: One (1) surface coating line, identified as Plant 4, constructed in 2002, consisting of three (3) paint booths, identified as EU19, EU20, and EU21, each with a total maximum capacity of 135 racks per hour, and each equipped with dry filters to control particulate overspray emissions. Plant 4 is equipped with a 3.0 mmBtu/hr Regenerative Thermal Oxidizer, RTO4 to control VOC emissions and exhausts to Stack P4. Plant 4 utilizes three (3) air atomization robotic spray guns.
- (e) Located in Plant 5: One (1) surface coating line, constructed in 2003, consisting of three (3) paint booths, identified as EU22, EU23, and EU24, each with a maximum capacity of 135 racks per hour and each equipped with dry filters to control particulate overspray. Plant 5 is equipped with a 3.0 mmBtu/hr Regenerative Thermal Oxidizer, RTO5 to control VOC emissions and exhausts to Stack P5. Plant 5 utilizes three (3) air atomization robotic spray guns.

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

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

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

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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]**

This permit 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.

### **B.3 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.4 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.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 a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

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

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- (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 in letter form no later than July 1 of each year to:

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

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]**

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- (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) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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: 317-233-5674 (ask for Compliance Section)  
Facsimile Number: 317-233-5967

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

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

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

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

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

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

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

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

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

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

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

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

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

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- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deletedby this permit.
- (b) All previous registrations and permits are superseded by this permit.

**B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]**

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- (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, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

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.15 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]**

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- (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 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.16 Permit Renewal [326 IAC 2-7-4]**

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- (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, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
  - (1) A timely renewal application is one that is:
    - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

- (B) 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.
- (2) If IDEM, OAQ, upon receiving a timely and complete 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.
- (c) **Right to Operate After Application for Renewal [326 IAC 2-7-3]**  
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.
- (d) **United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]**  
If IDEM, OAQ fails to act in a timely way on a Part 70 permit renewal, U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

**B.17 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]**

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- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
  
Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

**B.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12(b)(2)]**

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

explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by U.S. EPA.

B.19 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 emissions allowable under 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, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

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 which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes 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 increases and decreases in emissions in 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.

**B.20 Source Modification Requirement [326 IAC 2-7-10.5]**

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

**B.21 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1]**

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

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

**B.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]**

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- (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, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

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.23 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, I/M & Billing Section), to determine the appropriate permit fee.

B.24 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314]

Notwithstanding the conditions of this permit that state specific methods that may be used to demonstrate compliance with, or a violation of, applicable requirements, any person (including the Permittee) may also use other credible evidence to demonstrate compliance with, or a violation of, any term or condition of this permit.

## 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 [40 CFR 52, Subpart P] [326 IAC 6-3-2]

- (a) Pursuant to 40 CFR 52, Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (b) 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 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour. This condition is not federally enforceable.

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

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

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

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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. The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.

**C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]**

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- (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 260 linear feet on pipes or 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, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

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 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.9 Performance Testing [326 IAC 3-6]

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- (a) All testing required by this permit 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 for such required testing, 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, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

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) For such required testing, 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 for required testing 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 source 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.10 Compliance Requirements [326 IAC 2-1.1-11]

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The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any

monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or U.S. EPA.

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

#### **C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

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Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within thirty (30) days after the issuance of permit modification 079-19470-00010. 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 thirty (30) days, the Permittee may extend the compliance schedule related to the equipment for an additional thirty (30) days provided the Permittee notifies:

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

in writing, prior to the end of the initial thirty (30) 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.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

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

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

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

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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 December 18, 1998.
- (b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

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

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

C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5]  
[326 IAC 2-7-6]

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

submitted a request for a minor permit modification to the permit, and such request has not been denied.

- (3) An automatic measurement was taken when the process was not operating.
- (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B - Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

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

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

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

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

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

- (a) Pursuant to 326 IAC 2-6-3(b)(3), starting in 2006 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, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

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

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

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

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

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- (a) The source 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, P.O. Box 6015  
Indianapolis, Indiana 46206-6015
- (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.

**Stratospheric Ozone Protection**

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

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

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

## SECTION D.1

## FACILITY OPERATION CONDITIONS

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

Located in Plant 1:

- (1) One (1) surface coating line, identified as Line 1, constructed in 1988, consisting of:
  - (A) Two (2) manual paint booths, identified as EU1 and EU2, each with a maximum capacity of 135 racks per hour, each equipped with dry filters to control particulate overspray, exhausting to stacks S/V1 and S/V2; and
  - (B) Two (2) robot paint booths, constructed in 2000, identified as EU17, exhausting to stack S/V17, and EU18, exhausting to stacks S/V18a and S/V18b, each with a maximum capacity of 135 racks per hour, each equipped with dry filters to control particulate overspray.
- (2) One (1) surface coating line, identified as Line 2, constructed in 1989, consisting of two (2) manual paint booths, identified as EU4 and EU5, with a maximum capacity of 2.5 gallons paint per hour, each equipped with dry filters to control particulate overspray, exhausting to stacks S/V4 and S/V5, respectively.

Plant 1 utilizes four (4) manual air atomization guns and two (2) robotic air atomization guns.

**(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 General Reduction Requirements for New Facilities [326 IAC 8-1-6]

- (a) Pursuant to SSM 079-12803-00010, issued on December 15, 2000, the use of VOC on Line 1 (EU1, EU2, EU17, and EU18), including coatings used for plastic parts, dilution solvents, and cleaning solvents shall be less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month. This usage limit is required to limit the potential to emit of VOC to less than twenty-five (25) tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) not applicable.
- (b) Pursuant to T079-7572-00010, issued on September 23, 1998, the use of VOC on Line 2 (EU4 and EU5), including coatings used for plastic parts, dilution solvents, and cleaning solvents shall be less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month. This usage limit is required to limit the potential to emit of VOC to less than twenty-five (25) tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) not applicable.

#### D.1.2 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9, the owner or operator shall not allow the discharge into the atmosphere VOC in excess of (for clear coats) four and three-tenths (4.3), and (for all other coatings) three (3.0) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator for coatings used on metal parts.

#### D.1.3 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment of Plant 1 - Line 1 and Plant 1 - Line 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.1.4 Particulate Matter (PM) [40 CFR 52, Subpart P]**

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- (a) Pursuant to MSM 079-12803-00010, issued on December 15, 2000, and 40 CFR 52, Subpart P, the PM from the four (4) Line 1 paint booths (EU1, EU2, EU17, and EU18) shall not exceed the pound per hour emission rate established as E in the following formula:
- (b) Pursuant to T079-7572-00010, issued on September 23, 1998, and 40 CFR 52, Subpart P, the PM from the two (2) Line 2 paint booths (EU4 and EU5) shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

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

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- (a) Pursuant to MSM 079-12803-00010, issued on December 15, 2000, and 326 IAC 6-3-2(d), particulate from the surface coating Plant 1 - Line 1, shall be controlled by dry particulate filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (b) Pursuant to T079-7572-00010, issued on September 23, 1998, and 326 IAC 6-3-2(d), particulate from the surface coating Plant 1 - Line 2, shall be controlled by dry particulate filters, and the Permittee shall operate the control device in accordance with the manufacturer's specifications.

**D.1.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

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A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for each surface coating line, Line 1 and Line 2, and for the dry filters associated with each line, located in Plant 1.

**Compliance Determination Requirements**

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

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Compliance with the VOC content and usage limitations contained in Conditions D.1.1(a), D.1.1(b), and 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. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4

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

**D.1.8 Monitoring**

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- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation of this permit.
- (b) To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the paint booth stacks S/V1, S/V2, S/V4, S/V5, S/V17, S/V18a, and S/V18b while one or more of the booths are in operation.

- (c) Monthly inspections shall be performed of the coating emissions from each stack and for the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for each unit (EU1, EU2, EU4, EU5, EU17, and EU18) shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation of this permit.
- (d) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

#### **D.1.9 Record Keeping Requirements**

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- (a) To document compliance with Conditions D.1.1(a), D.1.1(b), and D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.1(a), D.1.1(b), and D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
  - (1) The VOC content of each coating material and solvent used less water.
  - (2) The amount of coating material and solvent used on a monthly basis.
    - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
    - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
  - (3) The volume weighted VOC content of the coatings used for each month.
  - (4) The cleanup solvent usage for each month.
  - (5) The total VOC usage for each month.
- (b) To document compliance with Conditions D.1.8(a), D.1.8(b), D.1.8(c), and D.1.8(d), the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### **D.1.10 Reporting Requirements**

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A quarterly summary of the information to document compliance with Conditions D.1.1(a) and D.1.1(b) 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).

## SECTION D.2

## FACILITY OPERATION CONDITIONS

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

Located in Plant 2:

(b) Located in Plant 2:

- (1) One (1) surface coating line, identified as Line A, constructed in 1996, consisting of three (3) manual paint booths, identified as EU6, EU7, and EU8, each equipped with dry filters to control particulate overspray, exhausting to stacks S/V6, S/V7, and S/V8, respectively.
- (2) One (1) surface coating line, identified as Line B, constructed in 1996, consisting of:
  - (A) Two (2) manual paint booths, identified as EU9 and EU10, each equipped with dry filters to control particulate overspray, exhausting to stacks S/V9 and S/V10, respectively; and
  - (B) Two (2) robot paint booths, identified as EU11 and EU12, each equipped with dry filters to control particulate overspray, exhausting to stacks S/V11 and S/V12, respectively.

Line A and Line B each have a maximum capacity of 4.0 gallons of conductive copper paint per hour, a maximum capacity of 2.5 gallons of conductive silver paint per hour, and a maximum capacity of 2.0 gallons of conductive black paint per hour.

Decorative, conductive and clear coatings are used in Plant 2. Plant 2 utilizes eight (8) manual High Volume Low Pressure (HVLP) spray guns, two (2) manual air atomization guns and two (2) robotic air atomization guns.

**(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 Reduction Requirements for New Facilities [326 IAC 8-1-6]**

Pursuant to CP 079-5091-00010, issued on March 29, 1996, Best Available Control Technology (BACT) shall be considered satisfied provided that:

- (a) The total VOC delivered to the applicators of Line A (EU6, EU7, and EU8) and Line B (EU9, EU10, EU11 and EU12) and all cleaning solvents used shall be limited to fifteen (15) tons per month, which is equivalent to one hundred eighty (180) tons per twelve (12) consecutive month period.
- (b) The seven (7) spray booths of Line A and Line B shall be equipped with High Volume Low Pressure (HVLP) spray applicators or applicators which deliver equivalent or better transfer efficiency when conductive or decorative coatings are used. High Volume Low Pressure application shall be considered achieved provided that the application equipment operates between 0.1 and 10 pounds per square inch (psig) air pressure, measured dynamically at the center of the air cap and at the air horns of the spray system. Any change or modification which may result in an increase in emissions or is in question with the above BACT requirements must be approved by OAQ before such change may occur.

- (c) Any solvent sprayed from the applicators in the seven (7) spray booths shall be sprayed 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) The conductive copper, silver and black coatings to be applied shall not exceed 6.1 pounds of VOC per gallon of coating, excluding water.
- (e) The two (2) 1.0 MMBtu/hr ovens located in Plant 2, identified as 8B and 9B, exhausting to their respective stacks identified as S/V13 and S/V14, shall be used to dry all parts coated by these seven (7) spray booths of Line A and Line B.

#### D.2.2 Particulate Matter (PM) [40 CFR 52, Subpart P]

---

Pursuant to T079-7572-00010, issued on September 23, 1998, and 40 CFR 52, Subpart P, PM from the three (3) Line A paint booths (EU6, EU7, and EU8) and the four (4) Line B paint booths (EU9, EU10, EU11, and EU12) 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.2.3 Particulate [326 IAC 6-3-2(d)]

---

Pursuant to T079-7572-00010, issued on September 23, 1998, and 326 IAC 6-3-2(d), particulate from the surface coating Plant 2 - Line A and Line B shall be controlled by dry particulate filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

#### D.2.4 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 each surface coating line, Line A and Line B, and for the dry filters associated with each line, located in Plant 2.

### Compliance Determination Requirements

#### D.2.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]

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Compliance with the VOC content and usage limitations contained in Condition D.2.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) 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.2.6 Monitoring

---

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation of this permit.

