



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: September 16, 2005
RE: BRC Rubber & Plastics, Inc. / 009-19963-00002
FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER.dot 1/10/05



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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Mr. Thom Maher
BRC Rubber & Plastics, Inc.
589 South Main Street, PO Box 227
Churubusco, IN 46723

September 16, 2005

Re: **009-19963-00002**
Second Significant Permit Modification to
Part 70 No.: T 009-7492-00002

Dear Mr. Maher:

BRC Rubber & Plastics, Inc. was issued a Part 70 Operating Permit T 009-7492-00002 on June 23, 2000 for a stationary miscellaneous automotive rubber parts manufacturing and coating source. A letter requesting changes to this permit was received on August 30, 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 modification consists of adding two (2) new shot blasters, increase in capacity of PB8 from 450 to 1,500 parts per hour and previously constructed and operated blasters, electric ovens and a dip and spin surface coating facility as well as incorporating insignificant activities. Also, incorporated conditions regarding NESHAP Subpart Mmmm for the metal surface coating operations.

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

Sincerely,

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

Attachments
MLK/MES

cc: File - Blackford County
U.S. EPA, Region V
Blackford County Health Department
Air Compliance Section Inspector - Ryan Hillman
Compliance Branch
Administrative and Development Section
Technical Support and Modeling - Michelle Boner



Mitchell E. Daniels, Jr.
 Governor

Thomas W. Easterly
 Commissioner

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 Indianapolis, Indiana 46204
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PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

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

(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 009 - 7492 - 00002	
Original Signed by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: June 23, 2000 Expiration Date: June 23, 2005

First Reopening No.: 009-13157, issued December 4, 2001
 First Minor Permit Modification No. 009-18225, issued December 11, 2003
 First Significant Permit Modification No. 009-18357, issued February 5, 2004

Second Significant Permit Modification No.: SPM 009-19963-00002	Conditions Affected: A.1, A.2 and A.3 Sections Affected: D.2, D.4 and D.5 Section Added: D.4 Facility Description Boxes: D.2, D.4 and D.5
Issued by: Original signed by Paul Dubenetzky, Chief Permits Branch Office of Air Quality	Issuance Date: September 16, 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 miscellaneous automotive rubber parts manufacturing and coating source.

Responsible Official: Thom Maher
Source Address: 623 West Monroe, Montpelier, Indiana 47359
Mailing Address: 589 South Main Street, P.O. Box 227, Churubusco, Indiana 46723
Phone Number: 219 - 693 - 2171
SIC Code: 3069
County Location: Blackford
Source Location Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Minor 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) natural gas-fired boiler, with No. 2 fuel oil as a backup fuel, known as BLR1, rated at 16.74 million British thermal units per hour, installed in 1980, exhausting to Stack S1.
- (b) One (1) natural gas-fired boiler, known as BLR2, rated at 12.50 million British thermal units per hour, installed in 1979, exhausting to Stack S2.
- (c) One (1) paint booth, known as PB1, equipped with HVLP spray applicators, equipped with dry filter for PM overspray control, known as CE-5, installed in 1993, exhausting to Stack S5, capacity: 2,000 automotive parts per hour.
- (d) One (1) paint booth, known as PB2, equipped with HVLP spray applicators, equipped with dry filter for PM overspray control, known as CE-6, installed in 1993, exhausting to Stack S6, capacity: 2,000 automotive parts per hour.
- (e) One (1) paint booth, known as PB3, equipped with HVLP spray applicators, equipped with dry filter for PM overspray control, known as CE-7, installed in 1993, exhausting to Stack S7, capacity: 2,000 automotive parts per hour.
- (f) One (1) paint booth (small chain-on-edge), known as PB4, equipped with HVLP spray applicators, equipped with dry filter for PM overspray control, known as CE-8, installed in 1993, exhausting to Stack S8, capacity: 280 automotive parts per hour.
- (g) One (1) paint booth, known as PB5, equipped with HVLP spray applicators, equipped with water wash for PM overspray control, known as CE-9, installed in 1993, exhausting to Stack S9, capacity: 2,000 automotive parts per hour.

- (h) One (1) paint booth (large chain-on-edge), known as PB6, equipped with HVLP spray applicators, equipped with water wash filter for PM overspray control, known as CE-10, installed in 1994, exhausting to Stack S10, capacity:2,000 automotive parts per hour.
- (i) One (1) paint booth (large chain-on-edge), known as PB7, equipped with HVLP spray applicators, equipped with water wash filter for PM overspray control, known as CE-11, installed in 1994, exhausting to Stack S11, capacity: 2,000 automotive parts per hour.
- (j) Three (3) hand paint stations, known HPB1 - HPB3, capacity: 300 automotive parts per hour.
- (k) One (1) dip and spin dryer and room exhaust, known as DIPDRY, installed in 1997, exhausting to Stack S12b, capacity: 35,000 automotive parts per hour.
- (l) One (1) flammable liquid storage room, known as FSTOR, installed prior to 1980, exhausting to Stack S13, capacity: 3,050 gallons.
- (m) One (1) vapor degreaser, known as VDG, exhausting to Stack S14, installed in 1997, capacity: 28,000 automotive parts per hour or 2.7 pounds of trichloroethylene per hour.
- (n) One (1) parts washer, identified as PW-1, installed in 2005, capacity: 30 gallons of solvent.
- (o) One (1) grit blaster, known as GBLAST1, equipped with a baghouse, known as CE-15a, installed in 1996, exhausting to Stack S15a, capacity: 1,320 pounds of parts per hour and 21.3 pounds of grit per hour.
- (p) One (1) grit blaster, known as GBLAST2, equipped with a baghouse, known as CE-15b installed in 1999, exhausting to Stack S15b, capacity: 1,800 pounds of parts per hour and 32.0 pounds of grit per hour.
- (q) One (1) dip and carousel, known as HDIP, installed in 1995, capacity: 1,000 automotive parts per hour.
- (r) One (1) line drier, known as DLINE, installed in 1995, exhausting to Stack S18, capacity: 1,000 automotive parts per hour.
- (s) One (1) chain-on-edge dried, known as CDRY, exhausting to Stack S19, installed in 1994, capacity: 2,000 automotive parts per hour.
- (t) One (1) paint booth (silver machine), known as PB8, equipped with dry filters for PM overspray control, known as CE-20, installed in 1999, exhausting to Stack S20, capacity: 1,500 automotive parts per hour.
- (u) One (1) dip machine, known DIP, installed in 1999, exhausting to Stack S21, capacity: 1,000 automotive parts per hour.
- (v) One (1) roll coater adhesive application system, identified as PB-9, with a maximum coating usage of 13.75 pounds per hour, processing a maximum of 6000 parts per hour, exhausting to stack S21.
- (w) Two (2) hand-spray booths, identified as PB-10 and PB-11, each with a maximum coating usage of 3.25 pounds per hour, processing a maximum of 2000 parts per hour each, equipped with dry filters identified as CE21 and CE22, and exhausting to stacks S23 and S24.

