



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: July 26, 2005  
RE: BRC Rubber & Plastics, Inc. / 009-19573-00002  
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 1/10/05



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We make Indiana a cleaner, healthier place to live.*

Mitchell E. Daniels, Jr.  
Governor

Thomas W. Easterly  
Commissioner

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Indianapolis, Indiana 46204  
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July 26, 2005

Thom Maher  
BRC Rubber & Plastics, Inc.  
589 South Main Street, P.O. Box 227  
Churubusco, Indiana 46723

Re: **009-19573-00002**  
Significant Source Modification to:  
Part 70 Operating Permit No.: **T 009-7492-00002**

Dear Mr. Maher:

BRC Rubber & Plastics, Inc. was issued a Part 70 Operating Permit T 009-7492-00002 on June 23, 2000 for a stationary miscellaneous automotive rubber parts manufacturing and coating source. An application to modify the source was received on August 30, 2004. Pursuant to 326 IAC 2-7-10.5, the following emission units are approved for construction at the source:

- (a) One (1) Ruemblin hand blaster, equipped with a self-contained vacuum, maximum capacity: 20 miscellaneous metal, plastic and/or rubber parts and 80 pounds per hour.
- (b) One (1) Guyson turntable blaster, equipped with a self-contained vacuum, maximum capacity: 900 miscellaneous metal, plastic and/or rubber parts and 166.5 pounds per hour.
- (c) One (1) paint booth (silver machine), known as PB8, equipped with dry filters for PM overspray control, known as CE-20, installed in 1999, exhausting to Stack S20, capacity: increasing from 450 to 1,500 metal automotive parts per hour.

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 contact Mark L. Kramer, c/o OAQ, 100 North Senate Avenue, Indianapolis, Indiana, 46204, at 631-691-3395, ext. 12 or in Indiana at 1-800-451-6027 (ext 631-691-3395).

Sincerely,

Original signed by

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

Attachments (TSD and SSM)  
MLK/MES

cc: File – Blackford County  
Blackford County Health Department  
Air Compliance Section Inspector – Ryan Hillman  
Compliance Branch  
Administrative and Development Section  
Technical Support and Modeling - Michele Boner



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## PART 70 SIGNIFICANT SOURCE MODIFICATION OFFICE OF AIR QUALITY

**BRC Rubber & Plastics, Inc.  
 623 West Monroe  
 Montpelier, Indiana 47359**

(herein known as the Permittee) is hereby authorized to construct subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

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

Operation Permit No.: T 009 - 7492 - 00002	
Original Signed by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: June 23, 2000  Expiration Date: June 23, 2005
First Significant Source Modification No.: SSM 009-19573-00002	Conditions Affected: A.1, A.2, A.3, D.2.2, D.2.3, D.2.8, D.2.14, D.2.15, D.4.1 - D.4.8  Conditions Added: B.26, D.2.1, D.2.4 D.2.5, D.2.6, D.2.17, D.2.18, D.4.2, and Report Forms  Section Added: D.4 Sections Affected: D.4 and D.5 Facility Description Boxes: D.2, D.4 and D.5
Original signed by Issued by: Paul Dubenetzky, Chief Permits Branch Office of Air Quality	Issuance Date: July 26, 2005

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## SECTION A

## SOURCE SUMMARY

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

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The Permittee owns and operates a stationary miscellaneous automotive rubber parts manufacturing and coating source.

Mailing Address: 589 South Main Street, P.O. Box 227, Churubusco, Indiana 46723

### A.2 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) One (1) natural gas-fired boiler, with No. 2 fuel oil as a backup fuel, known as BLR1, rated at 16.74 million British thermal units per hour, installed in 1980, exhausting to Stack S1.
- (b) One (1) natural gas-fired boiler, known as BLR2, rated at 12.50 million British thermal units per hour, installed in 1979, exhausting to Stack S2.
- (c) One (1) paint booth, known as PB1, equipped with HVLP spray applicators, equipped with dry filter for PM overspray control, known as CE-5, installed in 1993, exhausting to Stack S5, capacity: 2,000 automotive parts per hour.
- (d) One (1) paint booth, known as PB2, equipped with HVLP spray applicators, equipped with dry filter for PM overspray control, known as CE-6, installed in 1993, exhausting to Stack S6, capacity: 2,000 automotive parts per hour.
- (e) One (1) paint booth, known as PB3, equipped with HVLP spray applicators, equipped with dry filter for PM overspray control, known as CE-7, installed in 1993, exhausting to Stack S7, capacity: 2,000 automotive parts per hour.
- (f) One (1) paint booth (small chain-on-edge), known as PB4, equipped with HVLP spray applicators, equipped with dry filter for PM overspray control, known as CE-8, installed in 1993, exhausting to Stack S8, capacity: 280 automotive parts per hour.
- (g) One (1) paint booth, known as PB5, equipped with HVLP spray applicators, equipped with water wash for PM overspray control, known as CE-9, installed in 1993, exhausting to Stack S9, capacity: 2,000 automotive parts per hour.
- (h) One (1) paint booth (large chain-on-edge), known as PB6, equipped with HVLP spray applicators, equipped with water wash filter for PM overspray control, known as CE-10, installed in 1994, exhausting to Stack S10, capacity: 2,000 automotive parts per hour.
- (i) One (1) paint booth (large chain-on-edge), known as PB7, equipped with HVLP spray applicators, equipped with water wash filter for PM overspray control, known as CE-11, installed in 1994, exhausting to Stack S11, capacity: 2,000 automotive parts per hour.
- (j) Three (3) hand paint stations, known HPB1 - HPB3, capacity: 300 automotive parts per hour.
- (k) One (1) dip and spin dryer and room exhaust, known as DIPDRY, installed in 1997, exhausting to Stack S12b, capacity: 35,000 automotive parts per hour.
- (l) One (1) flammable liquid storage room, known as FSTOR, installed prior to 1980, exhausting to Stack S13, capacity: 3,050 gallons.
- (m) One (1) vapor degreaser, known as VDG, exhausting to Stack S14, installed in 1997, capacity: 28,000 automotive parts per hour or 2.7 pounds of trichloroethylene per hour.
- (n) One (1) parts washer, identified as PW-1, installed in 2005, capacity: 30 gallons of solvent.

- (o) One (1) grit blaster, known as GBLAST1, equipped with a baghouse, known as CE-15a, installed in 1996, exhausting to Stack S15a, capacity: 1,320 pounds of parts per hour and 21.3 pounds of grit per hour.
- (p) One (1) grit blaster, known as GBLAST2, equipped with a baghouse, known as CE-15b installed in 1999, exhausting to Stack S15b, capacity: 1,800 pounds of parts per hour and 32.0 pounds of grit per hour.
- (q) One (1) dip and carousel, known as HDIP, installed in 1995, capacity: 1,000 automotive parts per hour.
- (r) One (1) line drier, known as DLINE, installed in 1995, exhausting to Stack S18, capacity: 1,000 automotive parts per hour.
- (s) One (1) chain-on-edge drier, known as CDRY, exhausting to Stack S19, installed in 1994, capacity: 2,000 automotive parts per hour.
- (t) One (1) paint booth (silver machine), known as PB8, equipped with dry filters for PM over-spray control, known as CE-20, installed in 1999, exhausting to Stack S20, capacity: 1,500 automotive parts per hour.
- (u) One (1) dip machine, known as DIP, installed in 1999, exhausting to Stack S21, capacity: 1,000 automotive parts per hour.
- (v) One (1) roll coater adhesive application system, identified as PB-9, with a maximum coating usage of 13.75 pounds per hour, processing a maximum of 6000 parts per hour, exhausting to stack S21.
- (w) Two (2) hand-spray booths, identified as PB-10 and PB-11, each with a maximum coating usage of 3.25 pounds per hour, processing a maximum of 2000 parts per hour each, equipped with dry filters identified as CE21 and CE22, and exhausting to stacks S23 and S24.
- (x) One (1) Ruemblin hand blaster, equipped with a self-contained vacuum, maximum capacity: 20 miscellaneous metal, plastic and/or rubber parts and 80 pounds per hour.
- (y) One (1) Guyson turntable blaster, equipped with a self-contained vacuum, maximum capacity: 900 miscellaneous metal, plastic and/or rubber parts and 166.5 pounds per hour.
- (z) One (1) large turntable blaster (CM T18), installed in January 2004, equipped with a self-contained vacuum, maximum capacity: 2,580 miscellaneous metal, plastic and/or rubber parts and 477.3 pounds per hour.
- (aa) One (1) small hand Vac-U Blast, installed in January 2004, equipped with a self-contained vacuum, maximum capacity: 20 miscellaneous metal, plastic and/or rubber parts and 80 pounds per hour.
- (bb) One (1) Goff turntable blaster, installed in January 2004, equipped with a self-contained vacuum, maximum capacity: 1,125 miscellaneous metal, plastic and/or rubber parts and 208.1 pounds per hour.
- (cc) One (1) Empire Basket blaster, installed in November 2004, equipped with a self-contained vacuum, maximum capacity: 100 miscellaneous metal, plastic and/or rubber parts and 350.0 pounds per hour.
- (dd) One (1) dip & spin (chain dip), installed in 2004, exhausted through Stack S35, maximum capacity: 700 miscellaneous metal, plastic and/or rubber parts per hour.

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

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

Other activities with PM less five (5) pounds per hour or twenty-five (25) pounds per day.

- (a) PMILL, RPRCSS rubber making/primary mill (326 IAC 6-3).
- (b) SMILL, RPRCSS rubber making/secondary mill (326 IAC 6-3).
- (c) RCOAT, rubber coating (326 IAC 6-3).
- (d) PMIX, primary, Banbury mixer (326 IAC 6-3).
- (e) SMIX, secondary, Shaw mixer (326 IAC 6-3).
- (f) SBIAST, self-contained sand blaster (326 IAC 6-3).
- (g) CSILOs, three (3) carbon silos (326 IAC 6-3).
- (h) Phosline phosphate line (326 IAC 6-3).
- (i) One (1) natural gas fired burn off oven, known as FURN1, consisting of a primary chamber rated at 0.185 million British thermal units per hour and a secondary chamber rated at 0.290 million British thermal units per hour, capacity: 10.0 pounds of waste per hour (326 IAC 4-2).
- (j) One (1) phosphate line, installed in January 2003, exhausted through Stack S30, maximum capacity: 1,250 miscellaneous metal, plastic and/or rubber parts per hour (326 IAC 6-3).

Other activities with VOC less three (3) pounds per hour or fifteen (15) pounds per day.

- (k) Four (4) electric ovens, #1, #2 and #3 are heating ovens, and #4 is a drying oven, exhausted through Stacks S31 - S34, respectively, installed in June 2004 and 2005.

