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

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P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
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December 20, 2004

TO: Interested Parties / Applicant

RE: Venture Industries, LLC / SSM 039-19497-00498

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 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, 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 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER.dot 9/16/03

Mr. Kevin Robinson
Venture Industries, LLC
2501 Jeanwood Drive
Elkhart, Indiana 46514

December 20, 2004

Re: 039-19497-00498
First Significant Source Modification to
Part 70 039-15364-00498

Dear Mr. Robinson:

Venture Industries, LLC, located at 2501Jeanwood Drive, Elkhart, Indiana 46514 was issued a Part 70 permit on February 3, 2004 for a stationary trailer frame fabrication and coating operation. An application to modify the source was received on August 17, 2004, with additional information received on September 16, 2004. Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for construction at the source:

(a) One (1) Spray Coating operation, ID B02 which consists of four (4) air assisted spray systems, with a total maximum capacity of eleven (11) metal trailer frames per hour, venting outside the building, with dry filters to control the particulate matter (PM) overspray emissions. Painted trailer frames will be air dried in an open room; and

(b) One (1) Power Wash Station, which will utilize water for washing metal trailer frames.

The following construction conditions are applicable to the proposed project:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).

2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13 17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

4. Pursuant to 326 IAC 2 1.1 9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

6. Pursuant to 326 IAC 2-7-10.5(l) the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

This significant source modification authorizes construction of the new emission units. Operating conditions shall be incorporated into the Part 70 operating permit as a significant permit modification in accordance with 326 IAC 2-7-10.5(l)(2) and 326 IAC 2-7-12. Operation is not approved until the significant permit modification has been issued.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Aida De Guzman, 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 - Elkhart County
U.S. EPA, Region V
Elkhart County Health Department
Northern Regional Office
Air Compliance Section Inspector – Tony Pelath
Compliance Data Section
Administrative and Development

PART 70 SIGNIFICANT SOURCE MODIFICATION
OFFICE OF AIR QUALITY

Venture Technologies, LLC
2501 Jeanwood Drive
Elkhart, Indiana 46514

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

This approval is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

First Significant Source Modification No.: 039-19497-00498	
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: December 20, 2004

FACILITY OPERATION CONDITIONS

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

(a) One (1) Spray Coating operation, ID B02 which consists of four (4) air assisted spray systems, with a total maximum capacity of eleven (11) metal trailer frames per hour, venting outside the building, with dry filters to control the particulate matter (PM) overspray emissions. Painted trailer frames will be air dried in an open room; and

(b) One (1) Power Wash Station, which will utilize water for washing metal trailer frames.

(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)]

1. Volatile Organic Compounds (VOC) from Miscellaneous Metal Coating [326 IAC 8-2-9]

(a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the spray coating operation, ID B02 shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for air dried coatings.

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

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

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit for this spray booth and its control device.

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

(a) The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart MMMM. The Permittee must comply with these requirements on and after January 2, 2004.

(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 No. 8, Notification Requirements.

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

(a) The provisions of 40 CFR Part 63, Subpart MMMM (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics

Website at http://www.epa.gov/ttn/atw/misc/miscpg.html. Pursuant to 40 CFR 63.3883(b), the Permittee must comply with these requirements on and after January 2, 2007.

(b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition, except as otherwise provided in this condition. The permit shield applies to Condition No. 8, 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.

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

Pursuant to 40 CFR 52, Subpart P, the PM from the Spray Coating operation, ID B02 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:

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

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

Pursuant to 326 IAC 6-3-2, the Spray Coating operation ID BO2 shall be controlled by a dry filter, waterwash, or an equivalent control device, and that the Permittee shall operate the control device in accordance with manufacturer's specifications.

Compliance Determination Requirements

7. Volatile Organic Compounds (VOC)

Compliance with the VOC content limitation contained in Condition No. 1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

8. 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).

9. 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 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

10. Record Keeping Requirements

(a) To document compliance with Condition No. 1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits established in Condition No. 1.

(1) The VOC content of each coating material and solvent used.

(2) The amount of coating material and solvent less water used on daily 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; and

(6) The weight of VOCs emitted for each compliance period.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this Part 70 permit.