- (x) One (1) Ruemblin hand blaster, equipped with a self-contained vacuum, maximum capacity: 20 miscellaneous metal, plastic and/or rubber parts and 80 pounds per hour.
- (y) One (1) Guyson turntable blaster, equipped with a self-contained vacuum, maximum capacity: 900 miscellaneous metal, plastic and/or rubber parts and 166.5 pounds per hour.
- (z) One (1) large turntable blaster (CM T18), installed in January 2004, equipped with a self-contained vacuum, maximum capacity: 2,580 miscellaneous metal, plastic and/or rubber parts and 477.3 pounds per hour.
- (aa) One (1) small hand Vac-U Blast, installed in January 2004, equipped with a self-contained vacuum, maximum capacity: 20 miscellaneous metal, plastic and/or rubber parts and 80 pounds per hour.
- (bb) One (1) Goff turntable blaster, installed in January 2004, equipped with a self-contained vacuum, maximum capacity: 1,125 miscellaneous metal, plastic and/or rubber parts and 208.1 pounds per hour.
- (cc) One (1) Empire Basket blaster, installed in November 2004, equipped with a self-contained vacuum, maximum capacity: 100 miscellaneous metal, plastic and/or rubber parts and 350.0 pounds per hour.
- (dd) One (1) dip & spin (chain dip), installed in 2004, exhausted through Stack S35, maximum capacity: 700 miscellaneous metal, plastic and/or rubber parts per hour.

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

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

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

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

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

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

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, the applicable definitions found in the statutes or regulations (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]

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

B.5 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

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

- (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. The

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

- (c) Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit. The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. If requested by IDEM, OAQ, or the U.S. EPA, to furnish copies of requested records directly to U.S. EPA, then the Permittee must furnish record directly to the U.S. EPA. The Permittee may assert a claim of confidentiality in accordance with 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 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 appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining 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) & (13)] [326 IAC 2-7-6(1) & (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 (PMPs) 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; and
 - (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 PMPs 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

The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential

to emit.

- (c) A copy of the PMP's shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.

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

- (b) This permit shall be used as the primary document for determining compliance with applic-

able requirements established by previously issued permits. All previously issued operating permits are superseded by this permit.

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

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

Request for renewal shall be submitted to:

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

- (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) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

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] [326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
 - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
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:
 - (A) A brief description of the change within the source;
 - (B) The date on which the change will occur;
 - (C) Any change in emissions; and
 - (D) 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.

B.22 Source Modification Requirement [326 IAC 2-7-10.5]

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

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 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

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

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

performance or compliance test or procedure had been performed.

SECTION 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(c)]
Pursuant to 326 IAC 6-3-2(c), 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.
- C.2 Opacity [326 IAC 5-1]
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]
The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.
- C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]
The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is 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.
- 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 protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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).

Compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

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

- (a) In the event that a breakdown of the emission 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 Pressure Gauge Specifications

Whenever a condition in this permit requires the measurement of pressure drop across 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 ($\pm 2\%$) 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 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 submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
- (b) As a part of the annual 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
- (c) A verification to IDEM, OAQ, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

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. The compliance monitoring plan can be either an entirely new document, consist in whole information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:
 - (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, when applicable). The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:
 - (A) Reasonable response steps that may 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 reasonable 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, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:
 - (1) A false reading occurs due to the malfunction of the monitoring equipment. 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 or is returning 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.
- (e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.
- (f) If for reasons beyond its control, the Permittee fails to perform the monitoring and record keeping as required by Section D, then the reasons for this must be recorded.
 - (1) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent of the operating time in any quarter.
 - (2) Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.

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 excess emissions from the affected facility while the corrective actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ

that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The 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 (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.

- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

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

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

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

C.20 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. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

- (b) 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;
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (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 required in Section D of this permit 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. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.22 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)] Boilers

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

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

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

D.1.1 Particulate Matter Limitation (PM) [326 IAC 6-2]

- (a) Pursuant to 326 IAC 6-2-3(a) (Particulate emission limitations for sources of indirect heating: emission limitations for facilities specified in 326 IAC 6-2-1 (c)), particulate emissions from the natural gas-fired boiler, BLR2, used for indirect heating purposes which was existing and in operation on or before September 21, 1983, shall in no case exceed 1.50 pounds of particulate matter per million British thermal units heat input.
- (b) Pursuant to 326 IAC 6-2-4(a) (Particulate emission limitations for sources of indirect heating: emission limitations for facilities specified in 326 IAC 6-2-1 (d)), particulate emissions from the natural gas-fired boiler, BLR1, with No. 2 fuel oil as a backup fuel, used for indirect heating purposes which was existing and in operation on or after September 21, 1983, shall in no case exceed 0.453 pounds of particulate matter per million British thermal units heat input.

D.1.2 No. 2 Fuel Oil Throughput Limit [326 IAC 2-7-10.5]

The total input of No. 2 fuel oil to the boiler (BLR1) shall be limited to 702.68 kilogallons per twelve (12) consecutive month period with compliance determined at the end of each month. This fuel oil limit is equivalent to less than 24.9 tons per year of SO₂. Compliance with this limit will assure that the SO₂ emissions from the MSM 009-18297-00009 shall remain less than twenty-five (25) tons per year and that the requirements of 326 IAC 2-7-10.5(f) are not applicable.

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

D.1.3 Sulfur Dioxide (SO₂) [326 IAC 7-1.1-1] [326 IAC 12-1]

Pursuant to 326 IAC 7-1.1 (SO₂ Emissions Limitations) the SO₂ emissions from the 16.74 million British thermal units per hour oil-fired boiler (BLR1) shall not exceed five tenths (0.5) pound per million British thermal units heat input. Pursuant to 326 IAC 7-2-1, compliance shall be demonstrated on a thirty (30) day rolling weighted average.

D.1.4 Sulfur Dioxide Emissions and Sulfur Content

Compliance shall be determined utilizing one of the following options.

- (a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the sulfur dioxide emissions do not exceed five-tenths (0.5) pounds per million British thermal units heat input by:
 - (1) Providing vendor analysis of fuel delivered, if accompanied by a vendor certification, or;
 - (2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures

in 40 CFR 60, Appendix A, Method 19.

- (A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
 - (B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.
- (b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the 16.74 British thermal units per hour boiler (BLR1), using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.

A determination of noncompliance pursuant to any of the methods specified in (a) or (b) above shall not be refuted by evidence of compliance pursuant to the other method.

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

D.1.5 Visible Emissions Notations

- (a) Visible emission notations of the Boiler (BLR1) Stack S1 exhaust shall be performed once per shift during normal daylight operations when burning No. 2 fuel oil. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

D.1.6 Record Keeping Requirements

- (a) To document compliance with Condition D.1.2, the Permittee shall maintain records of the total amount of No. 2 fuel oil burned in boiler BLR1 each month.
- (b) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below.
 - (1) Calendar dates covered in the compliance determination period;
 - (2) Actual daily fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;
 - (3) To certify compliance when burning natural gas only, the Permittee shall maintain records of fuel used.

