INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

TO: Interested Parties / Applicant

DATE: July 8, 2005

RE: Parts Finishing Group / 113-20355-00084

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures
FNPER.dot 1/10/05

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) OFFICE OF AIR QUALITY

Parts Finishing Group – Indiana
210 South Progress Drive East
Kendallville, Indiana 46755

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 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. This permit also addresses new source review requirements and is intended to fulfill the new source review procedures and permit revision requirements pursuant to 326 IAC 2-8-11.1, applicable to those conditions.

Operation Permit No.: F113-20355-00084	
Original signed by: Paul Dubenetzky, Chief Permits Branch Office of Air Quality	Issuance Date: July 8, 2005 Expiration Date: July 8, 2005

TABLE OF CONTENTS

SECTION A SOURCE SUMMARY 5
A.1 General Information [326 IAC 2-8-3(b)]
A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]
A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]
A.4 FESOP Applicability [326 IAC 2-8-2]
A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

SECTION B GENERAL CONDITIONS 8
B.1 Permit No Defense [IC 13]
B.2 Definitions [326 IAC 2-8-1]
B.3 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5]
B.4 Enforceability [326 IAC 2-8-6]
B.5 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]
B.6 Severability [326 IAC 2-8-4(4)]
B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]
B.8 Duty to Provide Information[326 IAC 2-8-4(5)(E)]
B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]
B.10 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]
B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]
B.12 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]
B.13 Emergency Provisions [326 IAC 2-8-12]
B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]
B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]
B.16 Permit Renewal [326 IAC 2-8-3(h)]
B.17 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]
B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]
B.19 Permit Revision Requirement [326 IAC 2-8-11.1]
B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC13-14-2-2][IC 13-17-3-2][IC13-30-3-1]
B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]
B.22 Annual Fee Payment [326 IAC 2-7-19][326 IAC 2-8-4(6)] [326 IAC 2-8-16] [326 IAC 2-1.1-7]
B.23 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314][326 IAC 1-1-6]

SECTION C SOURCE OPERATION CONDITIONS 17

Emission Limitations and Standards [326 IAC 2-8-4(1)]
C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P][326 IAC 6-3-2]
C.2 Overall Source Limit [326 IAC 2-8]
C.3 Opacity [326 IAC 5-1]
C.4 Open Burning [326 IAC 4-1][IC 13-17-9]
C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]
C.6 Fugitive Dust Emissions [326 IAC 6-4]
C.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]
C.8 Stack Height [326 IAC 1-7]
C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61 Subpart M]

Testing Requirements [326 IAC 2-8-4(3)]
C.10 Performance Testing [326 IAC 3-6]

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

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]
C.12 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]
C.13 Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]

TABLE OF CONTENTS (Continued)

C.14 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5]
C.15 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]
C.16 Compliance Response Plan -Preparation, Implementation, Records, and Reports [326 IAC 2-8-4][326 IAC 2-8-5]
C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]
C.18 General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]
C.19 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

Stratospheric Ozone Protection
C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

SECTION D.1 FACILITY OPERATION CONDITIONS 24

Construction Conditions

General Construction Conditions
D.1.1 Permit No Defense
D.1.2 Federally Enforceable State Operating Permit [326 IAC 2-8]

Effective Date of the Permit
D.1.3 Effective Date of the Permit [IC13-15-5-3]
D.1.4 Modification to Construction Conditions [326 IAC 2]

Operation Conditions

Emission Limitations and Standards [326 IAC 2-8-4(1)]
D.1.5 FESOP [326 IAC 2-8-4][326 IAC 2-2][40 CFR 63, Subpart MMMM][40 CFR 63, Subpart DDDDD]
D.1.6 Volatile Organic Compound (VOC) Content Limitations [326 IAC 8-2-9]
D.1.7 Particulate Matter [40 CFR 52 Subpart P]
D.1.8 Particulate Control [326 IAC 6-3-2(d)]
D.1.9 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

Compliance Determination Requirements
D.1.10 Volatile Organic Compounds (VOC)
D.1.11 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 8-1-2][326 IAC 8-1-4]
D.1.12 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]
D.1.13 Catalytic Oxidizer Temperature
D.1.14 Parametric Monitoring
D.1.15 Monitoring

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]
D.1.16 Record Keeping Requirements
D.1.17 Reporting Requirements

TABLE OF CONTENTS (Continued)

SECTION D.2 FACILITY OPERATION CONDITIONS 30

Emission Limitations and Standards [326 IAC 2-8-4(1)]
D.2.1 PM Emissions [326 IAC 6-2-4]

SECTION D.3 FACILITY OPERATION CONDITIONS 31

Emission Limitations and Standards [326 IAC 2-8-4(1)]
D.3.1 Particulate Emission Limitations [326 IAC 6-3-2]

SECTION D.4 FACILITY OPERATION CONDITIONS 32

Emission Limitations and Standards [326 IAC 2-8-4(1)]

Certification Form 33
Emergency Occurrence Form 34
Quarterly Report Form 36-38
Quarterly Deviation and Compliance Monitoring Report Form 39

SECTION A SOURCE SUMMARY

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

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary metal parts coating plant.

