



*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: October 27, 2006

RE: Intergrated Manufacturing & Assembly / 001-19730-00023

FROM: Nisha Sizemore  
Chief, Permits Branch  
Office of Air Quality

### **Notice of Decision: Approval – Effective Immediately**

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

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

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

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

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

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

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

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

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

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

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

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



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Indianapolis, Indiana 46204-2215  
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## PART 70 OPERATING PERMIT RENEWAL OFFICE OF AIR QUALITY

**Integrated Manufacturing and Assembly, LLC  
917 Liechty Road  
Berne, Indiana 46711**

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

**The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.**

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

Operation Permit No.: T001-19730-00023	
Original signed by:  Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: October 27, 2006  Expiration Date: October 27, 2011

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## SECTION A SOURCE SUMMARY

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

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

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The Permittee owns and operates a stationary molded plastic parts spray painting operation.

Responsible Official:	Plant Manager
Source Address:	917 Liechty Road, Berne, Indiana 46711
Mailing Address:	917 Liechty Road, Berne, Indiana 46711
General Source Phone Number:	(260) 589-7206
SIC Code:	3089
County Location:	Adams
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD; Major Source, Section 112 of the Clean Air Act Not in 1 of 28 Source Categories

### 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) Two (2) prime coating booths used to coat plastic and metal parts, identified as EU-001 and EU-002, with a maximum capacity of 25.4 and 38 gallons of primer per hour, using water wash system CE-001 as particulate matter (PM) control and a natural gas 5.0 million British thermal units per hour (MMBtu/hr) thermal oxidizer CE-003 as volatile organic compound (VOC) control on the prime bake oven, and exhausting to stacks SV-007 and SV-008, and SV-009 and SV-010, respectively. This unit was constructed in 1987.
- (b) Three (3) base coating booths used to coat plastic and metal parts, identified as EU-003, EU-004, and EU-005, with a maximum capacity of 25.4, 38, and 25.4 gallons of base coating per hour, using water wash system CE-001 as PM control, and exhausting to stacks SV-013 and SV-014, and SV-015 and SV-016, and SV-017 and SV-018, respectively. This unit was constructed in 1987.
- (c) Two (2) clear coating booths used to coat plastic and metal parts, identified as EU-006 and EU-007, with a maximum capacity of 25.4 and 38 gallons of clear coat per hour, respectively, using water wash system CE-001 as PM control, and exhausting to stacks SV-019 and SV-020, and SV-021 and SV-022, respectively. This unit was constructed in 1987.
- (d) One (1) quality control booth used to coat plastic and metal parts, identified as EU-010, with a maximum capacity of 6.34 gallons of paint per hour, using dry panel filter CE-002 as PM control, and exhausting to stack SV-024. This unit was constructed in 1987.
- (e) One (1) mix room cleaning table, identified as EU-015, using no control, and exhausting to stack SV-025. This unit was constructed in 1987.
- (f) One (1) service booth used to coat plastic and metal parts, identified as EU-016, with a maximum capacity of 8.4 gallons of coating per hour using dry panel filter CE-004 as PM control, and exhausting to stack SV-027. This unit was constructed in 2003.

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 specifically regulated insignificant activities as defined in 326 IAC 2-7-1(21):

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-35]
- (b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; polymer sanding operations with particulate less than 25 lbs/day; and woodworking operations. [326 IAC 6-3]
- (c) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
- (d) Any unit emitting greater than 1 pound per day but less than 5 pounds per day or one ton per year of a single HAP; greater than 1 pound per day less than 12.5 pounds per day or 2.5 hours per year of any combination of HAPs; and VOC emissions less than 3 pounds per hour and 15 pounds per day.

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

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

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

## SECTION B

## GENERAL CONDITIONS

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

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

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

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- (a) This permit, T001-19730-00023, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

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

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

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

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

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

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

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

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

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

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

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- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state

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

- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

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

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

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2215

and

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

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

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

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

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

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

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

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

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

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

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2215

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

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

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

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

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

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

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- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

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

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

requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

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

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5] [326 IAC 2-7-10.5]

- (a) All terms and conditions of permits established prior to T001-19730-00023 and issued pursuant to permitting programs approved into the state implementation plan have been either
  - (1) incorporated as originally stated,
  - (2) revised under 326 IAC 2-7-10.5, or
  - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this combined permit, all previous registrations and permits are superseded by this Part 70 operating permit.

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

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

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

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

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality

100 North Senate Avenue  
Indianapolis, Indiana 46204-2215

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

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

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

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

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
  - (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

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

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

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2215

- (b) A timely renewal application is one that is:

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

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

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- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2215  
  
Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

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

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

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

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- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
  - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
  - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2215

and

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

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

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

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

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

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

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

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

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]

The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

(e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

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

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

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

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

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

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

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:  
  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2215  
  
The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

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

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.

- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

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

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

**SECTION C**

**SOURCE OPERATION CONDITIONS**

Entire Source

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

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

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and The methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

**C.2 Opacity [326 IAC 5-1]**

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]**

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

**C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]**

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

**C.5 Fugitive Dust Emissions [326 IAC 6-4]**

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

**C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]**

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

- (2) If there is a change in the following:
  - (A) Asbestos removal or demolition start date;
  - (B) Removal or demolition contractor; or
  - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2215

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

### **Testing Requirements [326 IAC 2-7-6(1)]**

#### **C.7 Performance Testing [326 IAC 3-6]**

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- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2215

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

### **Compliance Requirements [326 IAC 2-1.1-11]**

#### **C.8 Compliance Requirements [326 IAC 2-1.1-11]**

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The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

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

#### **C.9 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

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

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2215

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

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

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

#### **C.10 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

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

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

#### **C.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]**

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- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.

- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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

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

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on July 24, 1998.
- (b) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.  
[326 IAC 1-5-3]

C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

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

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

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

- (2) monitor performance data, if applicable; and
- (3) corrective actions taken.

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

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

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

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

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

- (a) In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2007 and every three (3) years thereafter, the Permittee shall submit triannually (every three (3) years) by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
  - (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
  - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2215

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

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

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

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present

or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

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

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- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2215
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

**Stratospheric Ozone Protection**

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

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

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

**SECTION D.1**

**FACILITY OPERATION CONDITIONS**

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

- (a) Two (2) prime coating booths used to coat plastic and metal parts, identified as EU-001 and EU-002, with a maximum capacity of 25.4 and 38 gallons of primer per hour, using water wash system CE-001 as particulate matter (PM) control and a natural gas 5.0 million British thermal units per hour (MMBtu/hr) thermal oxidizer CE-003 as volatile organic compound (VOC) control on the prime bake oven, and exhausting to stacks SV-007 and SV-008, and SV-009 and SV-010, respectively. This unit was constructed in 1987.
- (b) Three (3) base coating booths used to coat plastic and metal parts, identified as EU-003, EU-004, and EU-005, with a maximum capacity of 25.4, 38, and 25.4 gallons of base coating per hour, using water wash system CE-001 as PM control, and exhausting to stacks SV-013 and SV-014, and SV-015 and SV-016, and SV-017 and SV-018, respectively. This unit was constructed in 1987.
- (c) Two (2) clear coating booths used to coat plastic and metal parts, identified as EU-006 and EU-007, with a maximum capacity of 25.4 and 38 gallons of clear coat per hour, respectively, using water wash system CE-001 as PM control, and exhausting to stacks SV-019 and SV-020, and SV-021 and SV-022, respectively. This unit was constructed in 1987.
- (d) One (1) quality control booth used to coat plastic and metal parts, identified as EU-010, with a maximum capacity of 6.34 gallons of paint per hour, using dry panel filter CE-002 as PM control, and exhausting to stack SV-024. This unit was constructed in 1987.
- (e) One (1) mix room cleaning table, identified as EU-015, using no control, and exhausting to stack SV-025. This unit was constructed in 1987.
- (f) One (1) service booth used to coat plastic and metal parts, identified as EU-016, with a maximum capacity of 8.4 gallons of coating per hour using dry panel filter CE-004 as PM control, and exhausting to stack SV-027. This unit was constructed in 2003.

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

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

**D.1.1 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 2 to 40 CFR Part 63, Subpart PPPP] [40 CFR 63.4501]**

- (a) The provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart PPPP. The Permittee must comply with these requirements on and after April 19, 2007.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15, does not apply to paragraph (a) of this condition, except as otherwise provided in this condition. The permit shield applies to Condition D.1.17, Notification Requirements.

**D.1.2 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products [40 CFR Part 63, Subpart PPPP] [40 CFR 63.4481] [40 CFR 63.4482] [40 CFR 63.4483(b)] [40 CFR 63.4581]**

- (a) The provisions of 40 CFR Part 63, Subpart PPPP (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products) apply to the affected source. Pursuant to 40 CFR 63.4483(b), the Permittee must comply with these requirements on and after April 19, 2007.

- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition, except as otherwise provided in this condition. The permit shield applies to Condition D.1.17, Notification Requirements.
- (c) The following emissions units comprise the affected source that is subject to 40 CFR 63, Subpart PPPP:
  - (1) All coating operations as defined in 40 CFR 63.4581;
  - (2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
  - (3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and
  - (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.
- (d) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.4581, and are applicable to the affected source.