If the fuel supplier certification is used to demonstrate compliance, when burning alternate fuels and not determining compliance pursuant to 326 IAC 3-7-4, the following, as a minimum, shall be maintained:

- (4) Fuel supplier certifications;
- (5) The name of the fuel supplier; and
- (6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

- (c) To document compliance with Condition D.1.5, the Permittee shall maintain records of visible emission notations of the boiler (BLR1) Stack S1 exhaust once per shift when burning No. 2 fuel oil.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.7 Reporting Requirements

- (a) The natural gas fired boiler certification, shall be submitted to the address listed in Section C - General Reporting Requirements, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) A quarterly summary of the information to document compliance with Condition D.1.2 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 require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.2

FACILITY OPERATION CONDITIONS

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

- (c) One (1) paint booth, known as PB1, equipped with HVLP spray applicators, equipped with dry filter for PM overspray control, known as CE-5, installed in 1993, exhausting to Stack S5, capacity: 2,000 automotive parts per hour.
- (d) One (1) paint booth, known as PB2, equipped with HVLP spray applicators, equipped with dry filter for PM overspray control, known as CE-6, installed in 1993, exhausting to Stack S6, capacity: 2,000 automotive parts per hour.
- (e) One (1) paint booth, known as PB3, equipped with HVLP spray applicators, equipped with dry filter for PM overspray control, known as CE-7, installed in 1993, exhausting to Stack S7, capacity: 2,000 automotive parts per hour.
- (f) One (1) paint booth (small chain-on-edge), known as PB4, equipped with HVLP spray applicators, equipped with dry filter for PM overspray control, known as CE-8, installed in 1993, exhausting to Stack S8, capacity: 280 automotive parts per hour.
- (g) One (1) paint booth, known as PB5, equipped with HVLP spray applicators, equipped with water wash for PM overspray control, known as CE-9, installed in 1993, exhausting to Stack S9, capacity: 2,000 automotive parts per hour.
- (h) One (1) paint booth (large chain-on-edge), known as PB6, equipped with HVLP spray applicators, equipped with water wash filter for PM overspray control, known as CE-10, installed in 1994, exhausting to Stack S10, capacity: 2,000 automotive parts per hour.
- (i) One (1) paint booth (large chain-on-edge), known as PB7, equipped with HVLP spray applicators, equipped with water wash filter for PM overspray control, known as CE-11, installed in 1994, exhausting to Stack S11, capacity: 2,000 automotive parts per hour.
- (j) Three (3) hand paint stations, known HPB1 - HPB3, capacity: 300 automotive parts per hour.
- (k) One (1) dip and spin dryer and room exhaust, known as DIPDRY, installed in 1997, exhausting to Stack S12b, capacity: 35,000 automotive parts per hour.
- (l) One (1) flammable liquid storage room, known as FSTOR, installed prior to 1980, exhausting to Stack S13, capacity: 3,050 gallons.
- (q) One (1) dip and carousel, known as HDIP, installed in 1995, capacity: 1,000 automotive parts per hour.
- (r) One (1) line drier, known as DLINE, installed in 1995, exhausting to Stack S18, capacity: 1,000 automotive parts per hour.
- (s) One (1) chain-on-edge dried, known as CDRY, exhausting to Stack S19, installed in 1994, capacity: 2,000 automotive parts per hour.
- (t) One (1) paint booth (silver machine), known as PB8, equipped with dry filters for PM overspray control, known as CE-20, installed in 1999, exhausting to Stack S20, capacity: 1,200 automotive parts per hour.
- (u) One (1) dip machine, known DIP, installed in 1999, exhausting to Stack S21, capacity: 1,000 automotive parts per hour.
- (v) One (1) roll coater adhesive application system, identified as PB-9, with a maximum coating usage of 13.75 pounds per hour, processing a maximum of 6000 parts per hour, exhausting to stack S21.
- (w) Two (2) hand-spray booths, identified as PB-10 and PB-11, each with a maximum coating usage of 3.25 pounds per hour, processing a maximum of 2000 parts per hour each, equipped with dry filters identified as CE21 and CE22, and exhausting to stacks S23 and S24.
- (dd) One (1) dip & spin (chain dip), installed in 2004, exhausted through Stack S35, maximum capacity: 700 miscellaneous metal, plastic and/or rubber parts per hour.

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

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

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

The total VOC usage to all facilities listed in Section D.2 shall be limited to less than 232 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period, with compliance determined at the end of each month. This usage limit coupled with the unlimited potential to emit VOC from all other facilities, including insignificant activities, at this source of 18.0 tons per year shall render the requirements of 326 IAC 2-2 not applicable.

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

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

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

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

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

Pursuant to 40 CFR 52 Subpart P, the PM from paint booths, known as PB1 through PB8, and spray booths PB 10 and PB 11 shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

D.2.5 Particulate [326 IAC 6-3-2(d)]

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

D.2.6 General Provisions Relating to HAPs [326 IAC 20-1] [40 CFR Part 63, Subpart A] [Table 2 to CFR Part 63, Subpart M] [40 CFR 63.3901]

- (a) The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart M.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition, except as otherwise provided in this condition.

D.2.7 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products [40 CFR Part 63, Subpart M] [40 CFR 63.3882] [40 CFR 63.3883] [40 CFR 63.3980]

- (a) The provisions of 40 CFR Part 63, Subpart M (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/misc/miscpg.html>. Pursuant to 40 CFR 63.3883(b), the Permittee must comply with these requirements on and after January 2, 2007.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition, except as otherwise provided in this condition. The permit shield applies to Condition D.2.16, Notification Requirements.
- (c) The affected source is the collection of all of the items listed in 40 CFR 63.3882, paragraphs (b)(1) through (4) that are used for surface coating of miscellaneous metal parts and products within each subcategory as defined in 40 CFR 63.3881(a), paragraphs (2) through (6).
- (1) All coating operations as defined in 40 CFR 63.3981;
 - (2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
 - (3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and
 - (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.
- (d) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.3980, and are applicable to the affected source.

D.2.8 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for paint booth PB8 and roll coater PB-9.

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

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

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

D.2.10 Volatile Organic Compounds (VOC)

Compliance with the VOC usage limitations contained in Conditions D.2.1 and D.2.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.2.11 HAPs

Compliance with the HAPs usage limitation contained in Condition D.2.3 shall be determined

pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.2.12 VOC and HAPs Emissions

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

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

D.2.13 Particulate Matter (PM)

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

D.2.14 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the paint booth stacks S5 - S8 and S20 while one or more of the paint booths (PB1, PB2, PB3, PB4 and PB8) are in operation. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the paint booth stacks S23 and S24 while one or both of the paint booths PB-10 and PB-11, is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a deviation from this permit.
- (b) Daily inspections shall be performed to verify that the water level of the water pans meets the manufacturer's recommended level. To monitor the performance of the water pans, the water level of the pans shall be maintained weekly at a level where surface agitation indicates impact of the air flow. Water shall be kept free of solids and floating material that reduces the capture efficiency of the water pan. To monitor the performance of the baffles, weekly inspections of the baffle panels shall be conducted to verify placement and configuration meet recommendations of the manufacturer. In addition, weekly observations shall be made of the overspray from the surface coating booth stacks S9, S10, and S11 while one or more of the paint booths (PB5, PB6 and PB7) are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a deviation from this permit.
- (c) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C -

Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a deviation from this permit.