- (b) To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the paint booth stacks S/V6, S/V7, S/V8, S/V9, S/V10, S/V11, and S/V12 while one or more of the booths are in operation.
- (c) Monthly inspections shall be performed of the coating emissions from each stack and for the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for each unit (EU6, EU7, EU8, EU9, EU10, EU11, and EU12) shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation of this permit.
- (d) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

#### **D.2.7 Record Keeping Requirements**

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- (a) To document compliance with Condition D.2.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.2.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
  - (1) The VOC content of each coating material and solvent less water used.
  - (2) The amount of coating material and solvent used on a monthly basis.
    - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
    - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
  - (3) The cleanup solvent usage for each month.
  - (4) The total VOC usage for each month.
- (b) To document compliance with Conditions D.2.6(a), D.2.6(b), D.2.6(c), and D.2.6(d), the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### **D.2.8 Reporting Requirements**

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A quarterly summary of the information to document compliance with Condition D.2.1(a) 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.

### SECTION D.3

### FACILITY OPERATION CONDITIONS

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

- (c) Located in Plant 3: One (1) surface coating line, identified as Plant 3, constructed in 1999, consisting of three (3) paint booths, identified as EU13, EU14, and EU15, each with a total maximum capacity of 135 racks per hour, and each equipped with dry filters to control particulate overspray. Plant 3 is equipped with a 3.0 mmBtu/hr Regenerative Thermal Oxidizer, RTO3 to control VOC emissions and exhausts to Stack P3. Plant 3 utilizes three (3) air atomization robotic spray guns.
- (d) Located in Plant 4: One (1) surface coating line, identified as Plant 4, constructed in 2002, consisting of three (3) paint booths, identified as EU19, EU20, and EU21, each with a total maximum capacity of 135 racks per hour, and each equipped with dry filters to control particulate overspray emissions. Plant 4 is equipped with a 3.0 mmBtu/hr Regenerative Thermal Oxidizer, RTO4 to control VOC emissions and exhausts to Stack P4. Plant 4 utilizes three (3) air atomization robotic spray guns.
- (e) Located in Plant 5: One (1) surface coating line, constructed in 2003, consisting of three (3) paint booths, identified as EU22, EU23, and EU24, each with a maximum capacity of 135 racks per hour and each equipped with dry filters to control particulate overspray. Plant 5 is equipped with a 3.0 mmBtu/hr Regenerative Thermal Oxidizer, RTO5 to control VOC emissions and exhausts to Stack P5. Plant 5 utilizes three (3) air atomization robotic spray guns.

**(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 General Reduction Requirements for New Facilities [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6, the Best Available Control Technology (BACT) determined for Erler Industries Plant 3, Plant 4, and Plant 5 shall be the following:

- (a) The Regenerative Thermal Oxidizer (RTO) dedicated for each Plant 3, Plant 4, and Plant 5 shall be operated at all times each plant is in operation. Each RTO shall have a capture system efficiency of 100% and a destruction efficiency of 95%, such that all VOC emissions from the paint booths and the oven areas from each plant shall be directed into the RTO for destruction.
- (b) The effluent VOC concentration from Plant 3 RTO shall be limited to 100 parts per million by volume (ppmv), at a maximum air flow rate of 10,000 standard cubic feet per minute (scfm),
- (c) The effluent VOC concentration from Plant 4 and Plant 5 RTOs shall each be limited to 100 ppmv, at a maximum air flow rate of 9,000 scfm for each plant.
- (d) Good Work Practice Standards:
  - (1) All VOC containing coatings, thinners and/or other additives, cleaning materials and waste materials must be stored in closed containers.
  - (2) Spills of VOC-containing coatings, thinners, and/or other additives, cleaning materials and waste materials must be minimized.

- (3) VOC-containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be conveyed from one location to another in closed containers or pipes.
- (4) Mixing vessels with VOC-containing coatings and other materials must be closed except when adding to, removing, or mixing the contents.
- (5) Emissions of VOC must be minimized during cleaning of storage, mixing, and conveying equipment.

#### D.3.2 Particulate Matter (PM) [40 CFR 52, Subpart P]

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- (a) Pursuant to SSM 079-11008-00010, issued on September 27, 1999, and 40 CFR 52, Subpart P, the PM from the three (3) Plant 3, paint booths (EU13, EU14, and EU15) shall not exceed the pound per hour emission rate established as E in the following formula:
- (b) Pursuant to MSM 079-16237-00010, issued on September 5, 2002, and 40 CFR 52, Subpart P, the PM from the three (3) Plant 4, paint booths (EU19, EU20, and EU21) shall not exceed the pound per hour emission rate established as E in the following formula:
- (c) Pursuant to 40 CFR 52, Subpart P, the PM from the Plant 5 three (3) paint booths (EU22, EU23, and EU24) 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.3.3 Particulate Matter (PM) [326 IAC 6-3-2(d)]

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- (a) Pursuant to SSM 079-11008-00010, issued on September 27, 1999, and 326 IAC 6-3-2(d), particulate from the surface coating in Plant 3 shall be controlled by dry particulate filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (b) Pursuant to MSM 079-16237-00010, issued on September 5, 2002, and 326 IAC 6-3-2(d), particulate from the surface coating in Plant 4 shall be controlled by dry particulate filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (c) Pursuant to MSM 079-165701-00010, issued on February 12, 2003, and 326 IAC 6-3-2(d), particulate from the surface coating in Plant 5, shall be controlled by dry particulate filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

#### D.3.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for each surface coating line located in Plant 3, Plant 4, and Plant 5 and for the dry filters and RTO associated with each plant.

### Compliance Determination Requirements

#### D.3.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

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Within one hundred and eighty (180) days after initial startup of the third installed RTO, the Permittee shall conduct a performance test to verify capture efficiency using EPA Method 204 and destruction efficiency as per condition D.3.1 for the Regenerative Thermal Oxidizers using EPA Method 25A or methods as approved by the Commissioner. This test shall be repeated at least

once every five years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

#### D.3.6 Parametric Monitoring

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- (a) The Permittee shall determine the appropriate duct pressure or fan amperage from the most recent valid stack test to comply with the VOC limits in Condition D.3.1 and D.4.1 as approved by IDEM.
- (b) The duct pressure or fan amperage shall be observed at least once per day when the Regenerative Thermal Oxidizer is in operation. On and after the date the approved stack test results are available, the duct pressure or fan amperage shall be maintained within the normal range as established in most recent compliant stack test.

#### D.3.7 Regenerative Thermal Oxidizer Temperature

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- (a) A continuous monitoring system shall be calibrated, maintained, and operated on each Regenerative Thermal Oxidizer for measuring operating temperature. The output of this system shall be recorded as a 3-hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall operate the Regenerative Thermal Oxidizer at or above the three (3) hour average temperature of 1450°F.
- (b) The Permittee shall determine the 3-hour average temperature from the most recent valid stack test to demonstrates compliance with the limits in conditions D.3.1 and D.4.1, as approved by IDEM.
- (c) On and after the date the approved stack test results are available, the Permittee shall operate the Regenerative Thermal Oxidizer at or above the 3-hour average temperature as observed during the compliant stack test.

#### D.3.8 VOC Capture Efficiency Using Permanent or Temporary Total Enclosure

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The capture efficiency system shall be considered one-hundred (100) percent if the system meets the following criteria for a Permanent or Temporary Total Enclosure:

- (a) Any Natural Draft Opening (NDO) shall be at least four (4) equivalent opening diameters from each VOC emitting point.
- (b) Any exhaust point from the enclosure shall be at least four (4) equivalent duct or hood diameters from each NDO.
- (c) The total area of all NDO's shall not exceed 5 percent of the surface area of the enclosure's four walls, floor, and ceiling.
- (d) The average facial velocity (FV) of air through all NDO's shall be at least 3,600 meters per hour (200 feet per minute). The direction of airflow through all NDO's shall be into the enclosure.
- (e) All access doors and windows whose areas are not included in (c) and are not included in the calculation in (d) shall be closed during routine operation of the process.
- (f) All VOC in the enclosure emissions must be captured and contained for discharge through its respective RTOs.

Where:

Natural Draft Opening (NDO) - Any permanent opening in the enclosure that remains open during operation of the facility and is not connected to a duct in which a fan is installed.

Permanent Total Enclosure (PTE) - A permanently installed enclosure that completely

surrounds a source of emissions such that all VOC emissions are captured and contained for discharge through a control device.

Temporary Total Enclosure (TTE) - A temporarily installed enclosure that completely surrounds a source of emissions such that all VOC emissions are captured by the enclosure and contained for discharge through ducts that allow for the accurate measurement of VOC rates.

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

### **D.3.9 Monitoring**

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Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation of this permit.

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

### **D.3.10 Record Keeping Requirements**

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- (a) To document compliance with the BACT in Condition D.3.1, the Permittee shall maintain records of the following:
  - (1) VOC input from each plant into each respective RTO.
  - (2) Continuous temperature records (on a 3-hour average basis) for the Regenerative Thermal Oxidizers and the 3-hour average temperature used to demonstrate compliance with Condition D.3.1 and D.4.1 during the most recent compliant stack test.
  - (3) Daily records of duct pressure or fan amperage.
  - (4) Work Practices Standards.
- (b) To document compliance with Conditions D.3.9, the Permittee shall maintain a log of daily inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.4 FACILITY OPERATION CONDITIONS

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

Part 1 - Line 1, Plant 1 - Line 2, Plant 2 - Line A and Line B, Plant 3, Plant 4, and Plant 5

(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 VOC Limit - Prevention of Significant Deterioration [326 IAC 2-2]

The input VOC to the surface coating lines in Part 1 - Line 1, Plant 1 - Line 2, Plant 2 - Line A and Line B, Plant 3, Plant 4, and Plant 5, including coatings, dilution solvents, and cleaning solvents shall be restricted such that the VOC emissions shall be limited to less than two hundred fifty (250) tons of VOC per twelve (12) consecutive month period, with compliance determined at the end of each month. Compliance with this limit in conjunction with the operation of the RTOs as required in Section D.3 shall make 326 IAC 2-2, Prevention of Significant Deterioration (PSD) not applicable.

#### D.4.2 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 no later than 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.4.7, Notification Requirements.

#### D.4.3 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 no later than 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.4.7, 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 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.4.4 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 2 to 40 CFR Part 63, Subpart PPPP] [40 CFR 63.4501]

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- (a) The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart PPPP. The Permittee must comply with these requirements no later than April 19, 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.4.9, Notification Requirements.

D.4.5 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products [40 CFR Part 63, Subpart PPPP] [40 CFR 63.4481] [40 CFR 63.4482] [40 CFR 63.4483(b)] [40 CFR 63.4581]

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- (a) The provisions of 40 CFR Part 63, Subpart PPPP (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/plastic/plasticpg.html>. Pursuant to 40 CFR 63.4483(b), the Permittee must comply with these requirements no later than April 19, 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.4.9, Notification Requirements.
- (c) The following emissions units comprise the affected source that is subject to 40 CFR 63, Subpart PPPP:
  - (1) All coating operations as defined in 40 CFR 63.4581;
  - (2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
  - (3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and
  - (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.
- (d) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.4581, and are applicable to the affected source.

## Compliance Determination Requirements

D.4.6 VOC Emissions

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Compliance with condition D.4.1 shall be demonstrated within 30 days of the end of each month. This shall be based on the total volatile organic compound emitted for the previous month, and

adding it to previous 11 months total VOC emitted so as to arrive at VOC emissions for the most recent 12 consecutive month period . The VOC emissions for a month can be arrived at using the following equation for VOC usage:

$$\text{VOC emitted} = [(\text{VOC input}) \times (100 - \% \text{ overall control efficiency})] + [\text{VOC input from other uncontrolled facilities}]$$

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

### **D.4.7 Notification Requirements [40 CFR 63.3910]**

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- (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.4.8 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]**

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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

### **D.4.9 Notification Requirements [40 CFR 63.4510]**

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- (a) General. The Permittee must submit the notifications in 40 CFR 40 CFR 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply to the affected source by the dates specified in those sections, except as provided in 40 CFR 63.4510, paragraphs (b) and (c).
- (b) Notification of compliance status. The Permittee must submit the notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR 63.4540, 40 CFR 63.4550, or 40 CFR 63.4560 that applies to the affected source. The notification of compliance status must contain the information specified in 40 CFR 63.4510(c), paragraphs (1) through (11) and in 40 CFR 63.9(h).