Authorized individual:	Vice President & General Manager
Source Address:	210 South Progress Drive East, Kendallville, Indiana 46755
Mailing Address:	24600 Industrial Highway, Warren, Michigan 48089
General Source Phone:	(586) 759-3559
SIC Code:	3479
County Location:	Noble County
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

(a) Two (2) dip coating operations, identified as EU-01 and EU-02, to be constructed in 2005, applying coatings to automobile metal parts, controlled by catalytic oxidizer EU-07, and exhausting to stack 1.

(b) Three (3) spray coating lines, identified as EU-03, EU-04, and EU-05, to be constructed in 2005, applying coatings to automobile metal parts, equipped with HVLP spray guns, using dry filters for particulate control and using catalytic oxidizer EU-07 for VOC and HAP control, and exhausting to stack 1.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

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

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, including the following:

(1) One (1) natural gas fired boiler, to be constructed in 2005, with a maximum heat input capacity of 5.0 MMBtu/hr. [326 IAC 6-2-4]

(2) One (1) natural gas fired oven, to be constructed in 2005, used in conjunction with the dip coating operation EU-01, with a maximum heat input capacity of 1.0 MMBtu/hr.

(3) One (1) natural gas fired oven, to be constructed in 2005, used in conjunction with the dip coating operation EU-02, with a maximum heat input capacity of 2.0 MMBtu/hr.

(4) Two (2) natural gas fired ovens, to be constructed in 2005, equipped with spray coating operations EU-04 and EU05, each with a maximum heat input capacity of 0.5 MMBtu/hr.

(b) Combustion source flame safety purging on startup.

(c) Machining where an aqueous cutting coolant continuously floods the machining interface.

(d) Closed loop heating and cooling systems.

(e) Solvent recycling systems with batch capacity less than or equal to 100 gallons.

(f) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.

(g) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(h) Paved and unpaved roads and parking lots with public access.

(i) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

(j) On-site fire and emergency response training approved by the department.

(k) Filter or coalescer media changeout.

(l) Other emission units, not regulated by a NESHAP, with PM10, NOx, and SO_2 emissions less than five (5) pounds per hour or twenty-five (25) pounds per day, CO emissions less than twenty-five (25) pounds per day, VOC emissions less than three (3) pounds per hour or fifteen (15) pounds per day, lead emissions less than six-tenths (0.6) tons per year or three and twenty-nine hundredths (3.29) pounds per day, and emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP, or emitting greater than one (1) pound per day but less than twelve and five tenths (12.5) pounds per day or two and five tenths (2.5) ton per year of any combination of HAPs:

(1) One (1) steel shot blast machine, identified as EU-08, to be constructed in 2005, with a maximum abrasive usage of 5.0 pounds per hour and the maximum throughput rate of 5,000 pounds of metal parts per hour, controlled by a dust collector. [326 IAC 6-3-2]

(2) One (1) parts washer with acid and base cycles, identified as EU-06, to be constructed in 2005, with a maximum usage of 15 gallons per hour of 31.4% hydrochloric acid solution.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised, or

(3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

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

B.3 Permit Term [326 IAC 2-8-4(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.4 Enforceability [326 IAC 2-8-6]

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

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source’s existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

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

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

B.8 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1 when furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

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

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

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

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

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

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

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

(5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.12 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

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

The PMP extension notification does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ,. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.13 Emergency Provisions [326 IAC 2-8-12]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ and the Northern Regional Office, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

IDEM:
Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)

Facsimile No.: 317-233-5967

Northern Regional Office:
Telephone No.: 1-800-753-5519, or
Telephone No.: 219-245-4870
Facsimile No.: 219-245-4877

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

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

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

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

(h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

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

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

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

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

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

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.16 Permit Renewal [326 IAC 2-8-3(h)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

(b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

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

(2) If IDEM, OAQ upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

B.17 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

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

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

Any such application shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

(d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

(a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

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

(4) The Permittee notifies the:

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

and

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

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

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

(b) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).