**SECTION B**

**GENERAL CONDITIONS**

**B.26 Credible Evidence [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [62 FR 8314] [326 IAC 1-1-6]**

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

## SECTION D.2

## FACILITY OPERATION CONDITIONS

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

- (c) One (1) paint booth, known as PB1, equipped with HVLP spray applicators, equipped with dry filter for PM overspray control, known as CE-5, installed in 1993, exhausting to Stack S5, capacity: 2,000 automotive parts per hour.
- (d) One (1) paint booth, known as PB2, equipped with HVLP spray applicators, equipped with dry filter for PM overspray control, known as CE-6, installed in 1993, exhausting to Stack S6, capacity: 2,000 automotive parts per hour.
- (e) One (1) paint booth, known as PB3, equipped with HVLP spray applicators, equipped with dry filter for PM overspray control, known as CE-7, installed in 1993, exhausting to Stack S7, capacity: 2,000 automotive parts per hour.
- (f) One (1) paint booth (small chain-on-edge), known as PB4, equipped with HVLP spray applicators, equipped with dry filter for PM overspray control, known as CE-8, installed in 1993, exhausting to Stack S8, capacity: 280 automotive parts per hour.
- (g) One (1) paint booth, known as PB5, equipped with HVLP spray applicators, equipped with water wash for PM overspray control, known as CE-9, installed in 1993, exhausting to Stack S9, capacity: 2,000 automotive parts per hour.
- (h) One (1) paint booth (large chain-on-edge), known as PB6, equipped with HVLP spray applicators, equipped with water wash filter for PM overspray control, known as CE-10, installed in 1994, exhausting to Stack S10, capacity: 2,000 automotive parts per hour.
- (i) One (1) paint booth (large chain-on-edge), known as PB7, equipped with HVLP spray applicators, equipped with water wash filter for PM overspray control, known as CE-11, installed in 1994, exhausting to Stack S11, capacity: 2,000 automotive parts per hour.
- (j) Three (3) hand paint stations, known HPB1 - HPB3, capacity: 300 automotive parts per hour.
- (k) One (1) dip and spin dryer and room exhaust, known as DIPDRY, installed in 1997, exhausting to Stack S12b, capacity: 35,000 automotive parts per hour.
- (l) One (1) flammable liquid storage room, known as FSTOR, installed prior to 1980, exhausting to Stack S13, capacity: 3,050 gallons.
- (q) One (1) dip and carousel, known as HDIP, installed in 1995, capacity: 1,000 automotive parts per hour.
- (r) One (1) line drier, known as DLINE, installed in 1995, exhausting to Stack S18, capacity: 1,000 automotive parts per hour.
- (s) One (1) chain-on-edge drier, known as CDRY, exhausting to Stack S19, installed in 1994, capacity: 2,000 automotive parts per hour.
- (t) One (1) paint booth (silver machine), known as PB8, equipped with dry filters for PM overspray control, known as CE-20, installed in 1999, exhausting to Stack S20, capacity: 1,500 automotive parts per hour.
- (u) One (1) dip machine, known DIP, installed in 1999, exhausting to Stack S21, capacity: 1,000 automotive parts per hour.
- (v) One (1) roll coater adhesive application system, identified as PB-9, with a maximum coating usage of 13.75 pounds per hour, processing a maximum of 6000 parts per hour, exhausting to stack S21.
- (w) Two (2) hand-spray booths, identified as PB-10 and PB-11, each with a maximum coating usage of 3.25 pounds per hour, processing a maximum of 2000 parts per hour each, equipped with dry filters identified as CE21 and CE22, and exhausting to stacks S23 and S24.
- (dd) One (1) dip & spin (chain dip), installed in 2004, exhausted through Stack S35, maximum capacity: 700 miscellaneous metal, plastic and/or rubber parts per hour.

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

### D.2.1 Volatile Organic Compounds (VOC) [326 IAC 2-2]

The total VOC usage to all facilities listed in Section D.2 shall be limited to less than 232 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 coupled with the

unlimited potential to emit VOC from all other facilities, including insignificant activities, at this source of 18.0 tons per year shall render the requirements of 326 IAC 2-2 not applicable.

D.2.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

- (a) The VOC usage of the paint booth (silver machine), known as PB8 shall be limited to less than twenty five (25) tons of VOC, including adhesives and cleaning solvents, per twelve (12) consecutive month period, with compliance determined at the end of each month. This usage limit makes the requirements of 326 IAC 8-1-6 not applicable.
- (b) The VOC usage of the roll coater identified as PB-9 shall be limited to less than twenty-five (25) tons of VOC, including adhesives and cleaning solvents, per twelve (12) consecutive month period, with compliance determined at the end of each month. This usage limit makes 326 IAC 8-1-6 not applicable.

D.2.3 HAPs [326 IAC 2-4.1-1]

The HAP usage for a single and combination of HAPs of the roll coater PB-9 shall be limited to ten (10) and twenty-five (25) tons per twelve (12) consecutive month period, respectively, with compliance determined at the end of each month. These HAPs limits will render 326 IAC 2-4.1-1 not applicable to PB-9.

D.2.4 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to 40 CFR 52 Subpart P, the PM from paint booths, known as PB1 through PB8, and spray booths PB 10 and PB 11 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.2.5 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating shall be controlled by a dry particulate filter, 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.2.6 General Provisions Relating to HAPs [326 IAC 20-1] [40 CFR Part 63, Subpart A] [Table 2 to 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.
- (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.

**D.2.7 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 U.S. EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/misc/miscpg.html>. Pursuant to 40 CFR 63.3883(b), the Permittee must comply with these requirements on and after January 2, 2007.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition, except as otherwise provided in this condition. The permit shield applies to Condition D.2.17, 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.2.8 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 paint booth PB8 and roll coater PB-9.

**Compliance Determination Requirements [326 IAC 2-1.1-11] [326 IAC 2-7-6(1)]**

**D.2.9 Testing Requirements [326 IAC 2-7-6(1)] [326 IAC 2-1.1-11]**

The Permittee is not required to test these facilities by this permit. However, IDEM may require compliance testing when necessary to determine if these facilities are in compliance. If testing is required by IDEM, compliance with the PM limits specified in Condition D.2.4 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

**D.2.10 Volatile Organic Compounds (VOC)**

Compliance with the VOC usage limitations contained in Conditions D.2.1 and D.2.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. 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.2.11 HAPs**

Compliance with the HAPs usage limitation contained in Condition D.2.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. 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.2.12 VOC and HAPs Emissions**

- 
- (a) Compliance with Conditions D.2.1 and D.2.2 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.
  - (b) Compliance with Condition D.2.3 shall be demonstrated within 30 days of the end of each month based on the single and combination of HAPs usage for the most recent twelve (12) month period.

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

#### **D.2.13 Particulate Matter (PM)**

The dry filters CE-1 through CE-11, and CE20 and the water wash shall be in operation in accordance with manufacturer's specifications at all times that one or more of the spray booths PB-1 through PB-8 is in operation. The dry filters CE21 and CE22 shall be in operation in accordance with manufacturer's specifications at all times that one or both of the spray booths PB-10 or PB-11 is in operation, in order to comply with this limit.

#### **D.2.14 Monitoring**

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- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the paint booth stacks S5 - S8 and S20 while one or more of the paint booths (PB1, PB2, PB3, PB4 and PB8) are in operation. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the paint booth stacks S23 and S24 while one or both of the paint booths PB-10 and PB-11, 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 Monitoring Plan - Failure to Take Response Steps, shall be considered a deviation from this permit.
  - (b) Daily inspections shall be performed to verify that the water level of the water pans meets the manufacturer's recommended level. To monitor the performance of the water pans, the water level of the pans shall be maintained weekly at a level where surface agitation indicates impact of the air flow. Water shall be kept free of solids and floating material that reduces the capture efficiency of the water pan. To monitor the performance of the baffles, weekly inspections of the baffle panels shall be conducted to verify placement and configuration meet recommendations of the manufacturer. In addition, weekly observations shall be made of the overspray from the surface coating booth stacks S9, S10, and S11 while one or more of the paint booths (PB5, PB6 and PB7) are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a deviation from this permit.
  - (c) 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 Monitoring Plan - Failure to Take Response Steps, shall be considered a deviation from 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.2.15 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 (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 limit and the VOC emission limit established in Condition D.2.1 for all facilities listed in Section D.2.
- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) The cleanup solvent usage for each month;
  - (4) The total VOC usage for each month; and
  - (5) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Conditions D.2.2 and D.2.3, 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 and HAPs usage limits and the VOC and HAPs emission limits established in Conditions D.2.2 and D.2.3 for paint booth PB8 and roll coater PB-9.
- (1) The amount and VOC and HAPs content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) The cleanup solvent usage for each month;
  - (4) The total VOC and HAPs usage for each month; and
  - (5) The weight of VOCs and HAPs emitted for each compliance period.
- (c) To document compliance with Conditions D.2.13 and D.2.14, 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) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.2.16 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.2.1, D.2.2 and D.2.3 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 not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

#### D.2.17 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.2.18 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 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  
Indianapolis, Indiana 46204

## SECTION D.4

## FACILITY OPERATION CONDITIONS

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

(n) One (1) parts washer, identified as PW-1, installed in 2005, capacity: 30 gallons of solvent.

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

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

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

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

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

#### D.4.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:

- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
  - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF));
  - (B) The solvent is agitated; or
  - (C) The solvent is heated.
- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
- (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a

pressure which does not cause excessive splashing.

- (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38<sup>EC</sup>) (one hundred degrees Fahrenheit (100<sup>EF</sup>)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9<sup>EC</sup>) (one hundred twenty degrees Fahrenheit (120<sup>EF</sup>)):
  - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
  - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
  - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:
  - (1) Close the cover whenever articles are not being handled in the degreaser.
  - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
  - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

## SECTION D.5

## FACILITY OPERATION CONDITIONS

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

- (o) One (1) grit blaster, known as GBLAST1, equipped with a baghouse, known as CE-15a, installed in 1996, exhausting to Stack S15a, capacity: 1,320 pounds of parts per hour and 21.3 pounds of grit per hour.
- (p) One (1) grit blaster, known as GBLAST2, equipped with a baghouse, known as CE-15b installed in 1999, exhausting to Stack S15b, capacity: 1,800 pounds of parts per hour and 32.0 pounds of grit per hour.
- (x) One (1) Ruemblin hand blaster, equipped with a self-contained vacuum, maximum capacity: 20 miscellaneous metal, plastic and/or rubber parts and 80 pounds per hour.
- (y) One (1) Guyson turntable blaster, equipped with a self-contained vacuum, maximum capacity: 900 miscellaneous metal, plastic and/or rubber parts and 166.5 pounds per hour.
- (z) One (1) large turntable blaster (CM T18), installed in January 2004, equipped with a self-contained vacuum, maximum capacity: 2,580 miscellaneous metal, plastic and/or rubber parts and 477.3 pounds per hour.
- (aa) One (1) small hand Vac-U Blast, installed in January 2004, equipped with a self-contained vacuum, maximum capacity: 20 miscellaneous metal, plastic and/or rubber parts and 80 pounds per hour.
- (bb) One (1) Goff turntable blaster, installed in January 2004, equipped with a self-contained vacuum, maximum capacity: 1,125 miscellaneous metal, plastic and/or rubber parts and 208.1 pounds per hour.
- (cc) One (1) Empire Basket blaster, installed in November 2004, equipped with a self-contained vacuum, maximum capacity: 100 miscellaneous metal, plastic and/or rubber parts and 350.0 pounds per hour.

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

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

#### D.5.1 Particulate [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the:
  - (1) GBLAST1 and GBLAST2 facilities shall not exceed 3.10 and 3.82 pounds per hour when operating at a process weight rate of 0.660 and 0.900 tons per hour, respectively.
  - (2) Guyson turntable blaster shall not exceed 0.775 pounds per hour when operating at a process weight rate of 0.083 tons per hour.
  - (3) Large turntable blaster shall not exceed 1.57 pounds per hour when operating at a process weight rate of 0.239 tons per hour.
  - (4) Goff turntable blaster shall not exceed 0.900 pounds per hour when operating at a process weight rate of 0.104 tons per hour.
  - (5) Empire Basket blaster shall not exceed 1.28 pounds per hour when operating at a process weight rate of 0.175 tons per hour.

The pounds per hour limitations above were calculated with the following equation:

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

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

- (b) Pursuant to 326 IAC 6-3-2(e)(2), the allowable PM emission rate from the Ruemblin hand blaster and the small hand Vac-U Blast shall not exceed 0.551 pounds per hour when operating at a process weight rate of less than one hundred (100) pounds per hour, each.

#### D.5.2 PM and PM<sub>10</sub> Limitations [326 IAC 2-2]

The PM and PM<sub>10</sub> emission rates for the:

- (a) GBLAST1 and GBLAST2 facilities shall not exceed 3.10 and 3.82 pounds per hour.
- (b) Guyson turntable blaster shall not exceed 0.775 pounds per hour.
- (c) Large turntable blaster shall not exceed 1.57 pounds per hour.
- (d) Goff turntable blaster shall not exceed 0.900 pounds per hour.
- (e) Empire Basket blaster shall not exceed 1.28 pounds per hour.
- (f) Ruemblin hand blaster and the small hand Vac-U Blast shall each not exceed 0.551 pounds per hour.