Indiana Department of Environmental Management
Office of Air Quality

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

Source Background and Description

Source Name:	Venture Technologies, LLC
Source Location:	2501 Jeanwood Drive, Elkhart, Indiana 46514
County:	Elkhart
SIC Code:	3499, 3714
Operation Permit No.:	T039-15364-00498
Operation Permit Issuance Date:	February 3, 2003
1st Significant Source Modification No.:	039-19497-00498
1st Significant Permit Modification No.:	039-19563-00498
Permit Reviewer:	Aida De Guzman

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

(a) One (1) Spray Coating operation, ID B02 which consists of four (4) air assisted spray systems, with a total maximum capacity of eleven (11) metal trailer frames per hour, venting outside the building, with dry filters to control the particulate (PM) overspray emissions. Painted trailer frames will be air dried in an open room; and

(b) One (1) Power Wash Station, which will utilize water for washing metal trailer frames.

History

On August 17, 2004, Venture Technologies, LLC submitted an application to the OAQ requesting to add additional surface coating lines to their existing plant. Venture Technologies, LLC was issued a Part 70 permit on February 3, 2003.

Existing Approval

The source has been operating under the following approvals:

(a) Part 70 Permit No. T039-15364-00498, issued on February 3, 2003; and
(b) Review Request No. RR 039-17362-00498, issued on June 7, 2003.

Recommendation

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

Unless otherwise stated, information used in this review was derived from the application and

additional information submitted by the applicant.

An application for the purposes of this review was received on August 17, 2004. Additional information was received on September 2, 2004, and September 16, 2004.

Emission Calculations

(a) Painting Operation: See Page 1 and 2 of 2 TSD Appendix A of this document for detailed emissions calculations

Potential To Emit of Modification

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

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

Pollutant	Potential To Emit (tons/year)
PM	151.95
PM-10	151.95
SO_2	0.0
VOC	95.82
CO	0.0
NO_x	0.0

HAP's	Potential To Emit (tons/year)
Glycol Ether	8.51
Single HAP	8.51
Combined HAP	8.51

Justification for Modification

(a) This modification meets the criteria under a Minor Source Modification, 326 IAC 2-10.5(d)(9) for a modification which "has a potential to emit greater than the thresholds under subdivision (4) that adds an emission unit or units of the same type that are already permitted and that will comply with the same applicable requirements and permit terms as the existing emission unit or units". Although it meets this criteria, this modification will be reviewed under a Significant Source Modification under 326 IAC 2-7-10.5(f) because it will be limited to less than 40 tons per year to avoid a major review under the new 8-hour ozone standards (please see the limit below under **Potential to Emit of Modification After Issuance** on Page 4 of this TSD). This modification will also make the source a major source for HAPs, that triggers the applicability of NESHAP, 40 CFR Part 63, Subpart MMMM (Surface Coating of Miscellaneous Metal Parts and Products).

(b) The Part 70 Operating permit is being modified through a Part 70 Significant Permit Modification, pursuant to 326 IAC 2-7-12(d) as the change does not qualify as an Administrative Amendment or as a Minor Permit Modification.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM-10	attainment
SO_2	attainment
NO_2	attainment
1-Hour Ozone	attainment
8-Hour Ozone	nonattainment
CO	attainment
Lead	not determined

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as nonattainment for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for nonattainment new source review.

Source Status

Existing Source PSD Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and limits, taken from the Part 70 permit T039-15364-00498):

Pollutant	Emissions (tons/year)
PM	11.2
PM-10	11.2
SO_2	0.17
VOC	195.5
CO	22.6
NOx	26.9

(a) This existing source is a major stationary source under 326 IAC 2-1.1-5, 8-hour ozone standards because at least one non-attainment pollutant (VOC) is emitted at greater than 100 tons per year.

(b) This existing source is not a major source under 326 IAC 2-2, because other criteria pollutants (PM, PM10, SO2 and CO) are not emitted at a rate of 250 tons per year or greater. NOx, a nonattainment pollutant under the 8-hour ozone standards is not emitted at a major level. The source is not one of the 28 listed source categories.

Potential to Emit of Modification After Issuance

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

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
New Spray Coating Operation	0.63	0.63	0.0	<40 *	0.0	0.0	3.55 (Glycol Ether)
Significant Levels	25	15	40	40	40	-	-
Emission Offset Threshold Levels	-	-	-	-	-	100	-
Existing Source PTE Level	11.2	11.2	0.17	195.5	22.6	26.9	9.59 (Glycol Ether) 17.1 (combined HAPs)
PTE After Modification Issuance	11.83	11.83	0.17	<235.5	0.0	26.9	13.14 (Glycol Ether) 20.65 (combined HAPs)

* Since VOC is limited to less than 40 tons per year, the controlled particulate overspray emissions (PM, PM10) and HAPs emissions will also be scaled down.