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

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

D.2.15 Record Keeping Requirements

- (a) To document compliance with Condition D.2.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limit and the VOC emission limit established in Condition D.2.1 for all facilities listed in Section D.2.
- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Conditions D.2.2 and D.2.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAPs usage limits and the VOC and HAPs emission limits established in Conditions D.2.2 and D.2.3 for paint booth PB8 and roll coater PB-9.
- (1) The amount and VOC and HAPs content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC and HAPs usage for each month; and
 - (5) The weight of VOCs and HAPs emitted for each compliance period.
- (c) To document compliance with Conditions D.2.13 and D.2.14, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.16 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.2.1, D.2.2 and D.2.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

D.2.17 Notification Requirements [40 CFR 63.3910]

- (a) General. The Permittee must submit the applicable notifications in 40 CFR Part 63, Sections 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) by the dates specified in those sections, except as provided in 40 CFR 63.3910, paragraphs (b) and (c).
- (b) Notification of compliance status. The Permittee must submit the notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR Part 63, Sections 63.3940, 63.3950, or 63.3960 that applies to the affected source. The notification of compliance status must contain the information specified in 40 CFR 63.3910(c), paragraphs (1) through (11) and any additional information specified in 40 CFR 63.9(h).

D.2.18 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12] [326 IAC 2-7-5]

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

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

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

SECTION D.3

FACILITY OPERATION CONDITIONS

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

- (m) One (1) vapor degreaser, known as VDG, exhausting to Stack S14, installed in 1997, capacity: 28,000 automotive parts per hour or 2.7 pounds of trichloroethylene per hour.

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

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

D.3.1 General Provisions Relating to HAPs [326 IAC 20-1-1] [40 CFR Part 63, Subpart A]

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

D.3.2 Halogenated Solvent Cleaning Machine NESHAP [40 CFR Part 63, Subpart T]

This facility is subject to 40 CFR Part 63, Subpart T, (Halogenated Solvent Cleaning Machine NESHAP), which is incorporated by reference as 326 IAC 20-6-1. A copy of the rule is attached.

- (a) Pursuant to 40 CFR 63.463(a) & (b), the Permittee shall conform to the following design requirements:
- (1) The cleaning machine shall be designed or operated such that, it has an idling and downtime mode cover, as described in 40 CFR 63.463(d)(1)(i), that may be readily opened or closed, that completely covers the cleaning machine openings when in place, and is free of cracks, holes, and other defects or the cleaning machine shall be designed or operated such that it has a reduced room draft as described in 40 CFR 63.463(e)(2)(ii).
 - (2) The Permittee shall demonstrate that the solvent cleaning machine can achieve and maintain an idling emission limit of 0.22 kilograms per hour per square meter (0.045 pounds per hour per square foot) of solvent/air interface area as determined using the procedures in 40 CFR 63.465(a) and appendix A to 40 CFR 63 Subpart T.
 - (3) Cleaning machine shall have a freeboard ratio of 0.75 or greater.
 - (4) Cleaning machine shall have an automated parts handling system capable of moving parts or parts baskets at a speed of 3.4 meters per minutes (11 feet per minute) or less from the initial loading of parts through removal of cleaned parts.
 - (5) Cleaning machine shall be equipped with a device that shuts off sump heat if the sump liquid solvent level drops to the sump heater coils.
 - (6) Cleaning machine shall have a primary condenser.
 - (7) Cleaning machine shall be equipped with a vapor level control device that shuts off sump heat if the vapor level in the vapor cleaning machine rises above the height of the primary condenser.
- (b) Pursuant to 40 CFR 63.463 (d), the following work and operational practice requirements for the degreasing operation are applicable:

- (1) Control air disturbances across the cleaning machine opening(s) by placing cover(s) to the solvent cleaning machine during the idling mode and the downtime mode unless either the solvent has been removed from the machine or maintenance or monitoring is being performed that requires the cover(s) to not be in place or control air disturbances across the cleaning machine opening(s) by creating a reduced room draft as described in 40 CFR63.463(e)(2)(ii).
 - (2) The parts baskets or the parts being cleaned in the cleaning machine shall not occupy more than 50 percent of the solvent/air interface area unless the parts baskets or parts are introduced at a speed of 0.9 meters per minute (3 feet per minute) or less.
 - (3) Any spraying operations shall be done within the vapor zone or within a section of the solvent cleaning machine that is not directly exposed to the ambient air.
 - (4) Parts shall be oriented so that the solvents drains from them freely. Parts having cavities or blind holes shall be tipped or rotated before being removed from any solvent cleaning machine unless an equally effective approach has been approved by the commissioner.
 - (5) Parts baskets or parts shall not be removed from any solvent cleaning machine until dripping has stopped.
 - (6) During startup of each vapor cleaning machine, the primary condenser shall be turned on before the sump heater.
 - (7) During shutdown of each vapor cleaning machine, the sump heater shall be turned off and the solvent vapor layer allowed to collapse before the primary condenser is turned off.
 - (8) When solvent is added or drained from any solvent cleaning machine, the solvent shall be transferred using threaded or other leak proof couplings and the end of the pipe in the solvent sump shall be located beneath the liquid solvent surface.
 - (9) Each solvent cleaning machine and associated controls shall be maintained as recommended by the manufacturers of the equipment or using alternative maintenance practices that have been demonstrated to the commissioner's satisfaction to achieve the same or better results as those recommended by the manufacturer.
 - (10) Each operator of a solvent cleaning machine shall complete and pass the applicable sections of the test of solvent cleaning operating procedures in appendix B of 40 CFR 63, if requested during an inspection by the commissioner.
 - (11) Waste solvents, still bottoms, and sump bottoms shall be collected and stored in closed containers. The closed containers may contain a device that would allow pressure relief, but would not allow liquid solvent to drain from the container.
 - (12) Sponges, fabric, wood, and paper products shall not be cleaned.
- (c) That pursuant to 40 CFR 63.463 (e), the Permittee shall comply with the following requirements:
- (1) The Permittee shall conduct monitoring of each control device used to comply with §63. 463 as provided in 40 CFR63. 466, monitoring procedures.

- (2) Determine during each monitoring period if the control device used to comply with the above standards meets the following requirements:
 - (A) When using a working-mode cover the Permittee shall:
 - (i) ensure that the cover opens only for part entrance and removal and completely covers the cleaning machine openings when closed.
 - (ii) ensure that the working-mode cover is maintained free of cracks, holes, and other defects.
 - (B) When using an idling-mode cover the Permittee shall:
 - (i) ensure that the cover is in place whenever parts are not in the solvent cleaning machine and completely covers the cleaning machine openings when in place.
 - (ii) ensure that the idling-mode cover is maintained free of cracks, holes, and other defects.

D.3.3 Open Top Vapor Degreaser Operation [326 IAC 8-3-3]

The owner or operator of an open top vapor degreaser, VDG, shall:

- (a) equip the vapor degreaser with a cover that can be opened and closed easily without disturbing the vapor zone;
- (b) keep the cover closed at all times except when processing work loads through the degreaser;
- (c) minimize solvent carryout by:
 - (1) racking parts to allow complete drainage;
 - (2) moving parts in and out of the degreaser at less than 3.3 meters per minute (eleven (11) feet per minute);
 - (3) degreasing the workload in the vapor zone at least thirty (30) seconds or until condensation ceases;
 - (4) tipping out any pools of solvent on the cleaned parts before removal; and
 - (5) allowing parts to dry within the degreaser for at least fifteen (15) seconds or until visually dry;
- (d) not degrease porous or absorbent materials, such as cloth, leather, wood or rope;
- (e) not occupy more than half of the degreaser's open top area with the workload;
- (f) not load the degreaser such that the vapor level drops more than fifty percent (50%) of the vapor depth when the workload is removed;
- (g) never spray above the vapor level;
- (h) repair solvent leaks immediately, or shut down the degreaser;

- (i) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, such that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere;
- (j) not use workplace fans near the degreaser opening;
- (k) not allow visually detectable water in the solvent exiting the water separator; and
- (l) provide a permanent, conspicuous label summarizing the operating requirements.

