



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: December 14, 2005
RE: Bremen Corporation / 099-19959-00033
FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval – Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

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

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

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



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

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Governor

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Mr. Doug Hofferth
Bremen Corporation
405 North Industrial Drive
Bremen, IN 46506

December 14, 2005

Re: **099-19959-00033**
Second Significant Permit Modification to
Part 70 No.: T 099-7476-00033

Dear Mr. Hofferth:

Bremen Corporation was issued a 70 Operating Permit, T 099-7476-00033, on December 9, 1999 for a vinyl-coated foam product manufacturing source. A letter requesting changes to this permit was received on October 18, 2004. Pursuant to the provisions of 326 IAC 2-7-12 a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The existing equipment at 510 2nd Street, Bremen, Indiana, has been moved back to the 405 North Industrial Drive facility, which has been repaired following the fire. Process 1 has been removed from the source entirely. Processes 2 through 4 are again equipped with the existing catalytic oxidizer (Oxidizer #1), which was previously determined to be the Best Available Control Technology (BACT) for those facilities. The modification also consists of the addition of two (2) hand-spray booths to Process 3 and an increase the capacity of that facility.

The changes in the Part 70 Operating Permit are documented in the Technical Support Document. All other conditions of the permit shall remain unchanged and in effect. For your convenience, the entire revised Title V Operating Permit, with all modifications and amendments will be provided upon approval.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact CarrieAnn Paukowits, c/o OAQ, 100 North Senate Avenue, Indianapolis, Indiana, 46204, at 631-691-3395 ext. 18 or in Indiana at 1-800-451-6027 (ext 631-691-3395).

Sincerely,

Original Signed By:
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

CAP/MES

Attachments

cc: File - Marshall County
Marshall County Health Department
Northern Regional Office
Air Compliance Section Inspector - D.J. Knotts
Compliance Branch
Administrative and Development Section
Technical Support and Modeling - Michele Boner
Kent Lutian, Bremen Corporation



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PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Bremen Corporation
405 North Industrial Drive
Bremen, Indiana 46506**

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

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

Operation Permit No.: T 099-7476-00033	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: December 9, 1999 Expiration Date: December 9, 2004
1 st Significant Permit Modification No.: 099-12119, issued on July 18, 2000; 1 st Minor Permit Modification No.: 099-12291, issued August 1, 2000; Reopening No.: 099-13409, issued on November 13, 2001; 1st Administrative Amendment No.: 099-15681, issued on April 1, 2002 2 nd Administrative Amendment No.: 099-18923, issued on April 16, 2004	
Second Significant Permit Modification No. 099-19959-00033	Conditions Modified: A.1, A.2, B.25, C.1, D.1.1, D.1.2, D.1.3, D.1.4, D.1.11, D.1.12, D.1.13, D.1.8 and D.1.9 have been removed, and Conditions D.1.5 through D.1.7 (now D.1.7 through D.1.9) have been renumbered Conditions Added: B.27, D.1.5, D.1.6, D.1.14 and D.1.15 One report form has been added and two have been modified
Issued by: Original Signed By: Paul Dubenetzky, Chief Permits Branch Office of Air Quality	Issuance Date: December 14, 2005

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SECTION A

SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary vinyl-coated foam product manufacturing source.

Responsible Official: Vice President - General Manager
Source Address: 405 North Industrial Drive, Bremen, Indiana 46506
Mailing Address: 405 North Industrial Drive, Bremen, Indiana 46506
Phone Number: 219-546-4238
SIC Code: 3069
County Location: Marshall
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Major Source, under PSD Rules;
Major Source, Section 112 of the Clean Air Act

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

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

- (a) One (1) dip room, known as Process 2, consisting of four (4) dip tanks and one (1) cleaning station, constructed prior to 1985, exhausting to a catalytic oxidizer with a heat input capacity of 4.6 million British thermal units per hour, and exiting at stack 1 (Oxidizer #1), capacity: 3,162 pounds of paint, topcoat, and cleaning blend per hour.
- (b) One (1) mixing process, known as Process 4, constructed prior to 1985, exhausting to a catalytic oxidizer with a heat input capacity of 4.6 million British thermal units per hour, and exiting at stack 1 (Oxidizer #1), capacity: 12,671 pounds of coatings mixed per hour.
- (c) One (1) assembly area, known as Area 2, constructed prior to 1985, consisting of hand application of adhesive, exhausting to stack 13, capacity: 14.9 pounds of adhesives per hour.
- (d) One (1) final finish area, known as Area 3, constructed prior to 1985, consisting of one (1) automatic silk screener and one (1) manual silk screener, capacity: 25 units per hour
- (e) One (1) final finish area, known as Process 3, constructed in 1994 and modified in 2005, consisting of four (4) hand-spray painting booths equipped with airless spray guns, exhausting to dry filters and a catalytic oxidizer with a heat input capacity of 4.6 million British thermal units per hour, and exiting at stack 1 (Oxidizer #1), capacity: 373.70 pounds of coatings per hour.
- (f) One (1) assembly area, known as Area 1, constructed prior to 1985, consisting of hand application of adhesive and four (4) glue spraying booths equipped with high volume, low pressure spray guns, exhausting to stack 12, capacity: 133 pounds of adhesives per hour.

- (g) One (1) Roll Coater identified as Process 5, constructed in 1998, with a maximum capacity of 106.6 pounds per hour of adhesive usage.

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

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
 - (1) Two (2) natural gas fired hot water boilers, capacity: 0.28 million British thermal unit per hour, each. [326 IAC 6-2-4]

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

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

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (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 Permit No Defense [IC 13]

- (a) Indiana statutes from IC 13 and rules from 326 IAC, quoted 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.
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."

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

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

B.3 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-7-7(a)]

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

B.5 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.6 Severability [326 IAC 2-7-5(5)]

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

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

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

B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

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

- (b) 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.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAQ, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAQ, or the U.S. EPA, to furnish copies of requested records directly to U.S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) 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.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted under this permit 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, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 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. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

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

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 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 compliance 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.12 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 prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, 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;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date 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

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAQ, upon request and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

B.13 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, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

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

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) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) 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 compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) 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.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is 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.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.14 Permit Shield [326 IAC 2-7-15]

- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.
- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. 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:
 - (1) The applicable requirements are included and specifically identified in this permit; or

- (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- (c) 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, including any term or condition from a previously issued construction or operation permit, 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.
- (d) 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.
- (e) 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.
- (f) 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).
- (g) 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)]
- (h) 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)(7)]

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.16 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 Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) An emergency as defined in 326 IAC 2-7-1(12); or
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.
 - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.17 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]

- (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)]
- (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.18 Permit Renewal [326 IAC 2-7-4]

- (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).

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

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
 - (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]

If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) The Permittee must comply with 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

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.

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

- (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)(D)(i) 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.21 Operational Flexibility [326 IAC 2-7-20]

- (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 approval required by 326 IAC 2-1.1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

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

and

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

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

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

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b), (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) and the following additional conditions:
 - (1) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).
 - (2) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
 - (i) A brief description of the change within the source;
 - (ii) The date on which the change will occur;
 - (iii) Any change in emissions; and
 - (iv) Any permit term or condition that is no longer applicable as a result of the change.

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).

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

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

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

A modification, construction, or reconstruction shall be approved if required by and in accordance with the applicable provisions of 326 IAC 2.

B.23 Inspection and Entry [326 IAC 2-7-6(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) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-7-6(6)]

B.24 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

The application 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).

- (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.25 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. 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.26 Advanced Source Modification Approval [326 IAC 2-7-5(16)]

The requirements to obtain a source modification approval under 326 IAC 2-7-10.5 or a permit modification under 326 IAC 2-7-12 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3 if such modifications occur during the term of this permit.

B.27 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 Matter 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 one hundred (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 Exemptions), 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. The provisions of 326 IAC 9-1-2 are not federally enforceable.

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

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

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

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

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

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted by using ambient air quality modeling pursuant to 326 IAC 1-7-4.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

- (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
- 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 14-10-4, 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) 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 that the inspector be accredited is federally enforceable.