#### D.1.3 Best Available Control Technology (BACT) [326 IAC 8-1-6]

Pursuant to BACT from the Construction Permit 001-2662-00030, issued on April 12, 1993, the coating operations identified as EU-001, EU-002, EU-003, EU-004, EU-005, EU-006, EU-007, and EU-010 have the following requirements:

- (a) The application method for primer shall be high volume low pressure (HVLP).
- (b) The VOC content of coatings shall be limited as follows:
  - (1) Primer VOC content shall not exceed 6.0 pounds per gallon,
  - (2) Basecoat VOC content shall not exceed 6.34 pounds per gallon,
  - (3) Clearcoat VOC content shall not exceed 4.8 pounds per gallon.

#### D.1.4 PSD Minor Limit [326 IAC 2-2]

Pursuant to CP 001-2662-00030, issued on April 12, 1993, the VOC input (including coatings, dilution solvents, and cleaning solvents) to the surface coating facilities shall be less than 248 tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

The VOC input shall be calculated as follows:

$(\text{Input VOC to basecoat}) + (\text{Input VOC to clearcoat}) + (\text{VOC from solvent usage}) + \{(\text{VOC input to primer when control is operating}) * (100\% - (\% \text{ Efficiency}))\} + (\text{VOC input to primer when control is not operating})$

% Efficiency shall equal 22.5% or the value determined in the most recent stack test.

Where EF is the overall control efficiency of the thermal oxidizer CE-003.

**D.1.5 VOC Limit for Metal Parts Coating [326 IAC 8-2-1]**

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The input VOC from metal parts adhesive coating to EU-001, EU-002, EU-003, EU-004, EU-005, EU-006, EU-007, and EU-010 shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period for each booth with compliance demonstrated at the end of each month, therefore 326 IAC 8-2-9 will not apply.

**D.1.6 Volatile Organic Compounds (VOCs) [326 IAC 8-1-1]**

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The VOC input when coating plastic parts to the service booth EU-016 shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply.

**D.1.7 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-9]**

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Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating), the service booth (EU-016) when coating metal parts shall not allow the discharge into the atmosphere of VOC in excess of for clear coats four and three-tenths (4.3), for air dried or forced warm air dried coatings three and five-tenths (3.5), for extreme performance coatings three and five-tenths (3.5), and for all other coatings three (3.0) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator.

**D.1.8 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]**

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Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment of the service booth (EU-016) during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

**D.1.9 Particulate [326 IAC 6-3-2(d)]**

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Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating 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. The control devices for particulate control shall be in operation and control emissions from the surface coating operating at all times the surface coating is in operation.

**D.1.10 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

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

**Compliance Determination Requirements**

**D.1.11 Testing Requirements [326 IAC 2-7-6(1),(6)]**

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If the Permittee elects to use the thermal oxidizer (identified as CE-01) to comply with the VOC limit in Condition D.1.4, the Permittee shall perform stack testing to determine the overall VOC reduction efficiency of the primer coating line (EU-001 and EU-002) with its thermal oxidizer, using methods approved by the Commissioner. The stack tests shall be performed within 90 days of commencing operation of the thermal oxidizer and shall be repeated at least once every five (5) years. The overall control efficiency from the most recent stack tests shall be used for the calculations required in Condition D.1.4.

**D.1.12 Volatile Organic Compounds (VOC)**

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Compliance with the VOC content and usage limitations contained in Conditions D.1.3, D.1.4, D.1.5, and D.1.6 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" or "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

**D.1.13 Monitoring [40 CFR Part 64]**

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(a) Particulate Matter:

- (1) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters and water flow to the water wash. To monitor the performance of the dry filters and water wash, weekly observations shall be made of the overspray from the surface coating booth stacks, SV-007, SV-008, SV-009, SV-010, SV-013, SV-014, SV-015, SV-016, SV-017, SV-018, SV-019, SV-020, SV-021, SV-022, SV-024, and SV-027, while one or more of the booths are in operation. Failure to take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances 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 Response to Excursions or Exceedances 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. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.
  - (3) Daily inspections shall be performed to verify that the water level in the water wash meets the manufacturer's recommended level. To monitor the performance of the water flow, visual inspections of the water curtain shall be made weekly to identify any gaps or other disruptions in water flow. Water shall be kept free of solids and floating material that reduces the capture efficiency of the water sheet. 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. Failure to take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.
- (b) Volatile Organic Compound:
- (1) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature if the thermal oxidizer is operated. The output of this system shall be recorded as a three-hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances whenever the three-hour average temperature of the thermal oxidizer is below 1400°F. A three-hour average temperature that is below 1400°F is not a deviation from this permit. Failure to take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.
  - (2) The Permittee shall determine the three-hour average temperature from the most recent valid stack test that demonstrates compliance with limits in Condition D.1.4, as approved by IDEM if the thermal oxidizer is operated.
  - (3) On and after the date the approved stack test results are available, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances whenever the three-hour average temperature of the thermal oxidizer is below the three-hour average temperature as observed during the compliant stack test. A three-hour average temperature that is below the three-hour average temperature as observed during the compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

#### D.1.14 Parametric Monitoring [40 CFR Part 64]

- (a) The Permittee shall determine fan amperage or duct pressure from the most recent valid stack test that demonstrates compliance with limits in Conditions D.1.4, as approved by IDEM if the thermal oxidizer is operated.
- (b) The duct pressure or fan amperage shall be observed at least once per day when the thermal oxidizer is in operation. When for any one reading, the duct pressure or fan amperage is outside the normal range as established in most recent compliant stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A reading that is outside the range as established in the most recent compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

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

#### D.1.15 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.3, D.1.4, D.1.5, D.1.7, D.1.13(b) and D.1.14, the Permittee shall maintain records in accordance with (1) through (7) below. Records maintained for (1) through (7) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.3, D.1.4, D.1.5, D.1.6 and D.1.7.
  - (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.
  - (6) The continuous temperature records (on a three-hour average basis) for the thermal oxidizer when the thermal oxidizer is operated and the three-hour average temperature used to demonstrate compliance during the most recent compliance stack test. To document compliance with Condition D.1.4, the Permittee shall record the dates and times, on an hourly basis, of all periods of startup and shutdown of the thermal oxidizer, identified as CE-003 when the thermal oxidizer is operated.
  - (7) Daily records of the duct pressure or fan amperage when the thermal oxidizer is operated.
- (b) To document compliance with Condition D.1.13(a), the Permittee shall maintain weekly observations of the water level for the water curtains, a log of weekly overspray observations, and daily and monthly inspections.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.16 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.4, D.1.5, and D.1.6 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within

thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "Responsible Official" as defined by 326 IAC 2-7-1(34).

#### D.1.17 Notification Requirements [40 CFR 63.4510]

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General. The Permittee must submit the notifications in 40 CFR 40 CFR 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply to the affected source by the dates specified in those sections, except as provided in 40 CFR 63.4510, paragraphs (b) and (c).

Initial notification. The Permittee must submit the initial notification no later than April 19, 2005. If using compliance with the Automobiles and Light-Duty Trucks NESHAP (40 CFR Part 63, Subpart III) under 40 CFR 63.4881(d) to constitute compliance with this subpart for the plastic part coating operations, then the Permittee must include a statement to this effect in the initial notification and no other notifications are required under this subpart. If complying with another NESHAP that constitutes the predominant activity at the facility under 40 CFR 63.4481(e)(2) to constitute compliance with this subpart for the plastic coating operations, then the Permittee must include a statement to this effect in the initial notification and no other notifications are required under this subpart.

Notification of compliance status. The Permittee must submit the notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR 63.4540, 40 CFR 63.4550, or 40 CFR 63.4560 that applies to the affected source. The notification of compliance status must contain the information specified in 40 CFR 63.4510(c), paragraphs (1) through (11) and in 40 CFR 63.9(h).

#### D.1.18 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.

The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Part 70 permit the applicable requirements of 40 CFR 63, Subpart PPPP, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.

The significant permit modification application shall be submitted no later than July 19, 2006 to.

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2215

## SECTION D.2

## FACILITY OPERATION CONDITIONS

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

#### Insignificant Activities

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-5]
- (b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations [326 IAC 6-3].

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

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

#### D.2.1 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 of 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.

#### D.2.2 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.2.3 Particulate Emissions [326 IAC 6-3-2(c)]

The particulate matter from the insignificant grinding and machine operations at this facility shall be limited by the following. Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emission rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

### PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Integrated Manufacturing and Assembly, LLC  
Source Address: 917 Liechty Road, Berne, Indiana 46711  
Mailing Address: 917 Liechty Road, Berne, Indiana 46711  
Part 70 Permit No.: T001-19730-00023

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2215  
Phone: 317-233-0178  
Fax: 317-233-6865**

**PART 70 OPERATING PERMIT  
EMERGENCY OCCURRENCE REPORT**

Source Name: Integrated Manufacturing and Assembly, LLC  
Source Address: 917 Liechty Road, Berne, Indiana 46711  
Mailing Address: 917 Liechty Road, Berne, Indiana 46711  
Part 70 Permit No.: T001-19730-00023

**This form consists of 2 pages**

**Page 1 of 2**

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

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

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

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

**Page 2 of 2**

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

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

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

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

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

A certification is not required for this report.