Compliance with these PM and PM<sub>10</sub> limits renders the requirements of 326 IAC 2-2 not applicable.

### **Compliance Determination Requirements [326 IAC 2-1.1-11] [326 IAC 2-7-6(1)]**

#### D.5.3 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

- (a) During the period between 30 and 36 months after issuance of this permit, the Permittee shall perform PM testing of GBLAST1 and GBLAST2 utilizing Methods 5 or 17 (40 CFR 60, Appendix A) or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.
- (b) Within ninety (90) days after the issuance of the Significant Permit Modification (009-19963), in order to demonstrate compliance with Condition D.5.1(a)(2), the Permittee shall perform PM testing for the Guyson turntable blaster utilizing methods as approved by the Commissioner. Testing shall be conducted in accordance with Section C - Performance Testing.

#### D.5.4 Particulate Matter (PM)

- (a) The baghouses for PM control shall be in operation and control emissions from the grit blast facilities at all times that the GBLAST1 and/or GBLAST2 are in operation.
- (b) The self contained vacuums for PM and PM<sub>10</sub> control shall be in operation and control emissions from the Ruemblin hand, Guyson turntable, large turntable, small hand Vac-U Blast, Goff turntable and Empire Basket blasters at all times that blasters are in operation.

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

#### D.5.5 Visible Emissions Notations

- (a) Daily visible emission notations of the grit blast stack exhausts 15a and 15b and Ruemblin hand, Guyson turntable, large turntable, small hand Vac-U Blast, Goff turntable and Empire

Basket blaster exhausts shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports shall be considered a deviation from this permit.

#### D.5.6 Parametric Monitoring

- (a) The Permittee shall record the total static pressure drop across the baghouses used in conjunction with the grit blasters, at least once per shift when the GBLAST1 and GBLAST2 is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 4.0 and 8.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (b) The Permittee shall record the total static pressure drop across the self-contained vacuums controlling the Ruemblin hand, Guyson turntable, large turntable, small hand Vac-U Blast, Goff turntable and Empire Basket blasters, at least once per shift when the blasters are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 0.5 and 4.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (c) The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

#### D.5.7 Baghouse and Self-Contained Vacuum Inspections

- (a) An inspection shall be performed each calendar quarter of all bags controlling the grit blaster operations when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.
- (b) An inspection shall be performed each calendar quarter of all bags controlling the Ruemblin hand, Guyson turntable, large turntable, small hand Vac-U Blast, Goff turntable and Empire Basket blaster operations when venting to the atmosphere. A self-contained vacuum in-

spection shall be performed within three (3) months of redirecting vents to the atmosphere and every three (3) months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

#### **D.5.8 Broken or Failed Bag Detection**

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (c) For single compartment self-contained vacuums, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

##### **D.5.9 Record Keeping Requirements**

- (a) To document compliance with Condition D.5.5, the Permittee shall maintain records of daily visible emission notations of the GBLAST1 and GBLAST2 stack exhausts and the Ruemblin hand, Guyson turntable, large turntable, small hand Vac-U Blast, Goff turntable and Empire Basket blaster exhausts when exhausting to the atmosphere.
- (b) To document compliance with Condition D.5.6(a), the Permittee shall maintain once per shift records of the total static pressure drop during normal operation when venting to the atmosphere.
- (c) To document compliance with Condition D.5.6(b), the Permittee shall maintain records once per shift of the total static pressure drop during normal operation when exhausting to the atmosphere.
- (d) To document compliance with Condition D.5.7, the Permittee shall maintain records of the results of the inspections required under Condition D.5.7 and the dates the vents are redirected.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.6

## FACILITY OPERATION CONDITIONS

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

Other activities with PM less five (5) pounds per hour or twenty-five (25) pounds per day:

- (a) PMILL, RPRCSS rubber making/primary mill (326 IAC 6-3).
- (b) SMILL, RPRCSS rubber making/secondary mill (326 IAC 6-3).
- (c) RCOAT, rubber coating (326 IAC 6-3).
- (d) PMIX, primary, Banbury mixer (326 IAC 6-3).
- (e) SMIX, secondary, Shaw mixer (326 IAC 6-3).
- (f) SBIAST, self-contained sand blaster (326 IAC 6-3).
- (g) CSILOs, three (3) carbon silos (326 IAC 6-3).
- (h) Phosline phosphate line (326 IAC 6-3).
- (i) One (1) natural gas fired burn off oven, known as FURN1, consisting of a primary chamber rated at 0.185 million British thermal units per hour and a secondary chamber rated at 0.290 million British thermal units per hour, capacity: 10.0 pounds of waste per hour (326 IAC 4-2).
- (j) One (1) phosphate line, installed in January 2003, exhausted through Stack S30, maximum capacity: 1,250 miscellaneous metal, plastic and/or rubber parts per hour (326 IAC 6-3).

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

#### D.6.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from these facilities shall not exceed allowable PM emission rate based on the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 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.6.2 Incinerators [326 IAC 4-2]

The one (1) burn off oven, known as FURN1, which emits regulated pollutants shall:

- (a) Consist of primary and secondary chambers or the equivalent.
- (b) Be equipped with a primary burner unless burning only wood products.
- (c) Comply with 326 IAC 5-1 and 326 IAC 2.
- (d) Be maintained, operated, and burn waste in accordance with the manufacturer's specifications or an operation and maintenance plan as specified in Condition D.6.2(g).
- (e) Not emit particulate matter in excess five-tenths (0.5) pound of particulate matter per one thousand (1,000) pounds of dry exhaust gas under standard conditions corrected to fifty percent (50%) excess air for incinerators with solid waste capacity less than two hundred (200) pounds per hour.

- (f) If any of the requirements of Conditions D.6.2 (a) through (e) are not met, then the Permittee shall stop charging the incinerator until adjustments are made that address the underlying cause of the deviation.
- (g) A Permittee developing an operation and maintenance plan pursuant to Condition D.6.2 (d) must comply with the following:
  - (1) The operation and maintenance plan must be designed to meet the particulate matter emission limitation specified in Condition D.6.2(e) and include the following:
    - (A) Procedures for receiving, handling, and charging waste.
    - (B) Procedures for incinerator startup and shutdown.
    - (C) Procedures for responding to a malfunction.
    - (D) Procedures for maintaining proper combustion air supply levels.
    - (E) Procedures for operating the incinerator and associated air pollution control systems.
    - (F) Procedures for handling ash.
    - (G) A list of wastes that can be burned in the incinerator.
  - (2) Each incinerator operator shall review the plan before initial implementation of the operation and maintenance plan and annually thereafter.
  - (3) The operation and maintenance plan must be readily accessible to incinerator operators.
  - (4) The Permittee of the incinerator shall notify the department, in writing, thirty (30) days after the operation and maintenance plan is initially developed pursuant to this section.
- (h) The Permittee of the incinerator must make the manufacturer's specifications or the operation and maintenance plan available to the IDEM, OAQ upon request.

**Compliance Determination Requirement [326 IAC 2-1.1-11] [326 IAC 2-7-6(1)]**

There are no specific Compliance Determination Requirements for these emission units.

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

**D.6.3 Afterburner Operation**

The afterburner for control shall be in operation at all times when the incineration process is in operation.

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

**Part 70 Quarterly Report**

Source Name: BRC Rubber & Plastics, Inc.  
Source Address: 623 West Monroe, Montpelier, Indiana 47359  
Mailing Address: 589 South Main Street, P.O. Box 227, Churubusco, Indiana 46723  
Part 70 Permit No.: T 009-7492-00002  
Facilities: All surface coating facilities in Section D.2  
Parameter: VOC Usage  
Limit: Less than 232 tons per twelve (12) consecutive month period with compliance determined at the end of each month

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

Month	VOC Usage (tons)	VOC Usage (tons)	VOC Usage (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

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

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

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

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

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

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

Attach a signed certification to complete this report.

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

**Part 70 Quarterly Report**

Source Name: BRC Rubber & Plastics, Inc.  
Source Address: 623 West Monroe, Montpelier, Indiana 47359  
Mailing Address: 589 South Main Street, P.O. Box 227, Churubusco, Indiana 46723  
Part 70 Permit No.: T 009-7492-00002  
Facility: One (1) paint booth (silver machine), known as PB8  
Parameter: VOC Usage  
Limit: Less than 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month

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

Month	VOC Usage (tons)	VOC Usage (tons)	VOC Usage (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

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

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

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

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

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

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

Attach a signed certification to complete this report.

## Indiana Department of Environmental Management Office of Air Quality

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

#### Source Background and Description

<b>Source Name:</b>	<b>BRC Rubber &amp; Plastics, Inc.</b>
<b>Source Location:</b>	<b>623 West Monroe Street, Montpelier, Indiana 47359</b>
<b>County:</b>	<b>Blackford</b>
<b>SIC Code:</b>	<b>3069</b>
<b>Operation Permit No.:</b>	<b>T 009-7492-00002</b>
<b>Operation Permit Issuance Date:</b>	<b>June 23, 2000</b>
<b>Significant Source Modification No.:</b>	<b>SSM 009-19573-00002</b>
<b>Significant Permit Modification No.:</b>	<b>SPM 009-19963-00002</b>
<b>Permit Reviewer:</b>	<b>Mark L. Kramer</b>

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

- (a) One (1) Ruemblin hand blaster, to be installed in April 2005, equipped with a self-contained vacuum, maximum capacity: 20 miscellaneous metal, plastic and/or rubber parts and 80 pounds per hour.
- (b) One (1) Guyson turntable blaster, to be installed in April 2005, equipped with a self-contained vacuum, maximum capacity: 900 miscellaneous metal, plastic and/or rubber parts and 166.5 pounds per hour.
- (c) One (1) paint booth (silver machine), known as PB8, equipped with dry filters for PM overspray control, known as CE-20, installed in 1999, exhausting to Stack S20, capacity: increasing from 450 to 1,500 metal automotive parts per hour.

and

relating to the operation of the following emission units and pollution control devices:

- (d) One (1) large turntable blaster (CM T18), installed in January 2004, equipped with a self-contained vacuum, maximum capacity: 2,580 miscellaneous metal, plastic and/or rubber parts and 477.3 pounds per hour.
- (e) One (1) small hand Vac-U Blast, installed in January 2004, equipped with a self-contained vacuum, maximum capacity: 20 miscellaneous metal, plastic and/or rubber parts and 80 pounds per hour.
- (f) One (1) Goff turntable blaster, installed in January 2004, equipped with a self-contained vacuum, maximum capacity: 1,125 miscellaneous metal, plastic and/or rubber parts and 208.1 pounds per hour.
- (g) One (1) Empire Basket blaster, installed in November 2004, equipped with a self-contained vacuum, maximum capacity: 100 miscellaneous metal, plastic and/or rubber parts and 350.0

pounds per hour.

- (h) One (1) phosphate line, installed in January 2003, exhausted through Stack S30, maximum capacity: 1,250 miscellaneous metal, plastic and/or rubber parts per hour (deemed an insignificant activity with PM less five (5) pounds per hour or twenty-five (25) pounds per day) (326 IAC 6-3-2).
- (i) Four (4) electric ovens, #1, #2 and #3 are heating ovens, and #4 is a drying oven, exhausted through Stacks S31 - S34, respectively, installed in June 2004 and 2005 (deemed an insignificant activity).
- (j) One (1) dip & spin (chain dip), installed in 2004, exhausted through Stack S35, maximum capacity: 700 miscellaneous metal, plastic and/or rubber parts per hour.

### History

On August 30, 2004 BRC Rubber & Plastics, Inc. submitted an application to the OAQ requesting to add six (6) blasters, a phosphate line and a chain dip to their existing plant. In addition, BRC Rubber & Plastics, Inc. submitted an application on March 7, 2005 (009-20902) which will be combined with this modification. On April 20, 2005, the source requested to increase the capacity of paint booth (silver machine), known as PB8, from 450 to 1,500 parts per hour. BRC Rubber & Plastics, Inc., (formerly BRC Rubber Group, Montpelier Division) was issued a Part 70 permit on June 23, 2000. The first reopening was issued on December 4, 2001. MSM 009-18028-00002 was issued on November 24, 2003, followed by MPM 009-18225, issued on December 11, 2003 as well as MSM 009-18297-00002, issued on January 7, 2004 and SPM 009-18357-00002, issued on February 5, 2004.