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

C.9 Performance Testing [326 IAC 3-6]

- (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

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAQ within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

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

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

C.10 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements; and
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) Will comply with such applicable requirements that become effective during the term of this permit.

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

Compliance with applicable requirements shall be documented as required by this permit. All monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. 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

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).

C.12 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- (a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.13 Monitoring Methods [326 IAC 3]

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, or other approved methods as specified in this permit.

C.14 Temperature Gauge Specifications

Whenever a condition in this permit requires the measurement of temperature at any part of the unit or its control device, the gauge 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.

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

C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

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

within ninety (90) days after the date of issuance of this permit.

The ERP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) 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.16 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) Submit:
 - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
 - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
 - (3) A verification to IDEM, OAQ, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAQ, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.17 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] [326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
 - (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ, upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared with-

in ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:

- (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
- (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that 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 an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps 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.

C.18 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 corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAQ shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAQ within thirty (30) days of receipt of the notice of deficiency. IDEM, OAQ reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (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. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not 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.19 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
- (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:
- Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204
- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.20 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- (a) With the exception of performance tests conducted in accordance with Section C- Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.

- (e) At its discretion, IDEM, may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.21 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information 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 kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAQ, representative. 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 written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.22 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The 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
- (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, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

Stratospheric Ozone Protection

C.23 Compliance with 40 CFR 82 and 326 IAC 22-1

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) One (1) dip room, known as Process 2, consisting of four (4) dip tanks and one (1) cleaning station, constructed prior to 1985, exhausting to a catalytic oxidizer with a heat input capacity of 4.6 million British thermal units per hour, and exiting at stack 1 (Oxidizer #1), capacity: 3,162 pounds of paint, topcoat, and cleaning blend per hour.
- (b) One (1) mixing process, known as Process 4, constructed prior to 1985, exhausting to a catalytic oxidizer with a heat input capacity of 4.6 million British thermal units per hour, and exiting at stack 1 (Oxidizer #1), capacity: 12,671 pounds of coatings mixed per hour.
- (c) One (1) assembly area, known as Area 2, constructed prior to 1985, consisting of hand application of adhesive, exhausting to stack 13, capacity: 14.9 pounds of adhesives per hour.
- (d) One (1) final finish area, known as Area 3, constructed prior to 1985, consisting of one (1) automatic silk screener and one (1) manual silk screener, capacity: 25 units per hour
- (e) One (1) final finish area, known as Process 3, constructed in 1994 and modified in 2005, consisting of four (4) hand-spray painting booths equipped with airless spray guns, exhausting to dry filters and a catalytic oxidizer with a heat input capacity of 4.6 million British thermal units per hour, and exiting at stack 1 (Oxidizer #1), capacity: 373.70 pounds of coatings per hour.
- (f) One (1) assembly area, known as Area 1, constructed prior to 1985, consisting of hand application of adhesive and four (4) glue spraying booths equipped with high volume, low pressure spray guns, exhausting to stack 12, capacity: 133 pounds of adhesives per hour.
- (g) One (1) Roll Coater identified as Process 5, constructed in 1998, with a maximum capacity of 106.6 pounds per hour of adhesive usage.

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

Pursuant to 326 IAC 8-1-6 (New facilities; General reduction requirements), these facilities shall use the Best Available Control Technology (BACT). Pursuant to SSM 099-10314-00033, issued on September 14, 1999, and SPM 099-19959-00033, the Best Available Control Technology (BACT) for this source is the use of a catalytic oxidizer on Process 2, Process 3 and Process 4, the use of dip coating at Process 2, the use of airless or high volume, low pressure spray guns or an application with a higher transfer efficiency at all spray applications, and the use of coatings with a maximum VOC content of 6.98 pounds per gallon of coating less water.

The catalytic oxidizer shall operate at all times when Process 2, Process 3 or Process 4 is in operation. When operating, the catalytic oxidizer shall maintain a minimum operating temperature of 550 degrees Fahrenheit or the operating temperature determined in the most recent stack test to maintain at least ninety-five percent (95%) overall control efficiency (capture and destruction) of VOC. In addition, the catalytic oxidizer shall be tested once every two and one half (2.5) years for overall control efficiency using methods approved by the Commissioner.

D.1.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

- (a) Pursuant to SSM 099-10314-00033, issued on September 14, 1999, Process 2, Process 3 and Process 4 will be controlled by the catalytic oxidizer, and the VOC usage and VOC emissions shall be limited such that:

VOC usage at Area 1 + VOC usage at Area 2 + VOC usage at Area 3 + (VOC usage at Processes 2, 3 and 4 * (1 - 0.95)) = VOC emissions

The total VOC usage shall in no case exceed 4,980 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. The VOC emissions, as determined by the equation, shall be limited to less than 249 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This will limit the potential to emit VOC to less than 250 tons per year from Areas 1, 2 and 3, and Processes 2, 3, and 4.

- (b) Pursuant to SSM 099-20282-00033 and SPM 099-19959-00033, the total VOC usage at the two (2) hand-spray paint booths, constructed in 2005, at Process 3, shall in no case exceed 799 tons per twelve (12) consecutive month period, with compliance determined at the end of each month, and the catalytic oxidizer shall be operated at a minimum operating temperature of 550 degrees Fahrenheit or a temperature determined in the most recent stack test to maintain at least ninety-five percent (95%) overall control efficiency (capture and destruction) of VOC at all times when Process 3 is in operation. This will limit the potential to emit VOC from the two (2) hand-spray booths constructed in 2005 to less than 40 tons per year. Therefore, this modification is not a major modification pursuant to 326 IAC 2-2, PSD.
- (c) Pursuant to SSM 099-10314-00033, issued on September 14, 1999, the PM and PM₁₀ emissions shall be limited to 54.3 pounds per hour. This will be achieved by using dry filters at all times when the coating operations at Process 1 and Process 3 are in operation and the control efficiency shall not be less than ninety-eight percent (98.0%). Pursuant to 326 IAC 2-2, the PM and PM₁₀ emissions shall be less than 250 tons per year.
- (d) Pursuant to SSM 099-20282-00033 and SPM 099-19959-00033, the control efficiency of the dry filters controlling PM and PM₁₀ emissions from the two (2) hand-spray paint booths, constructed in 2005, at Process 3, shall be limited to 3.42 pounds per hour. This shall limit the potential to emit PM and PM₁₀ to less than 15 tons per year. Therefore, pursuant to 326 IAC 2-2, this modification is not a major modification to an existing major source.

Compliance with these limits makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

D.1.3 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating processes, Process 3 and Area 1, 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.

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Organic Solvent Degreasing Operations: Cold Cleaner Operation) and SSM 099-10314-00033, issued on September 14, 1999, the owner or operator of the cold cleaning facility 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 operating 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.1.5 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [40 CFR Part 63, Subpart P, Table 2] [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 40 CFR Part 63, Subpart P, Table 2. 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.

D.1.6 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products [40 CFR Part 63, Subpart P] [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 P (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.
- (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.
- (c) The following emissions units comprise the affected source that is subject to 40 CFR 63, Subpart P:
 - (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 is defined in the CAA, in 40 CFR Part 63, Section 63.2,

and in 40 CFR 63.4581, and is applicable to the affected source.

D.1.7 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.1.8 Testing Requirements [326 IAC 2-7-6(1),(6)]

During the period between 30 and 36 months after issuance of SSM 099-10314-00033, issued on September 14, 1999, the Permittee shall perform testing on the catalytic oxidizer to determine the overall VOC control efficiency (capture and destruction). Testing of the catalytic oxidizer shall be repeated at least once every two and one half (2.5) years for overall control efficiency using methods approved by the Commissioner. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facilities are in compliance.