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

### Part 70 Quarterly Report

Source Name: Integrated Manufacturing and Assembly, LLC  
 Source Address: 917 Liechty Road, Berne, Indiana 46711  
 Mailing Address: 917 Liechty Road, Berne, Indiana 46711  
 Part 70 Permit No.: T001-19730-00023  
 Facility: Coating and Cleaning Operations (EU-001, EU-002, EU-003, EU-004, EU-005, EU-006, EU-007, EU-008, EU-009, EU-010, and EU-016)  
 Parameter: VOC input  
 Limit: 248 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR:

Month	VOC Input			Controls		Emissions		
	Primer	Basecoat and Clearcoat	Solvent	Overall Control Efficiency	Down Time	Monthly Total*	Prior 11 Months Total	12 Month Rolling Total**
Month 1								
Month 2								
Month 3								

\*{VOC Input Primer (1 - Overall Control Efficiency)} + VOC Input Basecoat and Clearcoat + VOC Input Solvent

\*\*Monthly Total + Prior 11 Months Total

No deviation occurred in this quarter.

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

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

Attach a signed certification to complete this report.

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

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

Source Name: Integrated Manufacturing and Assembly, LLC  
 Source Address: 917 Liechty Road, Berne, Indiana 46711  
 Mailing Address: 917 Liechty Road, Berne, Indiana 46711  
 Part 70 Permit No.: T001-19730-00023

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

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

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

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

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

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

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

Attach a signed certification to complete this report.

# Indiana Department of Environmental Management Office of Air Quality

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

### Source Background and Description

Source Name:	Integrated Manufacturing and Assembly, LLC
Source Location:	917 Liechty Road, Berne, Indiana 46711
County:	Adams
SIC Code:	3089
Operation Permit No.:	T001-7657-00023
Operation Permit Issuance Date:	April 11, 2000
Permit Renewal No.:	T001-19730-00023
Permit Reviewer:	ERG/BL

On September 14, 2005, the Office of Air Quality (OAQ) had a notice published in the Daily Democrat, Decatur, Indiana, stating that Bing Assembly Systems, LLC had applied for a Part 70 Operating Permit Renewal to operate a stationary molded plastic parts spray painting operation with control. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On September 23, 2005, Integrated Manufacturing and Assembly, LLC submitted comments on the proposed Part 70 Operating Permit Renewal. Based on these comments, IDEM, OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table of Contents has been modified to reflect these changes.

On February 2, 2006, Bing Assembly Systems, LLC submitted an application to change their name to "Integrated Manufacturing and Assembly, LLC". This name change has been made throughout the permit. The change in the name of the company has not been made in the Technical Support Document (TSD) for this permit, since OAQ prefers the TSD reflect the version of the permit that was on public notice.

### Comments 1 and 2:

#### Page 5 of 38: Section A.2 Emission Units and Pollution Control Equipment Summary

*(f) One (1) service booth used to coat plastic and **metal** parts, identified...*

#### Page 24 of 38: Section D.1 FACILITY OPERATION CONDITIONS: Facility Description

*(f) One (1) service booth used to coat plastic and metal parts, identified...*

Plastic and metal parts may be coated in the subject service booth. The source explained in a telephone conversation that the service booth will apply clear coats, extreme performance coatings, and other coatings such as standard Sherwin Williams paint. The coatings are forced air dried.

### Response to Comments 1 and 2:

The following changes were made to the permit as a result of comments 1 and 2. Also, see comment 4 and its response for changes to rule applicability as a result of this change.

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

---

- ...
- (f) One (1) service booth used to coat plastic **and metal** parts, identified as EU-016, with a maximum capacity of 8.4 gallons of coating per hour using dry panel filter CE-004 as PM control, and exhausting to stack SV-027. This unit was constructed in 2003.

### SECTION D.1 FACILITY OPERATION CONDITIONS

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

...

- (f) One (1) service booth used to coat plastic **and metal** parts, identified as EU-016, with a maximum capacity of 8.4 gallons of coating per hour using dry panel filter CE-004 as PM control, and exhausting to stack SV-027. This unit was constructed in 2003.

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

### Comment 3:

#### Page 22 of 38: Section C.17 Emission Statement

*(a) Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit triennially (every three years) by July 1 of each year an emission statement covering...*

The Indiana Air Pollutions Control Board has adopted changes to the Emissions Statement Rule. According to a recent change in 326 IAC 2-6, any facility that has taken an enforceable limit in the permit to not exceed 250 tons of VOC shall fall under the triennial reporting for the Annual Air Emissions Statement. Integrated Manufacturing and Assembly, LLC, Bern, Indiana has taken a limit on the amount of product coated in a 12-month period to ensure that the source does not exceed 250 tons of VOC, and therefore falls under the triennial reporting.

### Response to Comment 3:

The following changes were made to the permit as a result of this comment.

C.4716 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

---

- (a) ~~Pursuant to~~ **In accordance with the compliance schedule specified in 326 IAC 2-6-3(ab)(1), starting in 2007 and every three (3) years thereafter**, the Permittee shall submit **triannually (every three (3) years)** by July 1 ~~of each year~~ an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

...

### Comment 4:

#### Page 25 of 38: **Section D.1.5 VOC Limit for Metal Parts Coating**

*The input VOC from metal parts adhesive coating to EU-001, EU-002, EU-003, EU-004, EU-005, EU-006,*

*EU-007, and EU-010, and EU-016 shall be limited to...*

Metal parts may be coated in service booth EU-016.

**Response to Comment 4:**

The service booth EU-016 is subject to 326 IAC 8-2-9 because it was constructed after July 1, 1990 and has actual VOC emissions that are greater than 15 pounds per day. Thus, the requirements of 326 IAC 8-2-9 have been included in this permit for service booth EU-016 so the booth may coat metal parts. The following changes were made to the permit as a result of this comment. Subsequent D section conditions were renumbered.

**D.1.7 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-9]**

---

**Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating), the service booth (EU-016) when coating metal parts shall not allow the discharge into the atmosphere of VOC in excess of for clear coats four and three-tenths (4.3), for air dried or forced warm air dried coatings three and five-tenths (3.5), for extreme performance coatings three and five-tenths (3.5), and for all other coatings three (3.0) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator.**

**D.1.8 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]**

---

**Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment of the service booth (EU-016) during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.**

**Comment 5:**

Integrated Manufacturing and Assembly, LLC submitted an application to IDEM received December 8, 2005 to change the emission reporting in the permit to a triennial basis.

**Response to Comment 5:**

The draft permit currently contains triennial emission reporting in Condition C.16. Thus, no change to the permit is necessary. See the response to Comment #3.

Upon further review, the OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table Of Contents has been modified to reflect these changes.

1. IDEM's mailing address was corrected throughout the permit:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2215

2. IDEM has determined that the Permittee is not required to keep records of all preventive maintenance. However, where the Permittee seeks to demonstrate that an emergency has occurred, the Permittee must provide, upon request, records of preventive maintenance in order to establish that the lack of proper maintenance did not cause or contribute to the deviation. Conditions B.10 – Preventive Maintenance, B.11 – Emergency Provisions, and PMP record keeping requirements in the D section have been revised as follows:

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

---

...

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

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

---

...

- (e) **The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.**

...

D.1.13 Monitoring [40 CFR Part 64]

---

- (a) Particulate Matter:

...

~~(4) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.~~

- (b) Volatile Organic Compound:

...

~~(4) The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the reading is below the above mentioned temperature for any one reading.~~

D.1.15 Record Keeping Requirements

---

- (a) To document compliance with Conditions D.1.3, D.1.4, D.1.5, ~~and D.1.6~~, **D.1.13(b) and D.1.14**, the Permittee shall maintain records in accordance with (1) through (7) below. Records maintained for (1) through (7) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.3, D.1.4, D.1.5, ~~and D.1.6~~, **and D.1.7**.

...

- (b) To document compliance with Condition **D.1.13(a)** ~~D.1.7 and D.1.8~~, the Permittee shall maintain weekly observations of the water level for the water curtains, a log of weekly overspray observations, daily and monthly inspections, ~~and those additional inspections prescribed by the Preventive Maintenance Plan.~~

...

3. For clarification purposes, Condition B.20 has been revised as follow:

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

---

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
- ...
- (3) The changes do not result in emissions which exceed the ~~emissions allowable under limitations provided in~~ **emissions allowable under limitations provided in** this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- ...
- (5) The Permittee maintains records on-site, **on a rolling five (5) year basis**, which document, ~~on a rolling five (5) year basis~~, all such changes and emissions ~~trading trades~~ that are subject to 326 IAC 2-7-20(b), (c), or (e). ~~and makes~~ **The Permittee shall make** such records available, upon reasonable request, for public review.
- ...
- (c) **Emission Trades [326 IAC 2-7-20(c)]**  
The Permittee may trade **emissions** increases and decreases ~~in emissions in~~ at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- ...