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

D.3.4 Testing Requirements [326 IAC 2-1.1-11] [326 IAC 2-7-6(1)] [40 CFR 63.465]

The Permittee is not required to test this facility by this permit or by 40 CFR Part 63; 40 CFR 63.465 Test Methods. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance.

The Permittee shall determine the idling emission rate of the solvent cleaning machine using reference method 307 in Appendix A to this part.

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

D.3.5 Monitoring Procedures [326 IAC 2-7-6(1)]

Pursuant to 40 CFR 63.466 the Permittee shall comply with the following monitoring procedures:

- (a) The Permittee shall conduct a visual inspection to determine if the cover is opening and closing properly, completely covers the cleaning machine openings when closed, and is free of cracks, holes, and other defects.
- (b) The Permittee shall monitor the hoist speed as described below:
 - (1) The Permittee shall determine the hoist speed by measuring the time it takes for the hoist to travel a measured distance. The speed is equal to the distance in meters divided by the time in minutes.
 - (2) The monitoring shall be conducted monthly. If after the first year, no exceedances of the hoist speed are measured, the Permittee may begin monitoring the hoist speed quarterly.
 - (3) If the exceedance of the hoist speed occurs during quarterly monitoring, the monitoring frequency returns to the monthly until another year of compliance without an exceedance is demonstrated.
 - (4) If the Permittee can demonstrate to the commissioner's satisfaction in the initial compliance report that the hoist cannot exceed a speed of 3.4 meters per minute (11 feet per minute), the required monitoring frequency is quarterly, including during the first year of compliance.
- (c) The Permittee shall establish the monitoring frequency for each control and submit it to the commissioner for approval in the initial test report.

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

D.3.6 Record Keeping Requirements

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- (a) The Permittee shall maintain, in written or electronic form, records of the following information specified below, for the life time of the machine,
- (1) Owners's manuals, or if not available, written maintenance and operating procedures, for the solvent cleaning machine and control equipment.
 - (2) The date of installation of the solvent cleaning machine and all of its control devices. If the exact date of the installation is not known, a letter certifying that the cleaning machine and its control devices were installed prior to, or on, November 29, 1993, or after November 29, 1993, may be substituted.
 - (3) The Permittee shall maintain records of the initial performance test, including the idling emission rate and values of the monitoring parameters measured during the test.
 - (4) Records of the halogenated HAP solvent content for each solvent used in a solvent cleaning machine.
- (b) The Permittee shall maintain, in written or electronic form, records of the following information specified below for a period of 5 years:
- (1) The results of control device monitoring required under 40 CFR63.466.
 - (2) Information on the actions taken to comply with 40 CFR63.463(e) and (f). This information shall include records of written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to accepted levels.
 - (3) Estimates of annual solvent consumption for each solvent cleaning machine.

D.3.7 Reporting Requirements

A summary of the information to document compliance with Condition D.3.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, and to the following address:

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

- (a) Submit an initial notification report immediately. The report shall include the following information:
- (1) The name and address of the owner or operator.
 - (2) The address of the solvent cleaning machine.
 - (3) A brief description of each solvent cleaning machine including machine type, solvent/air interface area, and existing controls.
 - (4) The date of installation for the solvent cleaning machine.
 - (5) The anticipated compliance approach for the solvent cleaning machine.

- (6) An estimated annual halogenated HAP solvent consumption for the solvent cleaning machine.
- (b) Submit an initial statement of compliance for the solvent cleaning machine no later than 30 days after the issuance of this permit. This statement shall include:
 - (1) The name and the address of the owner or operator.
 - (2) The address (i.e., physical location) of the solvent cleaning machine(s).
 - (3) A list of the control equipment used to achieve compliance for solvent cleaning machine.
 - (4) For each piece of control equipment required to be monitored, a list of the parameters that are monitored and the values of these parameters measured on or during the first month after the compliance date.
 - (5) The Permittee shall submit a test report for tests of idling emissions meeting the specifications in Method 307 of Appendix 40 CFR 63, Subpart T. This report shall comply with the following requirements:
 - (A) The test must be on the same specific model cleaner used at the source. The test can be done by the Permittee of the affected machine or can be supplied by the vendor of that solvent cleaning machine or a third party.
 - (B) The report must clearly state the monitoring parameters, monitoring frequency and the delineation of exceedances for each parameter.
 - (C) If a solvent cleaning machine vendor or third party test report is used to demonstrate compliance, it shall include the following for the solvent cleaning machine tested: Name of the person(s) or company that performed the test, model name, the date the solvent cleaning machine was tested, serial number, and a diagram of the solvent cleaning machine tested.
 - (D) If a solvent cleaning machine vendor or third party test report is used, the Permittee shall comply with the following requirement:

Demonstrate to the commissioner's satisfaction that the solvent emissions from the solvent cleaning machine for which the test report is being submitted are equal to or less than the solvent emissions from the solvent cleaning machine in the vendor test report.
 - (c) The Permittee shall submit an annual report by February 1 of each year following the one for which the reporting is being made. This report shall include the requirements as follows:
 - (1) A signed statement from the facility owner or his designee stating that, "All operators of solvent cleaning machines have received training on the proper operation of solvent cleaning machines and their control devices sufficient to pass the test required in 40 CFR63.463(d)(10)."
 - (2) An estimate of solvent consumption for each solvent cleaning machine during the reporting period.
 - (d) The Permittee shall submit an exceedance report to the commissioner semiannually except

when, the commissioner determines, on a case-by-case basis that more frequent reporting is necessary to accurately assess the compliance status of the source or, an exceedance occurs. Once an exceedance has occurred the Permittee shall follow a quarterly reporting format until a request to reduce reporting frequency under paragraph 40 CFR63.468 (i) of this section is approved. Exceedance reports shall be delivered or postmarked by the 30th day following the end of each calendar half or quarter, as appropriate. The exceedance report shall include the applicable information as given below:

- (1) Information on the actions taken to comply with 40 CFR63. 463(e) and (f). This information shall include records of written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to accepted levels.
 - (2) If an exceedance has occurred, the reason for the exceedance and a description of the actions taken.
 - (3) If no exceedances of a parameter have occurred, or a piece of equipment has not been inoperative, out of control, repaired, or adjusted, such information shall be stated in the report.
- (e) That pursuant to 40 CFR63.463 (i), the Permittee who is required to submit an exceedance report on a quarterly (or more frequent) basis may reduce the frequency of reporting to semiannual if the following conditions are met:
- (1) The source has demonstrated a full year of compliance without an exceedance.
 - (2) The Permittee continues to comply with all relevant record keeping and monitoring requirements specified in Subpart A (General Provisions) and in 40 CFR 63, Subpart T.
 - (3) The commissioner does not object to a reduced frequency of reporting for the affected source as provided in paragraphs (e)(3)(iii) of Subpart A (General Provisions) of 40 CFR 63.
- (f) The Permittee of a solvent cleaning machine requesting an equivalency determination, as described in 40 CFR63.469 shall submit an equivalency request report to the commissioner and receive an approval prior to startup.