D.4.10 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]

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

- (a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Part 70 permit the applicable requirements of 40 CFR 63, Subpart PPPP, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.
- (b) The significant permit modification application shall be submitted no later than July 19, 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

D.4.11 Record Keeping Requirements

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- (a) To document compliance with Condition D.4.1, the Permittee shall in addition to the records required by Condition D.1.9(a)(1), (2), (4), (5), and Condition D.2.7(a)(1) through (4) maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) for Plant 3, Plant 4, and Plant 5 shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limit established in Condition D.4.1.
  - (1) The VOC content of each coating material and solvent less water used.
  - (2) The amount of coating material and solvent used on a monthly basis.
    - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
    - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
  - (3) The cleanup solvent usage for each month.
  - (4) The total VOC usage for each month.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.4.12 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.4.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

### PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Erler Industries, Inc.  
Source Address: 418 Stockwell Street, North Vernon, Indiana 47265  
71 Hayden Pike, North Vernon, Indiana 47265  
125 West Hayden Pike, North Vernon, Indiana 47265  
Mailing Address: P.O. Box 219, North Vernon, Indiana 47265  
Part 70 Permit No.: T079-17195-00010

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify)
- Report (specify)
- Notification (specify)
- Affidavit (specify)
- Other (specify)

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
100 North Senate Avenue  
P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
Phone: 317-233-5674  
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT  
EMERGENCY OCCURRENCE REPORT**

Source Name: Erler Industries, Inc.  
Source Address: 418 Stockwell Street, North Vernon, Indiana 47265  
71 Hayden Pike, North Vernon, Indiana 47265  
125 West Hayden Pike, North Vernon, Indiana 47265  
Mailing Address: P.O. Box 219, North Vernon, Indiana 47265  
Part 70 Permit No.: T079-17195-00010

**This form consists of 2 pages**

**Page 1 of 2**

- 9** This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
  - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

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

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

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

**Page 2 of 2**

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

Form Completed by: \_\_\_\_\_

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

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

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

A certification is not required for this report.

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

## Part 70 Quarterly Report

Source Name: Erler Industries, Inc.  
Source Address: 418 Stockwell Street, North Vernon, Indiana 47265  
71 Hayden Pike, North Vernon, Indiana 47265  
125 West Hayden Pike, North Vernon, Indiana 47265  
Mailing Address: P.O. Box 219, North Vernon, Indiana 47265  
Part 70 Permit No.: T079-17195-00010  
Facility: Plant 1: Line 1 (EU1, EU2, EU17, and EU18)  
Parameter: VOC Input  
Limit: The input VOC, including coatings, dilution solvents, and cleaning solvents shall be restricted such that the VOC emissions shall be limited to less than 25 tons per consecutive 12 month period

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

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Input This Month (tons)	VOC Input Previous 11 Months (tons)	VOC Input 12 Month Total (tons)
Month 1			
Month 2			
Month 3			

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

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

Attach a signed certification to complete this report.

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

## Part 70 Quarterly Report

Source Name: Erler Industries, Inc.  
Source Address: 418 Stockwell Street, North Vernon, Indiana 47265  
71 Hayden Pike, North Vernon, Indiana 47265  
125 West Hayden Pike, North Vernon, Indiana 47265  
Mailing Address: P.O. Box 219, North Vernon, Indiana 47265  
Part 70 Permit No.: T079-17195-00010  
Facility: Plant 1: Line 2 (EU4 and EU5)  
Parameter: VOC Input  
Limit: The input VOC, including coatings, dilution solvents, and cleaning solvents shall be restricted such that the VOC emissions shall be limited to less than 25 tons per consecutive 12 month period

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

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Input This Month (tons)	VOC Input Previous 11 Months (tons)	VOC Input 12 Month Total (tons)
Month 1			
Month 2			
Month 3			

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

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

Attach a signed certification to complete this report.

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

## Part 70 Quarterly Report

Source Name: Erler Industries, Inc.  
Source Address: 418 Stockwell Street, North Vernon, Indiana 47265  
71 Hayden Pike, North Vernon, Indiana 47265  
125 West Hayden Pike, North Vernon, Indiana 47265  
Mailing Address: P.O. Box 219, North Vernon, Indiana 47265  
Part 70 Permit No.: T079-17195-00010  
Facility: Plant 2: Line A (EU6, EU7, and EU8) and Line B (EU9, EU10, EU11 and EU12)  
Parameter: VOC Input  
Limit: The input VOC, including coatings, dilution solvents, and cleaning solvents shall be restricted such that the VOC emissions shall be limited to less than 15 tons per month/180 tons per consecutive 12- month period

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

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Input This Month (tons)	VOC Input Previous 11 Months (tons)	VOC Input 12 Month Total (tons)
Month 1			
Month 2			
Month 3			

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

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

Attach a signed certification to complete this report.

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

### Part 70 Quarterly Report

Source Name: Erler Industries, Inc.  
 Source Address: 418 Stockwell Street, North Vernon, Indiana 47265  
 71 Hayden Pike, North Vernon, Indiana 47265  
 125 West Hayden Pike, North Vernon, Indiana 47265  
 Mailing Address: P.O. Box 219, North Vernon, Indiana 47265  
 Part 70 Permit No.: T079-17195-00010  
 Facility: Plant 1, Line 1; Plant 1, Line 2; Plant 2, Line A & Line B; Plant 3; Plant 4; Plant 5  
 Parameter: VOC  
 Limit: The input VOC, including coatings, dilution solvents, and cleaning solvents shall be restricted such that the VOC emissions shall be limited to less than two-hundred fifty (250) tons of VOC per twelve (12) consecutive-month period.

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

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Emissions This Month (tons)	VOC Emissions Previous 11 Months (tons)	VOC Emissions 12 Month Total (tons)
Month 1			
Month 2			
Month 3			

Note: This report shall accompany a detailed emission calculations that account for the RTOs operation.

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

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

Attach a signed certification to complete this report.

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

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

Source Name: Erler Industries, Inc.  
Source Address: 418 Stockwell Street, North Vernon, Indiana 47265  
71 Hayden Pike, North Vernon, Indiana 47265  
125 West Hayden Pike, North Vernon, Indiana 47265  
Mailing Address: P.O. Box 219, North Vernon, Indiana 47265  
Part 70 Permit No.: T079-17195-00010

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

Page 1 of 2

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. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do 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".

NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

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:**

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

Form Completed By: \_\_\_\_\_

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

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

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

Attach a signed certification to complete this report.

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

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

**Source Background and Description**

Source Name:	Erler Industries, Inc.
Source Location:	418 Stockwell Street, North Vernon, Indiana 47265 71 Hayden Pike, North Vernon, Indiana 47265 125 West Hayden Pike, North Vernon, Indiana 47265
County:	Jennings
SIC Code:	3479. 3663
Operation Permit No.:	T079-17195-00010
Operation Permit Issuance Date:	October 2, 2003
Significant Source Modification:	079-19764-00010
1 <sup>st</sup> Significant Permit Modification No.:	079-19470-00010
Permit Reviewer:	Aida De Guzman

The Office of Air Quality (OAQ) has reviewed a modification application from Erler Industries, Inc., a stationary surface coating plant that spray paints plastic and metal parts, relating to the installation of three (3) 3.0 million British thermal units per hour (mmBtu/hr) Regenerative Thermal Oxidizers (RTO). These RTOs will control the VOC emissions from existing permitted Plant 3, Plant 4, and Plant 5.

The installation of the RTOs is in response to EPA 's Notice of Violation (AE-17J), issued on June 21, 2004; and the Administrative Consent Order (EPA-05-04-113(a)-08-IN), issued on September 28, 2004.

Erler Industries, Inc. was found to be violating the term of its permit by emitting source-wide VOC totaled 325.45 tons per year, which exceeded the five (5) plants' aggregated allowable emissions of 305 tons per year. EPA determined that one or more of the following limits set forth in the Part 70 permit to avoid the applicability of 326 IAC 8-1-6 was exceeded.

Plant /Line ID	VOC Emission Limit (tons/year)
Plant 1 / Line 1	< 25
Plant 1 / Line 2	< 25
Plant 2 / Line A & B	< 180
Plant 3	< 25
Plant 4	< 25
Plant 5	< 25
Total Source Emissions	< 305

Since the source has violated one or more of the VOC limits established in the Part 70 permit to avoid the applicability of 326 IAC 8-1-6 (General Reduction Requirements), the source is now subject to 326 IAC 8-1-6, Best Available Control Analysis will be required. The source proposed to install three (3) Regenerative Thermal Oxidizers (RTOs), one on each plant (Plant 3, Plant 4, and Plant 5), in compliance with the EPA's Administrative Consent Order (EPA-05-04-113(a)-08-IN). Each RTO has a heat input capacity of 3.0 million British thermal units per hour (mmBtu/hr).

EPA determined that Plant 1 will maintain its 326 IAC 8-1-6 avoidance limit of less than 25 tons of VOC per year for each Line 1 and Line 2. Plant 2 will maintain the VOC limit of 180 tons per year determined as BACT, since this limit was never exceeded.

## History

On June 15, 2004, Erler Industries, Inc. submitted a modification application to the OAQ to return into compliance with the applicable requirements of the issued Part 70 permit. Erler Industries, Inc. was issued a Part 70 permit on October 2, 2003.

The source was issued a Part 70 Operating Permit T079-17195-00010 on October 2, 2003. The source has since received the following:

- (a) Minor Permit Modification T079-16961-00010, issued on March 19, 2003;
- (b) Minor Permit Modification T079-16437-00010, issued on October 16, 2002;
- (c) Reopen Part 70 Operating Permit T079-13341-00010, issued on February 7, 2002;
- (d) Minor Permit Modification T079-12808-00010, issued on January 12, 2001;
- (e) Administrative Amendment T079-11173-00010, issued on September 27, 1999;
- (f) Administrative Amendment T079-10586-00010, issued on August 20, 1999; and
- (g) Part 70 Operating Permit T079-7572-00010, issued on September 23, 1998.

## Recommendation

The staff recommends to the Commissioner that the 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 August 2, 2004; and August 18, 2004.

## Potential To Emit

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."

The following PTE is only for the combustion emissions coming from the RTOs, since there are no other new emission units proposed in this modification:

Pollutant	Potential To Emit (tons/year)
PM	0.1
PM-10	0.3
SO <sub>2</sub>	0.0
VOC	0.2
CO	3.3
NO <sub>x</sub>	3.9

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Benzene	8.27E-05
Dichlorobenzene	4.73E-05
Formaldehyde	2.957E-03
Hexane	7.09E-02
Toluene	1.34E-04
Lead	1.97E-05
Cadmium	4.336E-05
Chromium	5.519E-05
Manganese	1.498E-05
Nickel	8.278E-05

**Justification of the Modification**

- (a) Plant 3, Plant 4, and Plant 5 are each limited to less than 25 tons per year as required in the issued Part 70 to avoid the requirements of 326 IAC 8-1-6 (General Reduction Requirements), However, the source was cited by EPA to be in violation of these individual limits. Therefore, these plants will now be subject to 326 IAC 8-1-6 (General Reduction Requirements). The change will be subject to Significant Source Modification under 326 IAC 2-7-10.5(f)(2); and.
- (b) The installation of control equipment for Plants 3, 4, and 5 will be subject to a Significant Permit Modification under 326 IAC 2-7-12(d), since significant changes to the existing Part 70 permit's monitoring, reporting, and record keeping permit terms or conditions will be made.

**Existing Source**

The following table shows the actual emissions from the source. This information reflects the data from EPA's Notice of Violation (AE-17J).

Pollutant	Actual Emissions (tons/year)
PM	0
PM-10	1
SO <sub>2</sub>	0
VOC	325.45
CO	0
NO <sub>x</sub>	0
HAP (specify)	-

The existing source is an existing major source as it is emitting volatile organic compounds (VOC) at a rate of 250 tons per year, and it is not one of the 28 listed source categories.

HAPs	Potential To Emit (Taken from TV 079-17195-00010, issued on 10/2/03) (tons/year)
Xylene	63.89
MIK	14.12
MEK	256.01
Ethylbenzene	6.05
Glycol ethers	37.49
Toluene	0.82
Methanol	54.14
TOTAL	432.52

The source is an existing major source for Haps, as at least one single HAP is emitted at 10 tons per year or greater; or the combined HAPs is emitted at 25 tons per year or greater.

**Potential to Emit After the Modification**

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units. The following PTE is only for the combustion emissions coming from the RTOs, since there are no other new emission units proposed in this modification:

Process/facility	Limited Potential to Emit (tons/year)						
	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
RTOs	0.1	0.3	0.0	0.2	3.3	3.9	7.4E-02
Existing Source*	0.0	0.0	0.0	249.0	0.0	0.0	-
<b>Total Emissions</b>	<b>0.1</b>	<b>0.3</b>	<b>0.0</b>	<b>249.2</b>	<b>3.3</b>	<b>3.9</b>	<b>7.4E-02</b>

\*An Administrative Consent Order (EPA-05-04-113(a)-08-IN) between Erler Industries and EPA has been issued on September 28, 2004. The source will be adding RTOs in compliance with the Administrative Consent Decree. The source requested to be limited to a total VOC emissions of less than 250 tons per year, in combination with the RTOs. Therefore, the source will now be a minor source, since VOC is not emitted at a rate of 250 tons per year or greater.