4. The 326 IAC 6-3 revisions that became effective on June 12, 2002 were approved into the State Implementation Plan on September 23, 2005. These rules replace the previous version of 326 IAC 6-3 (Process Operations) that had been part of the SIP; therefore, the requirements in Condition D.1.9, which were from the previous version of 326 IAC 6-3-2, are no longer applicable to this source and the condition has been deleted as shown below. The surface coating operations are subject to the requirements in 326 IAC 6-3-2(d), which are included in current Condition D.1.9 (formerly Condition D.1.8). In addition, Condition C.1 has been revised to remove paragraph (a) which contained these requirements.

**C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [40 CFR 52 Subpart P] [326 IAC 6-3-2]**

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

**D.1.7 Particulate Matter (PM) [40 CFR Subpart P]**

---

~~Pursuant to 40 CFR Subpart P, the PM from the surface coating operations shall not exceed the pound per hour emission rate established as E in the following formula:~~

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

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

5. Operation of Equipment was listed two places in the permit. IDEM has decided that it is best to have this requirement under compliance determination in the specific D conditions, and delete it from Section C. The remaining conditions in Section C were renumbered accordingly.

~~C.6 Operation of Equipment [326 IAC 2-7-6(6)]~~

---

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

6. IDEM realizes that instrument specifications can only be practically applied to analog units, and has therefore clarified the condition to state that the condition only applies to analog units. IDEM has also determined that the accuracy of the instruments is not nearly as important as whether the instrument has a range that is appropriate for the normal expected reading of the parameter. Therefore, the accuracy requirements have been removed from the condition and Condition C.12 has been revised as follows:

~~C.1211 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]~~

---

~~(a) Whenever a condition in this permit requires the measurement of a temperature, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (2%) of full scale reading. When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.~~

~~(b) The Permittee may request that the IDEM, OAQ approve the use of a pressure gauge or other an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other the parameters.~~

7. IDEM has reconsidered the requirement to develop and follow a Compliance Response Plan. The Permittee will still be required to take reasonable response steps when a compliance monitoring parameter is determined to be out of range or abnormal. Replacing the requirement to develop and follow a Compliance Response Plan with a requirement to take reasonable response steps will ensure that the control equipment is returned to proper operation as soon as practicable, while still allowing the Permittee the flexibility to respond to situations that were not anticipated. The Section D conditions that refer to this condition have been revised to reflect the new condition title, and the following changes have been made to the Section C condition:

~~C.1514 Compliance Response Plan - Preparation, Implementation, Records, and Reports - Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]~~

---

~~(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on-site, and comprised of:~~

~~(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.~~

~~(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (c) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.~~

- ~~(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:~~
- ~~(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or~~
  - ~~(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.~~
  - ~~(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.~~
  - ~~(4) Failure to take reasonable response steps shall be considered a deviation from the permit.~~
- ~~(c) The Permittee is not required to take any further response steps for any of the following reasons:~~
- ~~(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.~~
  - ~~(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.~~
  - ~~(3) An automatic measurement was taken when the process was not operating.~~
  - ~~(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.~~
- ~~(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.~~
- ~~(e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.~~
- ~~(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.~~
- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit(s) (including any control device and associated capture**

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

D.1.13 Monitoring [40 CFR Part 64]

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- (a) Particulate Matter:
- (1) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters and water flow to the water wash. To monitor the performance of the dry filters and water wash, weekly observations shall be made of the overspray from the surface coating booth stacks, SV-007, SV-008, SV-009, SV-010, SV-013, SV-014, SV-015, SV-016, SV-017, SV-018, SV-019, SV-020, SV-021, SV-022, SV-024, and SV-027, 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 **reasonable** response steps in accordance with Section C - ~~Compliance Response Plan — Preparation, Implementation, Records, and Reports~~ **Response to Excursions or Exceedances** 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~~ **Response to Excursions or Exceedances** for this unit shall contain troubleshooting contingency and **reasonable** 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~~ **Response to Excursions or Exceedances** shall be considered a deviation from this permit.

- (3) Daily inspections shall be performed to verify that the water level in the spray booths meet the manufacturer's recommended level. To monitor the performance of the water flow, visual inspections of the water curtain shall be made weekly to identify any gaps or other disruptions in water flow. Water shall be kept free of solids and floating material that reduces the capture efficiency of the water sheet. 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. ~~The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step.~~ Failure to take reasonable response steps in accordance with Section C - ~~Compliance Response Plan — Preparation, Implementation, Records, and Reports~~ **Response to Excursions or Exceedances** shall be considered a deviation from this permit.
- ~~(4) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.~~

(b) Volatile Organic Compound:

- (1) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature if the thermal oxidizer is operated. The output of this system shall be recorded as an hourly average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall take ~~appropriate~~ **reasonable** response steps in accordance with Section C - ~~Compliance Response Plan — Preparation, Implementation, Records and Reports~~ **Response to Excursions or Exceedances** whenever the hourly average temperature of the thermal oxidizer is below 1400°F. An hourly average temperature that is below 1400°F is not a deviation from this permit. Failure to take **reasonable** response steps in accordance with Section C - ~~Compliance Response Plan — Preparation, Implementation, Records and Reports~~ **Response to Excursions or Exceedances** shall be considered a deviation from this permit.
- (2) The Permittee shall determine the hourly average temperature from the most recent valid stack test that demonstrates compliance with limits in ~~e~~Condition D.1.4, as approved by IDEM if the thermal oxidizer is operated.
- (3) On and after the date the approved stack test results are available, the Permittee shall take ~~appropriate~~ **reasonable** response steps in accordance with Section C - ~~Compliance Response Plan — Preparation, Implementation, Records and Reports~~ **Response to Excursions or Exceedances** whenever the hourly average temperature of the thermal oxidizer is below the hourly average temperature as observed during the compliant stack test. An hourly average temperature that is below the hourly average temperature as observed during the compliant stack test is not a deviation from this permit. Failure to take **reasonable** response steps in accordance with Section C - ~~Compliance Response Plan — Preparation, Implementation, Records and Reports~~ **Response to Excursions or Exceedances** shall be considered a deviation from this permit.
- ~~(4) The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the reading is below the above mentioned temperature for any one reading.~~

D.1.14 Parametric Monitoring [40 CFR Part 64]

- (a) The Permittee shall determine fan amperage or duct pressure from the most recent valid stack test that demonstrates compliance with limits in Conditions D.1.4, as approved by IDEM if the thermal oxidizer is operated.
- (b) The duct pressure or fan amperage shall be observed at least once per day when the thermal oxidizer is in operation. When for any one reading, the duct pressure or fan amperage is outside the normal range as established in most recent compliant stack test, the Permittee shall take reasonable response steps in accordance with Section C - ~~Compliance Response Plan - Preparation, Implementation, Records and Reports~~ **Response to Excursions or Exceedances**. A reading that is outside the range as established in the most recent compliant stack test is not a deviation from this permit. Failure to take **reasonable** response steps in accordance with Section C - ~~Compliance Response Plan - Preparation, Implementation, Records and Reports~~ **Response to Excursions or Exceedances** shall be considered a deviation from this permit.
8. IDEM deleted the sentence in Condition D.1.9 that stated the requirement to operate the control is not federally enforceable because 326 IAC 6-3-2(d) was approved into the SIP by the U.S. EPA on September 23, 2005.

D.1.89 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, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications. ~~This requirement to operate the control is not federally enforceable.~~ **The control devices for particulate control shall be in operation and control emissions from the surface coating operating at all times the surface coating is in operation.**
9. IDEM has deleted Condition D.1.13 because the quality control and service booths are part of the surface coating operation. Condition D.1.9 requires the surface coating operation to be controlled by dry particulate filter or equivalent. Thus, D.1.13 is redundant.

~~D.1.13 Particulate~~

- ~~Pursuant to 326 IAC 6-3-2(c),~~
- (a) ~~The water wash for particulate control shall be in operation at all times when any primer, base, or clear spray coating booths are in operation.~~
- (b) ~~The dry panel filters for particulate control shall be in operation at all times when the quality control coating and service booth coating is in operation.~~
10. IDEM, OAQ has decided to remove paragraph (d) concerning nonroad engines from B.18 - Permit Amendment or Modification. 40 CFR 89, Appendix A specifically indicates that states are not precluded from regulating the use and operation of nonroad engines, such as regulations on hours of usage, daily mass emission limits, or sulfur limits on fuel; nor are permits regulating such operations precluded, once the engine is no longer new.

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

- ...
- (d) ~~No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.~~
11. The equation in Condition D.1.4 has been corrected by changing "1%" to "100%". OAQ has also clarified that the control efficiency used in the equation should be 22.5% or the percentage efficiency determined in the most recent stack test. The following changes have been made to the permit:

D.1.4 PSD Minor Limit [326 IAC 2-2]

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Pursuant to CP 001-2662-00030, issued on April 12, 1993, the VOC input (including coatings, dilution solvents, and cleaning solvents) to the surface coating facilities shall be less than 248 tons per twelve (12) consecutive month period with compliance ~~determined~~ **demonstrated** at the end of each month. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

The VOC input shall be calculated as follows:

(Input VOC to basecoat) + (Input VOC to clearcoat) + (VOC from solvent usage) + {(VOC input to primer when control is operating) \* (100% - ~~22.5%~~ (**% Efficiency**))} + (VOC input to primer when control is not operating)

**% Efficiency shall equal 22.5% or the value determined in the most recent stack test.**

...

