



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: November 30, 2005  
RE: Bremen Corporation / 099-20282-00033  
FROM: Paul Dubenetzky  
Chief, Permits Branch  
Office of Air Quality

### Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, 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.*

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

November 30, 2005

Re: **099-20282-00033**  
Significant Source Modification to:  
Part 70 Operating Permit No.: **T 099-7476-00033**

Dear Mr. Hofferth:

Bremen Corporation was issued Part 70 Operating Permit, T 099-7476-00033, on December 9, 1999 for a vinyl-coated foam product manufacturing source. An application to modify the source was received on October 18, 2004. Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for construction at the source:

Two (2) additional hand spray booths at the final finish area, identified as Process 3. The description of Process 3 has been revised as follows:

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

The following construction conditions are applicable to the proposed project:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit  
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.
6. Pursuant to 326 IAC 2-7-10.5(l) the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

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

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

Sincerely,

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

CAP/MES

Attachments (Source Modification including updated conditions and Technical Support Document)

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



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## PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

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

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

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

Operation Permit No.: T 099-7476-00033	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: December 9, 1999  Expiration Date: December 9, 2004
Second Significant Source Modification No. 099-20282-00033	Conditions Modified: A.1, A.2, B.25, C.1, D.1.1, D.1.2, D.1.3, D.1.4, D.1.11, D.1.12, D.1.13, D.1.8 and D.1.9 have been removed, and Conditions D.1.5 through D.1.7 (now D.1.7 through D.1.9) have been renumbered  Conditions Added: B.27, D.1.5, D.1.6, D.1.14 and D.1.15  One report form has been added and two have been modified
Issued by: Original Signed By: Paul Dubenetzky, Chief Permits Branch Office of Air Quality	Issuance Date: November 30, 2005

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

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

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

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

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

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

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

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- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

**B.27 Credible Evidence [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [62 FR 8314] [326 IAC 1-1-6]**

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

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

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

**SECTION D.1 FACILITY OPERATION CONDITIONS**

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

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

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

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

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

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

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

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

$$\text{VOC usage at Area 1} + \text{VOC usage at Area 2} + \text{VOC usage at Area 3} + (\text{VOC usage at Processes 2, 3 and 4} * (1 - 0.95)) = \text{VOC emissions}$$

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

- (b) Pursuant to SSM 099-20282-00033 and SPM 099-19959-00033, the total VOC usage at the two (2) hand-spray paint booths, constructed in 2005, at Process 3, shall in no case exceed 799 tons per twelve (12) consecutive month period, with compliance determined at the end of each month, and the catalytic oxidizer shall be operated at a minimum operating temperature of 550 degrees Fahrenheit or a temperature determined in the most recent stack test to maintain at least ninety-five percent (95%) overall control efficiency (capture and destruction) of VOC at all times when Process 3 is in operation. This will limit the potential to emit VOC from the two (2) hand-spray booths constructed in 2005 to less than 40 tons per year. Therefore, this modification is not a major modification pursuant to 326 IAC 2-2, PSD.
- (c) Pursuant to SSM 099-10314-00033, issued on September 14, 1999, the PM and PM<sub>10</sub> emissions shall be limited to 54.3 pounds per hour. This will be achieved by using dry filters at all times when the coating operations at Process 1 and Process 3 are in operation and the control efficiency shall not be less than ninety-eight percent (98.0%). Pursuant to 326 IAC 2-2, the PM and PM<sub>10</sub> emissions shall be less than 250 tons per year.
- (d) Pursuant to SSM 099-20282-00033 and SPM 099-19959-00033, the control efficiency of the dry filters controlling PM and PM<sub>10</sub> emissions from the two (2) hand-spray paint booths, constructed in 2005, at Process 3, shall be limited to 3.42 pounds per hour. This shall limit the potential to emit PM and PM<sub>10</sub> to less than 15 tons per year. Therefore,

pursuant to 326 IAC 2-2, this modification is not a major modification to an existing major source.