**County Attainment Status**

The source is located in Jennings County.

Pollutant	Status
PM-10	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
8-hour Ozone	attainment
CO	attainment
Lead	not established

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Jennings County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

## Federal Rule Applicability

- (a) New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60):
- (2) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) included in this permit for this source.
- (b) National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14, 326 IAC 20 and 40 CFR Part 63):
- (1) 40 CFR Part 63, Subpart MMMM (Surface Coating of Miscellaneous Metal Parts and Products) -  
Plant 1 Line 1 and Plant 1 Line 2 when coating metal parts is subject to this NESHAP, since it is located in a source that is major for HAPs. Since this source is an existing source, its compliance date will be on January 2, 2007, which is 3 years from January 2, 2004.
  - (2) 40 CFR Part 63, Subpart PPPP (Surface Coating of Plastic Parts and Products) Plant 1 Line 1, Plant 1 Line 2, Plant 2 Line A & B, Plant 3, Plant 4, and Plant 5 are used for coating plastic parts and therefore are subject to this NESHAP, since they are located in a source that is major for HAPs. Since this source is an existing source, its compliance date for this NESHAP is April 19, 2007, which is 3 years from April 19, 2004.
  - (3) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) included in this permit for this source.
- (c) 40 CFR Part 64 - Compliance Assurance Monitoring (CAM):  
The CAM is applicable to specific emission unit based on individual pollutant, and must meet all of the following criterias:
- (1) The emission unit must be located at a major source for which a Part 70 permit is required.
  - (2) Be subject to an emission limitation or standard.
  - (3) Use a control device to achieve compliance.
  - (4) Have potential precontrol emissions of at least 100 percent of the major source thresholds.
- (A) Plant 3, Plant 4, and Plant 5 are not subject to 40 CFR Part 64, CAM rule since each plant precontrol VOC, HAPs, and PM10 emissions are less than 100 percent of the Part 70 threshold levels.
- (B) Plant 2, has a precontrol VOC at 454.76 tons/year, single HAP (MEK at 256.01 tons/yr), and combined HAPs at 372.37 tons/year at more, which are at more than 100% of the Part 70 threshold levels. However, it is not subject to the CAM rule because it does not have a control device to control the VOC or HAPs emissions. It relies on record keeping to demonstrate compliance with the state rules.  
*(Note: Plant 2 emissions were taken from the TV 079-17195-00010, issued on October 2, 2003).*
- (C) Plant 1 is not subject to the CAM, since its VOC and HAP emissions are less than 100% of the Part 70 threshold levels does not have; and it does not have a control device to comply with the limits.

### State Rule Applicability - Entire Source

- (a) 326 IAC 2-2 (Prevention of Significant Deterioration)  
The source is an existing major source emitting 325.35 tons per year, which is greater than 250 tons of VOC per year. The source is adding three (3) Regenerative Thermal Oxidizers (RTOs), and requested a limit of less than two-hundred fifty (250) tons per year to stay a minor source. The source is not one of the 28 listed source categories.
- (b) 326 IAC 2-4.1-1 (New Source Toxic Control)  
This rule applies to new or reconstructed major sources of HAPs built after July 27, 1997 and does not apply to modifications. Paint Booths EU17 and EU18 in Plant 1 were built in 2000 and are not emitting hazardous air pollutants (HAPs) at major levels, Plant 3 was built in 1999 and is not emitting HAPs at major levels, Plant 4 was built in 2002 and is not emitting HAPs at major levels, and Plant 5 was built in 2003 and is not emitting HAPs at major levels. Therefore, these booths are not subject to 326 IAC 2-4.1-1.

### State Rule Applicability - Individual Facilities

Note: All state rules determined in the Part 70 will stay in effect and this permit modification affects only 326 IAC 8-1-6 (General Reduction Requirements) and 326 IAC 2-4.1-1 (New Toxics Control).

Additions will be **bolded** and deletions will be ~~struck-through~~ for emphasis:

- (a) **326 IAC 8-1-6 (New Facilities; General Reduction Requirements)**
  - (1) Plant 1 - Line 1  
Pursuant to SSM 079-12803-00010, issued on December 15, 2000, the use of VOC on Line 1 (EU1, EU2, EU17, and EU18), including coatings that coat plastic parts, dilution solvents, and cleaning solvents shall be less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this limit makes 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) not applicable. 326 IAC 8-1-6 applies to all coatings used for surface coating plastic parts on Plant 1 - Line 1. Coatings used for surface coating metal parts on Line 1 - Plant 1 are subject to the requirements of 326 IAC 8-2-9.
  - (2) Plant 1 - Line 2  
Pursuant to T079-7572-00010, issued on September 23, 1998, the use of VOC on Line 2 (EU4 and EU5), including coatings that coat plastic parts, dilution solvents, and cleaning solvents shall be less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this limit makes 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) not applicable. 326 IAC 8-1-6 applies to all coatings used for surface coating plastic parts on Plant 1 - Line 2. Coatings used for surface coating metal parts on Line 1 - Plant 2 are subject to the requirements of 326 IAC 8-2-9.
  - (3) Plant 2 - Line A and Line B  
Pursuant to CP 079-5091-00010, issued on March 29, 1996, Best Available Control Technology (BACT) shall be considered satisfied provided that:
    - (A) The total VOC delivered to the applicators of Line A (EU6, EU7, and EU8) and Line B (EU9, EU10, EU11 and EU12) and all cleaning solvents used shall be limited to fifteen (15) tons per month, which is equivalent to one hundred eighty (180) tons per twelve (12) consecutive month period.
    - (B) The seven (7) spray booths of Line A and Line B shall be equipped with High Volume Low Pressure (HVLP) spray applicators or applicators

which deliver equivalent or better transfer efficiency. High Volume Low Pressure application shall be considered achieved provided that the application equipment operates between 0.1 and 10 pounds per square inch (psig) air pressure, measured dynamically at the center of the air cap and at the air horns of the spray system. Any change or modification which may result in an increase in emissions or is in question with the above BACT requirements must be approved by OAQ before such change may occur.

- (C) Any solvent sprayed from the applicators in the seven (7) spray booths shall be sprayed 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) The conductive copper, silver and black coatings to be applied shall not exceed 6.1 pounds of VOC per gallon of coating, excluding water.
- (E) The two (2) 1.0 MMBtu/hr ovens located in Plant 2, identified as 8B and 9B, exhausting to their respective stacks identified as S/V13 and S/V14, shall be used to dry all parts coated by these seven (7) spray booths of Line A and Line B.

(4) Best Available Control technology (BACT) for Plant 3, Plant 4, and Plant 5:

Due to EPA's Notice of Violation against Erler Industries, an Administrative Consent Order between Erler Industries and EPA was issued on September 28, 2004.

The source was found to have exceeded the VOC limits stipulated in the Part 70 permit for Plant 3, Plant 4, and Plant 5. These VOC limits were established to avoid the applicability of 326 IAC 8-1-6. Since the source exceeded these limits, the three (3) plants are now subject to 326 IAC 8-1-6 and BACT analysis was performed.

The BACT submitted by Erler Industries was verified by IDEM, through the review of the various control technologies listed in the USEPA BACT/RACT/LAER Clearinghouse, and from other states issued permits which lists the following:

BACT and LAER ESTABLISHED FOR VARIOUS PLASTIC COATING OPERATION AS COMPARED to ERLER INDUSTRIES		
Company Name	Type of Plastic Coating	Control Technology
Proposed BACT for Erler Industries	Plastic Cell Phones	Regenerative Thermal Oxidizer (RTO) 95% overall control
Venture Industries, Inc. - Michigan	Automotive Plastic Parts	<ul style="list-style-type: none"> <li>• Cleaning purges are captured and contained.</li> <li>• All emissions controlled by permanent total enclosure, carbon concentrators and RTOs with 95% control</li> </ul>
Orion Paint & Plastic LLC - Michigan	External Automotive Plastic Parts	<ul style="list-style-type: none"> <li>• RTO with 95% destruction efficiency</li> <li>• VOC content limits (primer 4.1, basecoat 4.8, clearcoat 4.0 lbs VOC/gallon as applied)</li> <li>• HVLP- transfer efficiency 35% - 50%</li> </ul>

Textron Automotive Company - Michigan	Automotive Plastic Parts	<ul style="list-style-type: none"> <li>RTO controlled robot zones, flash off, and ovens (captures: robot zones 80%, manual zones 0%, flash off 90%, ovens 90%)</li> <li>4.5 lb VOC/gal monthly average for clearcoat</li> <li>4.73 lb VOC/gal monthly average for basecoat</li> </ul>
Nailite International, Inc. - Florida	Plastic Parts	RTO with 95% reduction
Latex Technology - California	Latex Glove Manufacturing Line	RTO with overall control > 90%
Honda manufacturing - Alabama	Automotive Parts	<ul style="list-style-type: none"> <li>Low VOC content coatings (Primer 1.3, Basecoat 4.3, Clearcoat 4 lb VOC/gal coating)</li> <li>RTO controlling oven and clearcoat</li> </ul>
Mascotech Coatings, Inc. - Michigan	Plastic Parts	<ul style="list-style-type: none"> <li>Catalytic incinerator (capture efficiency: spray booths 85.5%, rotating units 80.75%)</li> <li>Voc content limit 6.3 lb VOC/gallon</li> </ul>
Evert Products Textron, Inc. - Michigan	Plastic Auto Parts	<ul style="list-style-type: none"> <li>RTO controlling booths, flashoffs and ovens with 79% efficiency</li> <li>HVLP</li> </ul>
Harley Davidson Tomahawk Somo Facility - Wisconsin	Plastic Parts	<ul style="list-style-type: none"> <li>HVLP and electrostatic robotic spray application</li> <li>Operating pressure shall be 10 psi</li> <li>VOC content limits</li> </ul>
Toter, Inc. - California	Plastic Parts	<ul style="list-style-type: none"> <li>Low VOC Coatings (1.09 lbs/VOC/gal as applied)</li> <li>HVLP</li> <li>Enclosed spray gun cleaner</li> </ul>
DA/PRO Rubber, Inc. - California	Binks Bench Type Spray Booths	Coating usage limit (200 gallons/year)
Artisan Resources - California	Binks dry	<ul style="list-style-type: none"> <li>Use of SCAQMD Regulation X1 compliant materials</li> <li>VOC limit: 667 lb VOC/month</li> </ul>
FORD Visteon Utica Plant - Michigan	Plastic Automotive Interior Parts	<ul style="list-style-type: none"> <li>Waterborne coatings (VOC content limit 3 lb VOC/gal)</li> <li>HVLP applicators</li> </ul>
Delphi Automotive Systems - Michigan	Plastic Automotive Interior Parts	<ul style="list-style-type: none"> <li>HVLP</li> <li>Low VOC coatings (2.4 lb/gal)</li> <li>Annual Limit: 94.3 tons/yr</li> </ul>
Donnelley Corp.- Newago, Michigan	Plastic Auto Parts	Basecoat, & clearcoat automatic booths controlled by thermal oxidizer with 79% efficiency w/ 90% recirculation

The most stringent BACT/LAER for plastic coating operation found is the use of an RTO to control VOC with 100 % capture system and 95% destruction efficiency.

The Administrative Consent Order (EPA-05-04-113(a)-08-IN) required the installation of the RTO's for Plants 3, 4, and 5 that coincide with the most stringent BACT/LAER for plastic coating operation found in the USEPA BACT/RACT/LAER Clearinghouse. Erler Industries proposes to match this control technology (100 % capture system and 95% destruction efficiency). Therefore, a cost analysis has not been evaluated.