12. Condition D.1.5 has been revised to clarify that the 25 ton per year limit applies to each individual booth.

D.1.5 VOC Limit for Metal Parts Coating [326 IAC 8-2-1]

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The input VOC from metal parts adhesive coating to EU-001, EU-002, EU-003, EU-004, EU-005, EU-006, EU-007, and EU-010 shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period **for each booth** with compliance demonstrated at the end of each month, ~~so that therefore~~ 326 IAC 8-2-9 will not apply.

13. Condition D.1.6 has been revised to clarify that the 25 ton per year limit applies to the service booth EU-016 only when coating plastic parts.

D.1.6 Volatile Organic Compounds (VOCs) [326 IAC 8-1-1]

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The VOC input **when coating plastic parts** to the service booth EU-016 shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply.

14. Conditions D.1.13(b) and D.1.15 have been revised to allow three-hour average temperature to be used to demonstrate compliance with the VOC limitations. OAQ has also corrected a clerical error in paragraph (a) in Condition D.1.13. The following changes have been made to the permit.

D.1.13 Monitoring [40 CFR Part 64]

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- (a) Particulate Matter:

...

- (3) Daily inspections shall be performed to verify that the water level in the ~~spray booth~~ **water wash** meets the manufacturer's recommended level. To monitor the performance of the water flow, visual inspections of the water curtain shall be made weekly to identify any gaps or other disruptions in water flow. Water shall be kept free of solids and floating material that reduces the capture efficiency of the water sheet. 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. Failure to take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

- (b) Volatile Organic Compound:

- (1) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature if the thermal oxidizer

is operated. The output of this system shall be recorded as an ~~hourly~~ **three-hour** average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances whenever the ~~hourly~~ **three-hour** average temperature of the thermal oxidizer is below 1400°F. An ~~hourly~~ **three-hour** average temperature that is below 1400°F is not a deviation from this permit. Failure to take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

- (2) The Permittee shall determine the ~~hourly~~ **three-hour** average temperature from the most recent valid stack test that demonstrates compliance with limits in condition D.1.4, as approved by IDEM if the thermal oxidizer is operated.
- (3) On and after the date the approved stack test results are available, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances whenever the ~~hourly~~ **three-hour** average temperature of the thermal oxidizer is below the ~~hourly~~ **three-hour** average temperature as observed during the compliant stack test. An ~~hourly~~ **three-hour** average temperature that is below the ~~hourly~~ **three-hour** average temperature as observed during the compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

#### D.1.15 Record Keeping Requirements

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- (a) To document compliance with Conditions D.1.3, D.1.4, D.1.5, ~~and D.1.6, 7, D.1.13(b) and D.1.14~~, the Permittee shall maintain records in accordance with (1) through (7) below. Records maintained for (1) through (7) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.3, D.1.4, D.1.5, ~~and D.1.6, and D.1.7~~. . . .
  - (6) The continuous temperature records (on an ~~hourly~~ **three-hour** average basis) for the thermal oxidizer when the thermal oxidizer is operated and the ~~hourly~~ **three-hour** average temperature used to demonstrate compliance during the most recent compliance stack test. To document compliance with Condition D.1.4, the Permittee shall record the dates and times, on an hourly basis, of all periods of startup and shutdown of the thermal oxidizer, identified as CE-003 when the thermal oxidizer is operated.
  - (7) Daily records of the duct pressure or fan amperage when the thermal oxidizer is operated.
  - (b) To document compliance with Condition **D.1.13(a)** ~~D.1.7 and D.1.8~~, the Permittee shall maintain weekly observations of the water level for the water curtains, a log of weekly overspray observations, daily and monthly inspections, ~~and these additional inspections prescribed by the Preventive Maintenance Plan.~~
  - (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.
15. Condition D.1.16 has been revised to clarify that reporting is required for Conditions D.1.4, D.1.5, and D.1.6.

#### D.1.16 Reporting Requirements

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A quarterly summary of the information to document compliance with Condition D.1.4, **D.1.5**, and **D.1.6** shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "Responsible Official" as defined by 326 IAC 2-7-1(34).

16. The rule citation 326 IAC 8-3-5 has been added to the title for Condition D.2.1.

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

17. The signature block on the cover of the permit has been changed from *Paul Dubenetzky, Assistant Commissioner*, to *Nisha Sizemore, Chief, Permits Branch*.

Operation Permit No.: T001-19730-00023	
Issued by:  Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date:  Expiration Date:

18. The phrase "in letter form" has been deleted from Condition B.9 because the information required may be submitted in a table.

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

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

...

19. The word "in" has been deleted from Condition B.12 as shown to make the sentence grammatically correct.

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

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed ~~in~~ compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

...

20. The contact numbers for IDEM, OAQ have been updated throughout the permit as follows:

Phone: 317-233-~~8603~~**0178**  
Phone: 317-233-~~5674~~**0178**  
Fax: 317-233-~~5967~~**6865**

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

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

**Source Background and Description**

Source Name:	Bing Assembly Systems, LLC
Source Location:	917 Liechty Road, Berne, Indiana 46711
County:	Adams
SIC Code:	3089
Operation Permit No.:	T001-7657-00023
Operation Permit Issuance Date:	April 11, 2000
Permit Renewal No.:	T001-19730-00023
Permit Reviewer:	ERG/HJ

The Office of Air Quality (OAQ) has reviewed a Part 70 Operating Permit Renewal application from Bing Assembly Systems, LLC relating to the operation of a stationary molded plastic parts spray painting operation.

**Permitted Emission Units and Pollution Control Equipment**

The source consists of the following permitted emission units and pollution control devices:

- (a) Two (2) prime coating booths used to coat plastic and metal parts, identified as EU-001 and EU-002, with a maximum capacity of 25.4 and 38 gallons of primer per hour, using water wash system CE-001 as particulate matter (PM) control and a natural gas 5.0 million British thermal units per hour (MMBtu/hr) thermal oxidizer CE-003 as volatile organic compound (VOC) control on the prime bake oven, and exhausting to stacks SV-007 and SV-008, and SV-009 and SV-010, respectively. This unit was constructed in 1987.
- (b) Three (3) base coating booths used to coat plastic and metal parts, identified as EU-003, EU-004, and EU-005, with a maximum capacity of 25.4, 38, and 25.4 gallons of base coating per hour, using water wash system CE-001 as PM control, and exhausting to stacks SV-013 and SV-014, and SV-015 and SV-016, and SV-017 and SV-018, respectively. This unit was constructed in 1987.
- (c) Two (2) clear coating booths used to coat plastic and metal parts, identified as EU-006 and EU-007, with a maximum capacity of 25.4 and 38 gallons of clear coat per hour, respectively, using water wash system CE-001 as PM control, and exhausting to stacks SV-019 and SV-020, and SV-021 and SV-022, respectively. This unit was constructed in 1987.
- (d) One (1) quality control booth used to coat plastic and metal parts, identified as EU-010, with a maximum capacity of 6.34 gallons of paint per hour, using dry panel filter CE-002 as PM control, and exhausting to stack SV-024. This unit was constructed in 1987.
- (e) One (1) mix room cleaning table, identified as EU-015, using no control, and exhausting to stack SV-025. This unit was constructed in 1987.

**Unpermitted Emission Units and Pollution Control Equipment**

The source also consists of the following unpermitted emission units.

- (f) One (1) service booth used to coat plastic parts, identified as EU-016, with a maximum capacity of 8.4 gallons of coating per hour using dry panel filter CE-004 as PM control, and exhausting to stack SV-027. This unit was constructed in 2003.

### Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-35]
- (b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; polymer sanding operations with particulate less than 25 lbs/day; and woodworking operations. [326 IAC 6-3]
- (c) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
- (d) Any unit emitting greater than 1 pound per day but less than 5 pounds per day or one ton per year of a single HAP; greater than 1 pound per day less than 12.5 pounds per day or 2.5 hours per year of any combination of HAPs; and VOC emissions less than 3 pounds per hour and 15 pounds per day.
- (e) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
  - (1) One (1) natural gas prime bake oven, identified as EU-013, with a maximum capacity of 2.5 MM Btu/hr, with combustion gases exhausting to stack SV-011.
  - (2) One (1) natural gas final bake oven, identified as EU-014, with a maximum capacity of 2.5 MM Btu/hr, using no control, and exhausting to stack SV-023.
- (f) Closed loop heating and cooling systems.
- (g) Noncontact cooling tower system, including forced and induced draft cooling tower system not regulated under a NESHAP.
- (h) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (i) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (j) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees C).
- (k) A laboratory as defined in 326 IAC 2-7(21)(D).

### Existing Approvals

The source has been operating under Title V permit T001-7657, 00023, issued on April 11, 2000. and the following previous approvals:

- (a) First Reopening R001-13126-00023, issued on December 3, 2001.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been incorporated as originally stated. All previous permits are superseded by this permit.

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

All construction conditions from all previously issued permits.

Reason not incorporated: All facilities previously permitted have already been constructed; therefore, the construction conditions are no longer necessary as part of the operating permit. Any facilities that were previously permitted but have not yet been constructed would need new pre-construction approval before beginning construction.