D.1.9 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.1.10 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

D.1.11 Parametric Monitoring

- (a) Continuous records of the catalytic oxidizer internal combustion zone temperature shall be kept using a chart recorder when Process 2, 3, or 4 is in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, when operating, the catalytic oxidizer shall maintain a minimum operating temperature of 550 degrees Fahrenheit or the operating temperature determined in the most recent stack test to maintain at least ninety-five percent (95%) overall control efficiency (capture and destruction) of VOC. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the temperature reading is below 550 degrees Fahrenheit or the operating temperature determined in the most recent stack test.

The instrument used for determining the temperature shall comply with Section C - Temperature Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

- (b) The Permittee shall determine the appropriate duct pressure or fan amperage from the most recent valid stack test that demonstrates compliance with the minimum control efficiency in Condition D.1.1, as approved by IDEM. The duct pressure or fan amperage shall be observed at least once per day when the catalytic oxidizer is in operation. On and after the date the approved stack test results are available, the duct pressure or fan amperage shall be maintained within the normal range as established in most recent compliant stack test.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

D.1.12 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Condition D.1.2.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Conditions D.1.2, D.1.3, and D.1.11 the Permittee shall maintain a log of daily inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) To document compliance with Conditions D.1.1 and D.1.12, the Permittee shall maintain continuous records of the internal combustion zone temperature of the catalytic oxidizer or indicate that Processes 2, 3, and 4 are not in operation at that time.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.13 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.2(a) and (b) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

D.1.14 Notification Requirements [40 CFR 63.4510]

- (a) **General.** The Permittee must submit the notifications in 40 CFR 40 CFR 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply to the affected source by the dates

specified in those sections, except as provided in 40 CFR 63.4510, paragraphs (b) and (c).

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

D.1.15 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]

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

- (a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Part 70 permit the applicable requirements of 40 CFR 63, Subpart PPPP, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.
- (b) The significant permit modification application shall be submitted no later than July 19, 2006.
- (c) The significant permit modification application shall be submitted to:

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

SECTION D.2

FACILITY OPERATION CONDITIONS

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

- (m) Two (2) natural gas fired hot water boilers, capacity: 0.28 million British thermal unit per hour, each.

(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 Particulate Matter Limitation (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4(a), for Q less than 10 million British thermal units per hour, Pt shall not exceed 0.6. Therefore, the PM emissions from the two (2) natural gas fired hot water boilers, with a heat input capacity of 0.28 million British thermal units per hour, each, shall be limited to 0.6 pounds per million British thermal unit. This limitation is based upon the following equation:

$$Pt = 1.09/Q^{0.26}$$

where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu) heat input

Q = Total source maximum operating capacity rating in million British thermal units per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

Compliance Determination Requirements

D.2.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

SECTION D.3

FACILITY OPERATION CONDITIONS

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

- (h) One(1) Roll Coater identified as Process 5, with a maximum capacity of 106.6 pounds per hour of adhesive usage.

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

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

D.3.1 Volatile Organic Compounds (VOC) Limit [326 IAC 8-1-6]

- (a) The roll coater identified as Process 5 shall use less than a total of twenty-five (25) tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period, rolled monthly. This usage limit is required to limit the potential to emit of VOC to less than twenty-five (25) tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 8-1-6 (New facilities: general reduction requirement) not applicable.
- (b) Any change or modification which may increase actual VOC usage to twenty-five (25) tons per year or more from the roll coater, will make the facilities subject to 326 IAC 8-1-6.

D.3.2 HAPs Limitations [326 IAC 2-4.1-1] [326 IAC 2-8]

- (a) The worst case single HAP delivered to the roll coater, shall be less than ten (10) tons per twelve (12) consecutive month period, rolled monthly. Therefore, the requirements of 326 IAC 2-4.1-1 do not apply.
- (b) The combination of HAPs delivered to the roll coater, shall be less than a total of twenty-five (25) tons per twelve (12) consecutive month period, rolled monthly. Therefore, the requirements of 326 IAC 2-4.1-1 do not apply.

D.3.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.3.4 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs)

Compliance with the VOC and HAPs usage limitations contained in Conditions D.3.1 and D.3.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.3.5 VOC and HAPs Emissions

Compliance with Conditions D.3.1 and D.3.2 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compounds, worst case single HAP and combination of HAPs usage for the most recent month and twelve (12) month period.

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

D.3.6 Record Keeping Requirements

- (a) To document compliance with Conditions D.3.1 and D.3.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAPs usage as well as the VOC and HAPs emission limits established in Conditions D.3.1 and D.3.2.
- (1) The amount of VOC and HAPs of each material used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.7 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.3.1 and D.3.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

Part 70 Quarterly Report

Source Name: Bremen Corporation
Source Address: 405 North Industrial Drive, Bremen, Indiana 46506
Mailing Address: 405 North Industrial Drive, Bremen, Indiana 46506
Part 70 Permit No.: 099-7476-00033
Facility: Process 5
Parameter: VOC emissions
Limit: Less than 25 tons per year, based on a twelve (12) month rolling total.

YEAR: _____

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

- No deviation occurred in this month.
- Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

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

Part 70 Quarterly Report

Source Name: Bremen Corporation
Source Address: 405 North Industrial Drive, Bremen, Indiana 46506
Mailing Address: 405 North Industrial Drive, Bremen, Indiana 46506
Part 70 Permit No.: 099-7476-00033
Facility: Process 5
Parameter: HAP (MEK) emissions
Limit: Less than 10 tons per year, based on a twelve (12) month rolling total.

YEAR: _____

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

- No deviation occurred in this month.
- Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

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

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Bremen Corporation
Source Address: 405 North Industrial Drive, Bremen, Indiana 46506
Mailing Address: 405 North Industrial Drive, Bremen, Indiana 46506
Part 70 Permit No.: 099-7476-00033

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) _____
- 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:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
100 North Senate Avenue
Indianapolis, Indiana 46204
Phone: 317-233-5674
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: Bremen Corporation
Source Address: 405 North Industrial Drive, Bremen, Indiana 46506
Mailing Address: 405 North Industrial Drive, Bremen, Indiana 46506
Part 70 Permit No.: 099-7476-00033

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2

- 9** 1. This is an emergency as defined in 326 IAC 2-7-1(12)
- C The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
 - C The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
- 9** 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(C)
- C The Permittee must submit notice in writing within ten (10) calendar days

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/Deviation:

Describe the cause of the Emergency/Deviation:

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

Page 2 of 2

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
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: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
Part 70 Quarterly Report**

Source Name: Bremen Corporation
Source Address: 405 North Industrial Drive, Bremen, Indiana 46506
Mailing Address: 405 North Industrial Drive, Bremen, Indiana 46506
Part 70 Permit No.: 099-7476-00033
Facility: Two (2) hand-spray paint booths, constructed in 2005, at Process 3
Parameter: VOC input
Limit: 799 tons per twelve (12) consecutive month period, with compliance determined at the end of each month

YEAR: _____

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

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
Part 70 Quarterly Report**

Source Name: Bremen Corporation
Source Address: 405 North Industrial Drive, Bremen, Indiana 46506
Mailing Address: 405 North Industrial Drive, Bremen, Indiana 46506
Part 70 Permit No.: 099-7476-00033
Facility: Processes 2, 3 and 4 and Areas 1, 2 and 3
Parameter: VOC emissions
Limit: Less than 249 tons per year, based on a twelve (12) month rolling total, according to the following equation:

$$\text{VOC usage at Area 1} + \text{VOC usage at Area 2} + \text{VOC usage at Area 3} + \text{VOC usage at Processes 2, 3 and 4} * (1 - (\text{capture efficiency of catalytic oxidizer} * \text{control efficiency of catalytic oxidizer})) = \text{VOC emissions}$$

YEAR: _____

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

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Bremen Corporation
Source Address: 405 North Industrial Drive, Bremen, Indiana 46506
Mailing Address: 405 North Industrial Drive, Bremen, Indiana 46506
Part 70 Permit No.: 099-7476-00033
Facility: Processes 2, 3 and 4 and Areas 1, 2 and 3
Parameter: VOC usage
Limit: 4,980 tons per year, based on a twelve (12) consecutive month rolling total