SECTION D.4

FACILITY OPERATION CONDITIONS

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

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

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

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

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

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

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

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

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

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

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

SECTION D.5

FACILITY OPERATION CONDITIONS

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

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

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

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

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

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

process weight rate of 0.104 tons per hour.

- (5) Empire Basket blaster shall not exceed 1.28 pounds per hour when operating at a process weight rate of 0.175 tons per hour.

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

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

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

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

D.5.2 PM and PM₁₀ Limitations [326 IAC 2-2]

The PM and PM₁₀ emission rates for the:

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

Compliance with these PM and PM₁₀ limits renders the requirements of 326 IAC 2-2 not applicable.

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

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

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

D.5.4 Particulate Matter (PM)

- (a) The baghouses for PM control shall be in operation and control emissions from the grit blast facilities at all times that the GBLAST1 and/or GBLAST2 are in operation.

- (b) The self contained vacuums for PM and PM₁₀ control shall be in operation and control emissions from the Ruemblin hand, Guyson turntable, large turntable, small hand Vac-U Blast, Goff turntable and Empire Basket blasters at all times that blasters are in operation.

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

D.5.5 Visible Emissions Notations

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

D.5.6 Parametric Monitoring

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

Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.5.7 Baghouse and Self-Contained Vacuum Inspections

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

D.5.8 Broken or Failed Bag Detection

In the event that bag failure has been observed:

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

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

D.5.9 Record Keeping Requirements

- (a) To document compliance with Condition D.5.5, the Permittee shall maintain records of daily visible emission notations of the GBLAST1 and GBLAST2 stack exhausts and the Ruemblin hand, Guyson turntable, large turntable, small hand Vac-U Blast, Goff turntable and Empire Basket blaster exhausts when exhausting to the atmosphere.
- (b) To document compliance with Condition D.5.6(a), the Permittee shall maintain once per shift records of the total static pressure drop during normal operation when venting to the atmosphere.
- (c) To document compliance with Condition D.5.6(b), the Permittee shall maintain records once per shift of the total static pressure drop during normal operation when exhausting to the atmosphere.

- (d) To document compliance with Condition D.5.7, the Permittee shall maintain records of the results of the inspections required under Condition D.5.7 and the dates the vents are redirected.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.6

FACILITY OPERATION CONDITIONS

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

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

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

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

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

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

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

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

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

D.6.2 Incinerators [326 IAC 4-2]

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

- (a) Consist of primary and secondary chambers or the equivalent.
- (b) Be equipped with a primary burner unless burning only wood products.
- (c) Comply with 326 IAC 5-1 and 326 IAC 2.
- (d) Be maintained, operated, and burn waste in accordance with the manufacturer's specifica-

tions or an operation and maintenance plan as specified in Condition D.6.2(g).

- (e) Not emit particulate matter in excess five-tenths (0.5) pound of particulate matter per one thousand (1,000) pounds of dry exhaust gas under standard conditions corrected to fifty percent (50%) excess air for incinerators with solid waste capacity less than two hundred (200) pounds per hour.
- (f) If any of the requirements of Conditions D.6.2 (a) through (e) are not met, then the Permittee shall stop charging the incinerator until adjustments are made that address the underlying cause of the deviation.
- (g) A Permittee developing an operation and maintenance plan pursuant to Condition D.6.2 (d) must comply with the following:
 - (1) The operation and maintenance plan must be designed to meet the particulate matter emission limitation specified in Condition D.6.2(e) and include the following:
 - (A) Procedures for receiving, handling, and charging waste.
 - (B) Procedures for incinerator startup and shutdown.
 - (C) Procedures for responding to a malfunction.
 - (D) Procedures for maintaining proper combustion air supply levels.
 - (E) Procedures for operating the incinerator and associated air pollution control systems.
 - (F) Procedures for handling ash.
 - (G) A list of wastes that can be burned in the incinerator.
 - (2) Each incinerator operator shall review the plan before initial implementation of the operation and maintenance plan and annually thereafter.
 - (3) The operation and maintenance plan must be readily accessible to incinerator operators.
 - (4) The Permittee of the incinerator shall notify the department, in writing, thirty (30) days after the operation and maintenance plan is initially developed pursuant to this section.
- (h) The Permittee of the incinerator must make the manufacturer's specifications or the operation and maintenance plan available to the IDEM, OAQ upon request.

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

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

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

D.6.3 Afterburner Operation

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

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

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: BRC Rubber & Plastics, Inc.
Source Address: 623 West Monroe, Montpelier, Indiana 47359
Mailing Address: 589 South Main Street, P.O. Box 227, Churubusco, Indiana 46723
Part 70 Permit No.: T 009-7492-00002

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

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: BRC Rubber & Plastics, Inc.
Source Address: 623 West Monroe, Montpelier, Indiana 47359
Mailing Address: 589 South Main Street, P.O. Box 227, Churubusco, Indiana 46723
Part 70 Permit No.: T 009-7492-00002

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2
<input checked="" type="radio"/> 1. This is an emergency as defined in 326 IAC 2-7-1(12) ☐The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and ☐The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
<input checked="" type="radio"/> 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(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 OPERATING PERMIT
NATURAL GAS-FIRED BOILER CERTIFICATION**

Source Name: BRC Rubber & Plastics, Inc.
Source Address: 623 West Monroe, Montpelier, Indiana 47359
Mailing Address: 589 South Main Street, P.O. Box 227, Churubusco, Indiana 46723
Part 70 Permit No.: T 009-7492-00002

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

Report period

Beginning: _____

Ending: _____

Boiler Affected

Alternate Fuel

Days burning alternate fuel

From

To

(can omit identification of boiler affected if only one gas boiler at this plant)

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:

A certification by the responsible official as defined by 326 IAC 2-7-1(34) is not required for this report.

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

Part 70 Quarterly Report

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

YEAR: _____

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

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

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

YEAR: _____

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

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: BRC Rubber & Plastics, Inc.
Source Address: 623 West Monroe, Montpelier, Indiana 47359
Mailing Address: 589 South Main Street, P.O. Box 227, Churubusco, Indiana 46723
Part 70 Permit No.: T 009-7492-00002
Facility: Boiler (BRL1)
Parameter: Throughput of No. 2 Fuel Oil
Limit: Less than 702.68 kilogallons per twelve (12) consecutive month period with compliance determined at the end of each month

YEAR: _____

Month	No. 2 Fuel Oil This Month	No. 2 Fuel Oil Previous 11 Months	No. 2 Fuel Oil 12 Month Total
	(gallons)	(gallons)	(gallons)

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: _____

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

Part 70 Quarterly Report

Source Name: BRC Rubber & Plastics, Inc.
Source Address: 623 West Monroe, Montpelier, Indiana 47359
Mailing Address: 589 South Main Street, P.O. Box 227, Churubusco, Indiana 46723
Part 70 Permit No.: T 009-7492-00002
Facility: Roll Coater PB-9
Parameter: VOC
Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month

YEAR: _____

Month	VOC This Month	VOC Previous 11 Months	VOC 12 Month Total
	(tons per month)	(tons per month)	(tons per month)

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: _____

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

Part 70 Quarterly Report

Source Name: BRC Rubber & Plastics, Inc.
 Source Address: 623 West Monroe, Montpelier, Indiana 47359
 Mailing Address: 589 South Main Street, P.O. Box 227, Churubusco, Indiana 46723
 Part 70 Permit No.: T 009-7492-00002
 Facility: Roll Coater PB-9
 Parameter: Single and Combination of HAPs
 Limit: Less than ten (10) and less than twenty-five (25) tons per twelve (12) consecutive month period, respectively, with compliance determined at the end of each month.