### **Enforcement Issue**

- (a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled "Unpermitted Emission Units and Pollution Control Equipment".
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction and operating permit rules.

### **Recommendation**

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

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

An administratively complete Part 70 permit renewal application for the purposes of this review was received on July 13, 2004.

There was no notice of completeness letter mailed to the Permittee.

### **Emission Calculations**

See Appendix A of this document for detailed emission calculations (pages 1 through 4).

### **Potential to Emit of the Source**

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

The source was issued a Part 70 Operating Permit on April 11, 2000. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of the original Part 70 operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/emission unit	Potential to Emit (tons/year)						
	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
All coatings and cleanup solvents (EU-001, EU-002, EU-003, EU-004, EU-005, EU-006, EU-007, and EU- 010) <sup>(b)</sup>	(a)	(a)	0	Less than 248 <sup>(c)</sup>	0	0	>25
Service Booth EU-016 <sup>(d)</sup>	(a)	(a)	0		0	0	<25
Total PTE	(a)	(a)	0	Less than 250	0	0	>25

- (a) The particulate emissions from the surface coating booths are limited by 326 IAC 6-3.
- (b) The VOC input to booth EU-001, EU-002, EU-003, EU-004, EU-005, EU-006, EU-007, and EU-010, for application of adhesive to metal parts is limited to less than 25 tons per twelve (12) consecutive month period (See discussion of 326 8-2-9 applicability).
- (c) The VOC input to all spray booths located at this source is limited to 248 tons per twelve (12) consecutive month period (see discussion of 326 IAC 2-2 limits).
- (d) The VOC input to spray booth EU-016 for plastic part coating operations is limited to 25 tons per year (see discussion of 326 IAC 8-1-6 applicability).

(a) The unrestricted potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC and PM10 are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) The unrestricted potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater than ten (10) tons per year and the unrestricted potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(c) **Fugitive Emissions**  
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 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 applicability.

**Actual Emissions**

The following table shows the actual emissions from the source. This information reflects the 2001 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	Not reported
PM10	Not Reported
SO <sub>2</sub>	Not Reported
VOC	151
CO	1
NO <sub>x</sub>	3
HAP	Not Reported

**County Attainment Status**

The source is located in Adams County.

Pollutant	Status
PM-10	Attainment
PM2.5	Attainment or Unclassifiable
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 (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to the ozone. Adams County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Adams 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 PM10 emissions as a surrogate for PM2.5 emissions. See the State Rule Applicability for the source section.
- (c) Adams County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

### **Part 70 Permit Conditions**

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

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

### **Federal Rule Applicability**

- (a) This Part 70 source involves pollutant-specific emission units as defined in 40 CFR 64.1 for VOC and PM:
  - (1) with the potential to emit before controls equal to or greater than the major source threshold for VOC and PM.
  - (2) that is subject to an emission limitation or standard for VOC and PM, and
  - (3) uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard.

The two prime booths identified as EU-001 and EU-002 at this Part 70 source have uncontrolled PTE of VOC and PM of greater than 100 tons per year and use control devices (thermal oxidizer and water curtain) as defined in 40 CFR 64.1 to comply with an emission limitation or standard under 326 IAC 6-3-2(c) and 326 IAC 2-7-5(1). (Note: The thermal oxidizer is not currently being used at the facility to comply with the VOC limit. VOC usage is low enough to comply with the limit without add-on controls.) The base booths identified as EU-003, EU-004, and EU-005 at this Part 70 source have an uncontrolled PTE of PM greater than 100 tons per year and use a control device (water curtain) as defined in 40 CFR 64.1 to comply with an emission limitation or standard under 326 IAC 6-3-2(c). The two clear coat booths identified as EU-006 and EU-007 at this Part 70 source have an uncontrolled PTE of PM greater than 100 tons per year and use a control device (water curtain) as defined in 40 CFR 64.1 to comply with an emission limitation or standard under 326 IAC 6-3-2(c). Therefore, the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are applicable to these emission units.

- (1) The CAM plan shall consist of the following requirements:
  - (A) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature if the thermal oxidizer is operated. The output of this system shall be recorded as an hourly average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan – Preparation, Implementation, Records and Reports whenever the hourly average temperature of the thermal oxidizer is below 1400°F. An hourly average temperature that is below 1400°F 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 determine the hourly average temperature from the most recent valid stack test that demonstrates compliance with limits in condition D.1.4, as approved by IDEM if the thermal oxidizer is operated.
  - (C) On and after the date the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports whenever the hourly average temperature of the thermal oxidizer is below the hourly average temperature as observed during the compliant stack test. An hourly average temperature that is below the hourly average temperature as observed during the compliant stack test 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.
  - (D) The Permittee shall determine fan amperage or duct pressure from the most recent valid stack test that demonstrates compliance with limits in conditions D.1.4, as approved by IDEM if the thermal oxidizer is operated.
  - (E) The duct pressure or fan amperage shall be observed at least once per day when the thermal oxidizer is in operation. When for any one reading, the duct pressure or fan amperage is outside the normal range as established in most recent compliant stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports. A reading that is outside the range as established in the most recent compliant stack test 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.
  - (F) Particulate Matter:  
Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters and water flow to the water wash. To monitor the performance of the dry filters and water wash, weekly observations shall be made of the overspray from the surface coating booth stacks, SV-007, SV-008, SV-009, SV-010, SV-013, SV-014, SV-015, SV-016, SV-017, SV-018, SV-019, SV-020, SV-021, SV-022, SV-024, and SV-027, 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.

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.

Daily inspections shall be performed to verify that the water level in the spray booths meet the manufacturer's recommended level. To monitor the performance of the water flow, visual inspections of the water curtain shall be made weekly to identify any gaps or other disruptions in water flow. Water shall be kept free of solids and floating material that reduces the capture efficiency of the water sheet. 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. 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.

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

- (2) Compliance with the above monitoring conditions shall satisfy the requirements of 40 CFR 64, Compliance Assurance Monitoring for the two prime coating booths identified as EU-001 and EU-002, for the base booths identified as EU-003, EU-004, and EU-005 and the two clear coat booths identified as EU-006 and EU-007.
- (b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit.
- (c) This source is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs), Plastic Parts Surface Coating (40 CFR Part 63, Subpart PPPP), and 326 IAC 20-1-1, because it conducts surface coating of automobile plastic parts; and it is a major source of hazardous air pollutants.

General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 2 to 40 CFR Part 63, Subpart PPPP] [40 CFR 63.4501]

- (1) The provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart PPPP. The Permittee must comply with these requirements on and after April 19, 2004.
- (2) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition, except as otherwise provided in this condition. The permit shield applies to Condition D.1.3, Notification Requirements.

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

- (1) The provisions of 40 CFR Part 63, Subpart PPPP (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/plastic/plasticpg.html>. Pursuant to 40 CFR 63.4483(b), the Permittee must comply with these requirements on and after April 19, 2007.
- (2) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition, except as otherwise provided in this condition. The permit shield applies to Condition D.1.17, Notification Requirements.
- (3) The following emissions units comprise the affected source that is subject to 40 CFR 63, Subpart PPPP:
  - (A) All coating operations as defined in 40 CFR 63.4581;
  - (B) All storage containers and mixing vessels in which coatings, thinners a and/or other additives, and cleaning materials are stored or mixed;
  - (C) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and
  - (D) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.
- (4) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 3.4581, and are applicable to the affected source.

Notification Requirements [40 CFR 63.4510]

General. The Permittee must submit the notifications in 40 CFR 40 CFR 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply to the affected source by the dates specified in those sections, except as provided in 40 CFR 63.4510, paragraphs (b) and (c).

Initial notification. The Permittee must submit the initial notification no later than April 19, 2005. If using compliance with the Automobiles and Light-Duty Trucks NESHAP (40 CFR Part 63, Subpart IIII) under 40 CFR 63.4881(d) to constitute compliance with this subpart for the plastic part coating operations, then the Permittee must include a statement to this effect in the initial notification and no other notifications are required under this subpart. If complying with another NESHAP that constitutes the predominant activity at the facility under 40 CFR 63.4481(e)(2) to constitute compliance with this subpart for the plastic coating operations, then the Permittee must include a statement to this effect in the initial notification and no other notifications are required under this subpart.

Notification of compliance status. The Permittee must submit the notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR 63.4540, 40 CFR 63.4550, or 40 CFR 63.4560 that applies to the affected source. The notification of compliance

status must contain the information specified in 40 CFR 63.4510(c), paragraphs (1) through (11) and in 40 CFR 63.9(h).

**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.

The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Part 70 permit the applicable requirements of 40 CFR 63, Subpart PPPP, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.

The significant permit modification application shall be submitted no later than July 19, 2006.

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

Pursuant to 40 CFR 63.4530, 40CFR 63.4531, 40 CFR 63.10(b)(1), (Record Keeping Requirements):

- (1) The Permittee must collect and keep records of the data and information specified in 40 CFR 63.4530, paragraphs (c) through (h). Failure to collect and keep these records is a deviation from the applicable standard.
- (2) Records must be in a form suitable and readily available for expeditious review. Where appropriate, the records may be maintained as electronic spreadsheets or as a database. You must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. You must keep each record on-site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. You may keep the records off-site for the remaining 3 years.