### Enforcement Issue

- (a) IDEM is aware that certain equipment has been constructed and/or operated prior to receipt of the proper permit.
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed approval is intended to satisfy the requirements of the construction permit rules.

### Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (EF)
S30	Phosphate Line	20	2.16	10,950	90
S31	Heating Oven #1	21	0.667	1,070	180
S32	Heating Oven #2	21	0.667	1,070	180
S33	Heating Oven #3	21	0.667	1,070	180
S34	Drying Oven # 4	21	0.667	1,070	90
S35	Dip & Spin (chain dip)	21	0.75	1,070	150

The stack S20 for PB8 is not a new or redesigned stack and therefore has not been listed.

### Recommendation

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

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

An application for the purposes of this review was received on August 30, 2004. Additional information was received on November 1 and 24, 2004 as well as on January 21, March 7 and 16, as well as April 20 and 21, 2005.

### Emission Calculations

See pages 1 - 5 of 5 of Appendix A of this document for detailed emissions calculations.

### Potential To Emit of Modification

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

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

<b>Pollutant</b>	<b>Potential To Emit (tons/year)</b>
PM	918
PM <sub>10</sub>	918
SO <sub>2</sub>	-
VOC	35.1
CO	-
NO <sub>x</sub>	-

<b>HAPs</b>	<b>Potential To Emit (tons/year)</b>
Xylene	13.9
Ethylbenzene	1.81
<b>TOTAL</b>	<b>15.7</b>

### Justification for Modification

The Part 70 Operating permit is being modified through a Part 70 Significant Source Modification. This Modification is being performed pursuant to 326 IAC 2-7-10.5(f)(4), because this modification has

an unrestricted potential to emit greater than twenty-five (25) tons of PM, PM<sub>10</sub>, and VOC per year.

**County Attainment Status**

The source is located in Blackford County.

Pollutant	Status
PM2.5	attainment
PM <sub>10</sub>	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
1-Hour Ozone	attainment
8-Hour Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and nitrogen oxides (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 ozone. Blackford 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. See the State Rule Applicability for the source section.
- (b) Blackford County has been classified as unclassifiable or attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM2.5 emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM<sub>10</sub> emissions as surrogate for PM2.5 emissions. See the State Rule Applicability for the source section.
- (c) Fugitive Emissions  
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

**Source Status**

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

Pollutant	Emissions (tons/year)
PM	12.9
PM <sub>10</sub>	13.6
SO <sub>2</sub>	26.1



This modification to an existing minor stationary source is not major because the emission increase is less than the PSD threshold levels. In order to retain the source's minor PSD source status, the entire source-wide VOC shall be limited to less than 250 tons per year. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

PM has been set equal to PM<sub>10</sub> and PM emission rates for the blasters have been set equal to the equivalent 326 IAC 6-3-2 hourly allowable PM rate for the entire year.

**Potential to Emit of the Entire Source with the Modification After Issuance**

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls of the entire source.

Process/facility	Potential to Emit (tons/year)					
	PM	PM <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>
Modification	47.2	47.2		Less than 33.9		
Existing Source	12.9	13.6	26.1	244	15.8	21.9
Total with Modification	60.1	60.8	26.1	Less than 250	15.8	21.9
PSD Threshold Level	250	250	250	250	250	250

Therefore, this existing source remains a minor PSD source after this source modification and with a VOC source-wide limit of less than 250 tons per year.

**Federal Rule Applicability**

- (a) This significant permit modification does not involve a pollutant-specific emissions unit as defined in 40 CFR 64.1 for PM<sub>10</sub>:
  - (1) with the potential to emit before controls equal to or greater than the major source threshold for PM<sub>10</sub>;
  - (2) that is subject to an emission limitation or standard for any pollutants; and
  - (3) uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard.

Therefore, the requirements of 40 CFR 64, Compliance Assurance Monitoring, are not applicable to this modification.

- (b) This source is not subject to the New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60, Subpart MM) - Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations, since this source is not an automobile or light-duty truck assembly plant.
- (c) The miscellaneous metal parts surface coating operations at this source are subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 14, (40 CFR Part 63, Subpart MMMM), Surface Coating of Miscellaneous Metal Parts and Products. This source

is considered an existing affected source pursuant to 40 CFR 63.3882. Pursuant to 40 CFR 63.3881, the affected source must be a major source of HAPs and use greater than or equal to 946 liters (250 gallons) of HAP coatings for the surface coating of miscellaneous metal parts and products. Since BRC Rubber & Plastics, Inc. uses more than 250 gallons of HAP coatings, the existing source is subject to the requirements of this rule. On March 7, 2005, BRC Rubber & Plastics, Inc. chose to comply with the requirements of NESHAP Subpart M MMM rather than Subpart P PPP. 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.

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

This rule has a future compliance date; therefore, the specific details of the rule and how the Permittee will demonstrate compliance are not provided in the permit. The Permittee shall submit an application for a significant permit modification no later than April 2, 2006, that will specify the option or options for the emission limitations and standards and methods for determining compliance chosen by the Permittee. At that time, IDEM, OAQ will include the specific details of the rule and how the Permittee will demonstrate compliance.

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 the permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 only applies to Condition D.2.15, of the permit, Notification Requirements which has been added.

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.

In addition, pursuant to 40 CFR 63, Subpart M MMM, the Permittee shall submit:

A Notification of Compliance Status containing the information required by 40 CFR 63.9(h) in accordance with 40 CFR 63.3910(c). The Notification of Compliance Status must be submitted no later than thirty (30) calendar days following the end of the initial compliance period described in 40 CFR 63.3940, 40 CFR 63.3950, or 40 CFR 63.3960 that applies to your affected source.

### **State Rule Applicability - Individual Facilities**

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

The source's overall potential to emit after controls and limits is less than PSD threshold levels. VOC

emissions are limited to less than 250 tons per year. Therefore, this source is still an existing minor PSD source. The potential to emit of all criteria pollutants is less than 250 tons per year and this source is not one of the twenty-eight (28) listed sources under 326 IAC 2-2. Therefore, the source remains a minor PSD source.

In order to assure that the addition of the six (6) blasters is a minor modification and that the source retains its minor PSD status, the blasters have had PM and PM<sub>10</sub> emission limitations proposed such that the sum of these limits equals less than 24.7 tons per year. This sum allows for future expansion of emission units and/or insignificant activities.

The hourly limits were set equal to the allowable PM emission rates pursuant to 326 IAC 6-3-2 based on the after control potential to emit PM.

Process/facility	PTE PM (TPY)	PTE PM <sub>10</sub> (TPY)	Allowable PM Emission Rate Pursuant to 326 IAC 6-3-2	PM & PM <sub>10</sub> Limits (TPY)	Hourly PM & PM <sub>10</sub> Limits (lbs/hr)
Ruemblin Hand Blaster	0.411	0.411	0.551	2.41	0.551
Guyson Turntable Blaster	3.40	3.40	0.775	3.40	0.775
Large Turntable Blaster	2.14	2.14	1.57	6.88	1.57
Small Hand Vac-U-Blast	0.411	0.411	0.551	2.41	0.551
Goff Turntable Blaster	1.51	1.51	0.900	3.95	0.900
Empire Basket Blaster	1.23	1.23	1.28	5.61	1.28
Total	9.10	9.10	5.63	24.7	5.63

326 IAC 2-4.1-1 (New source toxics control)

The potential single and combination of HAPs emissions from PB8 and dip & spin (chain dip) both constructed after the July 1997 applicability date are each less than the major HAPs threshold levels. PB8 and dip & spin (chain dip) operate independently of the previously installed emission units and also are independent of each other. Therefore, these operations are each not major for HAPs and thus this rule does not apply to either PB8 or dip & spin (chain dip). It should be note that source, including these emission units, is subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 14, (40 CFR Part 63, Subpart M), Surface Coating of Miscellaneous Metal Parts and Products.

326 IAC 8-1-6 (New facilities: general reduction requirements)

The unrestricted potential to emit VOC from the dip & spin (chain dip) is less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 do not apply to the dip & spin.

As a result of the proposed increase in capacity, the paint booth (silver machine), known as PB8, now has the potential to emit VOC greater than twenty-five (25) tons per year. BRC Rubber & Plastics, Inc. has agreed to limit the usage of VOC in PB8 to less than 25 tons per year. Therefore, the requirements of 326 IAC 8-1-6 are not applicable to the paint booth (PB8).

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

The particulate from each of the six (6) blasters shall not exceed the pounds per hour values when operating at the specified process weight rates in tons per hour.

<b>Emission Unit Blaster</b>	<b>Process Weight (tons per hour)</b>	<b>Allowable PM Emission Rate (pounds per hour)</b>	<b>Potential PM Emission Rate After Controls (pounds per hour)</b>
Ruemblin Hand Blaster	0.040	0.551	0.094
Guyson Turntable Blaster	0.083	0.775	0.778
Large Turntable Blaster	0.239	1.57	0.490
Small Hand Vac-U-Blast	0.040	0.551	0.094
Goff Turntable Blaster	0.104	0.900	0.346
Empire Basket Blaster	0.175	1.28	0.282

These limitations are based upon the following:

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

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

The control equipment shall be in operation at all times these facilities are in operation, in order to comply with these limits.

Note to the nearest hundred of a pound, the Guyson Turntable Blaster complies with the requirement of 326 IAC 6-3-2, but to verify compliance that this blaster does comply with the rule, stack testing is proposed.

326 IAC 6-3-2 (Process Operations)

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

Pursuant to 40 CFR 52 Subpart P, the particulate matter (PM) from the paint booth (silver machine), known as PB8 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:

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

Under the rule revision, particulate from the surface coating processes shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

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

The source is not one (1) of the listed source types in 326 IAC 8-2-9(a)(1)-(4). Although the source coats miscellaneous metal parts, the source is exempt from the requirements of this rule since its SIC Code of 3069 is not in the major groups of #33, #34, #35, #36, #37, #38 or #39 pursuant to 326 IAC 8-2-9(a)(5).

#### State Rule Applicability – Insignificant Activity

#### 326 IAC 6-3-2 (Particulate emission limitations, work practices, and control technologies)

Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from the phosphate line shall not exceed pound per hour emission rate established as E in the following equation:

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

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

#### 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 (2) 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 Requirements would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

- (a) Each of the blasters (Ruemblin hand blaster, Guyson turntable blaster, large turntable blaster, small hand Vac-U Blast, Goff turntable blaster and Empire Basket blaster) has applicable

compliance monitoring conditions as specified below:

- (1) Daily visible emissions notations of each of the six (6) blaster exhausts shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.
- (2) The Permittee shall record the total static pressure drop across the self-contained vacuums controlling the blasters, at least once per shift when the blasters are in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the self-contained vacuums shall be maintained within the range of 0.5 to 4.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.
- (3) An inspection shall be performed each calendar quarter of all bags controlling the blasting operations when venting to the atmosphere. A self-contained vacuum inspection shall be performed within three (3) months of redirecting vents to the atmosphere and every three (3) months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.
- (4) In the event that bag failure has been observed:
  - (A) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion.
  - (B) For single compartment self-contained vacuums, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (5) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the self-contained vacuums for the blasting processes must operate properly to ensure compliance with 326 IAC 6-3 (Particulate emission limitations, work practices, and control technologies) and 326 IAC 2-7 (Part 70).

- (b) The paint booth, PB8, has applicable compliance monitoring conditions as specified below:
- (1) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth Stack S20 while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
  - (2) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
  - (3) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the dry filters for PB8 surface coating processes must operate properly to ensure compliance with 326 IAC 6-3 (Particulate emission limitations, work practices, and control technologies) and 326 IAC 2-7 (Part 70).