(c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

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

B.19 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC13-30-3-1]

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

(a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

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

(b) 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.23 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314][326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

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

(1) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

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

C.2 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable;

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 Opacity [326 IAC 5-1]

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

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

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

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

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

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

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

C.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]

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

C.8 Stack Height [326 IAC 1-7]

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

C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue

Indianapolis, Indiana 46204

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Demolition and renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.10 Performance Testing [326 IAC 3-6]

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

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any

monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.12 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

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

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

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

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.13 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

C.14 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

(a) Whenever a condition in this permit requires the measurement of a temperature, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (∀2%) of full scale reading.

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

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.15 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

C.16 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this

permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and is comprised of:

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

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

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall be considered a deviation from the permit.

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

(e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

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

The response action documents submitted pursuant to this condition do require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.18 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

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

C.19 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

(a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the “authorized individual” as defined by 326 IAC2-1.1-1(1).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

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

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) The first report covered the period commencing on the date of issuance of the original FESOP and ended on the last day of the reporting period. All subsequent reporting periods shall be based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

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

(a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156

(b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]

(a) Two (2) dip coating operations, identified as EU-01 and EU-02, to be constructed in 2005, applying coatings to automobile metal parts, controlled by catalytic oxidizer EU-07, and exhausting to stack 1.

(b) Three (3) spray coating lines, identified as EU-03, EU-04, and EU-05, to be constructed in 2005, applying coatings to automobile metal parts, equipped with HVLP spray guns, using dry filters for particulate control and using catalytic oxidizer EU-07 for VOC and HAP control, and exhausting to stack 1.

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

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 326 IAC 2-8-11.1, WITH CONDITIONS LISTED BELOW.

Construction Conditions

General Construction Conditions

D.1.1 Permit No Defense

This permit 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.

D.1.2 Federally Enforceable State Operating Permit [326 IAC 2-8]

The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), Permit Administration & Development Section, verifying that the emission units were constructed as proposed in the application.

Effective Date of the Permit

D.1.3 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.

D.1.4 Modification to Construction Conditions [326 IAC 2]

All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for revisions pursuant to 326 IAC 2.

Operation Conditions

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.5 FESOP [326 IAC 2-8-4][326 IAC 2-2][40 CFR 63, Subpart MMMM][40 CFR 63, Subpart DDDDD]

(a) The emissions from the dip coating operations (EU-01 and EU-02) and the spray coating lines (EU-03, EU-04, and EU-05) shall be controlled by catalytic oxidizer EU-07 with a destruction efficiency of at least 95%.

(b) The capture efficiency for each of the dip coating operations (EU-01 and EU-02) shall be at least 90%.

(c) The capture efficiency for each of the spray coating lines (EU-03, EU-04, and EU-05 shall be at least 85%.

(d) The VOC emissions from the coating operations EU-01 through EU-05 shall not exceed 98.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month. The monthly VOC emissions from these coating operations shall be calculated as follows:

VOC Emissions (tons/month) = (1 – 95% x 90%) U1 + (1 – 95% x 85%) U2 + (S-W)

Where: U1 = Total VOC usage from the use of coatings and thinners in EU-01 and EU-02.
U2 = Total VOC Usage from the use of coatings and thinners in EU-03, EU-04, and EU-05.
S = Total VOC Usage from the use of cleaning solvents.
W = Total VOC in the waste solvent stream.

(e) Emissions for any single HAP from the dip coating operations (EU-01 and EU-02) and the spray coating lines (EU-03, EU-04, and EU-05) shall not exceed 9.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month. The monthly emissions for an individual HAP shall be calculated using the following equation:

HAP_i (tons/month) = (1 – 95% x 90%) X_i + (1 – 95% x 85%) Y_i + S_i

Where: i = Type of HAP
X_i= HAP i input to EU-01 and EU-02 from the use of coatings and thinners (tons/month).
Y_i = HAP i input to EU-03, EU-04, and EU-5 from the use of coatings and thinners (tons/month).
S_i = HAP i input from the use of cleaning solvents (tons/month).

(f) Total HAPs emissions from the from the dip coating operations (EU-01 and EU-02) and the spray coating lines (EU-03, EU-04, and EU-05) shall not exceed 24.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month. The total monthly HAP emissions shall be determined using the following equation:

Total HAP emissions (tons/month) = $\sum_i HAP_i$

Where HAP_i, shall be calculated using the equation in Condition D.1.5(e).

Combined with VOC emissions from the insignificant activities, the VOC emissions from the entire source are limited to less than 100 tons/yr. Combined with the HAP emissions from the insignificant activities, the HAP emissions from the entire source are limited to less than 10 tons/yr for a single HAP and less than 25 tons/yr. Therefore, the requirements of 326 IAC 2-7 (Part 70 Program), 326 IAC 2-2 (PSD), 40 CFR 63, Subpart MMMM, and 40 CFR 63, Subpart DDDDD are not applicable.