Pursuant to 40 CFR 63.4520 Reporting Requirements, the Permittee must submit semiannual compliance reports for each affected source according to the requirements of 40 CFR 63.4520, paragraphs (a)(1) through (7). The semiannual compliance reporting requirements may be satisfied by reports required under other part of the Clean Air Act (CAA), as specified in 40 CFR 63.4520, paragraph (a)(2).

- (d) The source is not subject to 40 CFR Part 63, Subpart T for Halogenated Solvent Cleaning because this NESHAP exempts nonmajor halogenated solvent cleaning machines. The degreasing operations at this source are not a major source of HAPs.

**State Rule Applicability – Entire Source**

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

The source submitted an Emergency Reduction Plan (ERP) on July 24, 1998.

**326 IAC 1-6-3 (Preventive Maintenance Plans)**

The source submitted a Preventive Maintenance Plan (PMP) on July 24, 1998.

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

The VOC emissions from the facility have always been limited to less than 248 tons per twelve (12) consecutive months. The source was constructed in 1993. It accepted a VOC limit below PSD major levels in the initial construction permit issued April 12, 1993. Therefore, the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 did not apply to the initial construction of this source. The addition of the service booth in December 2003 without a permit did not trigger PSD review because the potential emission increase was less than the significant levels. The source has made no other modifications. The new booth has been incorporated into the 248 tons per year VOC limit. The following limit has been included in the permit. The potential to emit VOC from the entire source is less than 250 tpy, which makes the source minor for future modifications.

### 326 IAC 2-2 (PSD Minor Limit)

Pursuant to CP 001-2662-00030, issued on April 12, 1993, the VOC input (including coatings, dilution solvents, and cleaning solvents) to the surface coating booths shall be less than 248 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable. The VOC input shall be calculated as follows:

$$(\text{Input VOC to basecoat}) + (\text{Input VOC to clearcoat}) + (\text{VOC from solvent usage}) + \{(\text{VOC input to primer when control is operating}) * (1 - \text{EF})\} + (\text{VOC input to primer when control is not operating}) \leq 248 \text{ tons of VOC per 12 month period.}$$

Where

EF = the overall control efficiency of the thermal oxidizer.

### 326 IAC 2-6 (Emission Reporting)

Since this source is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, this source is subject to 326 IAC 2-6 (Emission Reporting). In accordance with the compliance schedule in 326 IAC 2-6-3, an emission statement must be submitted triennially by July 1 beginning in 2007 and every 3 years after. The emission statement contain, at a minimum, the information specified in 326 IAC 2-6-4.

### 326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in the permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

### 326 IAC 6-4 (Fugitive Dust Emissions)

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

### 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

This source is not subject to the requirements of 326 IAC 6-5 because this source does not have the potential to emit greater than 25 tons per year of fugitive particulate emissions.

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

Although a major source of HAPs, this source is not subject to 326 IAC 2-4.1 because it was initially constructed prior to the July 27, 1997 applicability date and the addition of the new paint booth in 2003 did not meet the definition of reconstruction of a major source as defined in 40 CFR 63.41.

**State Rule Applicability – Surface Coating Booths**

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

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 requirements 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 T001-7657-00023, issued on April 11, 2000, and 40 CFR 52 Subpart P, the particulate emissions from the surface coating operations 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 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 8-1-6 (Best Available Control Technology (BACT))**

Spray booths EU-001, EU-002, EU-003, EU-004, EU-005, EU-006, EU-007, and EU-010 each have potential VOC emissions from plastic coating of greater than 25 tons per year and were all constructed after January 1, 1980; therefore, the Best Available Control Technology (BACT) requirements of 325 IAC 8-1-6 apply to these facilities. The following BACT requirements have been included in this permit. Pursuant to Construction Permit 001-2662-00030, issued on April 12, 1993, the coating operations identified as EU-001, EU-002, EU-003, EU-004, EU-005, EU-006, EU-007, EU-010 shall comply with the following requirements:

- (a) The application method for primer shall be high volume low pressure (HVLP).
- (b) The VOC content of coatings shall be limited as follows:
  - (1) Primer VOC content shall not exceed 6.0 pounds per gallon,
  - (2) Basecoat VOC content shall not exceed 6.34 pounds per gallon,
  - (3) Clearcoat VOC content shall not exceed 4.8 pounds per gallon.

The facility currently does not have to operate the thermal oxidizer to comply with this PSD minor limit. VOC usage is low enough to comply with this limit without controls.

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

The input VOC from metal parts adhesive coating to EU-001, EU-002, EU-003, EU-004, EU-005, EU-006, EU-007, and EU-010 shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month. The service booth, EU-016, has never coated metal parts and will not coat metal parts in the future. Thus 326 IAC 8-2-9 does not apply to this service booth.

### 326 IAC 8-1-6 (Volatile Organic Compounds (VOCs))

The VOC input to the service booth EU-016 when coating plastic parts shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply.

### State Rule Applicability - Degreaser

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

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.

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

The degreasing operation is subject to the requirements of 326 IAC 8-3-5 because it was constructed after July 1, 1990 and does not have a remote solvent reservoirs. The degreasing operation is also subject the requirements of 326 IAC 8-3-2 because it was constructed after July 1, 1990 and it is a cold cleaner operation.

- (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.

### **State Rule Applicability – Grinding and Machining Operations**

#### **326 IAC 6-3-2(c) (Particulate Emissions)**

The particulate emissions from the insignificant grinding and machine operations at this facility shall be limited by the following. Pursuant to 326 IAC 6-3-2(c), the allowable particulate emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

### **Testing Requirements**

The Permittee currently complies with the VOC limit (see PSD discussion above) by maintaining records of the VOC content and the amount of each coating and solvent used in the surface coating booths. However, the original limit included in the Construction Permit (CP 001-2662-00030, issued on April 12, 1993), allows the Permittee to use the thermal oxidizer (CE-003) to meet the PSD limit by controlling VOC emissions from spray booths EU-001 and EU-002. The Permittee's current permit (T001-7657-00023) includes a condition requiring the Permittee to perform stack tests on the thermal oxidizer should this control device be used to comply with the PSD limit. To date, stack testing has not been performed on the thermal oxidizer because this control device has never been operated. If the Permittee ever elects to operate the thermal oxidizer to comply with the VOC limit, then the Permittee is required to perform stack testings within 90 days of beginning operation, using methods approved by the Commissioner. The stack tests must be repeated once every 5 years. The overall control efficiency determined during the most recent performance test shall be used for calculating the VOC emissions from EU-001 and EU-002.

## Compliance Requirements

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

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

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

1. The spray coating operations have applicable compliance monitoring conditions as specified below:
  - (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters and water flow to the water wash. To monitor the performance of the dry filters and water wash, weekly observations shall be made of the overspray from the surface coating booth stacks, SV-007, SV-008, SV-009, SV-010, SV-013, SV-014, SV-015, SV-016, SV-017, SV-018, SV-019, SV-020, SV-021, SV-022, SV-024, and SV-027, 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.
  - (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan – Preparation, Implementation, Records, and Reports shall be considered a deviation from this permit.
  - (c) Daily inspections shall be performed to verify that the water level in the spray booths meet the manufacturer's recommended level. To monitor the performance of the water flow, visual inspections of the water curtain shall be made weekly to identify any gaps or other disruptions in water flow. Water shall be kept free of solids and floating material that reduces the capture efficiency of the water sheet. 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. 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.

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

These monitoring conditions are necessary because the water wash for the primer, base, and clear coating spray booths must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emissions for Manufacturing Operations) and 326 IAC 2-7 (Part 70).

The dry panel filter for the quality control booth and service booth must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

- (e) The thermal oxidizer CE-003 shall comply with the following applicable compliance monitoring requirements if this control device is used to comply with the VOC limitation:

- (1) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature if the thermal oxidizer is operated. The output of this system shall be recorded as an hourly average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan – Preparation, Implementation, Records and Reports whenever the hourly average temperature of the thermal oxidizer is below 1400°F. An hourly average temperature that is below 1400°F 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.
- (2) The Permittee shall determine the hourly average temperature from the most recent valid stack test that demonstrates compliance with limits in condition D.1.4, as approved by IDEM if the thermal oxidizer is operated.
- (3) On and after the date the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports whenever the hourly average temperature of the thermal oxidizer is below the hourly average temperature as observed during the compliant stack test. An hourly average temperature that is below the hourly average temperature as observed during the compliant stack test 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.
- (4) The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the reading is below the above mentioned temperature for any one reading.

- (f) Parametric Monitoring  
The Permittee shall determine fan amperage or duct pressure from the most recent valid stack test that demonstrates compliance with limits in Conditions D.1.4, as approved by IDEM if the thermal oxidizer is operated.

- (g) The duct pressure or fan amperage shall be observed at least once per day when the thermal oxidizer is in operation. When for any one reading, the duct pressure or fan amperage is outside the normal range as established in most recent compliant stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports. A reading that is outside the range as established in the most recent compliant stack test 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.

The thermal oxidizer must operate properly if this control device is used to ensure compliance with 326 IAC 2-2 and 326 IAC 2-7 (Part 70).