**Best Available Control Technology:**

The BACT determined for Erler Industries Plant 3, Plant 4, and Plant 5 is the following:

- (1) Installation of three (3) Regenerative Thermal Oxidizers designed with total permanent total enclosure (100 percent capture) and a 95% destruction efficiency. One (1) RTO will be installed on each surface coating line in Plants 3, 4, and 5. The air flow from the paint booth, flash off area, and the oven will be ducted into the RTO for destruction.
  - (A) The RTO must be operated at all times whenever Plant 3, Plant 4 or Plant 5 is in operation.
  - (B) Within one hundred and eighty (180) days after initial startup, the Permittee shall conduct a performance test to verify VOC control efficiencies of the Regenerative Thermal Oxidizers utilizing EPA methods or methods as approved by the Commissioner.
  - (C) A continuous monitoring system shall be calibrated, maintained, and operated on the Regenerative Thermal Oxidizers for measuring operating temperature.
  - (D) The Permittee shall determine the three (3) hour average temperature from the most recent valid stack test.
  - (E) On and after the date the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the three (3) hour average temperature as observed during the compliant stack test.
  - (F) The Permittee shall determine the appropriate duct pressure or fan amperage from the most recent valid stack test that demonstrates compliance with the VOC limits.
- (2) The effluent VOC concentration from Plant 3 RTO shall be limited to 100 parts per million by volume (ppmv) at an air flow rate of 10,000 standard cubic feet per minute (scfm),
- (3) The effluent VOC concentration from Plant 4 and Plant 5 RTOs shall be limited to 100 ppmv at an air flow rate of 9,000 scfm for each plant.
- (4) Record Keeping BACT:  
To document compliance with the VOC concentration limits, the Permittee shall maintain records of the following:
  - (A) VOC input from each plant into each respective RTO,
  - (A) RTOs three (3) hour average operating temperature; and
  - (B) Daily records of duct pressure and fan amperage.
- (5) Good Work Practice Standards:
  - (A) All VOC containing coatings, thinners and/or other additives, cleaning materials and waste materials must be stored in closed containers.
  - (B) Spills of VOC-containing coatings, thinners, and/or other additives, cleaning materials and waste materials must be minimized.
  - (C) VOC-containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be conveyed from one location to another in closed containers or pipes.
  - (D) Mixing vessels with VOC-containing coatings and other materials must be closed except when adding to, removing, or mixing the contents.

- (E) Emissions of VOC must be minimized during cleaning of storage, mixing, and conveying equipment.

### Changes to the Part 70

The Part 70 permit will be modified to incorporate the BACT for Plants 3, 4, and 5 (additions are **bolded** and deletions are ~~struck-through~~ for emphasis):

#### **B.24 Credible Evidence [326 IAC 2-7-5(3)]~~[326 IAC 2-7-6]~~[62 FR 8314]**

**Notwithstanding the conditions of this permit that state specific methods that may be used to demonstrate compliance with, or a violation of, applicable requirements, any person (including the Permittee) may also use other credible evidence to demonstrate compliance with, or a violation of, any term or condition of this permit.**

#### **C.11 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, P. O. Box 6015  
Indianapolis, Indiana 46206-6015**

**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.**

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

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

(a) Located in Plant 1:

- (1) One (1) surface coating line, identified as Line 1, ~~installed January 18, 1994~~**constructed in 1988**, consisting of:
- (A) Two (2) manual paint booths, identified as EU1 and EU2, each with a maximum capacity of ~~327 parts~~ **135 racks** per hour, each equipped with dry filters to control particulate overspray, exhausting to stacks S/V1 and S/V2; and
- (B) Two (2) robot paint booths, ~~installed December 15,~~ **constructed in 2000**, identified as EU17, exhausting to stack S/V17, and EU18, exhausting to stacks S/V18a and S/V18b, each with a maximum capacity of ~~327 parts~~ **135 racks** per hour, each equipped with dry filters to control particulate overspray.

- (2) One (1) surface coating line, identified as Line 2, ~~installed January 18, 1991~~ **constructed in 1989**, consisting of two (2) manual paint booths, identified as EU4 and EU5, with a maximum capacity of 2.5 gallons paint per hour, each equipped with dry filters to control particulate overspray, exhausting to stacks S/V4 and S/V5, respectively.

Plant 1 utilizes **four (4) manual air atomization guns and two (2) robotic air atomization guns**. ~~High Volume Low Pressure (HVLP), air atomized and electrostatic paint guns:~~

(b) Located in Plant 2:

- (1) One (1) surface coating line, identified as Line A, ~~constructed in installed in March 29, 1996~~, consisting of three (3) manual paint booths, identified as EU6, EU7, and EU8, each equipped ~~with two (2) High Volume Low Pressure (HVLP) spray guns and~~ dry filters to control particulate overspray, exhausting to stacks S/V6, S/V7, and S/V8, respectively.
- (2) One (1) surface coating line, identified as Line B, ~~constructed in installed in March 29, 1996~~, consisting of:
  - (A) Two (2) manual paint booths, identified as EU9 and EU10, each equipped with ~~High Volume Low Pressure (HVLP) spray guns and~~ dry filters to control particulate overspray, exhausting to stacks S/V9 and S/V10, respectively; and
  - (B) Two (2) robot paint booths, identified as EU11 and EU12, each equipped with ~~High Volume Low Pressure (HVLP) spray guns and~~ dry filters to control particulate overspray, exhausting to stacks S/V11 and S/V12, respectively.

Line A and Line B each have a maximum capacity of 4.0 gallons of conductive copper paint per hour, a maximum capacity of 2.5 gallons of conductive silver paint per hour, and a maximum capacity of 2.0 gallons of conductive black paint per hour.

**Decorative, conductive and clear coatings are used in Plant 2. Plant 2 utilizes eight (8) manual High Volume Low Pressure (HVLP) spray guns, two (2) manual air atomization guns and two (2) robotic air atomization guns.**

- (c) Located in Plant 3: One (1) surface coating line, identified as ~~Line Plant 3~~, ~~installed constructed in September 27, 1999~~, consisting of three (3) paint booths, identified as EU13, EU14, and EU15, ~~each with a total maximum capacity of 437 plastic parts~~ **135 racks** per hour, ~~and~~ each equipped with High Volume Low Pressure (HVLP) spray guns ~~and~~ dry filters to control particulate overspray. **Plant 3 is equipped with a 3.0 mmBtu/hr Regenerative Thermal Oxidizer, RTO3 to control VOC emissions and exhausts to Stack P3.** ~~exhausting to stacks S/V13, S/V14, and S/V15, respectively.~~ **Plant 3 utilizes three (3) air atomization robotic spray guns**
- (d) Located in Plant 4: One (1) surface coating line, identified as ~~Line Plant 4~~, ~~installed constructed in September 5, 2002~~, consisting of three (3) paint booths, identified as EU19, EU20, and EU21, ~~each with a total maximum capacity of 625 parts~~ **135 racks** per hour, ~~and~~ each equipped with High Volume Low Pressure (HVLP) spray guns, ~~controlled by fabric~~ with dry filters to control particulate overspray emissions. **Plant 4 is equipped with a 3.0 mmBtu/hr Regenerative Thermal Oxidizer, RTO4 to control VOC emissions and exhausts to Stack P4.** ~~exhausting to stacks S/V19, S/V20, and S/V21, respectively.~~ **Plant 4 utilizes three (3) air atomization robotic spray guns.**
- (e) Located in Plant 5: One (1) surface coating line, ~~installed constructed in February 12, 2003~~, consisting of three (3) paint booths, identified as EU22, EU23, and EU24, ~~each~~

with a maximum capacity of ~~625 plastic parts~~ **135 racks** per hour **and** each equipped with ~~High Volume Low Pressure (HVLP) spray guns and with dry filters to control particulate overspray.~~ **Plant 5 is equipped with a 3.0 mmBtu/hr Regenerative Thermal Oxidizer, RTO5 to control VOC emissions and exhausts to Stack P5.** ~~exhausting to stacks S/V22, S/V23, and S/V24, respectively.~~ **Plant 5 utilizes three (3) air atomization robotic spray guns.**

#### SECTION D.1 FACILITY OPERATION CONDITIONS

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

Located in Plant 1:

- (1) One (1) surface coating line, identified as Line 1, ~~installed January 18, 1994~~ **constructed in 1988**, consisting of:
  - (A) Two (2) manual paint booths, identified as EU1 and EU2, each with a maximum capacity of ~~327 parts~~ **135 racks** per hour, each equipped with dry filters to control particulate overspray, exhausting to stacks S/V1 and S/V2; and
  - (B) Two (2) robot paint booths, ~~installed December 15,~~ **constructed in 2000**, identified as EU17, exhausting to stack S/V17, and EU18, exhausting to stacks S/V18a and S/V18b, each with a maximum capacity of ~~327 parts~~ **135 racks** per hour, each equipped with dry filters to control particulate overspray.
- (2) One (1) surface coating line, identified as Line 2, ~~installed January 18, 1994~~ **constructed in 1989**, consisting of two (2) manual paint booths, identified as EU4 and EU5, with a maximum capacity of 2.5 gallons paint per hour, each equipped with dry filters to control particulate overspray, exhausting to stacks S/V4 and S/V5, respectively.

Plant 1 utilizes **four (4) manual air atomization guns and two (2) robotic air atomization guns.** ~~High Volume Low Pressure (HVLP), air atomized and electrostatic paint guns.~~

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

Located in Plant 2:

- (1) One (1) surface coating line, identified as Line A, **constructed in** ~~installed in March 29, 1996,~~ consisting of three (3) manual paint booths, identified as EU6, EU7, and EU8, each equipped ~~with two (2) High Volume Low Pressure (HVLP) spray guns and dry filters to control particulate overspray, exhausting to stacks S/V6, S/V7, and S/V8, respectively.~~
- (2) One (1) surface coating line, identified as Line B, **constructed in** ~~installed in March 29, 1996,~~ consisting of:
  - (A) Two (2) manual paint booths, identified as EU9 and EU10, each equipped with ~~High Volume Low Pressure (HVLP) spray guns and dry filters to control particulate overspray, exhausting to stacks S/V9 and S/V10, respectively;~~ and
  - (B) Two (2) robot paint booths, identified as EU11 and EU12, each equipped with ~~High Volume Low Pressure (HVLP) spray guns and dry filters to control particulate overspray, exhausting to stacks S/V11 and S/V12, respectively.~~

Line A and Line B each have a maximum capacity of 4.0 gallons of conductive copper paint per hour, a maximum capacity of 2.5 gallons of conductive silver paint per hour, and a maximum capacity of 2.0 gallons of conductive black paint per hour.

**Decorative, conductive and clear coatings are used in Plant 2. Plant 2 utilizes eight (8) manual High Volume Low Pressure (HVLP) spray guns, two (2) manual air atomization guns and two (2) robotic air atomization guns.**

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

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

- (c) Located in Plant 3: One (1) surface coating line, identified as ~~Line Plant 3~~, installed **constructed** in ~~September 27, 1999~~, consisting of three (3) paint booths, identified as EU13, EU14, and EU15, **each** with a total maximum capacity of ~~437 plastic parts~~ **135 racks** per hour, **and** each equipped with High Volume Low Pressure (HVLP) spray guns and dry filters to control particulate overspray. **Plant 3 is equipped with a 3.0 mmBtu/hr Regenerative Thermal Oxidizer, RTO3 to control VOC emissions and exhausts to Stack P3.** ~~exhausting to stacks S/V13, S/V14, and S/V15, respectively. Plant 3 utilizes three (3) air atomization robotic spray guns~~
- (d) Located in Plant 4: One (1) surface coating line, identified as ~~Line Plant 4~~, installed **constructed** in ~~September 5, 2002~~, consisting of three (3) paint booths, identified as EU19, EU20, and EU21, **each** with a total maximum capacity of ~~625 parts~~ **135 racks** per hour, **and** each equipped with High Volume Low Pressure (HVLP) spray guns, controlled by fabric with dry filters to control particulate overspray emissions. **Plant 4 is equipped with a 3.0 mmBtu/hr Regenerative Thermal Oxidizer, RTO4 to control VOC emissions and exhausts to Stack P4.** ~~exhausting to stacks S/V19, S/V20, and S/V21, respectively. Plant 4 utilizes three (3) air atomization robotic spray guns.~~
- (e) Located in Plant 5: One (1) surface coating line, installed **constructed** in ~~February 12, 2003~~, consisting of three (3) paint booths, identified as EU22, EU23, and EU24, **each** with a maximum capacity of ~~625 plastic parts~~ **135 racks** per hour **and** each equipped with High Volume Low Pressure (HVLP) spray guns and with dry filters to control particulate overspray. **Plant 5 is equipped with a 3.0 mmBtu/hr Regenerative Thermal Oxidizer, RTO5 to control VOC emissions and exhausts to Stack P5.** ~~exhausting to stacks S/V22, S/V23, and S/V24, respectively. Plant 5 utilizes three (3) air atomization robotic spray guns.~~

**(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 General Reduction Requirements for New Facilities [326 IAC 8-1-6]**