### Testing Requirements

A stack test of the PM emission rate from the Guyson turntable blaster is proposed to verify compliance with 326 IAC 6-3-2. The PM emission rates after controls for all other blasters are significantly less than the allowable PM emission rate pursuant to 326 IAC 6-3-2 and therefore no additional testing is proposed.

### Proposed Changes

The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language appears in bold). In Section D.2 due to the addition of Conditions D.2.1, D.2.5, D.2.6, D.2.7 and D.4.2, all subsequent conditions in Sections D.2 and D.4 have been renumbered as well as the internal citations.

#### 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) natural gas-fired boiler, with No. 2 fuel oil as a backup fuel, known as BLR1, rated at 16.74 million British thermal units per hour, installed in 1980, exhausting to Stack S1.
- (b) One (1) natural gas-fired boiler, known as BLR2, rated at 12.50 million British thermal units per hour, installed in 1979, exhausting to Stack S2.

- (c) One (1) paint booth, known as PB1, equipped with HVLP spray applicators, equipped with dry filter for PM overspray control, known as CE-5, installed in 1993, exhausting to Stack S5, capacity: 2,000 automotive parts per hour.
- (d) One (1) paint booth, known as PB2, equipped with HVLP spray applicators, equipped with dry filter for PM overspray control, known as CE-6, installed in 1993, exhausting to Stack S6, capacity: 2,000 automotive parts per hour.
- (e) One (1) paint booth, known as PB3, equipped with HVLP spray applicators, equipped with dry filter for PM overspray control, known as CE-7, installed in 1993, exhausting to Stack S7, capacity: 2,000 automotive parts per hour.
- (f) One (1) paint booth (small chain-on-edge), known as PB4, equipped with HVLP spray applicators, equipped with dry filter for PM overspray control, known as CE-8, installed in 1993, exhausting to Stack S8, capacity: 280 automotive parts per hour.
- (g) One (1) paint booth, known as PB5, equipped with HVLP spray applicators, equipped with water wash for PM overspray control, known as CE-9, installed in 1993, exhausting to Stack S9, capacity: 2,000 automotive parts per hour.
- (h) One (1) paint booth (large chain-on-edge), known as PB6, equipped with HVLP spray applicators, equipped with water wash filter for PM overspray control, known as CE-10, installed in 1994, exhausting to Stack S10, capacity: 2,000 automotive parts per hour.
- (i) One (1) paint booth (large chain-on-edge), known as PB7, equipped with HVLP spray applicators, equipped with water wash filter for PM overspray control, known as CE-11, installed in 1994, exhausting to Stack S11, capacity: 2,000 automotive parts per hour.
- (j) Three (3) hand paint stations, known HPB1 - HPB3, capacity: 300 automotive parts per hour.
- (k) One (1) dip and spin adhesive system, known as DIPSPIN, installed in 1997, exhausting to Stack S12a, capacity: 35,000 automotive parts per hour.
- (l) One (1) dip and spin dryer and room exhaust, known as DIPDRY, installed in 1997, exhausting to Stack S12b, capacity: 35,000 automotive parts per hour.
- (m) One (1) flammable liquid storage room, known as FSTOR, installed prior to 1980, exhausting to Stack S13, capacity: 3,050 gallons.
- (n) One (1) vapor degreaser, known as VDG, exhausting to Stack S14, installed in 1997, capacity: 28,000 automotive parts per hour or 2.7 pounds of trichloroethylene per hour.
- (o) One (1) grit blaster, known as GBLAST1, equipped with a baghouse, known as CE-15a, installed in 1996, exhausting to Stack S15a, capacity: 1,320 pounds of parts per hour and 21.3 pounds of grit per hour.
- (p) One (1) grit blaster, known as GBLAST2, equipped with a baghouse, known as CE-15b installed in 1999, exhausting to Stack S15b, capacity: 1,800 pounds of parts per hour and 32.0 pounds of grit per hour.
- (q) One (1) dip and carousel, known as HDIP, installed in 1995, capacity: 1,000 automotive parts per hour.

- (r) One (1) line drier, known as DLINE, installed in 1995, exhausting to Stack S18, capacity: 1,000 automotive parts per hour.
- (s) One (1) chain-on-edge drier, known as CDRY, exhausting to Stack S19, installed in 1994, capacity: 2,000 automotive parts per hour.
- (t) One (1) paint booth (silver machine), known as PB8, equipped with dry filters for PM overspray control, known as CE-20, installed in 1999, exhausting to Stack S20, capacity: ~~450~~ **1,500** automotive parts per hour.
- (u) One (1) dip machine, known DIP, installed in 1999, exhausting to Stack S21, capacity: 1,000 automotive parts per hour.
- (v) One (1) roll coater adhesive application system, identified as PB-9, with a maximum coating usage of 13.75 pounds per hour, processing a maximum of 6000 parts per hour, exhausting to stack S21.
- (w) Two (2) hand-spray booths, identified as PB-10 and PB-11, each with a maximum coating usage of 3.25 pounds per hour, processing a maximum of 2000 parts per hour each, equipped with dry filters identified as CE21 and CE22, and exhausting to stacks S23 and S24.
- (x) **One (1) Ruemblin hand blaster, equipped with a self-contained vacuum, maximum capacity: 20 miscellaneous metal, plastic and/or rubber parts and 80 pounds per hour.**
- (y) **One (1) Guyson turntable blaster, equipped with a self-contained vacuum, maximum capacity: 900 miscellaneous metal, plastic and/or rubber parts and 166.5 pounds per hour.**
- (z) **One (1) large turntable blaster (CM T18), installed in January 2004, equipped with a self-contained vacuum, maximum capacity: 2,580 miscellaneous metal, plastic and/or rubber parts and 477.3 pounds per hour.**
- (aa) **One (1) small hand Vac-U Blast, installed in January 2004, equipped with a self-contained vacuum, maximum capacity: 20 miscellaneous metal, plastic and/or rubber parts and 80 pounds per hour.**
- (bb) **One (1) Goff turntable blaster, installed in January 2004, equipped with a self-contained vacuum, maximum capacity: 1,125 miscellaneous metal, plastic and/or rubber parts and 208.1 pounds per hour.**
- (cc) **One (1) Empire Basket blaster, installed in November 2004, equipped with a self-contained vacuum, maximum capacity: 100 miscellaneous metal, plastic and/or rubber parts and 350.0 pounds per hour.**
- (dd) **One (1) dip & spin (chain dip), installed in 2004, exhausted through Stack S35, maximum capacity: 700 miscellaneous metal, plastic and/or rubber parts per hour.**

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

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

Other activities with PM less five (5) pounds per hour or twenty-five (25) pounds per day.

- (a) PMILL, RPRCSS rubber making/primary mill (326 IAC 6-3).
- (b) SMILL, RPRCSS rubber making/secondary mill (326 IAC 6-3).
- (c) RCOAT, rubber coating (326 IAC 6-3).
- (d) PMIX, primary, Banbury mixer (326 IAC 6-3).
- (e) SMIX, secondary, Shaw mixer (326 IAC 6-3).
- (f) SBIAST, self-contained sand blaster (326 IAC 6-3).
- (g) CSILOs, three (3) carbon silos (326 IAC 6-3).
- (h) Phosline phosphate line (326 IAC 6-3).
- (i) One (1) natural gas fired burn off oven, known as FURN1, consisting of a primary chamber rated at 0.185 million British thermal units per hour and a secondary chamber rated at 0.290 million British thermal units per hour, capacity: 10.0 pounds of waste per hour (326 IAC 4-2).
- (j) **One (1) phosphate line, installed in January 2003, exhausted through Stack S30, maximum capacity: 1,250 miscellaneous metal, plastic and/or rubber parts per hour (326 IAC 6-3-2).**

**Other activities with VOC less three (3) pounds per hour or fifteen (15) pounds per day.**

- (k) **Four (4) electric ovens, #1, #2 and #3 are heating ovens, and #4 is a drying oven, exhausted through Stacks S31 - S34, respectively, installed in June 2004 and 2005.**

#### SECTION D.2 FACILITY OPERATION CONDITIONS

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

- (t) One (1) paint booth (silver machine), known as PB8, equipped with dry filters for PM overspray control, known as CE-20, installed in 1999, exhausting to Stack S20, capacity: ~~450~~ **1,500** automotive parts per hour.
- (dd) **One (1) dip & spin (chain dip), installed in 2004, exhausted through Stack S35, maximum capacity: 700 miscellaneous metal, plastic and/or rubber parts per hour.**

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

##### D.2.1 Volatile Organic Compounds (VOC) [326 IAC 2-2]

**The total VOC usage to all facilities listed in Section D.2 shall be limited to less than 232 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 coupled with the unlimited potential to emit VOC from all other facilities, including insignificant activities, at this source of 18.0 tons per year shall render the requirements of 326 IAC 2-2 not applicable.**

##### D.2.2 Volatile Organic Compounds (VOC) [326 IAC 8 1 6]

- (a) The VOC usage of the dip and spin adhesive system, known as DIPSPIN 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 makes 326 IAC 8 1 6 not applicable.
- (b) **The VOC usage of the paint booth (silver machine), known as PB8 shall be limited to less than twenty five (25) tons of VOC, including adhesives and cleaning solvents, per twelve (12) consecutive month period, with compliance determined at the end of each month. This usage limit makes the requirements of 326 IAC 8-1-6 not applicable.**
- (cb) The VOC usage of the roll coater identified as PB 9 shall be limited to less than twenty five (25) tons of VOC, including adhesives and cleaning solvents, per twelve (12) consecutive month period, with compliance determined at the end of each month. This usage limit makes 326 IAC 8 1 6 not applicable.

**D.2.4 Particulate Matter (PM) [326 IAC 6-3-2(c)] [40 CFR 52 Subpart P]**

The particulate matter (PM) overspray from the paint booths, known as PB1 through PB8, and spray booths PB 10 and PB 11 will be limited by the following:

**Pursuant to 40 CFR 52 Subpart P, the PM from paint booths, known as PB1 through PB8, and spray booths PB 10 and PB 11 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.2.5 Particulate [326 IAC 6-3-2(d)]**

**Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating shall be controlled by a dry particulate filter, 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.2.8 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 DIPSPIN, **paint booth PB8** and roll coater PB-9.

**D.2.108 Volatile Organic Compounds (VOC)**

Compliance with the VOC usage limitations contained in Conditions D.2.1 and D.2.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. 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.2.1240-VOC and HAPs Emissions**

- (a) Compliance with Conditions D.2.1 and D.2.2 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.
- (b) Compliance with Condition D.2.32 shall be demonstrated within 30 days of the end of each month based on the single and combination of HAPs usage for the most recent twelve (12) month period.

D.2.153 Record Keeping Requirements

- (a) To document compliance with Condition D.2.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limit and the VOC emission limit established in Condition D.2.1 for all facilities listed in Section D.2.
- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) The cleanup solvent usage for each month;
  - (4) The total VOC usage for each month; and
  - (5) The weight of VOCs emitted for each compliance period.
- (ba) To document compliance with Conditions D.2.24 and D.2.3 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 and HAPs usage limits and the VOC and HAPs emission limits established in Conditions D.2.24 and D.2.32 for DIPSPIN, paint booth PB8 and roll coater PB-9.
- (1) The amount and VOC and HAPs content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) The cleanup solvent usage for each month;
  - (4) The total VOC and HAPs usage for each month; and
  - (5) The weight of VOCs and HAPs emitted for each compliance period.
- (cb) To document compliance with Conditions D.2.1344 and D.2.1442, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (de) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.1644 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.2.1, D.2.2 and D.2.32 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 not

BRC Rubber & Plastics, Inc.  
Montpelier, Indiana  
Permit Reviewer: MLK/MES

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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: BRC Rubber & Plastics, Inc.  
Source Address: 623 West Monroe Street, Montpelier, Indiana 47359  
Mailing Address: 589 South Main Street, P.O. Box 227, Churubusco, Indiana 46723  
Part 70 Permit No.: T 009-7492-00002  
Facilities: All Surface Coating Facilities Listed in Section D.2  
Parameter: VOC Usage  
Limit: Less than 232 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR \_\_\_\_\_

Month	VOC Usage (tons)	VOC Usage (tons)	VOC Usage (tons)
	This Month	Previous 11 Months	12 Month Total

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

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

Attach a signed certification to complete this report.