YEAR: _____

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

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

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

Source Name: Bremen Corporation
Source Address: 405 North Industrial Drive, Bremen, Indiana 46506
Mailing Address: 405 North Industrial Drive, Bremen, Indiana 46506
Part 70 Permit No.: 099-7476-00033

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of each Deviation

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

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

Source Background and Description

Source Name:	Bremen Corporation
Source Location:	405 North Industrial Drive, Bremen, Indiana 46506
County:	Marshall
SIC Code:	3069
Operation Permit No.:	T 099-7476-00033
Operation Permit Issuance Date:	December 9, 1999
Significant Source Modification No.:	099-20282-00033
Significant Permit Modification No.:	099-19959-00033
Permit Reviewer:	CarrieAnn Paukowits

The Office of Air Quality (OAQ) has reviewed a modification application from Bremen Corporation relating to the construction and operation of the following emission units and pollution control devices:

The applicant has moved the existing equipment at 510 2nd Street, Bremen, Indiana, back to the 405 North Industrial Drive facility, which has been repaired following the fire. Process 1 has been removed from the source entirely. Processes 2, 3 and 4 are again equipped with the existing catalytic oxidizer (Oxidizer #1), which was previously determined to be the Best Available Control Technology (BACT) for those facilities. The oxidizer was not damaged in the fire, but the duct work inside the building was damaged and has been replaced. The applicant is also proposing to add two (2) hand-spray booths to Process 3 and increase the capacity of that facility, as follows:

One (1) final finish area, known as Process 3, **constructed in 1994 and modified in 2005**, consisting of ~~two (2)~~ **four (4)** hand-spray painting booths equipped with airless spray guns, exhausting to dry filters and a catalytic oxidizer with a heat input capacity of 4.6 million British thermal units per hour, and exiting at stack ~~1 32~~-(Oxidizer #1), capacity: ~~357~~ **373.70** pounds of ~~paint and topcoat~~ **coatings** per hour.

The following changes have also been made to the permit:

- (a) The phone number and OAQ section name have been revised in Condition B.25, Annual Fee Payment.
- (b) The IDEM, OAQ, mailing address has been updated in all places in the permit.
- (c) Indiana was required to incorporate credible evidence provisions into state rules consistent with the SIP call published by U.S. EPA in 1997 (62 FR 8314). Indiana has incorporated the credible evidence provision in 326 IAC 1-1-6. This rule is effective March 16, 2005. A Credible Evidence Condition has been added as Condition B.27 of the permit.
- (d) The source became a major source as a result of Minor Source Modification 099-12268-00003 and Minor Permit Modification 099-12291-00003, issued on July 12, 2000, and August 1, 2000, respectively. That modification was for the addition of Process 5 and limited the potential to emit Volatile Organic Compounds (VOC) from Process 5 to less than 25 tons per year. Therefore, the total source potential to emit VOC became 274.9 tons per year, which is greater than 250 tons per year. Section A.1 was not modified in that modification, but should have been modified. Therefore, Section A.1 is modified in this modification, and the proposed modification has been reviewed as a modification to an existing major source

pursuant to 326 IAC 2-2, Prevention of Significant Deterioration (PSD).

History

On October 18, 2004, Bremen Corporation submitted an application to the OAQ requesting that the permit be modified to show that the equipment from the 510 2nd Street plant has been relocated back to the 405 North Industrial Drive plant and requesting to add two (2) hand-spray painting booths to Process 3. Bremen Corporation was issued a Part 70 permit on December 9, 1999. A significant permit modification (099-12119-00033) was issued on July 18, 2000, a first minor permit modification (099-12291-00033) was issued on August 1, 2000, a reopening (099-13409-00033) was issued on November 13, 2001, and administrative amendments (099-15681-00033 and 099-18923-00033) were issued on April 1, 2002, and April 16, 2004, respectively.

Administrative Amendment 099-18923-00033 granted permission to relocate some facilities from the 405 North Industrial Drive plant to a new 510 2nd Street plant due to a fire at the source. During that review, the two (2) locations were determined to be the same source. A Variance for 326 IAC 2-2 (Prevention of Significant Deterioration) and 326 IAC 8-1-6 (New facilities; General reduction requirements) was issued to the source on April 16, 2004, so that they could operate at the new, temporary location. Now that the facilities have been relocated back to 405 North Industrial Drive, the source will comply with the requirements of those rules, as applicable prior to the fire. All facilities will be removed from the 510 2nd Street plant.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (EF)
S1	Oxidizer 1	25.0	3.5	20,000	130

Recommendation

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

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

An application for the purposes of this review was received on October 18, 2004. Additional information was received on July 11, August 19, and October 11, 2005.

Emission Calculations

See pages 1 and 2 of Appendix A of this document for detailed emissions calculations.

Potential To Emit of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment

and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA.

The potential to emit from the facilities that had been moved to 510 2nd Street and are now being moved back into 405 North Industrial Drive are not evaluated as part of this modification since they are being moved within the same source. This table reflects the PTE before controls for the two (2) proposed hand-spray booths at Process 3. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	17.0
PM ₁₀	17.0
SO ₂	0.00
VOC	66.8
CO	0.00
NO _x	0.00

HAPs	Potential To Emit (tons/year)
Hexane	5.95
Toluene	14.0
Xylenes	5.38
MEK	6.99
Ethyl benzene	1.61
TOTAL	28.0

Justification for Modification

The Part 70 Operating permit is being modified through a Part 70 Significant Source Modification and a Significant Permit Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5(f)(4) and (6), which applies to any modification with a potential to emit greater than or equal to twenty-five (25) tons per year of VOC, and any modification with a potential to emit greater than or equal to ten (10) tons per year of a single hazardous air pollutant (HAP) as defined under Section 112(b) of the CAA or twenty-five (25) tons per year of any combination of HAPs. The permit is being modified with a Significant Permit Modification pursuant to 326 IAC 2-7-12.

County Attainment Status

The source is located in Marshall County.

Pollutant	Status
PM _{2.5}	attainment
PM ₁₀	attainment

Pollutant	Status
SO ₂	attainment
NO ₂	attainment
1-Hour Ozone	attainment
8-Hour Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) 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 emissions and NO_x are considered when evaluating the rule applicability relating to ozone. Marshall County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NO_x were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Marshall County has been classified as unclassifiable or attainment for PM_{2.5}. U.S. EPA has not yet established the requirements for PSD, 326 IAC 2-2 for PM_{2.5} emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM_{2.5} emissions, it has directed states to regulate PM₁₀ emissions as a surrogate for PM_{2.5} emissions.
- (c) Marshall County has been classified as attainment or unclassifiable in Indiana for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for PSD, 326 IAC 2-2.
- (d) Fugitive Emissions
 Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards (NSPS) that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

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

Pollutant	Emissions (tons/year)
PM	Less than 250
PM ₁₀	Less than 250
SO ₂	0.056
VOC	274.9
CO	8.02
NO _x	9.55
Single HAP	Greater than 10

Total HAPs	Greater than 25
------------	-----------------

- (a) This existing source is a major stationary source because an attainment regulated pollutant is emitted at a rate of 250 tons per year or more.
- (b) These emissions are based upon the limitations in the Part 70 Operating Permit. Although Process 1 has been removed, the potential to emit based on the limitations in the permit has not changed.

Potential to Emit of Modification After Issuance

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

Process/facility	Potential to Emit (tons/year)						
	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
Proposed Modification	< 15	< 15	0.00	< 40	0.00	0.00	14.0 individual; 28.0 total
PSD Threshold Level	25	15	40	40	100	40	-

- (a) This modification to an existing major stationary source is not major because the emission increase is less than the PSD threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.
- (b) The potential to emit is limited as indicated under 326 IAC 2-2, in the “State Rule Applicability” section of this document.

Federal Rule Applicability

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

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

- (b) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.
- (c) The plastic parts surface coating operations are subject to the National Emission Standards

for Hazardous Air Pollutants (NESHAP) for Surface Coating of Plastic Parts and Products, 40 CFR 63, Subpart PPPP. This source is considered an existing affected source pursuant to 40 CFR 63.4482.