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

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

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Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating processes, Process 3 and Area 1, shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

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

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Pursuant to 326 IAC 8-3-2 (Organic Solvent Degreasing Operations: Cold Cleaner Operation) and SSM 099-10314-00033, issued on September 14, 1999, the owner or operator of the cold cleaning facility shall:

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

**D.1.5 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [40 CFR Part 63, Subpart P, Table 2] [40 CFR 63.4501]**

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

**D.1.6 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products [40 CFR Part 63, Subpart P] [40 CFR 63.4481] [40 CFR 63.4482] [40 CFR 63.4483(b)] [40 CFR 63.4581]**

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- (a) The provisions of 40 CFR Part 63, Subpart P (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/plastic/plasticpg.html>. Pursuant to 40 CFR 63.4483(b), the Permittee must comply with these requirements on and after April 19, 2007.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15

does not apply to paragraph (a) of this condition.

- (c) The following emissions units comprise the affected source that is subject to 40 CFR 63, Subpart PPPP:
- (1) All coating operations as defined in 40 CFR 63.4581;
  - (2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
  - (3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and
  - (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.
- (d) Terminology used in this section is defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.4581, and is applicable to the affected source.

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

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

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

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

#### D.1.9 Volatile Organic Compounds (VOC)

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

#### D.1.10 Monitoring

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

#### D.1.11 Parametric Monitoring

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- (a) Continuous records of the catalytic oxidizer internal combustion zone temperature shall be kept using a chart recorder when Process 2, 3, or 4 is in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, when operating, the catalytic oxidizer shall maintain a minimum operating temperature of 550 degrees Fahrenheit or the operating temperature determined in the most recent stack test to maintain at least ninety-five percent (95%) overall control efficiency (capture and destruction) of VOC. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the temperature reading is below 550 degrees Fahrenheit or the operating temperature determined in the most recent stack test.
- The instrument used for determining the temperature shall comply with Section C - Temperature Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.
- (b) The Permittee shall determine the appropriate duct pressure or fan amperage from the most recent valid stack test that demonstrates compliance with the minimum control efficiency in Condition D.1.1, as approved by IDEM. The duct pressure or fan amperage shall be observed at least once per day when the catalytic oxidizer is in operation. On and after the date the approved stack test results are available, the duct pressure or fan amperage shall be maintained within the normal range as established in most recent compliant stack test.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

#### D.1.12 Record Keeping Requirements

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

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

#### D.1.13 Reporting Requirements

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

#### D.1.14 Notification Requirements [40 CFR 63.4510]

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

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

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

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

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

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

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

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

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

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

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

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

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

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

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

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

Attach a signed certification to complete this report.

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

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

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

YEAR:

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

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

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

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

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

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

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

Attach a signed certification to complete this report.

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

**Part 70 Quarterly Report**

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

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

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

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

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

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

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

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

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

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

Attach a signed certification to complete this report.

## Indiana Department of Environmental Management Office of Air Quality

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

#### Source Background and Description

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

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

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

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

The following changes have also been made to the permit:

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

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

### History

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

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

### Enforcement Issue

There are no enforcement actions pending.

### Stack Summary

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

### Recommendation

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

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

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

### Emission Calculations

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

### Potential To Emit of Modification

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

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

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

<b>Pollutant</b>	<b>Potential To Emit (tons/year)</b>
PM	17.0
PM <sub>10</sub>	17.0
SO <sub>2</sub>	0.00
VOC	66.8
CO	0.00
NO <sub>x</sub>	0.00

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

**Justification for Modification**

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

**County Attainment Status**

The source is located in Marshall County.