YEAR: _____

Month	This Month (tons per month)		Previous 11 Months (tons per month)		12 Month Total (tons per month)	
	Single HAP	Combination of HAPs	Single HAP	Combination of HAPs	Single HAP	Combination of HAPs

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: _____

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

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

Source Name: BRC Rubber & Plastics, Inc.
Source Address: 623 West Monroe, Montpelier, Indiana 47359
Mailing Address: 589 South Main Street, P.O. Box 227, Churubusco, Indiana 46723
Part 70 Permit No.: T 009-7492-00002

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 based on a calendar year. 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 a Part 70
Significant Source and Permit Modifications**

Source Background and Description

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

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

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

and

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

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

pounds per hour.

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

History

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

Enforcement Issue

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

Stack Summary

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

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

Recommendation

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

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

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

Emission Calculations

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

Potential To Emit of Modification

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

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

Pollutant	Potential To Emit (tons/year)
PM	918
PM ₁₀	918
SO ₂	-
VOC	35.1
CO	-
NO _x	-

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

Justification for Modification

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

an unrestricted potential to emit greater than twenty-five (25) tons of PM, PM₁₀, and VOC per year.

County Attainment Status

The source is located in Blackford County.

Pollutant	Status
PM _{2.5}	attainment
PM ₁₀	attainment
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 and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Blackford County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (b) Blackford County has been classified as unclassifiable or attainment for PM_{2.5}. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (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 surrogate for PM_{2.5} emissions. See the State Rule Applicability for the source section.
- (c) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

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

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

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

PM has been set equal to PM₁₀ and PM emission rates for the blasters have been set equal to the equivalent 326 IAC 6-3-2 hourly allowable PM rate for the entire year.

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

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

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

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

Federal Rule Applicability

- (a) This significant permit modification does not involve a pollutant-specific emissions unit as defined in 40 CFR 64.1 for PM₁₀:
 - (1) with the potential to emit before controls equal to or greater than the major source threshold for PM₁₀;
 - (2) that is subject to an emission limitation or standard for any pollutants; and
 - (3) uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard.

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

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

is considered an existing affected source pursuant to 40 CFR 63.3882. Pursuant to 40 CFR 63.3881, the affected source must be a major source of HAPs and use greater than or equal to 946 liters (250 gallons) of HAP coatings for the surface coating of miscellaneous metal parts and products. Since BRC Rubber & Plastics, Inc. uses more than 250 gallons of HAP coatings, the existing source is subject to the requirements of this rule. On March 7, 2005, BRC Rubber & Plastics, Inc. chose to comply with the requirements of NESHAP Subpart MMMM rather than Subpart PPPP. A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/misc/miscpg.html>. Pursuant to 40 CFR 63.3883(b), the Permittee must comply with these requirements on and after January 2, 2007.

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

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

Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of the permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 only applies to Condition D.2.15, of the permit, Notification Requirements which has been added.

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

- (1) All coating operations as defined in 40 CFR 63.3981,
- (2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
- (3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and
- (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.

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

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

State Rule Applicability - Individual Facilities

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

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

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

In order to assure that the addition of the six (6) blasters is a minor modification and that the source retains its minor PSD status, the blasters have had PM and PM₁₀ emission limitations proposed such that the sum of these limits equals less than 24.7 tons per year. This sum allows for future expansion of emission units and/or insignificant activities.

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

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

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

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

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

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

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

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

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

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

These limitations are based upon the following:

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

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

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

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

326 IAC 6-3-2 (Process Operations)

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

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

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

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

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

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

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

State Rule Applicability – Insignificant Activity

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

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

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

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

Compliance Requirements

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

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

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

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

compliance monitoring conditions as specified below:

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

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

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

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

Testing Requirements

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

Proposed Changes

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

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

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

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

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

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

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

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

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

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

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

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

SECTION D.2 FACILITY OPERATION CONDITIONS

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

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

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

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

The total VOC usage to all facilities listed in Section D.2 shall be limited to less than 232 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period, with compliance determined at the end of each month. This usage limit coupled with the unlimited potential to emit VOC from all other facilities, including insignificant activities, at this source of 18.0 tons per year shall render the requirements of 326 IAC 2-2 not applicable.

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

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

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

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

Pursuant to 40 CFR 52 Subpart P, the PM from paint booths, known as PB1 through PB8, and spray booths PB 10 and PB 11 shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

D.2.5 Particulate [326 IAC 6-3-2(d)]

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

D.2.8 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for DIPSPIN, **paint booth PB8** and roll coater PB-9.

D.2.108 Volatile Organic Compounds (VOC)

Compliance with the VOC usage limitations contained in Conditions D.2.1 and D.2.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.2.1240-VOC and HAPs Emissions

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

D.2.153 Record Keeping Requirements

- (a) **To document compliance with Condition D.2.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limit and the VOC emission limit established in Condition D.2.1 for all facilities listed in Section D.2.**
- (1) **The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;**
 - (2) **A log of the dates of use;**
 - (3) **The cleanup solvent usage for each month;**
 - (4) **The total VOC usage for each month; and**
 - (5) **The weight of VOCs emitted for each compliance period.**
- (ba) To document compliance with Conditions **D.2.24 and D.2.3** the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAPs usage limits and the VOC and HAPs emission limits established in Conditions **D.2.24 and D.2.32** for **DIPSPIN, paint booth PB8** and roll coater PB-9.
- (1) The amount and VOC and HAPs content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC and HAPs usage for each month; and
 - (5) The weight of VOCs and HAPs emitted for each compliance period.
- (cb) To document compliance with Conditions **D.2.1311 and D.2.1412**, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (de) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.1614 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.2.1, **D.2.2** and **D.2.32** shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does not

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

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Permit Modification No.: 009-19963-00002

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

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

Part 70 Quarterly Report

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

YEAR: _____

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

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

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

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

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

YEAR: _____

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

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

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

Attach a signed certification to complete this report.

SECTION D.4 FACILITY OPERATION CONDITIONS

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

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

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

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

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

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

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

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

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

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

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

D.4.2 PM and PM₁₀ Limitations [326 IAC 2-2]

The PM and PM₁₀ emission rates for the:

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

Compliance with these PM and PM₁₀ limits renders the requirements of 326 IAC 2-2 not applicable.

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

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

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

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

D.4.43 Particulate Matter (PM)

- (a) The baghouses for PM control shall be in operation and control emissions from the grit blast facilities at all times that the GBLAST1 and/or GBLAST2 are in operation.
- (b) **The self contained vacuums for PM and PM₁₀ control shall be in operation and control emissions from the Ruemblin hand, Guyson turntable, large turntable, small hand Vac-U Blast, Goff turntable and Empire Basket blasters at all times that blasters are in operation.**

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

D.4.54 Visible Emissions Notations

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

D.4.65 Parametric Monitoring

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

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

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

D.4.76 Baghouse and Self-Contained Vacuum Inspections

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

D.4.87 Broken or Failed Bag Detection

In the event that bag failure has been observed:

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

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

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

D.4.98 Record Keeping Requirements

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

SECTION D.5 FACILITY OPERATION CONDITIONS

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

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

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

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

Change 1:

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

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

Change 2:

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

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

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

Change 3:

The provisions of National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products [40 CFR Part 63, Subpart M] [40 CFR 63.3882] [40 CFR 63.3883] [40 CFR 63.3980] apply to the surface coating of metal at this major source of HAPs. This rule has a future compliance date and the following conditions have been added to Section D.2 of the proposed permit and all subsequent conditions in this Section have been renumbered and the internal cites within Condition D.2.11 (now D.2.15) revised.