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

This rule has a future compliance date; therefore, the specific details of the rule and how the Permittee will demonstrate compliance are not provided in this modification. The Permittee shall submit an application for a significant permit modification that will specify the option or options for the emission limitations, standards, and methods for determining compliance chosen by the Permittee. This application must be submitted by July 19, 2006, which is nine months prior to the compliance date for 40 CFR 63, Subpart PPPP. At that time, IDEM, OAQ will include the specific details of the rule and how the Permittee will demonstrate compliance. In addition, pursuant to 40 CFR 63, Subpart PPPP, the Permittee shall submit a Notification of Compliance Status containing the information 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.

State Rule Applicability - Individual Facilities

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

The potential to emit VOC is greater than 250 tons per year from the entire source. Therefore, this source is a major source pursuant to 326 IAC 2-2, PSD. In order for this modification to be a minor modification to an existing major source, the potential to emit VOC is limited as follows:

- (a) The total VOC usage shall in no case exceed 799 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Pursuant to Condition D.1.1 of the permit, the Permittee is required to operate the catalytic oxidizer and maintain a minimum operating temperature of 550 degrees Fahrenheit, or the operating temperature determined in the most recent stack test, to maintain at least ninety-five percent (95%) overall control efficiency (capture and destruction) of VOC at all times when Process 3 is in operation. Therefore, the potential to emit VOC from the two (2) proposed hand-spray booths will be limited to less than 40 tons per year, and this modification is not a major modification pursuant to 326 IAC 2-2, PSD ($799 \text{ tons} \times (1-0.95) < 40 \text{ tons}$).
- (b) The potential to emit PM and PM₁₀ from the two (2) proposed hand-spray booths shall be limited to 3.42 pounds per hour. This will limit the potential to emit PM and PM₁₀ to less than 15 tons per year. Operation of the dry filters at all times when the two (2) proposed hand-spray booths are in operation will limit the potential to emit PM and PM₁₀ to no more than 3.42 pounds per hour.

326 IAC 2-4.1-1 (New Source Toxics Control)

The two (2) proposed spray booths at Process 3 are a modification to an existing major source of HAPs, which was constructed prior to July 27, 1997. Therefore, the requirements of 326 IAC 2-4.1-1 are not applicable.

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

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 of the previous

version of 326 IAC 6-3-2 are no longer applicable to this source.

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate from the surface coating processes at Process 3 and Area 1 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.
- (b) All other coating operations do not have particulate emissions. Therefore, pursuant to 326 IAC 6-3-1(b)(14), the requirements of 326 IAC 6-3-2 do not apply to those operations.

326 IAC 8-1-6 (New facilities; General reduction requirements)

The two (2) proposed hand-spray booths at Process 3 have potential VOC emissions greater than twenty-five (25) tons per year. Therefore, the proposed facilities are subject to the requirements of 326 IAC 8-1-6. The applicant has provided a Best Available Control Technology (BACT) analysis for the proposed facilities. Control technologies considered are the following:

- (a) Carbon Adsorbers - Carbon adsorption is used to remove VOCs from low to medium concentration gas streams when a stringent outlet concentration must be met or when recovery of VOC is desired. It is particularly useful when the pollutant gas is non-combustible, and difficult to control by other means. The VOCs generated by the coating operations at this source are easily burned and the volatiles cannot be reused even if recovered. Therefore, carbon adsorption is not the best option for these facilities.
- (b) Catalytic thermal incineration (oxidizer) - Catalytic incinerators employ a bed of active material (catalyst) that facilitates the overall combustion reaction. The catalyst increases the reaction rate, enabling conversion at lower reaction temperatures than in thermal incinerators. Catalytic oxidizers are used with coating operations. Therefore, it is considered technically feasible for these facilities.
- (c) Gas absorbers - Absorption is a process where one or more soluble components of a gas mixture are dissolved in a liquid in a wet scrubber, packed tower or bubble tower. The scrubber liquid is specific to the gas being removed and a variety of VOCs are generated by the coating operations at this source. Therefore, this is not a technically feasible option for these facilities.
- (d) Refrigeration systems - Condensation is a separation technique in which one or more volatile components of a vapor are separated from the mixture through saturation and phase change. This is not a technically feasible option for coating operations.
- (e) Regenerative thermal incineration (oxidizer) - Thermal incineration involves burning of the organic materials present in the gas stream using high temperature combustion. The pollutant gas stream is heated by an air-to-air heat exchanger. The burner then further heats the preheated stream to the incineration temperature to combust the VOCs. The resulting hot exhaust gas passes back through the air-to-air heat exchanger to preheat the incoming pollutant air stream. If high concentrations of VOC are present, the process may require dilution air to eliminate the explosion hazard. Varying concentrations also cause wide fluctuations in the combustion chamber temperature. Therefore, a recuperative thermal oxidizer is not technically feasible for these facilities.
- (f) Recuperative thermal incineration (oxidizer) - Recuperative thermal oxidizers are like regenerative thermal oxidizers, except they preheat the air stream using heat recovery chambers filled with irregularly shaped ceramic material used as a heat transfer medium rather than an air-to-air heat exchanger. Deposition of the particulate on the surface of the ceramic material decreases the surface area for reaction. However, this type of control has

been used at other surface coating source. Therefore, it is considered technically feasible for these facilities.

The applicant also reviewed previous BACT determinations for surface coating sources. They are as follows:

- (a) General Motors, RBLC ID MI-0266, for automobile surface coating
 - (1) Top coats, base color and clear coats - Limit VOC emissions to 5.2 pounds per gallon, use a carbon concentrator and thermal oxidizer with an estimated efficiency of 53%.
 - (2) Sealers and adhesives - VOC emission limits of 0.3 pound per gallon and 22.2 tons per year.
- (b) Bremen Corporation existing source - Catalytic Oxidizer with a ninety-five percent (95%) overall control efficiency on Processes 1, 2, 3 and 4, dip coating on Process 2, HVLP spray guns or spray guns with a higher transfer efficiency, VOC content no more than 6.98 lbs/gallon of coating less water for all coatings.
- (c) Steel Case Wood Furniture, RBLC ID MI-0286, for wood furniture surface coating

Surface coating, tiecoat and sealers - VOC limit of 5.9 pounds per gallon, high transfer application on flat lines, application by automatic electrostatic and manual HVLP on hangline, RTO with an 80% or 85% capture efficiency and a ninety-five percent (95%) destruction efficiency.
- (d) Homanit USA, Inc., RBLC ID NC-0098, for thin high density fiberboard manufacturing

140 tons of VOC per year
- (e) Winnebago Industries, Inc., RBLC ID IA-0078 (draft), for aluminum coating

Two (2) paint booths and two (2) bake ovens - 55.0 tons of VOC per year, add-on control not considered cost-effective.
- (f) Country Coach, Inc., RBLC ID OR-0045 (draft), for Motor coach coating
 - (1) Automobile and truck coating - VOC limit of 6.50 pounds per gallon of coating, transfer efficiency limit (not stated), operator training, and closed container requirements.
 - (2) Cabinet finishing - No emission rate limits.
 - (3) Metal parts coating - 2.10 pounds per gallon of coating, as applied, transfer efficiency (not stated), operating training, and closed container requirements.

The best available control technologies reviewed are all for surface coating operations. However, only the BACT for Bremen Corporation is for polymeric foam coating. Of the sources listed above with control devices, the catalytic oxidizer at Bremen Corporation is the most efficient. Therefore, the applicant has proposed that BACT for the facilities at 510 2nd Street be the same as BACT for the processes at 405 North Industrial Drive. Therefore, BACT for the two (2) proposed hand-spray booths is as follows:

- (a) The use of a catalytic oxidizer on Process 3 at all times. When operating, the catalytic

oxidizer shall maintain a minimum operating temperature of 550 degrees Fahrenheit, or the operating temperature determined in the most recent stack test to maintain at least ninety-five percent (95%) overall control efficiency (capture and destruction) of VOC. In addition, the catalytic oxidizer shall be tested once every two and one half (2.5) years for overall control efficiency using methods approved by the Commissioner.