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

**Part 70 Quarterly Report**

Source Name: BRC Rubber & Plastics, Inc.  
Source Address: 623 West Monroe Street, Montpelier, Indiana 47359  
Mailing Address: 589 South Main Street, P.O. Box 227, Churubusco, Indiana 46723  
Part 70 Permit No.: T 009-7492-00002  
Facility: One (1) paint booth (silver machine), known as PB8  
Parameter: VOC Usage  
Limit: Less than 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

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

Month	VOC Usage (tons)	VOC Usage (tons)	VOC Usage (tons)
	This Month	Previous 11 Months	12 Month Total

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

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

Attach a signed certification to complete this report.

#### SECTION D.4 FACILITY OPERATION CONDITIONS

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

- (o) One (1) grit blaster, known as GBLAST1, equipped with a baghouse, known as CE-15a, installed in 1996, exhausting to Stack S15a, capacity: 1,320 pounds of parts per hour and 21.3 pounds of grit per hour.
- (p) One (1) grit blaster, known as GBLAST2, equipped with a baghouse, known as CE-15b installed in 1999, exhausting to Stack S15b, capacity: 1,800 pounds of parts per hour and 32.0 pounds of grit per hour.
- (x) **One (1) Ruemblin hand blaster, to be installed in April 2005, equipped with a self-contained vacuum, maximum capacity: 20 miscellaneous metal, plastic and/or rubber parts and 80 pounds per hour.**
- (y) **One (1) Guyson turntable blaster, to be installed in April 2005, equipped with a self-contained vacuum, maximum capacity: 900 miscellaneous metal, plastic and/or rubber parts and 166.5 pounds per hour.**
- (z) **One (1) large turntable blaster (CM T18), installed in January 2004, equipped with a self-contained vacuum, maximum capacity: 2,580 miscellaneous metal, plastic and/or rubber parts and 477.3 pounds per hour.**
- (aa) **One (1) small hand Vac-U Blast, installed in January 2004, equipped with a self-contained vacuum, maximum capacity: 20 miscellaneous metal, plastic and/or rubber parts and 80 pounds per hour.**
- (bb) **One (1) Goff turntable blaster, installed in January 2004, equipped with a self-contained vacuum, maximum capacity: 1,125 miscellaneous metal, plastic and/or rubber parts and 208.1 pounds per hour.**
- (cc) **One (1) Empire Basket blaster, installed in November 2004, equipped with a self-contained vacuum, maximum capacity: 100 miscellaneous metal, plastic and/or rubber parts and 350.0 pounds per hour.**

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

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

##### D.4.1 Particulate Matter (PM) [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2 (~~Process Operations~~) (**Particulate Emission Limitations for Manufacturing Processes**), the allowable ~~PM~~ **particulate** emission rate from the:
  - (1) GBLAST1 and GBLAST2 facilities shall not exceed 3.10 and 3.82 pounds per hour when operating at a process weight rate of 0.660 and 0.900 tons per hour, respectively.
  - (2) **Guyson turntable blaster shall not exceed 0.775 pounds per hour when operating at a process weight rate of 0.083 tons per hour.**

- (3) **Large turntable blaster shall not exceed 1.57 pounds per hour when operating at a process weight rate of 0.239 tons per hour.**
- (4) **Goff turntable blaster shall not exceed 0.900 pounds per hour when operating at a process weight rate of 0.104 tons per hour.**
- (5) **Empire Basket blaster shall not exceed 1.28 pounds per hour when operating at a process weight rate of 0.175 tons per hour.**

The pounds per hour limitations **above were** ~~was~~ calculated with the following equation:

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

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

- (b) **Pursuant to 326 IAC 6-3-2(e)(2), the allowable PM emission rate from the Ruemblin hand blaster and the small hand Vac-U Blast shall not exceed 0.551 pounds per hour when operating at a process weight rate of less than one hundred (100) pounds per hour, each.**

#### **D.4.2 PM and PM<sub>10</sub> Limitations [326 IAC 2-2]**

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The PM and PM<sub>10</sub> emission rates for the:

- (a) **GBLAST1 and GBLAST2 facilities shall not exceed 3.10 and 3.82 pounds per hour.**
- (b) **Guyson turntable blaster shall not exceed 0.775 pounds per hour.**
- (c) **Large turntable blaster shall not exceed 1.57 pounds per hour.**
- (d) **Goff turntable blaster shall not exceed 0.900 pounds per hour.**
- (e) **Empire Basket blaster shall not exceed 1.28 pounds per hour.**
- (f) **Ruemblin hand blaster and the small hand Vac-U Blast shall each not exceed 0.551 pounds per hour.**

**Compliance with these PM and PM<sub>10</sub> limits renders the requirements of 326 IAC 2-2 not applicable.**

Compliance Determination Requirements [326 IAC 2-1.1-11] [326 IAC 2-7-6(1)]

#### **D.4.3~~2~~ Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]**

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- (a) **During the period between 30 and 36 months after issuance of this permit, the Permittee shall perform PM testing of **GBlast 1 and GBlast2** utilizing Methods 5 or 17 (40 CFR 60, Appendix A) or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.**
- (b) **Within ninety (90) days after the issuance of the Significant Permit Modification (009-19963), in order to demonstrate compliance with Condition D.4.1(a)(2), the Permittee**

**shall perform PM testing for the Guyson turntable blaster utilizing methods as approved by the Commissioner. Testing shall be conducted in accordance with Section C - Performance Testing.**

**D.4.43 Particulate Matter (PM)**

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- (a) The baghouses for PM control shall be in operation and control emissions from the grit blast facilities at all times that the GBLAST1 and/or GBLAST2 are in operation.
- (b) **The self contained vacuums for PM and PM<sub>10</sub> control shall be in operation and control emissions from the Ruemblin hand, Guyson turntable, large turntable, small hand Vac-U Blast, Goff turntable and Empire Basket blasters at all times that blasters are in operation.**

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

**D.4.54 Visible Emissions Notations**

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- (a) Daily visible emission notations of the grit blast stack exhausts 15a and 15b **and Ruemblin hand, Guyson turntable, large turntable, small hand Vac-U Blast, Goff turntable and Empire Basket blaster exhausts** shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for **these** ~~this~~ units shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. **Failure to take response steps in accordance with Section C - Compliance Response Plan – Preparation, Implementation, Records and Reports shall be considered a deviation from this permit.**

**D.4.65 Parametric Monitoring**

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- (a) The Permittee shall record the total static pressure drop across the baghouses used in conjunction with the grit blasters, at least once per shift when the GBLAST1 and GBLAST2 is in operation when venting to the atmosphere. ~~Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouses shall be maintained within the range of 4.0 and 8.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.~~ **When for any one reading, the pressure drop across the baghouse is outside the normal range of 4.0 and 8.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take**

**response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.**

- (b) The Permittee shall record the total static pressure drop across the self-contained vacuums controlling the Ruemblin hand, Guyson turntable, large turntable, small hand Vac-U Blast, Goff turntable and Empire Basket blasters, at least once per shift when the blasters are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 0.5 and 4.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.**
- (c) The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.**

#### **D.4.76 Baghouse and Self-Contained Vacuum Inspections**

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- (a) An inspection shall be performed each calendar quarter of all bags controlling the grit blaster operations when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.**
- (b) An inspection shall be performed each calendar quarter of all bags controlling the Ruemblin hand, Guyson turntable, large turntable, small hand Vac-U Blast, Goff turntable and Empire Basket blaster operations when venting to the atmosphere. A self-contained vacuum inspection shall be performed within three (3) months of redirecting vents to the atmosphere and every three (3) months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.**

#### **D.4.87 Broken or Failed Bag Detection**

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In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).**
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).**

- (c) **For single compartment self-contained vacuums, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).**

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

**D.4.98** Record Keeping Requirements

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- (a) To document compliance with Condition D.4.54, the Permittee shall maintain records of daily visible emission notations of the GBLAST1 and GBLAST2 stack exhausts **and the Ruemblin hand, Guyson turntable, large turntable, small hand Vac-U Blast, Goff turntable and Empire Basket blaster exhausts when exhausting to the atmosphere.**
- (b) To document compliance with Condition D.4.65(a), the Permittee shall maintain ~~the following:~~
- (1) ~~Daily~~ **once per shift** records of the **total static pressure drop** following operational parameters during normal operation when venting to the atmosphere:
    - (A) ~~Inlet and outlet differential static pressure; and~~
    - (B) ~~Cleaning cycle: frequency and differential pressure.~~
  - (2) ~~Documentation of all response steps implemented, per event.~~
  - (3) ~~Operation and preventive maintenance logs, including work purchases orders, shall be maintained.~~
  - (4) ~~Quality Assurance/Quality Control (QA/QC) procedures.~~
  - (5) ~~Operator standard operating procedures (SOP).~~
  - (6) ~~Manufacturer's specifications or its equivalent.~~
  - (7) ~~Equipment "troubleshooting" contingency plan.~~
  - (8) ~~Documentation of the dates vents are redirected.~~
- (c) **To document compliance with Condition D.4.6(b), the Permittee shall maintain records once per shift of the total static pressure drop during normal operation when exhausting to the atmosphere.**
- (db) To document compliance with Condition D.4.76, the Permittee shall maintain records of the results of the inspections required under Condition D.4.76 and the dates the vents are redirected.
- (ee) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.5 FACILITY OPERATION CONDITIONS

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

- (j) **One (1) phosphate line, installed in January 2003, exhausted through Stack S30, maximum capacity: 1,250 miscellaneous metal, plastic and/or rubber parts per hour (326 IAC 6-3).**

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

Upon further review, the OAQ has decided to make the following changes to the construction and operation permits. The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded**):

#### Change 1:

The letterhead of the permit has been revised to indicate the new Governor and the new Commissioner of IDEM. The P.O. Box in the address of the OAQ has been deleted throughout the permit and the ZIP code has been revised as follows:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, ~~P.O. Box 6015~~  
Indianapolis, Indiana 46204 ~~6-6015~~

#### Change 2:

Indiana was required to incorporate credible evidence provisions into state rules consistent with the SIP call published by U.S. EPA in 1997 (62 FR 8314). Indiana has incorporated the credible evidence provision in 326 IAC 1-1-6. This rule is effective March 16, 2005; therefore, Condition B.26 reflecting this rule will be incorporated into the proposed permit as follows:

#### **B.26 Credible Evidence [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [62 FR 8314] [326 IAC 1-1-6]**

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

#### Change 3:

The provisions of 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] apply to the surface coating of metal at this major source of HAPs. This rule has a future compliance date and the following conditions have been added to Section D.2 of the proposed permit and all subsequent conditions in this Section have been renumbered and the internal cites within Condition D.2.11 (now D.2.15) revised.

#### **D.2.6 General Provisions Relating to HAPs [326 IAC 20-1] [40 CFR Part 63, Subpart A] [Table 2 to 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.**

- (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.

**D.2.7 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 on and after January 2, 2007.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition, except as otherwise provided in this condition. The permit shield applies to Condition D.2.16, 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.

**RECORD KEEPING AND REPORTING REQUIREMENTS**

**D.2.17 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) **Notification of compliance status.** The Permittee must submit the notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR Part 63, Sections 63.3940, 63.3950, or 63.3960 that applies to the affected source. The notification of compliance

**status must contain the information specified in 40 CFR 63.3910(c), paragraphs (1) through (11) and any additional information specified in 40 CFR 63.9(h).**

**D.2.18 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  
Indianapolis, Indiana 46204**

**Change 4:**

The mailing/delivery address for the source has been changed from 589 U.S. 33 South, P.O. Box 227, Churubusco to 589 South Main Street, P.O. Box 227, Churubusco. This change has been incorporated in Condition A.1 and in the report forms.