- ~~(a) Pursuant to SSM 079-11008-00010, issued on September 27, 1999, the input VOC to the surface coating Plant 3, Line 3 (EU13, EU14 and EU15); and shall be limited to less than twenty-five (25) tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period, with compliance determined at the end of each month. This usage limit is required to limit the potential to emit of VOC to less than twenty-five (25) tons of VOC per twelve (12) consecutive month period. Compliance with this limit, shall makes 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) not applicable.~~
- ~~(b) Pursuant to MSM 079-16237-00010, issued on September 5, 2002, the input VOC to the surface coating Plant 4, Line 4 (EU19, EU20, and EU21) shall be limited to less than twenty-five (25) tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period, with compliance determined at the end of each month. This usage limit is required to limit the potential to emit of VOC to less than twenty-five (25) tons per twelve (12) consecutive month period. Compliance with this limit, makes 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) not applicable.~~

**Pursuant to 326 IAC 8-1-6, the Best Available Control Technology (BACT) determined for Erler Industries Plant 3, Plant 4, and Plant 5 shall be the following:**

- (a) The Regenerative Thermal Oxidizer (RTO) dedicated for each Plant 3, Plant 4, and**

**Plant 5 shall be operated at all times each plant is in operation. Each RTO shall have a capture system efficiency of 100% and a destruction efficiency of 95%, with the air flow from the paint booth, flash off area, and the oven from each plant shall be ducted into the RTO for destruction.**

- (b) **The effluent VOC concentration from Plant 3 RTO shall be limited to 100 parts per million by volume (ppmv), at a maximum air flow rate of 10,000 standard cubic feet per minute (scfm),**
- (c) **The effluent VOC concentration from Plant 4 and Plant 5 RTOs shall be limited to 100 ppmv, at a maximum air flow rate of 9,000 scfm for each plant.**
- (d) **Good Work Practice Standards:**
  - (1) **All VOC containing coatings, thinners and/or other additives, cleaning materials and waste materials must be stored in closed containers.**
  - (2) **Spills of VOC-containing coatings, thinners, and/or other additives, cleaning materials and waste materials must be minimized.**
  - (3) **VOC-containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be conveyed from one location to another in closed containers or pipes.**
  - (4) **Mixing vessels with VOC-containing coatings and other materials must be closed except when adding to, removing, or mixing the contents.**
  - (5) **Emissions of VOC must be minimized during cleaning of storage, mixing, and conveying equipment.**

**D.3.2 Particulate Matter (PM) [40 CFR 52, Subpart P]**

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- (a) Pursuant to SSM 079-11008-00010, issued on September 27, 1999, and 40 CFR 52, Subpart P, the PM from the three (3) Plant 3, ~~Line 3~~ paint booths (EU13, EU14, and EU15) shall not exceed the pound per hour emission rate established as E in the following formula:
- (b) Pursuant to MSM 079-16237-00010, issued on September 5, 2002, and 40 CFR 52, Subpart P, the PM from the three (3) Plant 4, ~~Line 4~~ paint booths (EU19, EU20, and EU21) shall not exceed the pound per hour emission rate established as E in the following formula:
- (c) **Pursuant to 40 CFR 52, Subpart P, the PM from the Plant 5 three (3) paint booths (EU22, EU23, and EU24) 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.3.3 Particulate Matter (PM) [326 IAC 6-3-2(d)]**

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- (a) Pursuant to SSM 079-11008-00010, issued on September 27, 1999, and 326 IAC 6-3-2(d), particulate from the surface coating in Plant 3 ~~Line 3~~ shall be controlled by dry particulate filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

- (b) Pursuant to MSM 079-16237-00010, issued on September 5, 2002, and 326 IAC 6-3-2(d), particulate from the surface coating in Plant 4 ~~-Line 4~~ shall be controlled by dry particulate filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (c) Pursuant to MSM 079-165701-00010, issued on February 12, 2003, and 326 IAC 6-3-2(d), particulate from the surface coating in Plant 5, shall be controlled by dry particulate filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

**D.3.4 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 each surface coating line **located in Plant 3, Line 3, and Plant 4, Line 4, and Plant 5 and** for the dry filters **and RTO** associated with each **line plant**.

**Compliance Determination Requirements**

**D.3.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]**

**Within one hundred and eighty (180) days after initial startup of the third installed RTO, the Permittee shall conduct a performance test to verify capture efficiency using EPA Method 204 and destruction efficiency as per condition D.3.1 for the Regenerative Thermal Oxidizers using EPA Method 25A or methods as approved by the Commissioner. This test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.**

**D.3.6 Parametric Monitoring**

- (a) **The Permittee shall determine the appropriate duct pressure or fan amperage from the most recent valid stack test to comply with the VOC limits in Condition D.3.1 and D.4.1 as approved by IDEM.**
- (b) **The duct pressure or fan amperage shall be observed at least once per day when the Regenerative Thermal Oxidizer is in operation. On and after the date the approved stack test results are available, the duct pressure or fan amperage shall be maintained within the normal range as established in most recent compliant stack test.**

**D.3.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]**

~~Compliance with the VOC content and usage limitations contained in Conditions D.3.1 (a) and D.3.1(b) D.3.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) 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.~~

**D.3.7 Regenerative Thermal Oxidizer Temperature**

- (a) **A continuous monitoring system shall be calibrated, maintained, and operated on each Regenerative Thermal Oxidizer for measuring operating temperature. The output of this system shall be recorded as a 3-hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall operate the Regenerative Thermal Oxidizer at or above the three (3) hour average temperature of 1450°F.**
- (b) **The Permittee shall determine the 3-hour average temperature from the most recent valid stack test to demonstrates compliance with the limits in conditions D.3.1 and D.4.1, as approved by IDEM.**

- (c) On and after the date the approved stack test results are available, the Permittee shall operate the Regenerative Thermal Oxidizer at or above the 3-hour average temperature as observed during the compliant stack test.

#### **D.3.8 VOC Capture Efficiency Using Permanent or Temporary Total Enclosure**

The capture efficiency system shall be considered one-hundred (100) percent if the system meets the following criteria for a Permanent or Temporary Total Enclosure:

- (a) Any Natural Draft Opening (NDO) shall be at least four (4) equivalent opening diameters from each VOC emitting point.
- (b) Any exhaust point from the enclosure shall be at least four (4) equivalent duct or hood diameters from each NDO.
- (c) The total area of all NDO's shall not exceed 5 percent of the surface area of the enclosure's four walls, floor, and ceiling.
- (d) The average facial velocity (FV) of air through all NDO's shall be at least 3,600 meters per hour (200 feet per minute). The direction of airflow through all NDO's shall be into the enclosure.
- (e) All access doors and windows whose areas are not included in (c) and are not included in the calculation in (d) shall be closed during routine operation of the process.
- (f) All VOC in the enclosure emissions must be captured and contained for discharge through its respective RTOs.

**Where:**

- Natural Draft Opening (NDO) - Any permanent opening in the enclosure that remains open during operation of the facility and is not connected to a duct in which a fan is installed.
- Permanent Total Enclosure (PTE) - A permanently installed enclosure that completely surrounds a source of emissions such that all VOC emissions are captured and contained for discharge through a control device.
- Temporary Total Enclosure (TTE) - A temporarily installed enclosure that completely surrounds a source of emissions such that all VOC emissions are captured by the enclosure and contained for discharge through ducts that allow for the accurate measurement of VOC rates.

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

##### **D.3.6 9 Monitoring**

- ~~(a)~~ Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a ~~violation~~ **deviation** of this permit.

*(Note: the following (b) and (c) conditions are no longer applicable, since the particulate overspray will be burned-off by the RTOs):*

- ~~(b)~~ To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the paint booth stacks S/V13, S/V14, S/V15, S/V19, S/V20, and S/V21 while one or more of the booths are in operation.

- ~~(c) Monthly inspections shall be performed of the coating emissions from each stack and for the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for each unit (EU13, EU14, EU15, EU19, EU20, and EU21) shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.~~
- ~~(d) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.~~

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

#### **D.3.7 10 Record Keeping Requirements**

- ~~(a) To document compliance with Conditions D.3.1 (a) and D.3.1(b), the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.3.1 (a) and D.3.1(b):~~
- ~~(1) The VOC content of each coating material and solvent less water used.~~
  - ~~(2) The amount of coating material and solvent used on a monthly basis.~~
- 
- ~~(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.~~
- ~~(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.~~
- ~~(3) The cleanup solvent usage for each month.~~
- ~~(4) The total VOC usage for each month.~~
- (a) To document compliance with the BACT in Condition D.3.1, the Permittee shall maintain records of the following:**
- (1) VOC input from each plant into each respective RTO,**
  - (2) Continuous temperature records (on a 3-hour average basis) for the Regenerative Thermal Oxidizers and the 3-hour average temperature used to demonstrate compliance with Condition D.3.1 and D.4.1 during the most recent compliant stack test.**
  - (3) Daily records of duct pressure and fan amperage.**
  - (4) Work Practices Standards.**
- ~~(e-b) To document compliance with Conditions D.3.6-9, D.3.6 (b), D.3.6 (c), and D.3.6 (d), the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.~~
- ~~(d c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.~~

## SECTION D.4 FACILITY OPERATION CONDITIONS

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

**Part 1 - Line 1, Plant 1 - Line 2, Plant 2 - Line A and Line B, Plant 3, Plant 4, and Plant 5**  
Located in Plant 5: One (1) surface coating line, installed February 12, 2003, consisting of three (3) paint booths, identified as EU22, EU23, and EU24, with a maximum capacity of 625 plastic parts per hour, each equipped with High Volume Low Pressure (HVLP) spray guns and dry filters to control particulate overspray, exhausting to stacks S/V22, S/V23, and S/V24, respectively.

(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 General Reduction Requirements for New Facilities [326 IAC 8-1-6]

Pursuant to MSM 079-16570-00010, issued on February 12, 2003, the input VOC to the surface coating line located in Plant 5 (EU22, EU23, and EU24), shall be limited to less than twenty-five (25) tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period with compliance determined at the end of each month. This usage limit is required to limit the potential to emit of VOC to less than twenty-five (25) tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) not applicable.

#### D.4.1 VOC Limit - Prevention of Significant Deterioration [326 IAC 2-2]

The input VOC to the surface coating lines in Part 1 - Line 1, Plant 1 - Line 2, Plant 2 - Line A and Line B, Plant 3, Plant 4, and Plant 5, including coatings, dilution solvents, and cleaning solvents shall be restricted such that the VOC emissions shall be limited to less than two-hundred fifty (250) tons of VOC per twelve (12) consecutive-month period, with compliance determined at the end of each month. Compliance with this limit in conjunction with the operation of the RTOs as required in Section D.3 shall make 326 IAC 2-2, Prevention of Significant Deterioration (PSD) not applicable.

#### D.4.2 Particulate Matter (PM) [40 CFR 52, Subpart P]

Pursuant to 40 CFR 52, Subpart P, the PM from the Plant 5 three (3) paint booths (EU22, EU23, and EU24) shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

#### D.4.3 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating, shall be controlled by dry particulate filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications. This requirement to operate the control is not federally enforceable.

#### D.4.4 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 the one (1) surface coating line and the dry filters **and RTO** located in Plant 5.

**D.4.2. 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]**

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- (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 no later than 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.4.7, Notification Requirements.

**D.4.3 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]**

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- (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 no later than 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.4.7, 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 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.4.4 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 2 to 40 CFR Part 63, Subpart P] [40 CFR 63.4501]**

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- (a) The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except

when otherwise specified by Table 2 to 40 CFR Part 63, Subpart PPPP. The Permittee must comply with these requirements no later than April 19, 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.4.9, Notification Requirements.

**D.4.5 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products [40 CFR Part 63, Subpart PPPP] [40 CFR 63.4481] [40 CFR 63.4482] [40 CFR 63.4483(b)] [40 CFR 63.4581]**

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- (a) The provisions of 40 CFR Part 63, Subpart PPPP (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/plastic/plasticpg.html>. Pursuant to 40 CFR 63.4483(b), the Permittee must comply with these requirements no later than April 19, 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.4.9, Notification Requirements.
- (c) The following emissions units comprise the affected source that is subject to 40 CFR 63, Subpart PPPP:
- (1) All coating operations as defined in 40 CFR 63.4581;
  - (2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
  - (3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and
  - (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.
- (d) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.4581, and are applicable to the affected source.