- (b) The use of airless or high volume, low pressure spray guns or an application with a higher transfer efficiency.
- (c) The use of coatings with a maximum VOC content of 6.98 pounds per gallon of coating less water.

Since the applicant agreed to install a catalytic oxidizer, no cost analysis was required. The proposed process is most similar to the existing Bremen Corporation processes.

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 the two (2) proposed hand-spray booths at Process 3, with emissions controlled by dry filters and a catalytic oxidizer (Oxidizer #1), are:

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Continuous records of the catalytic oxidizer internal combustion zone temperature shall be kept using a chart recorder when Process 3 is in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, when operating, the catalytic oxidizer shall maintain a minimum operating temperature of 550 degrees Fahrenheit, or the operating temperature determined in the most recent stack test to maintain at least ninety-five percent (95%) overall control efficiency (capture and destruction) of VOC. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the temperature reading is below 550 degrees Fahrenheit or the operating temperature determined in the most recent stack test.

- (c) The Permittee shall determine the appropriate duct pressure or fan amperage from the most recent valid stack test that demonstrates compliance with the limits in the permit, as approved by IDEM. The duct pressure or fan amperage shall be observed at least once per day when the catalytic oxidizer is in operation. On and after the date the approved stack test results are available, the duct pressure or fan amperage shall be maintained within the normal range as established in most recent compliant stack test.
- (d) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the dry filters and the catalytic oxidizer for Process 3 must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes), 326 IAC 8-1-6 (New facilities; General reduction requirements) and 326 IAC 2-7 (Part 70), and to make the requirements of 326 IAC 2-2 (PSD) not applicable.

Testing Requirements

Pursuant to T 099-7476-00033, issued on December 9, 1999, testing of the catalytic oxidizer shall be repeated at least once every two and one half (2.5) years for overall control efficiency using methods approved by the Commissioner.

Proposed Changes

The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language appears in bold):

Changes to IDEM, OAQ, address:

The IDEM, OAQ, address has been updated in all places in the permit as follows:

100 North Senate Avenue, ~~P.O. Box 6015~~
Indianapolis, Indiana ~~46206-6015~~ **46204**

The conditions for which the only change is the IDEM, OAQ, address update are not included in the source modification. However, those conditions are included in the permit modification.

Changes to Section A:

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

The Permittee owns and operates a stationary vinyl-coated foam product manufacturing source.

Responsible Official: ~~Ken Lutian~~ **Vice President - General Manager**
Source Address: 405 North Industrial Drive, Bremen, Indiana 46506
Mailing Address: 405 North Industrial Drive, Bremen, Indiana 46506
Phone Number: 219-546-4238
SIC Code: 3069
County Location: Marshall
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
~~Minor~~ **Major** Source, under PSD Rules;
Major Source, Section 112 of the Clean Air Act

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

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

~~New Location - 510 2nd Street, Bremen, Indiana:~~

- ~~(a)~~ One (1) spray room, known as Process 1a, consisting of two (2) manual spray booths equipped with high volume, low pressure and airless spray guns, with particulate overspray emissions controlled by dry filters, with a maximum capacity of 12 units per hour.
- ~~(b)~~**(a)** One (1) dip room, known as Process 2, consisting of four (4) dip tanks and one (1) cleaning station, **constructed prior to 1985, exhausting to a catalytic oxidizer with a heat input capacity of 4.6 million British thermal units per hour, and exiting at stack 1 (Oxidizer #1)**, capacity: 3,162 pounds of paint, topcoat, and cleaning blend per hour.
- ~~(c)~~**(b)** One (1) mixing process, known as Process 4, **constructed prior to 1985, exhausting to a catalytic oxidizer with a heat input capacity of 4.6 million British thermal units per hour, and exiting at stack 1 (Oxidizer #1)**, capacity: 12,671 pounds of coatings mixed per hour.
- ~~(d)~~**(c)** One (1) assembly area, known as Area 2, **constructed prior to 1985**, consisting of hand application of adhesive, exhausting to stack 13, capacity: 14.9 pounds of adhesives per hour.
- ~~(e)~~**(d)** One (1) final finish area, known as Area 3, **constructed prior to 1985**, consisting of one (1) automatic silk screener and one (1) manual silk screener, capacity: 25 units per hour

~~Existing Location - 405 North Industrial Drive, Bremen, Indiana:~~

- ~~(a)~~ Three (3) automatic spray booths equipped with high volume, low pressure and airless spray guns, exhausting to dry filters and a catalytic oxidizer with a heat input capacity of 4.6 million British thermal units per hour, and exiting at stack 32, capacity: 9,153 pounds of paint and topcoat per hour.
- ~~(b)~~**(e)** One (1) final finish area, known as Process 3, **constructed in 1994 and modified in 2005**, consisting of ~~two (2)~~ **four (4)** hand-spray painting booths equipped with airless spray guns, exhausting to dry filters and a catalytic oxidizer with a heat input capacity of 4.6 million British thermal units per hour, and exiting at stack 1 ~~32~~ (Oxidizer #1), capacity: ~~357~~ **373.70** pounds of paint and topcoat **coatings** per hour.

- (e)(f) One (1) assembly area, known as Area 1, **constructed prior to 1985**, consisting of hand application of adhesive and four (4) glue spraying booths equipped with high volume, low pressure spray guns, exhausting to stack 12, capacity: 133 pounds of adhesives per hour.
- (d)(g) One (1) Roll Coater identified as Process 5, **constructed in 1998**, with a maximum capacity of 106.6 pounds per hour of adhesive usage.

Changes to Section B:

B.25 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. 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 317-233-0425 **4230** (ask for ~~OAQ, Technical Support and Modeling~~ **OAQ, Billing, Licensing, and Training** Section), to determine the appropriate permit fee.

B.27 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.

Changes to Section C:

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

~~Pursuant to 326 IAC 6-3-2(e), the allowable particulate matter 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.~~ 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 one hundred (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.

Changes to Section D:

SECTION D.1 FACILITY OPERATION CONDITIONS

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

New Location - 510 2nd Street, Bremen, Indiana:

- (a) ~~One (1) spray room, known as Process 1a, consisting of two (2) manual spray booths equipped with high volume, low pressure and airless spray guns, with particulate overspray emissions controlled by dry filters, with a maximum capacity of 12 units per hour.~~

- ~~(b)~~(a) One (1) dip room, known as Process 2, consisting of four (4) dip tanks and one (1) cleaning station, **constructed prior to 1985, exhausting to a catalytic oxidizer with a heat input capacity of 4.6 million British thermal units per hour, and exiting at stack 1 (Oxidizer #1)**, capacity: 3,162 pounds of paint, topcoat, and cleaning blend per hour.
- ~~(e)~~(b) One (1) mixing process, known as Process 4, **constructed prior to 1985, exhausting to a catalytic oxidizer with a heat input capacity of 4.6 million British thermal units per hour, and exiting at stack 1 (Oxidizer #1)**, capacity: 12,671 pounds of coatings mixed per hour.
- ~~(d)~~(c) One (1) assembly area, known as Area 2, **constructed prior to 1985**, consisting of hand application of adhesive, exhausting to stack 13, capacity: 14.9 pounds of adhesives per hour.
- ~~(e)~~(d) One (1) final finish area, known as Area 3, **constructed prior to 1985**, consisting of one (1) automatic silk screener and one (1) manual silk screener, capacity: 25 units per hour

Existing Location -405 North Industrial Drive, Bremen, Indiana:

- ~~(a)~~ Three (3) automatic spray booths equipped with high volume, low pressure and airless spray guns, exhausting to dry filters and a catalytic oxidizer with a heat input capacity of 4.6 million British thermal units per hour, and exiting at stack 32, capacity: 9,153 pounds of paint and topcoat per hour.
- ~~(b)~~(e) One (1) final finish area, known as Process 3, **constructed in 1994 and modified in 2005**, consisting of ~~two (2)~~ **four (4)** hand-spray painting booths equipped with airless spray guns, exhausting to dry filters and a catalytic oxidizer with a heat input capacity of 4.6 million British thermal units per hour, and exiting at stack 1 ~~32~~(Oxidizer #1), capacity: ~~357~~ **373.70** pounds of ~~paint and topcoat~~ **coatings** per hour.
- ~~(e)~~(f) One (1) assembly area, known as Area 1, **constructed prior to 1985**, consisting of hand application of adhesive and four (4) glue spraying booths equipped with high volume, low pressure spray guns, exhausting to stack 12, capacity: 133 pounds of adhesives per hour.
- ~~(d)~~(g) One (1) Roll Coater identified as Process 5, **constructed in 1998**, with a maximum capacity of 106.6 pounds per hour of adhesive usage.