<b>Pollutant</b>	<b>Status</b>
PM <sub>2.5</sub>	attainment
PM <sub>10</sub>	attainment

Pollutant	Status
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
1-Hour Ozone	attainment
8-Hour Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC emissions and NO<sub>x</sub> are considered when evaluating the rule applicability relating to ozone. Marshall County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NO<sub>x</sub> were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Marshall County has been classified as unclassifiable or attainment for PM<sub>2.5</sub>. U.S. EPA has not yet established the requirements for PSD, 326 IAC 2-2 for PM<sub>2.5</sub> emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM<sub>2.5</sub> emissions, it has directed states to regulate PM<sub>10</sub> emissions as a surrogate for PM<sub>2.5</sub> emissions.
- (c) Marshall County has been classified as attainment or unclassifiable in Indiana for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for PSD, 326 IAC 2-2.
- (d) Fugitive Emissions  
 Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards (NSPS) that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

**Source Status**

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

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

Total HAPs	Greater than 25
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- (a) This existing source is a major stationary source because an attainment regulated pollutant is emitted at a rate of 250 tons per year or more.
- (b) These emissions are based upon the limitations in the Part 70 Operating Permit. Although Process 1 has been removed, the potential to emit based on the limitations in the permit has not changed.

**Potential to Emit of Modification After Issuance**

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

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

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

**Federal Rule Applicability**

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

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

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

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

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

This rule has a future compliance date; therefore, the specific details of the rule and how the Permittee will demonstrate compliance are not provided in this modification. The Permittee shall submit an application for a significant permit modification that will specify the option or options for the emission limitations, standards, and methods for determining compliance chosen by the Permittee. This application must be submitted by July 19, 2006, which is nine months prior to the compliance date for 40 CFR 63, Subpart PPPP. At that time, IDEM, OAQ will include the specific details of the rule and how the Permittee will demonstrate compliance. In addition, pursuant to 40 CFR 63, Subpart PPPP, the Permittee shall submit a Notification of Compliance Status containing the information required by 40 CFR 63.9(h), no later than 30 calendar days following the end of the initial compliance period described in 40 CFR 63.4540, 40 CFR 63.4550, or 40 CFR 63.4560, that applies to the affected source.

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

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

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

- (a) The total VOC usage shall in no case exceed 799 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Pursuant to Condition D.1.1 of the permit, the Permittee is required to operate the catalytic oxidizer and maintain a minimum operating temperature of 550 degrees Fahrenheit, or the operating temperature determined in the most recent stack test, to maintain at least ninety-five percent (95%) overall control efficiency (capture and destruction) of VOC at all times when Process 3 is in operation. Therefore, the potential to emit VOC from the two (2) proposed hand-spray booths will be limited to less than 40 tons per year, and this modification is not a major modification pursuant to 326 IAC 2-2, PSD ( $799 \text{ tons} \times (1-0.95) < 40 \text{ tons}$ ).
- (b) The potential to emit PM and PM<sub>10</sub> from the two (2) proposed hand-spray booths shall be limited to 3.42 pounds per hour. This will limit the potential to emit PM and PM<sub>10</sub> to less than 15 tons per year. Operation of the dry filters at all times when the two (2) proposed hand-spray booths are in operation will limit the potential to emit PM and PM<sub>10</sub> to no more than 3.42 pounds per hour.

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

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

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

The 326 IAC 6-3 revisions that became effective on June 12, 2002, were approved into the State Implementation Plan on September 23, 2005. These rules replace the previous version of 326 IAC 6-3 (Process Operations) that had been part of the SIP; therefore, the requirements of the previous

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

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate from the surface coating processes at Process 3 and Area 1 shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (b) All other coating operations do not have particulate emissions. Therefore, pursuant to 326 IAC 6-3-1(b)(14), the requirements of 326 IAC 6-3-2 do not apply to those operations.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

### Compliance Requirements

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

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

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

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

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

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

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

### Testing Requirements

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

### Proposed Changes

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

#### Changes to IDEM, OAQ, address:

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

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

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

Changes to Section A:

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

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

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

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

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

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

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

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

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

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

Changes to Section B:

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

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 **4230** (ask for ~~OAQ, Technical Support and Modeling~~ **OAQ, Billing, Licensing, and Training** Section), to determine the appropriate permit fee.