PM/PM10 = <40 tons/yr / 95.82 * $1.51_{(after\ control)}$
= 0.63 tons/year

HAP = <40 tons/yr / 95.82 *8.51
= 3.55 tons/year

(a) This modification to an existing major source is not major under 326 IAC 2-1.1-5, 8-hour ozone standards because VOC is not emitted at 40 tons per year or greater. Therefore, the modification will not require a major NSR review.

(b) This modification is not a major under 326 IAC 2-2, because the attainment criteria pollutants (PM, PM10, SO2 and CO) are not emitted at significant levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

(a) This modification to an existing major source is not major for NOx, a non-attainment pollutant, since it is not emitted at major threshold level.

Federal Rule Applicability

(a) New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60:

(a) 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) -
The construction of the new spray coating operation, ID B02 is not major for hazardous air pollutants (HAPs) by itself. This modification combined with the existing source PTE for Glycol Ether will result to a total single HAP (Glycol Ether)

of more than 10 tons per year, therefore the source is now a major source for HAPs, and it will be subject to 40 CFR Part 63, Subpart MMMM. The source, which is an existing affected source will have a compliance date 3 years after January 2, 2004.

(2) 40 CFR Part 63, Subpart T- National Emission Standards for Halogenated Solvent Cleaning. The Power Wash Station is not subject to this NESHAP, as it does not use any halogenated solvent for cleaning. It uses only water for cleaning.

(c) 40 CFR Part 64 - Compliance Assurance Monitoring (CAM):
This rule applies to sources that emits single hazardous air pollutant (HAP) at 10 tons per year and combined HAPs at 25 tons per year. It also applies to sources that have uncontrolled emissions of 100 tons per year of PM10, sulfur dioxide (SO2), nitrogen oxides (NOx), carbon monoxide (CO), or volatile organic compounds (VOC) (except for Lake and Porter Counties where the VOC threshold is 25 tons per year), that rely on pollution control devices to comply with emission limitations required under the federal rules and Indiana's SIP.

Venture Industries, LLC has a VOC uncontrolled emissions of greater than 100 tons per year. However, it is not subject to the CAM rule because it does not have a control device to control the VOC emissions. It relies on record keeping to demonstrate compliance with the state rules.

(d) 40 CFR 52, Subpart P - Particulate Matter (PM)
Pursuant to 40 CFR 52, Subpart P, the PM overspray from the Spray Coating operation, ID B02 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:

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

State Rule Applicability - Entire Source

(a) 326 IAC 2-2 (Prevention of Significant Deterioration)
This modification to an existing major source is not major under 326 IAC 2-2, because the attainment criteria pollutants (PM, PM10, SO2 and CO) are not emitted at significant levels (see table under **Potential to Emit of Modification After Issuance** for these levels).

(b) 326 IAC 2-1.1-5 (8-Hour Ozone Standards)
The modification to an existing major source under the new 8-hour ozone standards is not major, as it does not emit 40 tons of VOC per year or greater.

(c) 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; it does not apply to modifications. The existing source, which was permitted and constructed in 1998 is not a major source for HAPs. The new Spray Coating operation is not subject to this rule, as it is a modification to the source. Therefore, Condition D.1.4 was deleted, as it referenced to modifications.

State Rule Applicability - Individual Facilities

(a) 326 IAC 8-2-9 (Miscellaneous Metal Coating)
Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic

compound (VOC) content of coating delivered to the applicator at the new spray coating operation shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for extreme performance coatings or coatings that are air dried.

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

The source is in compliance with this limit (See detailed emission calculations on page 1 of 2 TSD Appendix A of this document).

(b) 326 IAC 6-3-2 (Process Operations)
The new Spray Coating operation is subject to 326 IAC 6-3-2, and shall be controlled by a dry filter, waterwash, or an equivalent control device, subject to the following:

(1) The Permittee shall operate the control device in accordance with manufacturer's specifications.

The source is in compliance with this rule, as dry filters will be installed to control PM overspray emissions from the new Spray Coating operation.