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

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 (New facilities; General reduction requirements), these facilities shall use the Best Available Control Technology (BACT). Pursuant to SSM 099-10314-00033, issued on September 40 14, 1999, **and SPM 099-19959-00033**, the Best Available Control Technology (BACT) for this source is the use of a catalytic oxidizer on ~~Process 1~~, Process 2, Process 3 and Process 4, the use of dip coating at Process 2, the use of airless or high volume, low pressure spray guns or an application with a higher transfer efficiency at all spray applications, and the use of coatings with a maximum VOC content of 6.98 pounds per gallon of coating less water.

The catalytic oxidizer shall operate at all times when ~~Process 1~~, Process 2, Process 3 ~~and~~ **or** Process 4 ~~are~~ **is** in operation. When operating, the catalytic ~~incinerator~~ **oxidizer** shall maintain a minimum operating temperature of 550 degrees Fahrenheit or ~~a~~ **the operating** temperature determined in the most recent stack test to maintain at least ninety-five percent (95%) overall control efficiency (capture and destruction) of VOC. In addition, the catalytic oxidizer shall be tested once every two and one

half (2.5) years for **overall control** efficiency using methods approved by the Commissioner.

D.1.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

- (a) Pursuant to SSM 099-10314-00033, issued on September 14, 1999, ~~since only Process 1, Process 2, Process 3 and Process 4 will be controlled by the catalytic oxidizer, and the VOC usage and VOC emissions shall be limited such that:~~

VOC usage at Area 1 + VOC usage at Area 2 + VOC usage at Area 3 + (VOC usage at Processes 1, 2, 3 and 4 * (1 - 0.95)) = VOC emissions

The total VOC usage shall in no case exceed 4,980 tons per year, ~~based on a twelve (12) consecutive month period, with compliance determined at the end of each month rolling total.~~ The VOC emissions, as determined by the equation, shall be limited to less than 249 tons per year, ~~based on a twelve (12) consecutive month period, with compliance determined at the end of each month rolling total.~~ This will limit the **potential to emit VOC emissions from the entire source to less than 250 tons per year from Areas 1, 2 and 3, and Processes 2, 3, and 4.**

- (b) Pursuant to SSM 099-20282-00033 and SPM 099-19959-00033, the total VOC usage at the two (2) hand-spray paint booths, constructed in 2005, at Process 3, shall in no case exceed 799 tons per twelve (12) consecutive month period, with compliance determined at the end of each month, and the catalytic oxidizer shall be operated at a minimum operating temperature of 550 degrees Fahrenheit or a temperature determined in the most recent stack test to maintain at least ninety-five percent (95%) overall control efficiency (capture and destruction) of VOC at all times when Process 3 is in operation. This will limit the potential to emit VOC from the two (2) hand-spray booths constructed in 2005 to less than 40 tons per year. Therefore, this modification is not a major modification pursuant to 326 IAC 2-2, PSD.

- ~~(c)~~(c) Pursuant to SSM 099-10314-00033, issued on September 14, 1999, the PM and PM₁₀ emissions shall be limited to 54.3 pounds per hour. This will be achieved by using dry filters at all times when the coating operations at Process 1 and Process 3 are in operation and the control efficiency shall not be less than ninety-eight percent (98.0%). Pursuant to 326 IAC 2-2, the PM and PM₁₀ emissions shall be less than 250 tons per year.

- (d) Pursuant to SSM 099-20282-00033 and SPM 099-19959-00033, the control efficiency of the dry filters controlling PM and PM₁₀ emissions from the two (2) hand-spray paint booths, constructed in 2005, at Process 3, shall be limited to 3.42 pounds per hour. This shall limit the potential to emit PM and PM₁₀ to less than 15 tons per year. Therefore, pursuant to 326 IAC 2-2, this modification is not a major modification to an existing major source.

- ~~(e)~~ Operation Condition 5 from CP 099-4592-00033, issued on November 2, 1995, which requires that the total amount of volatile organic compounds delivered to the applicator, including cleanup solvents, shall not exceed 249 tons per year calculated on a 52-week rolling average and during the first 52 weeks of operation, commencing on November 11, 1994, VOC usage shall be limited such that, total VOC used divided by weeks of operation shall not exceed 9,577 pounds per week is not applicable because, with the addition of the catalytic oxidizer, the VOC usage may be greater than 249 tons per year without VOC emissions exceeding 249 tons per year. This requirement was replaced in SSM 099-10314-00033, issued on September 10, 1999, with (a) of this condition.

Compliance with these limits makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2(e) (d)]

~~Pursuant to CP 099-4592-00033, issued on November 2, 1995, and SSM 099-10314-00033, issued on September 10, 1999, the particulate matter (PM) from the coating operations shall not exceed the pound per hour emission rate established as E in the following formula:~~

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

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

Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating processes, Process 3 and Area 1, 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.

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

~~Pursuant to 326 IAC 8-3-2 (Organic Solvent Degreasing Operations: Cold Cleaner Operation) and SSM 099-10314-00033, issued on September 10-14, 1999, the owner or operator of the cold cleaning facility 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 operating 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.1.5 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [40 CFR Part 63, Subpart P, Table 2] [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 40 CFR Part 63, Subpart P, Table 2. 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.

D.1.6 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products [40 CFR Part 63, Subpart P, Table 2] [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 P (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.

- (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.**
- (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 is defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.4581, and is applicable to the affected source.**

D.1.57 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

D.1.68 Testing Requirements [326 IAC 2-7-6(1),(6)]

During the period between 30 and 36 months after issuance of SSM 099-10314-00033, issued on September 14, 1999, the Permittee shall perform testing on the catalytic oxidizer to determine the overall VOC control efficiency (capture and destruction). Testing of the catalytic oxidizer shall be repeated at least once every two and one half (2.5) years for **overall control** efficiency using methods approved by the Commissioner. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facilities are in compliance.

D.1.79 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.8 VOC Emissions

Compliance with Condition D.1.2 shall be demonstrated at the end of each month based on the total volatile organic compound usage and emissions for the most recent twelve (12) month period.

D.1.9 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the spray coating in Process 1 and Process 3 is in operation.