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

The Permittee owns and operates a stationary miscellaneous automotive rubber parts manufacturing and coating source.

Mailing Address: 589 **South Main Street** ~~U.S. 33 South~~, P.O. Box 227, Churubusco, Indiana 46723

**Change 5:**

The name of the source has been changed from BRC Rubber Group, Montpelier Division to BRC Rubber & Plastics, Inc. This change has been incorporated throughout the permit.

**Conclusion**

The construction and operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification and Significant Permit Modifications Nos. SSM 009-19573-00002 and SPM 009-19963-00002.

## Indiana Department of Environmental Management Office of Air Quality

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

<b>Source Name:</b>	<b>BRC Rubber &amp; Plastics, Inc.</b>
<b>Source Location:</b>	<b>623 West Monroe Street, Montpelier, Indiana 47359</b>
<b>County:</b>	<b>Blackford</b>
<b>SIC Code:</b>	<b>3069</b>
<b>Operation Permit No.:</b>	<b>T 009-7492-00002</b>
<b>Significant Source Modification No.:</b>	<b>SSM 009-19573-00002</b>
<b>Significant Permit Modification No.:</b>	<b>SPM 009-19963-00002</b>
<b>Permit Reviewer:</b>	<b>Mark L. Kramer</b>

On June 9, 2005, the Office of Air Quality (OAQ) had a notice published in the Montpelier Herald, Montpelier, Indiana, stating that BRC Rubber & Plastics, Inc. had applied for a Significant Source Modification to construct two (2) shot blasters and increase the capacity of paint booth PB8 at this source. The notice also stated that OAQ proposed to issue a Significant Permit Modification for these operations and operate shot blasters, a dip and spin surface coating unit and four (4) electric ovens as well as provided information on how the public could review the proposed Significant Source and Significant Permit Modifications 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 these Significant Source and Permit Modifications should be issued as proposed.

On June 30, 2005, Martin Gaughan of BRC Rubber & Plastics, Inc., submitted comments on the proposed Significant Source and Permit Modifications. The comments are as follows: The permit language, if changed, has deleted language as ~~strikeouts~~ and new language **bolded**.

#### Comment 1:

Section A.2 Emission Units and Pollution Control Equipment Summary and Section D.2 Facility Operating Conditions.

Please remove Unit K the dip and spin adhesive system (DIPSPIN), installed in 1997, exhausting to stack S12a, capacity 35,000 automotive parts per hour. BRC is removing this unit from service.

#### Response 1:

In Condition A.2 and Section D.2, item (k), the dip and spin adhesive system (DIPSPIN) will be removed from the equipment list. In addition, all references to the dip and spin adhesive system (DIPSPIN) will be removed from Conditions D.2.2(a), D.2.3(a), D.2.8 and D.2.15(b) for the DIPSPIN as follows: In addition, the two (2) quarterly report forms for the DIPSPIN only have been deleted but not show here.

#### 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:

~~(k) One (1) dip and spin adhesive system, known as DIPSPIN, installed in 1997, exhausting to Stack S12a, capacity: 35,000 automotive parts per hour.~~

#### D.2.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

~~(a) The VOC usage of the dip and spin adhesive system, known as DIPSPIN 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 makes 326 IAC 8-1-6 not applicable.~~

- (ab) The VOC usage of the paint booth (silver machine), known as PB8 shall be limited to less than twenty five (25) tons of VOC, including adhesives and cleaning solvents, per twelve (12) consecutive month period, with compliance determined at the end of each month. This usage limit makes the requirements of 326 IAC 8-1-6 not applicable.
- (be) The VOC usage of the roll coater identified as PB-9 shall be limited to less than twenty-five (25) tons of VOC, including adhesives and cleaning solvents, per twelve (12) consecutive month period, with compliance determined at the end of each month. This usage limit makes 326 IAC 8-1-6 not applicable.

#### D.2.3 HAPs [326 IAC 2-4.1-1]

- ~~(a) The HAP usage for a single and combination of HAPs of DIPSPIN shall be limited to less than ten (10) and twenty-five (25) tons per twelve (12) consecutive month period, respectively. In addition, any HAPs delivered to the applicators from the use of clean-up solvents and other materials shall be included in the total potential to emit HAPs from the DIPSPIN operation. Therefore, these HAPs limits will render 326 IAC 2-4.1-1 not applicable to the DIPSPIN.~~
- (b) The HAP usage for a single and combination of HAPs of the roll coater PB-9 shall be limited to ten (10) and twenty-five (25) tons per twelve (12) consecutive month period, respectively, with compliance determined at the end of each month. These HAPs limits will render 326 IAC 2-4.1-1 not applicable to PB-9.

#### D.2.8 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 DIPSPIN, paint booth PB8 and roll coater PB-9.

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

##### D.2.15 Record Keeping Requirements

- (a) To document compliance with Condition D.2.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limit and the VOC emission limit established in Condition D.2.1 for all facilities listed in Section D.2.
  - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) The cleanup solvent usage for each month;
  - (4) The total VOC usage for each month; and
  - (5) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Conditions D.2.2 and D.2.3, 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 and HAPs usage limits and the VOC and HAPs emission limits established in Conditions D.2.2 and D.2.3 for ~~DIPSPIN~~, paint booth PB8 and roll coater PB-9.

- (1) The amount and VOC and HAPs content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) The cleanup solvent usage for each month;
  - (4) The total VOC and HAPs usage for each month; and
  - (5) The weight of VOCs and HAPs emitted for each compliance period.
- (c) To document compliance with Conditions D.2.13 and D.2.14, 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) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**Comment 2:**

BRC is adding a parts washer under insignificant activities. Form GSD-10 is attached. The unit will be limited to less than 15 pounds of VOC emissions per day.

**Response 2:**

According to 326 IAC 1-2-18.5, a cold cleaner degreaser is defined as a tank containing organic solvent at a temperature below the boiling point of the solvent which is used to spray, brush, flush, or immerse an article for the purpose of cleaning or degreasing the article.

In order for the proposed parts washer to be classified as an insignificant activity, it must meet the definition of an insignificant degreaser, which is a degreasing operation that does not exceed one hundred and forty-five (145) gallons per twelve (12) months, except if subject to 326 IAC 20-6.

Supplemental information submitted July 11, 2005 indicated that cementing section of BRC Rubber and Plastics believes that they would exceed the one hundred and forty-five (145) gallons a year criteria for an insignificant degreaser activity.

The potential to emit VOC/HAP (MEK) from this proposed cleaner is calculated as follows:

If 3 gallons of MEK is used per 8 hour shift or potentially 9 gallons per day, then the potential VOC/HAP emissions are as follows:

$6.8 \text{ lbs/gal} \times 9 \text{ gal/day} \times 100\% \text{ VOC/HAP} = 61.2 \text{ lbs per day}$  or potentially  $61.2 \text{ lbs/day} \times 365 \text{ days/yr} \times 1 \text{ ton}/2000 \text{ pounds} = 11.2 \text{ tons per year of VOC/MEK}$ .

Therefore, the proposed installation of the cold parts washer would require a minor source modification to a Part 70 Operating Permit which is being incorporated into this Significant Source and Significant Permit Modifications. In addition, the parts washer would be subject to the requirements of 326 IAC 8-3-2 and 326 IAC 8-3-5.

Since the proposed parts washer will not produce a product on its own, the parts washer is not subject to the requirements of 326 IAC 2-4.1-1 (New Source Toxics Control).

Thus, the proposed parts washer has been added to Condition A.2 as item (n). Section D.4 has been added for the parts washer and all subsequent D Sections have been renumbered and internal cites revised to reflect the revised Section numbers. It should be noted that the VOC emission limit in Condition D.2.1 now includes this new part washer as part of the 18 tons per year for facilities other than those listed in Section D.2.

**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:

- (k)** One (1) dip and spin dryer and room exhaust, known as DIPDRY, installed in 1997, exhausting to Stack S12b, capacity: 35,000 automotive parts per hour.
- (l)** One (1) flammable liquid storage room, known as FSTOR, installed prior to 1980, exhausting to Stack S13, capacity: 3,050 gallons.
- (m)** One (1) vapor degreaser, known as VDG, exhausting to Stack S14, installed in 1997, capacity: 28,000 automotive parts per hour or 2.7 pounds of trichloroethylene per hour.
- (n) One (1) parts washer, identified as PW-1, installed in 2005, capacity: 30 gallons of solvent.**

**SECTION D.4 FACILITY OPERATION CONDITIONS**

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

- (n) One (1) parts washer, identified as PW-1, installed in 2005, capacity: 30 gallons of solvent**

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

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

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

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

- (a) Equip the cleaner with a cover;**
- (b) Equip the cleaner with a facility for draining cleaned parts;**
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;**
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;**
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;**
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.**

**D.4.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]**

---

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:
- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
    - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
    - (B) The solvent is agitated; or
    - (C) The solvent is heated.
  - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
  - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
  - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
  - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
    - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
    - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
    - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:

- (1) Close the cover whenever articles are not being handled in the degreaser.**
- (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.**
- (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.**

**Abrasive Blasting - Confined**  
**Company Name: BRC Rubber & Plastics, Inc.**  
**Address City IN Zip: 623 Monroe Street, Montpelier, Indiana 47359**  
**Permit Number: SSM 009-19573 and SPM 009-19963**  
**Pit ID: 009-00002**  
**Reviewer: Mark L. Kramer**  
**Application Date: August 30, 2004**

**Table 1 - Emission Factors for Abrasives**

Abrasive	Emission Factor	
	lb PM / lb abrasive	lb PM10 / lb PM
Sand	0.041	0.70
Grit	0.010	0.70
Steel Shot	0.004	0.86
Other	0.010	

**Table 2 - Density of Abrasives (lb/ft3)**

Abrasive	Density (lb/ft3)
Al oxides	160
Sand	99
Steel	487

**Table 3 - Sand Flow Rate (FR1) Through Nozzle (lb/hr)**

Flow rate of Sand Through a Blasting Nozzle as a Function of Nozzle pressure and Internal Diameter

Internal diameter, in	Nozzle Pressure (psig)							
	30	40	50	60	70	80	90	100
1/8	28	35	42	49	55	63	70	77
3/16	65	80	94	107	122	135	149	165
1/4	109	138	168	195	221	255	280	309
5/16	205	247	292	354	377	420	462	507
3/8	285	355	417	477	540	600	657	720
7/16	385	472	560	645	755	820	905	940
1/2	503	615	725	835	945	1050	1160	1265
5/8	820	990	1170	1336	1510	1680	1850	2030
3/4	1140	1420	1670	1915	2160	2400	2630	2880
1	2030	2460	2900	3340	3780	4200	4640	5060

**Calculations  
 Empire Blaster**

**All Blasters 99% control**

*Adjusting Flow Rates for Different Abrasives and Nozzle Diameters*

Flow Rate (FR) = Abrasive flow rate (lb/hr) with internal nozzle diameter (ID)  
 FR1 = Sand flow rate (lb/hr) with internal nozzle diameter (ID1) From Table 3 =  
 D = Density of abrasive (lb/ft3) From Table 2 =  
 D1 = Density of sand (lb/ft3) =  
 ID = Actual nozzle internal diameter (in) =  
 ID1 = Nozzle internal diameter (in) from Table 3 =

477
487
99
0.38
0.38

**Flow Rate (FR) (lb/hr) = 2346.455 per nozzle**

**Uncontrolled Emissions (E, lb/hr)**

EF = emission factor (lb PM/ lb abrasive) From Table 1 =  
 FR = Flow Rate (lb/hr) =  
 w = fraction of time of wet blasting =  
 N = number of nozzles =

0.004
2346.455
0 %
3

<b>Uncontrolled Emissions =</b>	<b>28.16 lb/hr</b>
	<b>123.33 ton/yr</b>
<b>Controlled Emissions</b>	<b>0.282 lb/hr</b>
	<b>1.23 ton/yr</b>