(c) 326 IAC 8-3 (Organic Solvent Degreasing Operation)
This rule does not apply to the Power Wash Station, as it does not use solvent in the cleaning operation. It utilizes only water in cleaning.

Changes to the Part 70 Permit

The Part 70 permit will be modified as follows (additions are **bolded** and deletions are ~~struck-through~~ for emphasis):

Change 1: The following condition will be added in the Part 70 permit:

B.25 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.

Change 2: The Emission Statement in the Part 70 will be revised using the new language in the rule, 326 IAC 2-6:

C.18 ~~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) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:~~

~~(1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);~~

~~(2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.~~

~~(b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission 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).~~

~~(c) The annual 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 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

(a) In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2007 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.

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

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

(a) One (1) spray coating operation, **ID B01** constructed in 2001, exhausting to stacks PB1, PB2, PB3, and BO1, consisting of the following equipment:

(1) one (1) paint booth, with a maximum capacity of four (4) commercial and one (1) military metal trailer frames per hour, with emissions controlled by dry filters, and

(2) one (1) flash-off/cool down area, and

(3) one (1) natural gas-fired bake/cure oven with a maximum heat input capacity of 3.5 MMBtu/hr.

(b) One (1) Spray Coating operation, ID B02 which consists of four (4) air assisted spray systems, with a total maximum capacity of eleven (11) metal frames per hour, venting outside the building, with dry filters to control the particulate (PM) overspray emissions. Painted trailer frames will be air dried in an open room.

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

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

(a) One (1) aqueous pretreatment operation, constructed in 1998, exhausting to stacks S1 and S2, and vents EF1 and EF2, consisting of the following equipment:

(1) three (3) dip tanks, with an aggregate maximum capacity of 166.8 pounds of aqueous cleaner, aqueous rinse and phosphate solution per hour (insignificant per 326 IAC 2-7-1(21)(G)(ix)(DD)), and

(2) two (2) natural gas-fired 7.0 MMBtu/hr boilers used to provide hot water (insignificant per 326 IAC 2-7-1(21)(G)(i)(AA)(aa)). [326 IAC 6-2-4]

(b) One (1) epoxy and acrylic electrocoating operation, constructed in 1998, exhausting to vents EF1 through EF5 and stacks S3 through S6, consisting of the following equipment:

(1) fifteen (15) dip tanks, with an aggregate maximum capacity of 181.2 pounds resin per hour, 20 trailer frames per hour, 40 metal parts per hour, and 166.8 pounds of aqueous cleaner per hour, with an epoxy or acrylic dip application method (insignificant per 326 IAC 2-7-1(21)(G)(ix)(DD)),

(2) one (1) cool-down area,

(3) one (1) natural gas-fired E-coat cure oven, with a maximum heat input capacity of 1.9 MMBtu/hr (insignificant per 326 IAC 2-7-1(21)(G)(i)(AA)(aa)) [326 IAC 6-3-2], and

(4) one (1) natural gas-fired burn-off oven, with a maximum heat input capacity of 1.6 MMBtu/hr (insignificant per 326 IAC 2-7-1(21)(G)(i)(AA)(aa)). [326 IAC 4-2]

(c) Activities with emissions equal to or less than the following thresholds: 5 tons per year PM or PM10, 1.0 ton per year of a single HAP, or 2.5 tons per year of any combination of HAPs: Eighty-five (85) MIG (Metal Inert Gas) welding stations with a capacity of 0.59 lb of wire per hour per station. [326 IAC 6-3-2]

(d) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, an woodworking operations. [326 IAC 6-3-2]

(e) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, and soldering equipment. [326 IAC 6-3-2(c)]

(f) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2] [326 IAC 8-3-5]

(g) One (1) Power Wash Station, which will utilize water for washing metal trailer frames.

SECTION D.1 FACILITY OPERATION CONDITIONS

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

(a) One (1) spray coating operation, **ID B01** constructed in 2001, exhausting to stacks PB1, PB2, PB3, and BO1, consisting of the following equipment:

(1) one (1) paint booth, with a maximum capacity of four (4) commercial and one (1) military metal trailer frames per hour, with emissions controlled by dry filters, and

(2) one (1) flash-off/cool down area, and

(3) one (1) natural gas-fired bake/cure oven with a maximum heat input capacity of 3.5 MMBtu/hr.