**B.27 Credible Evidence [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [62 FR 8314] [326 IAC 1-1-6]**

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

Changes to Section C:

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

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

Changes to Section D:

**SECTION D.1 FACILITY OPERATION CONDITIONS**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- ~~(c)~~(c) Pursuant to SSM 099-10314-00033, issued on September 14, 1999, the PM and PM<sub>10</sub> emissions shall be limited to 54.3 pounds per hour. This will be achieved by using dry filters at all times when the coating operations at Process 1 and Process 3 are in operation and the control efficiency shall not be less than ninety-eight percent (98.0%). Pursuant to 326 IAC 2-2, the PM and PM<sub>10</sub> emissions shall be less than 250 tons per year.

- (d) Pursuant to SSM 099-20282-00033 and SPM 099-19959-00033, the control efficiency of the dry filters controlling PM and PM<sub>10</sub> emissions from the two (2) hand-spray paint booths, constructed in 2005, at Process 3, shall be limited to 3.42 pounds per hour. This shall limit the potential to emit PM and PM<sub>10</sub> to less than 15 tons per year. Therefore, pursuant to 326 IAC 2-2, this modification is not a major modification to an existing major source.

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

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

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

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

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

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

**Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating processes, Process 3 and Area 1, shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.**

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

~~Pursuant to 326 IAC 8-3-2 (Organic Solvent Degreasing Operations: Cold Cleaner Operation) and SSM 099-10314-00033, issued on September 10-14, 1999, the owner or operator of the cold cleaning facility shall:~~

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

**D.1.5 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [40 CFR Part 63, Subpart P, Table 2] [40 CFR 63.4501]**

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

**D.1.6 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products [40 CFR Part 63, Subpart P, Table 2] [40 CFR 63.4481] [40 CFR 63.4482] [40 CFR 63.4483(b)] [40 CFR 63.4581]**

- (a) The provisions of 40 CFR Part 63, Subpart P (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/plastic/plasticpg.html>. Pursuant to 40 CFR 63.4483(b),

**the Permittee must comply with these requirements on and after April 19, 2007.**

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

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

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

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

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

**D.1.79 Volatile Organic Compounds (VOC)**

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

**D.1.8 VOC Emissions**

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

**D.1.9 Particulate Matter (PM)**

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

**D.1.11 Parametric Monitoring**

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

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

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

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

#### D.1.12 Record Keeping Requirements

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

**D.1.13 Reporting Requirements**

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

**D.1.14 Notification Requirements [40 CFR 63.4510]**

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

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

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

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

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

Changes to Report Forms:

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

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

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

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

☉ No deviation occurred in this month.

☉ Deviation/s occurred in this month.

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

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

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

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

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

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

Attach a signed certification to complete this report.

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

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

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

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

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

☞ No deviation occurred in this month.

☞ Deviation/s occurred in this month.

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

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

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

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

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

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

**Attach a signed certification to complete this report.**

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

**Part 70 Quarterly Report**

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

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

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

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.**

## **Conclusion**

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

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

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

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

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

**State Potential Emissions**

**Add worst case coating to all solvents**

<b>Uncontrolled</b>	<b>15.2</b>	<b>365.9</b>	<b>66.8</b>	<b>17.0</b>
<b>Controlled</b>	<b>0.762</b>	<b>18.3</b>	<b>3.34</b>	<b>0.078</b>

**METHODOLOGY**

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

**Appendix A: Emission Calculations**  
**HAP Emission Calculations**

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

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

Total State Potential Emissions

**Uncontrolled VOC Emissions      5.95      14.0      5.38      6.99      1.61      28.0**

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

**METHODOLOGY**

**VOC Emissions after Control      0.297      0.699      0.269      0.350      0.081      1.40**

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