**METHODOLOGY**

Emission Factors from STAPPA/ALAPCO "Air Quality Permits", Vol. I, Section 3 "Abrasive Blasting" (1991 edition)  
 Ton/yr = lb/hr X 8760 hr/yr X ton/2000 lbs  
 Flow Rate (FR) (lb/hr) = FR1 x (ID/ID1)² x (D/D1)  
 E = EF x FR x (1-w/200) x N  
 w should be entered in as a whole number (if w is 50%, enter 50)

**Hand-Vac-U Blast**

*Adjusting Flow Rates for Different Abrasives and Nozzle Diameters*

Flow Rate (FR) = Abrasive flow rate (lb/hr) with internal nozzle diameter (ID)  
 FR1 = Sand flow rate (lb/hr) with internal nozzle diameter (ID1) From Table 3 =  
 D = Density of abrasive (lb/ft3) From Table 2 =  
 D1 = Density of sand (lb/ft3) =  
 ID = Actual nozzle internal diameter (in) =  
 ID1 = Nozzle internal diameter (in) from Table 3 =

477
487
99
0.38
0.38

**Flow Rate (FR) (lb/hr) = 2346.455 per nozzle**

**Uncontrolled Emissions (E, lb/hr)**

EF = emission factor (lb PM/ lb abrasive) From Table 1 =  
 FR = Flow Rate (lb/hr) =  
 w = fraction of time of wet blasting =  
 N = number of nozzles =

0.004
2346.455
0 %
1

<b>Uncontrolled Emissions =</b>	<b>9.39 lb/hr</b>
	<b>41.11 ton/yr</b>
<b>Controlled Emissions</b>	<b>0.094 lb/hr</b>
	<b>0.41 ton/yr</b>

**Ruemblin Hand Blast**

*Adjusting Flow Rates for Different Abrasives and Nozzle Diameters*

Flow Rate (FR) = Abrasive flow rate (lb/hr) with internal nozzle diameter (ID)  
 FR1 = Sand flow rate (lb/hr) with internal nozzle diameter (ID1) From Table 3 =  
 D = Density of abrasive (lb/ft3) From Table 2 =  
 D1 = Density of sand (lb/ft3) =  
 ID = Actual nozzle internal diameter (in) =  
 ID1 = Nozzle internal diameter (in) from Table 3 =

477
487
99
0.38
0.38

**Flow Rate (FR) (lb/hr) = 2346.455 per nozzle**

**Uncontrolled Emissions (E, lb/hr)**

EF = emission factor (lb PM/ lb abrasive) From Table 1 =  
 FR = Flow Rate (lb/hr) =  
 w = fraction of time of wet blasting =  
 N = number of nozzles =

0.004
2346.455
0 %
1

<b>Uncontrolled Emissions =</b>	<b>9.39 lb/hr</b>
	<b>41.11 ton/yr</b>
<b>Controlled Emissions</b>	<b>0.094 lb/hr</b>
	<b>0.41 ton/yr</b>

**Large Turntable Blaster** *Adjusting Flow Rates for Different Abrasives and Nozzle Diameters*

Flow Rate (FR) = Abrasive flow rate (lb/hr) with internal nozzle diameter (ID)  
 FR1 = Sand flow rate (lb/hr) with internal nozzle diameter (ID1) From Table 3 =  
 D = Density of abrasive (lb/ft3) From Table 2 =  
 D1 = Density of sand (lb/ft3) =  
 ID = Actual nozzle internal diameter (in) =  
 ID1 = Nozzle internal diameter (in) from Table 3 =


**Flow Rate (FR) (lb/hr) = 12240.000** per nozzle  
**based on a manufacturer's specification of 17 lbs of steel shot per 5 seconds**

**Uncontrolled Emissions (E, lb/hr)**

EF = emission factor (lb PM/ lb abrasive) From Table 1 =  
 FR = Flow Rate (lb/hr) =  
 w = fraction of time of wet blasting =  
 N = number of nozzles =

0.004
12240.000
0 %
1

<b>Uncontrolled Emissions =</b>	<b>48.96 lb/hr</b>
	<b>214.44 ton/yr</b>
<b>Controlled Emissions</b>	<b>0.490 lb/hr</b>
	<b>2.14 ton/yr</b>

**Goff Blaster** *Adjusting Flow Rates for Different Abrasives and Nozzle Diameters*

Flow Rate (FR) = Abrasive flow rate (lb/hr) with internal nozzle diameter (ID)  
 FR1 = Sand flow rate (lb/hr) with internal nozzle diameter (ID1) From Table 3 =  
 D = Density of abrasive (lb/ft3) From Table 2 =  
 D1 = Density of sand (lb/ft3) =  
 ID = Actual nozzle internal diameter (in) =  
 ID1 = Nozzle internal diameter (in) from Table 3 =


**Flow Rate (FR) (lb/hr) = 8640.000** per nozzle  
**based on a manufacturer's specification of 12 lbs of steel shot per 5 seconds**

**Uncontrolled Emissions (E, lb/hr)**

EF = emission factor (lb PM/ lb abrasive) From Table 1 =  
 FR = Flow Rate (lb/hr) =  
 w = fraction of time of wet blasting =  
 N = number of nozzles =

0.004
8640.000
0 %
1

<b>Uncontrolled Emissions =</b>	<b>34.56 lb/hr</b>
	<b>151.37 ton/yr</b>
<b>Controlled Emissions</b>	<b>0.346 lb/hr</b>
	<b>1.51 ton/yr</b>

Flow Rate (FR) = Abrasive flow rate (lb/hr) with internal nozzle diameter (ID)  
 FR1 = Sand flow rate (lb/hr) with internal nozzle diameter (ID1) From Table 3 =  
 D = Density of abrasive (lb/ft3) From Table 2 =  
 D1 = Density of sand (lb/ft3) =  
 ID = Actual nozzle internal diameter (in) =  
 ID1 = Nozzle internal diameter (in) from Table 3 =


**Flow Rate (FR) (lb/hr) = 19440.000** per nozzle  
**based on a manufacturer's specification of 27 lbs of steel shot per 5 seconds**

**Uncontrolled Emissions (E, lb/hr)**

EF = emission factor (lb PM/ lb abrasive) From Table 1 =  
 FR = Flow Rate (lb/hr) =  
 w = fraction of time of wet blasting =  
 N = number of nozzles =

0.004
19440.000
0
1

<b>Uncontrolled Emissions =</b>	<b>77.76 lb/hr</b>
	<b>340.59 ton/yr</b>
<b>Controlled Emissions</b>	<b>0.778 lb/hr</b>
	<b>3.41 ton/yr</b>

**Summary of Potential to Emit Before and After Controls (TPY)**

Blaster	Before Controls PM	After Controls PM
Empire Basket	123.33	1.23
Small Hand Vac-U	41.11	0.411
Ruemblin Hand	41.11	0.411
Large Turntable	214.44	2.14
Goff	151.37	1.51
Guyson	340.59	3.41
<b>Total</b>	<b>912</b>	<b>9.12</b>

**Allowable Rate of Emissions**

	Process Rate (lbs/hr)	Process Weight Rate (tons/hr)	Allowable Emissions (lbs/hr)
Empire Basket	350	0.175	1.28
Small Hand Vac-U	80	0.040	0.551
Ruemblin Hand	80	0.040	0.551
Large Turntable	477.3	0.239	1.57
Goff	208.1	0.104	0.900
Guyson	166.5	0.083	0.775

**Methodology**

Allowable Emissions = 4.10(Process Weight Rate)<sup>0.67</sup>

For process weight rates less than 100 lbs/hr  
 the allowable PM rate is 0.551 lbs/hr

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

**Company Name: BRC Rubber & Plastics, Inc.  
Address City IN Zip: 623 Monroe Street, Montpelier, Indiana 47359  
Permit Number: SSM 009-19573 and SPM 009-19663  
Plt ID: 009-00002  
Reviewer: Mark L. Kramer  
Application Date: August 30, 2004**

**Dip & Spin**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
P/N3045340112	8.37	74.100%	0.06%	74.0%	0.0%	25.90%	0.00014	700.000	6.20	6.20	0.61	14.58	2.66	0.00	23.93	100%
3345353012	8.37	74.100%	0.06%	74.0%	0.0%	25.90%	0.00014	700.000	6.20	6.20	0.61	14.58	2.66	0.00	23.93	100%
45620312	8.36	74.100%	0.06%	74.0%	0.0%	25.90%	0.00019	700.000	6.19	6.19	0.82	19.76	3.61	0.00	23.90	100%

PM Control Efficiency: 0.00%

**State Potential Emissions**

**Add worst case coating to all solvents**

<b>Uncontrolled</b>	<b>2.04</b>	<b>48.91</b>	<b>8.93</b>	<b>0.00</b>
<b>Controlled</b>	<b>2.04</b>	<b>48.91</b>	<b>8.93</b>	<b>0.00</b>

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Ethylbenzene	Xylene Emissions (ton/yr)	Ethylbenzene Emissions (ton/yr)	Total HAPs (ton/yr)
Resins								
P/N3045340112	8.37	0.00014	700.000	60.00%	15.00%	2.16	0.54	2.69
3345353012	8.37	0.00014	700.000	60.00%	15.00%	2.16	0.54	2.69
45620312	8.36	0.00019	700.000	60.00%	15.00%	2.92	0.73	3.65
<b>Total</b>						<b>7.23</b>	<b>1.81</b>	<b>9.04</b>

**PB8 (Silver Machine) Increase in Capacity From 450 to 1,500 units/hour**

Material All on Metal Substrate Unless Otherwise Indicated	Density (lbs/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (units/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 (tons/yr)	lbs VOC/gal solids	Transfer Efficiency
<b>PB8 Silver Machine Adhesive</b>																
<b>Chemlock EP6887-35 for Parts #</b>																
304410002	8.19	73.90%	0.0%	73.9%	0.03%	15.85%	0.00070	1050.000	6.05	6.05	4.45	106.72	19.48	5.51	38.17	20%
4376	8.19	73.90%	0.0%	73.9%	0.03%	15.85%	0.00070	1050.000	6.05	6.05	4.45	106.72	19.48	5.51	38.17	20%
<b>Worst Case</b>									<b>6.05</b>	<b>6.05</b>	<b>4.45</b>	<b>106.72</b>	<b>19.48</b>	<b>5.51</b>	<b>38.17</b>	

<b>VOC</b>	<b>0%</b>	<b>Uncontrolled</b>	<b>4.45</b>	<b>106.72</b>	<b>19.48</b>	<b>5.505</b>
<b>PM</b>	<b>90%</b>	<b>Controlled</b>	<b>4.45</b>	<b>106.72</b>	<b>19.48</b>	<b>0.551</b>

**PB8 (Silver Machine) Increase in Capacity From 450 to 1,500 units/hour**

**PB8 with 1500 units/hr after controls**

6.35      152.46      27.82      0.786

PB8 Silver Machine Solvent	Density (lbs/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (units/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 (tons/yr)	lbs VOC/gal solids	Transfer Efficiency
<b>Xylene for Parts #</b>																
304410002	7.24	100.00%	0.0%	100.0%	0.00%	0.00%	0.00020	1050.000	7.24	7.24	1.52	36.49	6.66	0.00	n/a	100%
4376	7.24	100.00%	0.0%	100.0%	0.00%	0.00%	0.00020	1050.000	7.24	7.24	1.52	36.49	6.66	0.00	n/a	100%
<b>Worst Case</b>									<b>Uncontrolled</b>		<b>1.52</b>	<b>36.49</b>	<b>6.66</b>	<b>0.00</b>	<b>n/a</b>	<b>100%</b>

**PB8 with 1500 units/hr after controls**  
2.17      52.13      9.51      0.00

Grand Total Adhesive and Solvent Uncontrolled increased capacity	<b>5.97</b>	<b>143.21</b>	<b>26.14</b>	<b>5.51</b>
Grand Total Adhesive and Solvent Controlled increased capacity	5.97	143.21	26.14	0.551
Total Adhesive and Solvent Controlled& Limited (1500 units/hr)			<b>25</b>	<b>0.551</b>

**METHODOLOGY**

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