(b) One (1) Spray Coating operation, ID B02 which consists of four (4) air assisted spray systems, with a total maximum capacity of eleven (11) metal frames per hour, venting outside the building, with dry filters to control the particulate (PM) overspray emissions. Painted trailer frames will be air dried in an open room.

(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 Particulate Matter (PM) [40 CFR 52 Subpart P] [326 IAC 6-3-2]

~~(a)~~ Pursuant to CP/MSOP 039-12883-00498, issued March 20, 2001, and 40 CFR 52 Subpart P, the particulate matter (PM) from the spray coating operation, ID B01 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:

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

Change 3: The following condition will be deleted, as it does not apply to a bake/cure oven.

~~(b) Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from the 3.5 MMBtu/hr bake/cure oven used in the spray coating operation shall be limited by the following:~~

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

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

D.1.2 Volatile Organic Compounds (VOC) from Miscellaneous Metal Coating [326 IAC 8-2-9]

(a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating applied to the metal components in the spray coating operation, **ID B01** be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings. ~~Solvent sprayed from application equipment during~~

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

(b) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the spray coating operation, ID B02 shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for air dried coatings.

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

D.1.3 General Provisions Relating to VOC Rules: Military Specifications [326 IAC 8-1-7]

If emission limitations set forth in 326 IAC 8 conflict with military specifications, the owner or operator of a source may petition the commissioner to have military specifications be the controlling limitation. If the commissioner approves the petition, the modified limitation shall be submitted to the U.S. EPA as a SIP revision.

Change 4: The following Condition D.1.4 will be deleted, as 326 IAC 2-4.1-1 does not apply to modifications.

~~D.1.4 Hazardous Air Pollutants (HAPs) [326 IAC 2-4.1]~~

~~Pursuant to CP/MSOP 039-12883-00498, issued March 20, 2001, any change or modification which may increase any single HAP potential emissions to 10 tons per year or more, or combination of HAPs potential emissions to 25 tons per year or more, shall require prior approval by the IDEM, OAQ before such changes may take place.~~

D.1.5**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 for these facilities and any control devices.

D.1.5. General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 2 to 40 CFR Part 63, Subpart MMMM] [40 CFR 63.3901]

(a) The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart MMMM. The Permittee must comply with these requirements on and after January 2, 2004.

(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.1.11, Notification Requirements.

D.1.6. National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products [40 CFR Part 63, Subpart MMMM] [40 CFR 63.3882] [40 CFR 63.3883] [40 CFR 63.3980]

(a) The provisions of 40 CFR Part 63, Subpart MMMM (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at http://www.epa.gov/ttn/atw/misc/miscpg.html. Pursuant to 40 CFR 63.3883(b), the Permittee must comply with these requirements on and after January 2, 2007.

(b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition, except as otherwise provided in this condition. The permit shield applies to Condition D.1.11, Notification Requirements.

(c) The affected source is the collection of all of the items listed in 40 CFR 63.3882, paragraphs (b)(1) through (4) that are used for surface coating of miscellaneous metal parts and products within each subcategory as defined in 40 CFR 63.3881(a), paragraphs (2) through (6).

(1) All 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.1.7 Particulate [326 IAC 6-3-2(d)]

(a) Pursuant to CP/MSOP 039-12883-00498, issued March 20, 2001, and 326 IAC 6-3-2(d), the spray booth, ID B01 shall be controlled by a dry particulate filter, and the control device shall be operated in accordance with manufacturer's specifications.

(b) Pursuant to 326 IAC 6-3-2, the new Spray Coating operation, ID BO2 shall be controlled by a dry filter, waterwash, or an equivalent control device, subject to the following:

(1) The Permittee shall operate the control device in accordance with manufacturer's specifications.