D.2.6 General Provisions Relating to HAPs [326 IAC 20-1] [40 CFR Part 63, Subpart A] [Table 2 to CFR Part 63, Subpart M] [40 CFR 63.3901]

- (a) **The provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart M.**

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

D.2.7 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products [40 CFR Part 63, Subpart M] [40 CFR 63.3882] [40 CFR 63.3883] [40 CFR 63.3980]

- (a) The provisions of 40 CFR Part 63, Subpart M (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/misc/miscpg.html>. Pursuant to 40 CFR 63.3883(b), the Permittee must comply with these requirements on and after January 2, 2007.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition, except as otherwise provided in this condition. The permit shield applies to Condition D.2.16, Notification Requirements.
- (c) The affected source is the collection of all of the items listed in 40 CFR 63.3882, paragraphs (b)(1) through (4) that are used for surface coating of miscellaneous metal parts and products within each subcategory as defined in 40 CFR 63.3881(a), paragraphs (2) through (6).
- (1) All coating operations as defined in 40 CFR 63.3981;
 - (2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
 - (3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and
 - (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.
- (d) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.3980, and are applicable to the affected source.

RECORD KEEPING AND REPORTING REQUIREMENTS

D.2.17 Notification Requirements [40 CFR 63.3910]

- (a) **General.** The Permittee must submit the applicable notifications in 40 CFR Part 63, Sections 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) by the dates specified in those sections, except as provided in 40 CFR 63.3910, paragraphs (b) and (c).
- (b) **Notification of compliance status.** The Permittee must submit the notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR Part 63, Sections 63.3940, 63.3950, or 63.3960 that applies to the affected source. The notification of compliance

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

D.2.18 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]

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

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

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

Change 4:

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

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

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

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

Change 5:

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

Conclusion

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

Indiana Department of Environmental Management Office of Air Quality

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

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

On June 9, 2005, the Office of Air Quality (OAQ) had a notice published in the Montpelier Herald, Montpelier, Indiana, stating that BRC Rubber & Plastics, Inc. had applied for a Significant Source Modification to construct two (2) shot blasters and increase the capacity of paint booth PB8 at this source. The notice also stated that OAQ proposed to issue a Significant Permit Modification for these operations and operate shot blasters, a dip and spin surface coating unit and four (4) electric ovens as well as provided information on how the public could review the proposed Significant Source and Significant Permit Modifications and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not these Significant Source and Permit Modifications should be issued as proposed.

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

Comment 1:

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

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

Response 1:

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

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

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

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

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

~~(a) The VOC usage of the dip and spin adhesive system, known as DIPSPIN shall be limited to less than twenty five (25) tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period, with compliance determined at the end of~~

~~each month. This usage limit makes 326 IAC 8-1-6 not applicable.~~

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

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

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

D.2.8 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for DIPSPIN, paint booth PB8 and roll coater PB-9.

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

D.2.15 Record Keeping Requirements

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

VOC and HAPs usage limits and the VOC and HAPs emission limits established in Conditions D.2.2 and D.2.3 for ~~DIPSPIN~~, paint booth PB8 and roll coater PB-9.

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

Comment 2:

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

Response 2:

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

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

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

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

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

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

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

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

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

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

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

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

SECTION D.4 FACILITY OPERATION CONDITIONS

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

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

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

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

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

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

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

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

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

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

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

Table 1 - Emission Factors for Abrasives

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

Table 2 - Density of Abrasives (lb/ft3)

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

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

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

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

Calculations

All Blasters 99% control

Empire Blaster

Adjusting Flow Rates for Different Abrasives and Nozzle Diameters

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

477
487
99
0.38
0.38

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

Uncontrolled Emissions (E, lb/hr)

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

0.004
2346.455
0 %
3

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

METHODOLOGY

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

Hand-Vac-U Blast

Adjusting Flow Rates for Different Abrasives and Nozzle Diameters

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

477
487
99
0.38
0.38

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

Uncontrolled Emissions (E, lb/hr)

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

0.004
2346.455
0 %
1

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

**Ruemblin
Hand Blast**

Adjusting Flow Rates for Different Abrasives and Nozzle Diameters

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

477
487
99
0.38
0.38

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

Uncontrolled Emissions (E, lb/hr)

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

0.004
2346.455
0 %
1

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

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

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

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

Uncontrolled Emissions (E, lb/hr)

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

0.004
12240.000
0
1

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

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

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

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

Uncontrolled Emissions (E, lb/hr)

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

0.004
8640.000
0
1

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

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

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

Uncontrolled Emissions (E, lb/hr)

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

0.004

19440.000

0

%

1

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

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

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

Allowable Rate of Emissions

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

Methodology

Allowable Emissions = 4.10(Process Weight Rate)^{0.67}

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

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

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

Dip & Spin

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

PM Control Efficiency: 0.00%

State Potential Emissions

Add worst case coating to all solvents

Uncontrolled	2.04	48.91	8.93	0.00
Controlled	2.04	48.91	8.93	0.00

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

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

Material All on Metal Substrate Unless Otherwise Indicated	Density (lbs/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (units/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (pounds per hour)	Potential VOC (pounds per day)	Potential VOC (tons per year)	Particulate Potential (tons/yr)	lbs VOC/gal solids	Transfer Efficiency
PB8 Silver Machine Adhesive																
Chemlock EP6887-35 for Parts #																
304410002	8.19	73.90%	0.0%	73.9%	0.03%	15.85%	0.00070	1050.000	6.05	6.05	4.45	106.72	19.48	5.51	38.17	20%
4376	8.19	73.90%	0.0%	73.9%	0.03%	15.85%	0.00070	1050.000	6.05	6.05	4.45	106.72	19.48	5.51	38.17	20%
Worst Case									6.05	6.05	4.45	106.72	19.48	5.51	38.17	
									VOC	0%	Uncontrolled	4.45	106.72	19.48	5.505	
									PM	90%	Controlled	4.45	106.72	19.48	0.551	

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

PB8 with 1500 units/hr after controls

6.35 152.46 27.82 0.786

PB8 Silver Machine Solvent	Density (lbs/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (units/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (pounds per hour)	Potential VOC (pounds per day)	Potential VOC (tons per year)	Particulate Potential (tons/yr)	lbs VOC/gal solids	Transfer Efficiency
Xylene for Parts #																
304410002	7.24	100.00%	0.0%	100.0%	0.00%	0.00%	0.00020	1050.000	7.24	7.24	1.52	36.49	6.66	0.00	n/a	100%
4376	7.24	100.00%	0.0%	100.0%	0.00%	0.00%	0.00020	1050.000	7.24	7.24	1.52	36.49	6.66	0.00	n/a	100%
Worst Case									Uncontrolled		1.52	36.49	6.66	0.00	n/a	100%
									PB8 with 1500 units/hr after controls		2.17	52.13	9.51	0.00		

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

METHODOLOGY

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