## Compliance Determination Requirements

### D.4.6 VOC Emissions

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Compliance with condition D.4.1 shall be demonstrated within 30 days of the end of each month. This shall be based on the total volatile organic compound emitted for the previous month, and adding it to previous 11 months total VOC emitted so as to arrive at VOC emissions for the most recent 12 consecutive month period. The VOC emissions for a month can be arrived at using the following equation for VOC usage:

$$\text{VOC emitted} = [(\text{VOC input}) \times (100 - \% \text{ overall control efficiency})] + [\text{VOC input from other uncontrolled facilities}]$$

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

**D.4.7 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) **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.4.8 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

**D.4.9 Notification Requirements [40 CFR 63.4510]**

- (a) **General.** The Permittee must submit the notifications in 40 CFR 40 CFR 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply to the affected source by the dates specified in those sections, except as provided in 40 CFR 63.4510, paragraphs (b) and (c).
- (b) **Notification of compliance status.** The Permittee must submit the notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR 63.4540, 40 CFR 63.4550, or 40 CFR 63.4560 that applies to the affected source. The notification of compliance status must contain the information specified in 40 CFR 63.4510(c), paragraphs (1) through (11) and in 40 CFR 63.9(h).

**D.4.10 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326**

**IAC 2-7-5]**

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

- (a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Part 70 permit the applicable requirements of 40 CFR 63, Subpart PPPP, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.**
- (b) The significant permit modification application shall be submitted no later than July 19, 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**

**D.4.711 Record Keeping Requirements**

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- (a) To document compliance with Condition D.4.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limit established in Condition D.4.1.**
  - (1) The VOC content of each coating material and solvent less water used.**
  - (2) The amount of coating material and solvent used on a monthly basis.**
    - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.**
    - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.**
  - (3) The cleanup solvent usage for each month.**
  - (4) The total VOC usage for each month.**
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.**

**D.4.812 Reporting Requirements**

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A quarterly summary of the information to document compliance with Condition D.4.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

**Part 70 Quarterly Report**

Source Name: Erler Industries, Inc.  
Source Address: 418 Stockwell Street, North Vernon, Indiana 47265

71 Hayden Pike, North Vernon, Indiana 47265  
125 West Hayden Pike, North Vernon, Indiana 47265  
Mailing Address: P.O. Box 219, North Vernon, Indiana 47265  
Part 70 Permit No.: T079-17195-00010  
Facility: Plant 1: Line 1 (EU1, EU2, EU17, and EU18)  
Parameter: VOC Input  
Limit: **The input VOC, including coatings, dilution solvents, and cleaning solvents shall be restricted such that the VOC emissions shall be limited to less than 25 tons per consecutive 12 month period**

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

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Input This Month (tons)	VOC Input Previous 11 Months (tons)	VOC Input 12 Month Total (tons)
Month 1			
Month 2			
Month 3			

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

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

Attach a signed certification to complete this report.

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

**Part 70 Quarterly Report**

Source Name: Erler Industries, Inc.  
Source Address: 418 Stockwell Street, North Vernon, Indiana 47265  
71 Hayden Pike, North Vernon, Indiana 47265

Mailing Address: 125 West Hayden Pike, North Vernon, Indiana 47265  
 Part 70 Permit No.: P.O. Box 219, North Vernon, Indiana 47265  
 Facility: T079-17195-00010  
 Parameter: Plant 1: Line 2 (EU4 and EU5)  
 Limit: VOC Input  
**The input VOC, including coatings, dilution solvents, and cleaning solvents shall be restricted such that the VOC emissions shall be limited to less than 25 tons per consecutive 12 month period**

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

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Input This Month (tons)	VOC Input Previous 11 Months (tons)	VOC Input 12 Month Total (tons)
Month 1			
Month 2			
Month 3			

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

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

Attach a signed certification to complete this report.

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

**Part 70 Quarterly Report**

Source Name: \_\_\_\_\_ Erler Industries, Inc.  
 Source Address: \_\_\_\_\_ 418 Stockwell Street, North Vernon, Indiana 47265  
 \_\_\_\_\_ 71 Hayden Pike, North Vernon, Indiana 47265  
 \_\_\_\_\_ 125 West Hayden Pike, North Vernon, Indiana 47265

Mailing Address: \_\_\_\_\_ P.O. Box 219, North Vernon, Indiana 47265  
 Part 70 Permit No.: \_\_\_\_\_ T079-17195-00010  
 Facility: \_\_\_\_\_ Plant 3: Line 3 (EU13, EU14, EU15)  
 Parameter: \_\_\_\_\_ VOC Input  
 Limit: \_\_\_\_\_ Less than 25 tons per consecutive 12 month period

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

Month	Column 1	Column 2	Column 1 + Column 2
	This Month (tons)	Previous 11 Months (tons)	12 Month Total (tons)
Month 1			
Month 2			
Month 3			

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.  
 Deviation has been reported on: \_\_\_\_\_

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

Attach a signed certification to complete this report.  
 \_\_\_\_\_

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

**Part 70 Quarterly Report**

Source Name: \_\_\_\_\_ Erler Industries, Inc.  
 Source Address: \_\_\_\_\_ 418 Stockwell Street, North Vernon, Indiana 47265  
 \_\_\_\_\_ 71 Hayden Pike, North Vernon, Indiana 47265  
 \_\_\_\_\_ and 125 West Hayden Pike, North Vernon, Indiana 47265  
 Mailing Address: \_\_\_\_\_ P.O. Box 219, North Vernon, Indiana 47265

Part 70 Permit No.: T079-17195-00010  
Facility: Plant 4: Line 4 (EU19, EU20, EU21)  
Parameter: VOC Input  
Limit: Less than 25 tons per consecutive 12 month period

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

Month	Column 1	Column 2	Column 1 + Column 2
	This Month (tons)	Previous 11 Months (tons)	12 Month Total (tons)
Month 1			
Month 2			
Month 3			

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.

Deviation has been reported on: \_\_\_\_\_

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

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

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

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

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

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

**Part 70 Quarterly Report**

Source Name: \_\_\_\_\_ Erler Industries, Inc.  
 Source Address: \_\_\_\_\_ 418 Stockwell Street, North Vernon, Indiana 47265  
 \_\_\_\_\_ 71 Hayden Pike, North Vernon, Indiana 47265  
 \_\_\_\_\_ and 125 West Hayden Pike, North Vernon, Indiana 47265  
 Mailing Address: \_\_\_\_\_ P.O. Box 219, North Vernon, Indiana 47265  
 Part 70 Permit No.: T079-17195-00010  
 Facility: \_\_\_\_\_ One (1) Surface Coating Line located in Plant 5 (EU22, EU23, and EU24)  
 Parameter: \_\_\_\_\_ VOC Input  
 Limit: \_\_\_\_\_ Less than 25 tons per consecutive 12 month period

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

Month	Column 1	Column 2	Column 1 + Column 2
	This Month (tons)	Previous 11 Months (tons)	12 Month Total (tons)
Month 1			
Month 2			
Month 3			

\_\_\_\_\_  No deviation occurred in this quarter.

\_\_\_\_\_  Deviation/s occurred in this quarter:

Deviation has been reported on: \_\_\_\_\_

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

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

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

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

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

\_\_\_\_\_ Attach a signed certification to complete this report.

The following Report Form will be added to the permit:

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

**Part 70 Quarterly Report**

**Source Name:** Erler Industries, Inc.  
**Source Address:** 418 Stockwell Street, North Vernon, Indiana 47265  
 71 Hayden Pike, North Vernon, Indiana 47265  
 and 125 West Hayden Pike, North Vernon, Indiana 47265  
**Mailing Address:** P.O. Box 219, North Vernon, Indiana 47265  
**Part 70 Permit No.:** T079-17195-00010  
**Facility:** Plant 1, Line 1; Plant 1, Line 2; Plant 2, Line A & Line B; Plant 3; Plant 4;  
 Plant 5  
**Parameter:** VOC Input  
**Limit:** The input VOC, including coatings, dilution solvents, and cleaning solvents shall be restricted such that the VOC emissions shall be limited to less than two-hundred fifty (250) tons of VOC per twelve (12) consecutive-month period.

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

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Input This Month (tons)	VOC Input Previous 11 Months (tons)	VOC Input 12 Month Total (tons)
Month 1			
Month 2			
Month 3			

Note: This report shall accompany a detailed emission calculations that account for the RTOs operation.

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

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

**Attach a signed certification to complete this report.**

**Conclusion**

The operation of this plastic and metal parts surface coating shall be subject to the conditions of the attached **Significant Source Modification 079-19764-00010** and **Significant Permit Modification 079-19470-00010**.

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

Addendum to the  
Technical Support Document for a Significant Source Modification and Significant Permit Modification to a  
Part 70 Operating Permit

Source Name: Erler Industries, Inc.  
Source Location: 418 Stockwell Street, North Vernon, Indiana 47265  
71 Hayden Pike, North Vernon, Indiana 47265  
125 West Hayden Pike, North Vernon, Indiana 47265  
County: Jennings  
SIC Code: 3479, 3663  
Operation Permit No.: T079-17195-00010  
Issuance Date: October 2, 2003  
Significant Source Modification No.: 079-19764-00010  
1<sup>st</sup> Significant Permit Modification No.: 079-19470-00010  
Permit Reviewer: Aida De Guzman

On December 16, 2004, the Office of Air Quality (OAQ) had a notice published in the Plain Dealer and Sun, North Vernon, Indiana, stating that Erler Industries, Inc. had applied for a modification to the Part 70 Operating Permit to install three (3) Regenerative Thermal Oxidizers (RTOs) to control the VOC emissions from existing permitted Plant 3, Plant 4, and Plant 5. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed 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 permit should be issued as proposed.

Public Notice ended on January 15, 2005, however, Erler Industries requested until January 19, 2005 to submit the following comments (additions are **bolded** and deletions are ~~struck through~~ for emphasis):

Comment 1: Section A.4. Please revise to include a solvent recycling system with batch capacity less than or equal to 100 gallons per 326 IAC 2-7-1(21)(G)(viii).

Response 1: It is not necessary to list "solvent recycling system with batch capacity less than or equal to 100 gallons" in Section A.4 of the Part 70 permit, as this section listed only insignificant activities with applicable requirements.

Comment 2: Condition B.12(a). Please insert "federal statutes and regulations and the" before "Indiana" in the third sentence.

Response 2: The following Condition will be revised as suggested:

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

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- (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 in 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 **federal statutes and regulations and the** Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the

requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

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

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

Comment 3: Condition B.24, Credible Evidence. Has the new rule reflecting this provision become effective?

Response 3: The new Credible Evidence rule has been sent on December 15, 2004 to the Attorney General's Office for approval.

In accordance with the credible evidence rule (62 Fed. Reg. 8314, Feb 24, 1997); Section 113(a) of the Clean Air Act, 42 U.S. C. § 7413 (a); and a letter from the United States Environmental Protection Agency (USEPA) to IDEM, OAQ dated May 18, 2004, all

permits must address the use of credible evidence; otherwise, USEPA will object to the permits.

Comment 4: Condition C.11. The last sentence of Condition C.11 should be deleted or, alternatively, the Significant Source Modification will need to be revised to allow the monitoring of the RTOs to commence within 90 days of the effective date of the Significant Source Modification and Significant Permit Modification. The RTOs have been in operation for some time and cannot apply the monitoring retroactively.

Response 4: Condition C.11. As a standard the monitoring of a control device is ninety (90) days maximum, which reflects the actual time necessary to install the equipment and begin the monitoring, this time frame should be shorter if the source already has the control equipment in place. Therefore, the ninety (90) days required in the draft permit will be changed to a shorter time, which is thirty (30) days since the source has already installed the RTOs and already began monitoring. Condition C.11 will be revised as follows:

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ~~ninety (90)~~ **thirty (30)** days of **after the issuance of permit modification 079-19470-00010**. 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)~~ **thirty (30)** days, the Permittee may extend the compliance schedule related to the equipment for an additional ~~ninety (90)~~ **thirty (30)** days provided the Permittee notifies:

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

in writing, prior to the end of the initial ~~ninety (90)~~ **thirty (30)** 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 units, compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

Comment 5: Conditions D.1.4, D.2.2 and D.3.2. Conditions D.1.4, D.2.2, and D.3.2 list 40 CFR 52, Subpart P as the authority for the particulate matter emission limitations. We understand that IDEM is referring to the SIP because EPA has not yet approved the changes to 326 IAC 6-3-2 as published in 25 IR 3051. Because the portion of 40 CFR 52, Subpart P referenced in D.1.4, D.2.2, and D.3.2 is identical to the Indiana requirement in 326 IAC 6-3-2, please add "326 IAC 6-3-2" in the authority line for conditions D.1.4, D.2.2 and D.2.3 to clarify where the particulate emission limitation can be found in the Indiana regulations.

Response 5: 326 IAC 6-3-2 cannot be cited with 40 CR 52, Subpart P in Conditions D.1.4, D.2.2, and D.3.2 as these conditions cite what is enforceable under the federal rule. No changes will be made to these conditions.