### **Conclusion**

The operation of this molded plastic parts spray painting operation shall be subject to the conditions of this Part 70 permit 001-19730-00023.

**Appendix A: Emissions Calculations  
VOC and Particulate from Service Booth EU-016**

**Company Name: Bing Assembly Systems, LLC  
Address: 917 Liechty Road, Berne, IN 46711  
Permit Number: T001-19730-00023  
Plt ID: 001-00030  
Reviewer: ERG/HJ**

Material	Density (lb/gal)	Weight % Volatile (H <sub>2</sub> O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Max. Usage (gal/unit)	Maximum Production (units/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	PTE VOC (lbs/hour)	PTE VOC (lbs/day)	PTE VOC (tons/year)	PTE of PM/PM10 (tons/yr)	lb VOC/gal solids	Transfer Efficiency	
Ultra System Reducer	7.08	99.0%	0.00%	99.0%	0.00%	1.00%	0.003	70.0	7.01	7.01	1.34	32.2	5.88	0.02	701	65.0%	
Ultra 7000 Basecoat System	8.50	60.0%	0.00%	60.0%	0.00%	40.0%	0.005	70.0	5.10	5.10	1.95	46.9	8.55	2.00	12.8	65.0%	
Ultra 7000 Clearcoat System	8.17	54.0%	0.00%	54.0%	0.00%	46.0%	0.012	70.0	4.41	4.41	3.71	88.9	16.2	4.84	9.59	65.0%	
ABS/1	8.71	33.0%	0.00%	33.0%	0.00%	67.0%	0.001	70.0	2.87	2.87	0.27	6.41	1.17	0.83	4.29	65.0%	
<b>Worst Case Material</b>											<b>3.71</b>	<b>88.9</b>	<b>16.2</b>	<b>4.84</b>			

**Notes**

The materials used in the paint booth are applied using two (2) high-volume-low, pressure guns. The paint booth is controlled by dry filters. The service booth would only apply the coatings listed above one at a time. The coatings would not be used simultaneously.

**Methodology**

Pounds of VOC per Gallon Coating less Water = Density (lb/gal) \* Weight % Organics \* 1/(1-Volume % water)

Pounds of VOC per Gallon Coating = Density (lb/gal) \* Weight % Organics

PTE of VOC (lbs/hr) = Pounds of VOC per Gallon coating (lb/gal) \* Maximum Usage (gal/unit) \* Maximum Throughput (units/hr)

PTE of VOC (lbs/day) = Pounds of VOC per Gallon coating (lb/gal) \* Maximum Usage (gal/unit) \* Maximum Throughput (units/hr) \*24 (hr/day)

PTE of VOC (tons per year) = Pounds of VOC per Gallon coating (lb/gal) \* Maximum Usage (gal/unit) \* Maximum Throughput (units/hr) \* 8760 (hr/yr) \* 1 ton/2000 lbs

PTE of PM/PM10 (tons/yr) = Maximum Throughput (units/hour) \* Maximum Usage (gal/unit) \* Density (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)

**Appendix A: Emission Calculations**  
**HAP Emissions from Service Booth EU-016**

**Company Name:** Bing Assembly Systems, LLC  
**Address:** 917 Liechty Road, Berne, IN 46711  
**Permit Number:** T001-19730-00023  
**Pit ID:** 001-00023  
**Reviewer:** ERG/HJ

Material	Density of Material (lb/gal)	Maximum Usage (gal/unit)	Maximum Production Rate (units/hour)	Hazardous Air Pollutants													
				Xylene		Toluene		Methyl Ethyl Ketone		Ethylbenzene		Methyl Isobutyl Ketone		Hexamethylene Diisocyanate		Methyl n-Amyl ketone	
				Wt %	Emissions (ton/yr)	Wt %	Emissions (ton/yr)	Wt %	Emissions (ton/yr)	Wt %	Emissions (ton/yr)	Wt %	Emissions (ton/yr)	Wt %	Emissions (ton/yr)	Wt %	Emissions (ton/yr)
Ultra System Reducer	7.08	0.003	70.0	0.00%	0.00	3.00%	0.18	20.0%	1.17	0.00%	0.00	1.00%	0.06	0.00%	0.00	8.00%	0.47
Ultra 7000 Basecoat	8.50	0.005	70.0	33.0%	4.64	5.00%	0.70	0.00%	0.00	6.00%	0.84	2.00%	0.28	0.00%	0.00	0.00%	0.00
Ultra 7000 Clearcoat	8.17	0.011	70.0	0.00%	0.00	0.00%	0.00	7.00%	1.91	0.00%	0.00	4.00%	1.09	0.00%	0.00	5.00%	1.37
ABS/1	8.71	0.001	70.0	22.0%	0.76	20.0%	0.69	0.00%	0.00	4.00%	0.14	0.00%	0.00	0.01%	0.0003	0.00%	0.00
<b>Worst Case Material</b>					<b>4.64</b>		<b>0.70</b>		<b>1.91</b>		<b>0.84</b>		<b>1.09</b>		<b>0.0003</b>		<b>1.37</b>

**Notes**

The amount of materials used per unit is as reported by the source.  
 The weight percent of HAPs in materials is from Material Safety Data Sheets. Information provided by source.

**Methodology**

PTE for HAPs (tons/yr) = Density (lb/gal) x Maximum Usage (gal/unit) x Maximum Production Rate (unit/hr) x Weight % HAP x 8760 (hrs/yr) x 1 ton/2000 lbs

**Appendix A: Emissions Calculations  
VOC and Particulate from Existing Surface Coating  
Booths**

**Company Name: Bing Assembly Systems, LLC  
Address: 917 Liechty Road, Berne, IN 46711  
Permit Number: T001-19730-00023  
Plt ID: 001-00023  
Reviewer: ERG/HJ**

<b>Emission Unit</b>	<b>Max. Usage (gal/hr) of Worst Case Coating</b>	<b>Density (lb/gal)</b>	<b>Weight % VOC</b>	<b>PTE VOC (lbs/hour)</b>	<b>PTE VOC (tons/year)</b>
Primer Booth EU-001	25.4	8.40	65.0%	139	607
Primer Booth EU-002	38.0	8.40	65.0%	207	909
Base Booth EU-003	25.4	8.07	73.7%	151	662
Base Booth EU-004	38.0	8.07	73.7%	226	990
Base Booth EU-005	25.4	8.07	73.7%	151	662
Clear Booth EU-006	25.4	7.90	73.7%	148	648
Clear Booth EU-007	38.0	7.90	60.0%	180	789
QC Booth EU-010	6.34	8.40	60.0%	32.0	140

<b>Emission Unit</b>	<b>Max. Usage (gal/hr) of Worst Case Coating</b>	<b>Density (lb/gal)</b>	<b>Weight % PM</b>	<b>Transfer Efficiency</b>	<b>PTE of PM/PM10 (lbs/hr)</b>	<b>PTE of PM/PM10 (tons/yr)</b>
Primer Booth EU-001	25.4	11.9	78.7%	0.75	59.5	260
Primer Booth EU-002	38.0	11.9	78.7%	0.75	89.0	390
Base Booth EU-003	25.4	8.41	57.7%	0.75	30.8	135
Base Booth EU-004	38.0	8.41	57.7%	0.75	46.1	202
Base Booth EU-005	25.4	8.41	57.7%	0.75	30.8	135
Clear Booth EU-006	25.4	8.24	57.7%	0.75	30.2	132
Clear Booth EU-007	38.0	8.24	60.7%	0.75	47.5	208
QC Booth EU-010	6.34	11.9	60.7%	0.75	11.4	50.1

**Note:** Different coatings are used for VOC and PM in the calculations for PTE-worst case coatings.

**Methodology**

PTE of VOC (lbs/hr) = Max. Usage (gal/hr of worst case coating) \* Density (lb/gal) \* Weight % VOC

PTE of VOC (tons per year) = VOC (lbs/hr) \* 8760 (hr/yr) \* 1 ton/2000 lbs

PTE of PM/PM10 (lbs/hr) = Max. Usage (gal/hr of worst case coating) \* Density (lb/gal) \* Weight % PM/PM10 \* (1-Transfer efficiency)

PTE of PM/PM10 (tons/yr) = PM/PM10 (lbs/hr) \* 8760 (hr/yr) \* 1 ton/2000 lbs

**Appendix A: Emissions Calculations**  
**Summary- PTE for Criteria Pollutants of Entire Source**

**Company Name:** Bing Assembly Systems, LLC  
**Address:** 917 Liechty Road, Berne, IN 46711  
**Permit Number:** T001-19730-00023  
**Pit ID:** 001-00023  
**Reviewer:** ERG/HJ

<b>Emission Unit</b>	<b>VOC (tons/year)</b>	<b>PM/PM10 (tons/year)</b>
Primer Booth EU-001	607	260
Primer Booth EU-002	909	390
Base Booth EU-003	662	135
Base Booth EU-004	990	202
Base Booth EU-005	662	135
Clear Booth EU-006	648	132
Clear Booth EU-007	789	208
QC Booth EU-010	140	11.4
Service Booth EU-016	16.2	4.84
<b>Total Potential to Emit</b>	<b>5422</b>	<b>1479</b>