D.1.11 Parametric Monitoring

- (a) Continuous records of the thermal catalytic oxidizer internal combustion zone temperature shall be kept using a chart recorder when Process 4, 2, 3, or 4 is in operation. Unless**

operated under conditions for which the Compliance Response Plan specifies otherwise, when operating, the catalytic ~~incinerator~~ **oxidizer** shall maintain a minimum operating temperature of 550 degrees Fahrenheit or ~~a~~ **the operating** temperature determined in the most recent stack test to maintain at least ~~ninety-five percent (95%) percent~~ **ninety-five percent (95%) percent** overall control **efficiency** (capture and destruction) ~~efficiency for~~ **of** VOC. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the temperature reading is below 550 degrees Fahrenheit **or the operating temperature determined in the most recent stack test.**

The instrument used for determining the temperature shall comply with Section C - Temperature Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

- (b) The Permittee shall determine the appropriate duct pressure or fan amperage from the most recent valid stack test that demonstrates compliance with the minimum control efficiency in Condition D.1.1, as approved by IDEM. The duct pressure or fan amperage shall be observed at least once per day when the catalytic oxidizer is in operation. On and after the date the approved stack test results are available, the duct pressure or fan amperage shall be maintained within the normal range as established in most recent compliant stack test.**
- ~~(b)~~**(c)** Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

D.1.12 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Condition D.1.2.
- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Conditions D.1.2, D.1.3, and D.1.10 the Permittee shall maintain a log of daily inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) To document compliance with Conditions D.1.1 and D.1.11, the Permittee shall maintain continuous records of the internal combustion zone temperature of the catalytic oxidizer or indicate that Processes 4, 2, 3, and 4 are not in operation at that time.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.13 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.2(a) and (b) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

D.1.14 Notification Requirements [40 CFR 63.4510]

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

D.1.15 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]

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

- (a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Part 70 permit the applicable requirements of 40 CFR 63, Subpart PPPP, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.
- (b) The significant permit modification application shall be submitted no later than July 19, 2006.
- (c) The significant permit modification application shall be submitted to:

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

Changes to Report Forms:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION
 Part 70 Quarterly Report**

Source Name: Bremen Corporation
Source Address: 405 North Industrial Drive, Bremen, Indiana 46506
Mailing Address: 405 North Industrial Drive, Bremen, Indiana 46506
Part 70 Permit No.: 099-7476-00033
Facility: Two (2) hand-spray paint booths, constructed in 2005, at Process 3
Parameter: VOC input
Limit: 799 tons per twelve (12) consecutive month period, with compliance determined at the end of each month

YEAR: _____

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

☛ No deviation occurred in this month.

☛ Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION
 Part 70 Quarterly Report**

Source Name: Bremen Corporation
 Source Address: 405 North Industrial Drive, Bremen, Indiana 46506
 Mailing Address: 405 North Industrial Drive, Bremen, Indiana 46506
 Part 70 Permit No.: 099-7476-00033
 Facility: Processes 1, 2, 3 and 4 and Areas 1, 2 and 3
 Parameter: VOC emissions
 Limit: Less than 249 tons per year, based on a twelve (12) month rolling total, according to the following equation:

$$\text{VOC usage at Area 1} + \text{VOC usage at Area 2} + \text{VOC usage at Area 3} + \text{VOC usage at Processes 1, 2, 3 and 4} * (1 - (\text{capture efficiency of catalytic oxidizer} * \text{control efficiency of catalytic oxidizer})) = \text{VOC emissions}$$

YEAR: _____

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

☞ No deviation occurred in this month.

☞ Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Bremen Corporation
 Source Address: 405 North Industrial Drive, Bremen, Indiana 46506
 Mailing Address: 405 North Industrial Drive, Bremen, Indiana 46506
 Part 70 Permit No.: 099-7476-00033
 Facility: Processes 1, 2, 3 and 4 and Areas 1, 2 and 3
 Parameter: VOC usage
 Limit: 4,980 tons per year, based on a twelve (12) consecutive month rolling total

YEAR: _____

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

☉ No deviation occurred in this month.

☉ Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Bremen Corporation
Bremen, Indiana
Permit Reviewer: MES

Page 22 of 22
Source Modification No.: 099-20282-00033
Permit Modification No.: 099-19959-00033

Conclusion

The construction and operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 099-20282-00033 and Significant Permit Modification No. 099-19959-00033.

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

**Company Name: Bremen Corporation
Address City IN Zip: 405 North Industrial Drive, Bremen, Indiana 46506
Significant Source Modification No.: SSM 099-20282-00033
Significant Permit Modification No.: SPM 099-19959-00033
Reviewer: CarrieAnn Paukowits
Application Date: October 18, 2004**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Process 3, Hand Spray Booth 3																
PDC F-861 Liquid Powder	9.20	9.500%	0.0%	9.5%	0.0%	90.00%	0.01335	50	0.87	0.87	0.58	14.00	2.56	8.52	0.97	65%
PDC F-830	7.58	52.000%	0.0%	52.0%	0.0%	24.00%	0.01335	50	3.94	3.94	2.63	63.14	11.52	3.72	16.42	65%
F-717	6.87	65.400%	0.0%	65.4%	0.0%	26.40%	0.01335	50	4.49	4.49	3.00	71.98	13.14	2.43	17.02	65%
CF-1400 (F-827)	8.70	59.700%	48.7%	11.0%	0.0%	41.00%	0.01335	50	0.96	0.96	0.64	15.33	2.80	3.59	2.33	65%
DM-Topcoat	12.51	97.500%	6.2%	91.3%	0.1%	1.45%	0.01335	50	11.43	11.42	7.62	182.97	33.39	0.32	787.70	65%
Process 3, Hand Spray Booth 4																
PDC F-861 Liquid Powder	9.20	9.500%	0.0%	9.5%	0.0%	90.00%	0.01335	50	0.87	0.87	0.58	14.00	2.56	8.52	0.97	65%
PDC F-830	7.58	52.000%	0.0%	52.0%	0.0%	24.00%	0.01335	50	3.94	3.94	2.63	63.14	11.52	3.72	16.42	65%
F-717	6.87	65.400%	0.0%	65.4%	0.0%	26.40%	0.01335	50	4.49	4.49	3.00	71.98	13.14	2.43	17.02	65%
CF-1400 (F-827)	8.70	59.700%	48.7%	11.0%	0.0%	41.00%	0.01335	50	0.96	0.96	0.64	15.33	2.80	3.59	2.33	65%
DM-Topcoat	12.51	97.500%	6.2%	91.3%	0.1%	1.45%	0.01335	50	11.43	11.42	7.62	182.97	33.39	0.32	787.70	65%

PM Control Efficiency: 99.54%
VOC Control Efficiency: 95.00%

State Potential Emissions

Add worst case coating to all solvents

Uncontrolled	15.2	365.9	66.8	17.0
Controlled	0.762	18.3	3.34	0.078

METHODOLOGY

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

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: Bremen Corporation
Address City IN Zip: 405 North Industrial Drive, Bremen, Indiana 46506
Significant Source Modification No.: SSM 099-20282-00033
Significant Permit Modification No.: SPM 099-19959-00033
Reviewer: CarrieAnn Paukowits
Application Date: October 18, 2004

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Hexane	Weight % Toluene	Weight % Xylenes	Weight % MEK	Weight % Ethyl benzene	Hexane Emissions (ton/yr)	Toluene Emissions (ton/yr)	Xylenes Emissions (ton/yr)	MEK Emissions (ton/yr)	Ethyl benzene Emissions (ton/yr)	Total HAPs (ton/yr)
Process 3, Hand Spray Booth 3														
PDC F-861 Liquid Powder	9.20	0.01335	50	0.00%	26.00%	10.00%	13.00%	3.00%	0.00	6.99	2.69	3.50	0.81	13.99
PDC F-830	7.58	0.01335	50	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
F-717	6.87	0.01335	50	14.80%	0.00%	12.70%	0.00%	3.10%	2.97	0.00	2.55	0.00	0.62	6.15
CF-1400 (F-827)	8.70	0.01335	50	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
DM-Topcoat	12.51	0.01335	50	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Process 3, Hand Spray Booth 4														
PDC F-861 Liquid Powder	9.20	0.01335	50	0.00%	26.00%	10.00%	13.00%	3.00%	0.00	6.99	2.69	3.50	0.81	13.99
PDC F-830	7.58	0.01335	50	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
F-717	6.87	0.01335	50	14.80%	0.00%	12.70%	0.00%	3.10%	2.97	0.00	2.55	0.00	0.62	6.15
CF-1400 (F-827)	8.70	0.01335	50	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
DM-Topcoat	12.51	0.01335	50	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00

Total State Potential Emissions

Uncontrolled VOC Emissions 5.95 14.0 5.38 6.99 1.61 28.0

VOC Control Efficiency 95.0% 95.0% 95.0% 95.0% 95.0% 95.0%

METHODOLOGY

VOC Emissions after Control 0.297 0.699 0.269 0.350 0.081 1.40

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