Comment 6: Section D.2 Facility Description (b)(1). Insert “with” after “equipped”.

Response 6: Section D.2 will be changed as requested:

## SECTION D.2 FACILITY OPERATION CONDITIONS

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

Located in Plant 2:

(b) Located in Plant 2:

- (1) One (1) surface coating line, identified as Line A, constructed in 1996, consisting of three (3) manual paint booths, identified as EU6, EU7, and EU8, each equipped **with** dry filters to control particulate overspray, exhausting to stacks S/V6, S/V7, and S/V8, respectively.
- (2) One (1) surface coating line, identified as Line B, constructed in 1996, consisting of:
  - (A) Two (2) manual paint booths, identified as EU9 and EU10, each equipped with dry filters to control particulate overspray, exhausting to stacks S/V9 and S/V10, respectively; and
  - (B) Two (2) robot paint booths, identified as EU11 and EU12, each equipped with dry filters to control particulate overspray, exhausting to stacks S/V11 and S/V12, respectively.

Line A and Line B each have a maximum capacity of 4.0 gallons of conductive copper paint per hour, a maximum capacity of 2.5 gallons of conductive silver paint per hour, and a maximum capacity of 2.0 gallons of conductive black paint per hour.

Decorative, conductive and clear coatings are used in Plant 2. Plant 2 utilizes eight (8) manual High Volume Low Pressure (HVLP) spray guns, two (2) manual air atomization guns and two (2) robotic air atomization guns.

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

Comment 7: Section D.3 Facility Description (e). Insert “to Stack P5” after the word “exhausts” in the second sentence.

Response 7: Section D.3 will be revised as requested:

## SECTION D.3 FACILITY OPERATION CONDITIONS

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

- (c) Located in Plant 3: One (1) surface coating line, identified as Plant 3, constructed in 1999, consisting of three (3) paint booths, identified as EU13, EU14, and EU15, each with a total maximum capacity of 135 racks per hour, and each equipped with dry filters to control particulate overspray. Plant 3 is equipped with a 3.0 mmBtu/hr Regenerative Thermal Oxidizer, RTO3 to control VOC emissions and exhausts to Stack P3. Plant 3 utilizes three (3) air atomization robotic spray guns.
- (d) Located in Plant 4: One (1) surface coating line, identified as Plant 4, constructed in 2002, consisting of three (3) paint booths, identified as EU19, EU20, and EU21, each with a total maximum capacity of 135 racks per hour, and each equipped with dry filters to control particulate overspray emissions. Plant 4 is equipped with a 3.0 mmBtu/hr Regenerative Thermal Oxidizer, RTO4 to control VOC emissions and exhausts to Stack P4. Plant 4 utilizes three (3) air atomization robotic spray guns.
- (e) Located in Plant 5: One (1) surface coating line, constructed in 2003, consisting of three (3) paint booths, identified as EU22, EU23, and EU24, each with a maximum capacity of 135 racks per hour and each equipped with dry filters to control particulate overspray. Plant 5 is equipped with a 3.0 mmBtu/hr Regenerative Thermal Oxidizer, RTO5 to control VOC emissions and exhausts to **Stack P5**. Plant 5 utilizes three (3) air atomization robotic spray guns.

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

Comment 8: Condition D.3.1 paragraph (a). Please change the wording in the second sentence to "Each RTO shall have a capture system efficiency of 100% and a destruction efficiency of 95%, such that all VOC emissions are directed to the RTO."

Comment 9: Section D.3.1(c). Insert the word "each" after the word "shall" to clarify that each Plant 4 and Plant 5 are subject to separate VOC concentration limits of 100 ppmv.

Responses 8 & 9: Condition D.3.1(a) and D.3.1(c) will be revised as follows:

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

**D.3.1 General Reduction Requirements for New Facilities [326 IAC 8-1-6]**

Pursuant to 326 IAC 8-1-6, the Best Available Control Technology (BACT) determined for Erler Industries Plant 3, Plant 4, and Plant 5 shall be the following:

- (a) The Regenerative Thermal Oxidizer (RTO) dedicated for each Plant 3, Plant 4, and Plant 5 shall be operated at all times each plant is in operation. Each RTO shall have a capture system efficiency of 100% and a destruction efficiency of 95%, **such that all VOC emissions** ~~with the air flow from the paint booths, flash-off area, and the oven areas~~ from each plant shall be ~~ducted~~ **directed** into the RTO for destruction.
- (b) The effluent VOC concentration from Plant 3 RTO shall be limited to 100 parts per million by volume (ppmv), at a maximum air flow rate of 10,000 standard cubic feet per minute (scfm),
- (c) The effluent VOC concentration from Plant 4 and Plant 5 RTOs shall **each** be limited to 100 ppmv, at a maximum air flow rate of 9,000 scfm for each plant.

- (d) Good Work Practice Standards:
- (1) All VOC containing coatings, thinners and/or other additives, cleaning materials and waste materials must be stored in closed containers.
  - (2) Spills of VOC-containing coatings, thinners, and/or other additives, cleaning materials and waste materials must be minimized.
  - (3) VOC-containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be conveyed from one location to another in closed containers or pipes.
  - (4) Mixing vessels with VOC-containing coatings and other materials must be closed except when adding to, removing, or mixing the contents.
  - (5) Emissions of VOC must be minimized during cleaning of storage, mixing, and conveying equipment.

Comment 10: Condition D.3.5. As previously noted, Erler is conducting performance tests of the RTOs within the same 180 day time period pursuant to the EPA's Administrative Consent Order. A test protocol has been submitted to the IDEM and EPA for approval. Please confirm that the testing conducted pursuant to the EPA's order will suffice for the initial testing conducted per D.3.5.

Response 10: Although the stack testing for the RTOs is being conducted pursuant to the EPA's Administrative Consent Order, this test should satisfy the initial stack test required in this permit if validated by IDEM, Compliance Data Section.

Comment 11: Sections D.1.6, D.2.4 and D.3.4. A preventative maintenance plan should be required only for the control equipment, not the entire coating line, consistent with the Condition B.10(a)(1).

Response 11: The Preventive Maintenance Plan requirement must be included in every applicable Title V permit pursuant to 326 IAC 2-7-5(13). This rule refers back to the Preventive Maintenance Plan requirement as described in 326 IAC 1-6-3. This Preventive Maintenance Plan rule sets out the requirements for:

- (1) Identification of the individuals responsible for inspecting, maintaining and repairing the emission control equipment (326 IAC 1-6-3(a)(1)),
- (2) The description of the items or conditions in the facility that will be inspected and the inspection schedule for said items or conditions (326 IAC 1-6-3(a)(2)), and
- (3) The identification and quantification of the replacement parts for the facility which the Permittee will maintain in inventory for quick replacement (326 IAC 1-6-3(a)(2)).

It is clear from the structure of the wording in 326 IAC 1-6-3 that the PMP requirement affects the entirety of the applicable facilities. Only 326 IAC 1-6-3(a)(1) is limited, in that it requires identification of the personnel in charge of only the emission control equipment, and not any other facility equipment. 326 IAC 1-6-3(b) provides that "...as deemed necessary by the commissioner, any person operating a facility shall comply with the requirements of subsection (a) of this section."

Many types of facilities require maintenance in order to prevent excess emissions. For example: Electrostatic application equipment needs proper maintenance in order to maintain maximum transfer efficiency. Therefore, no changes will be made to Conditions D.1.6, D.2.4, and D.3.4.

Comment 12: Condition D.3.10 paragraph (a)(3). Please change this requirement to “duct pressure or fan amperage” as per D.3.6(a).

Response 12: Condition D.3.10(a)(3) will be revised to be consistent with Condition D.3.6(a).

#### D.3.10 Record Keeping Requirements

- (a) To document compliance with the BACT in Condition D.3.1, the Permittee shall maintain records of the following:
- (1) VOC input from each plant into each respective RTO.
  - (2) Continuous temperature records (on a 3-hour average basis) for the Regenerative Thermal Oxidizers and the 3-hour average temperature used to demonstrate compliance with Condition D.3.1 and D.4.1 during the most recent compliant stack test.
  - (3) Daily records of duct pressure ~~and~~ or fan amperage.
  - (4) Work Practices Standards.
- (b) To document compliance with Conditions D.3.9, the Permittee shall maintain a log of daily inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Comment 13: Condition D.4.9. Please include the initial notification requirement under Subpart PPPP. See 40 CFR 63.4510(b).

Response 13: The initial notification required in Sections 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) as referenced in Section 63.4510 of Subpart PPPP is already in Condition D.4.9(a) and (b). Therefore, no change will be made to the permit.

Comment 14: Condition D.4.11(a). In the first sentence, please insert “in addition to the records required by Condition D.1.9(a)(1), (2), (4), (5), and Condition D.2.7(a)(1)-(4)” before “maintain” and insert “for Plant 3, Plant 4, and Plant 5” after “below”. As written the recordkeeping in D.4.11(a) duplicates the records required by D.1.9(a) and D.2.7(a).

Response 14: Condition D.4.11(a) will be revised to consider the record keeping already required in Condition D.1.9(a)(1), (2), (4), (5), and Condition D.2.7(a)(1) through (4).

#### D.4.11 Record Keeping Requirements

- (a) To document compliance with Condition D.4.1, the Permittee shall **in addition to the records required by Condition D.1.9(a)(1), (2), (4), (5), and Condition D.2.7(a)(1) through (4)** maintain records in accordance with (1) through (4) below **for Plant 3, Plant 4, and Plant 5**. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limit established in Condition D.4.1.
- (1) The VOC content of each coating material and solvent less water used.

- (2) The amount of coating material and solvent used on a monthly basis.
    - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
    - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
  - (3) The cleanup solvent usage for each month.
  - (4) The total VOC usage for each month.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Comment 15: Sections D.1.9(c), D.2.7(c), D.3.10(c) and D.4.11(b). These conditions are redundant because Condition C.18 already requires this and therefore should be deleted.

Response 15: Condition C.18 and other conditions in the Section C are general requirements. The conditions in Section D are conditions that are specific to the listed emission units in that Section. IDEM does not find this redundant. Therefore, Conditions D.1.9(c), D.2.7(c), D.3.10(c) and D.4.11(b) will remain in the permit.

Comment 16: Part 70 Quarterly Reporting Forms. For the Form for the 250 ton source wide limit, please change the VOC reporting requirement from "VOC Input" to "VOC Emissions". This way the IDEM can easily determine that we are in compliance with the facility VOC emission cap of 250 tons of VOC emissions per twelve consecutive-month period as per D.4.6.

Response 16: The following report form will be revised to correct the following typographical error:

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

**Part 70 Quarterly Report**

Source Name: Erler Industries, Inc.  
 Source Address: 418 Stockwell Street, North Vernon, Indiana 47265  
 71 Hayden Pike, North Vernon, Indiana 47265  
 and 125 West Hayden Pike, North Vernon, Indiana 47265  
 Mailing Address: P.O. Box 219, North Vernon, Indiana 47265  
 Part 70 Permit No.: T079-17195-00010  
 Facility: Plant 1, Line 1; Plant 1, Line 2; Plant 2, Line A & Line B; Plant 3; Plant 4; Plant 5  
 Parameter: VOC  
 Limit: The input VOC, including coatings, dilution solvents, and cleaning solvents shall be restricted such that the VOC emissions shall be limited to less than two-hundred fifty (250) tons of VOC per twelve (12) consecutive-month period.

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

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Input Emissions This Month (tons)	VOC Input Emissions Previous 11 Months (tons)	VOC Input Emissions 12 Month Total (tons)
Month 1			
Month 2			
Month 3			

Note: This report shall accompany a detailed emission calculations that account for the RTOs operation.

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

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

Attach a signed certification to complete this report

On January 13, 2005, EPA also submitted the following comments:

Comment 1: EPA has found the following discrepancy with the dates written in the permit:

The June 21<sup>st</sup>, 2004 that is in the draft permit for EPA issuance date of the NOV/FOV should be June 17, 2004. The permit should state receipt date of June 21<sup>st</sup>, 2004 or issuance date of June 17<sup>th</sup>, 2004 to be consistent.

Response 1: IDEM, OAQ prefers not to change the TSD because the TSD preserves the original information and integrity of the permitting process. Since the discrepancy is in the TSD, the TSD Addendum will denote the corrections made to the original TSD. Therefore, corrections to the second paragraph of the TSD will be as follows:

“The installation of the RTOs is in response to EPA’s Notice of Violation (AE-17J), issued on ~~June 21, 2004~~ **June 17, 2004**; and the Administrative Consent Order (EPA-05-04-113(a)-08-IN), issued on September 28, 2004”.