D.1.8 Particulate Matter (PM) [40 CFR 52, Subpart P]

Pursuant to 40 CFR 52, Subpart P, the PM overspray from the Spray Coating operation, ID B02 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:

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

Compliance Determination Requirements

D.1.6 **9** Volatile Organic Compounds (VOC)

Compliance with the VOC content limitation contained in Condition D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. 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.1.7Particulate [326 IAC 6-3-2(d)]~~

~~Pursuant to CP/MSOP 039-12883-00498, issued March 20, 2001, and 326 IAC 6-3-2(d), the spray booth, **ID B01** shall be controlled by a dry particulate filter, and the control device shall be operated in accordance with manufacturer's specifications.~~

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

D.1.8~~8~~ **10**Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the dry filters used to control emissions from the spray coating operation, **ID B01.** To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks PB1 and PB2 while the booth is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a ~~violation~~ **deviation** of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a ~~violation~~ **deviation** of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

D.1.11. Notification Requirements [40 CFR 63.3910]

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

(b) 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.1.12. Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]

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

(a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Part 70 permit the applicable requirements of 40 CFR 63, Subpart 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.1.9**13** Record Keeping Requirements

(a) To document compliance with Condition~~s~~ D.1.2, ~~and D.1.4~~ the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits ~~and the HAPs emnission limits~~ established in Condition~~s~~ D.1.2, ~~and D.1.4.~~

(1) The VOC ~~(and HAP)~~ content of each coating material and solvent used.

(2) The amount of coating material and solvent less water used on daily 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 ~~(and HAP)~~ content of the coatings used for each month;

(4) ~~The cleanup solvent usage for each month;~~

(5) The total VOC ~~(and HAP)~~ usage for each month; and

(6) The weight of VOCs ~~(and HAPs)~~ emitted for each compliance period.

(b) To document compliance with Condition D.1.~~8~~ **10**, 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.

Compliance Requirements

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

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

of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

Conclusion

The construction of the new painting operation shall be subject to the conditions of the attached **Significant Source Modification No. 039-19497-00498 and Significant Permit Modification 039-19563-00498.**

Indiana Department of Environmental Management
Office of Air Quality

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

Source Name:	**Venture Industries, Inc.**	
Source Location:	**2501 Jeanwood Drive, Elkhart, Indiana 46514**	
County:	**Elkhart**	
SIC Code:	**3499, 3714**	
Operation Permit No.:	**T039-15364-00498**	**Issuance Date: February 3, 2003**
Significant Source Modification No.:	**039-19497-00498**	
Significant Permit Modification No.:	**039-19563-00498**	
Permit Reviewer:	**Aida De Guzman**	

On November 10, 2004, the Office of Air Quality (OAQ) had a notice published in The **Elkhart Truth, Elkhart**, Indiana, stating that **Venture Industries, Inc.** had applied for a Part 70 Operating Permit to install one (1) spray coating operation. The notice also stated that OAQ proposed to issue a permit for this emission unit 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.

The source has made the following comment to the permit (additions are **bolded** and deletions are ~~struck-through~~ for emphasis).

Comment 1: Please correct the source's name as follows:

Venture ~~Industries~~ **Technologies,** LLC

Response 1: The source's name was corrected as written in your comment. This correction will be reflected in the source modification permit, and source and permit modification letters. The TSDs however, have the correct name.

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

Company Name: Venture Technologies, LLC
Address City IN Zip: 2501 Jeanwood Drive, Elkhart, IN 46541
Permit Number: 039-19497
Plt ID: 039-00498
Reviewer: Aida De Guzman
Date Application Received: Aug. 17, 2004

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Spray Painting Operation (Open Area)																
Black Enamel	8.4	76.50%	62.3%	14.2%	63.1%	20.90%	1.50000	11.000	3.24	1.19	19.70	472.91	86.31	151.95	5.71	75%
Wipe Cleaning Solvent	6.6	100.00%	0.0%	100.0%	0.0%	0.00%	0.03000	11.000	0.00	0.00	0.00	0.00	9.51	0.00	0.00	100%

State Potential Emissions **Add worst case coating to all solvents**

Uncontrolled Emissions -	**19.70**	**472.91**	**95.82**	**151.95**
Controlled/Limited Emissions -			**<40**	**1.50**

METHODOLOGY

Note: Dry filters will be installed to control PM overspray with 99% control efficiency.

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

Appendix A: Emission Calculations
HAP Emissions
From Surface Coating Operations

Company Name: **Venture Technologies, LLC**
Address City IN ZIP: **2501 Jeanwood Drive, Elkhart, IN 46541**
Permit Number: **039-19497**
Plant ID Number: **039-00498**
Reviewer: **Aida De Guzman**
Date Application Received: Aug. 17, 2004

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Glycol Ether	Glycol Ether Emissions (ton/yr)
Open Area					
Spray Coating	8.41	1.500000	11.00	1.40%	8.51

Total State Potential Emissions **8.51**

METHODOLOGY

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