D.1.6 Volatile Organic Compound (VOC) Content Limitations [326 IAC 8-2-9]

(a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), no owner or operator of a facility engaged in the surface coating of miscellaneous metal parts or products may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of three and five tenths (3.5) pounds of VOC per gallon of coating excluding water, delivered to a coating applicator that applies extreme performance coatings.

(b) Pursuant to 326 IAC 8-1-2 (b), the VOC emissions from the coating operations EU-01 through EU-05 shall be limited to no greater than the equivalent emissions, expressed as pounds of VOC per gallon of coating solids, allowed in (a).

This equivalency was determined by the following equation:

E = L / (1 - (L/D))

Where:

L= Applicable emission limit from 326 IAC 8 in pounds of VOC per gallon of coating;
D = Density of VOC in coating in pounds per gallon of VOC;
E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.

Actual solvent density shall be used to determine compliance of the surface coating operation using the compliance methods in 326 IAC 8-1-2 (a).

(c) The pounds of VOC per gallon of coating solids shall be limited to less than 6.67.

(d) Pursuant to 326 IAC 8-1-2(c), the overall control efficiency of the thermal oxidizer shall be no less than the equivalent overall efficiency calculated by the following equation:

$$O = \frac{V - E}{V} X\ 100$$

Where:

V = The actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content of all coatings, as applied to the subject coating line as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids as applied.
E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.
O = Equivalent overall efficiency of the capture system and control device as a percentage.

The overall efficiency of the thermal oxidizer shall be greater than 77%.

(e) Pursuant to 326 IAC 8-2-9(f) (Miscellaneous Metal Coating Operations), solvent sprayed from the application equipment during clean up or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.1.7 Particulate Matter [40 CFR 52 Subpart P]

Pursuant to 40 CFR 52 Subpart P, the particulate matter from each of the spray coating lines EU-03, EU-04, and EU-05 shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

D.1.8 Particulate Control [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the spray coating lines EU-03, EU-04, and EU-05 shall be controlled by dry particulate filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.1.9 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.1.10 Volatile Organic Compounds (VOC)

In order to comply with Conditions D.1.5 and D.1.6, the catalytic oxidizer EU-07 shall be in operation and control emissions from the dip coating operations (EU-01 and EU-02) and the spray coating lines (EU-03, EU-04, and EU-05) at all times that these units are in operation.

D.1.11 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 8-1-2][326 IAC 8-1-4]

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

(b) The Permittee shall determine the VOC and HAP contents of the waste stream in a shipment pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by EPA Reference Method 24 and the sampling procedures in 326 IAC 8-1-4 or other methods as approved by the Commissioner. If a shipment consists of separate containers, the Permittee shall sample each container.

D.1.12 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

Within 60 days after achieving the maximum production, but no later than 180 days after initial startup, the Permittee shall perform the following tests:

(a) In order to demonstrate compliance with Conditions D.1.5(a) and D.1.6(d), the Permittee shall conduct a performance test to verify VOC destruction efficiency for the catalytic oxidizer EU-07 utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration.

(b) In order to demonstrate compliance with Conditions D.1.5(b) and D.1.6(d), the Permittee shall conduct a performance test to determine the capture efficiencies for the dip coating operations (EU-01 and EU-02) utilizing methods as approved by the Commissioner.

(c) In order to demonstrate compliance with Conditions D.1.5(c) and D.1.6(d), the Permittee shall conduct a performance test to determine the capture efficiencies for the spray coating lines EU-03, EU-04, and EU05 utilizing methods as approved by the Commissioner.

Testing shall be conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.13 Catalytic Oxidizer Temperature

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the catalytic oxidizer for measuring operating temperature. The output of this system shall be recorded as a 3-hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall operate the catalytic oxidizer at or above the 3-hour average temperature of 600°F.

(b) The Permittee shall determine the 3-hour average temperature from the most recent valid stack test that demonstrates compliance with limits in Condition D.1.5 (a) as approved by IDEM.

(c) On and after the date the approved stack test results are available, the Permittee shall operate the catalytic oxidizer at or above the 3-hour average temperature as observed during the compliant stack test.

D.1.14 Parametric Monitoring

(a) The Permittee shall determine the appropriate duct pressure or fan amperage from the most recent valid stack test that demonstrates compliance with limits in Condition D.1.5 (a), as approved by IDEM.

(b) The duct pressure or fan amperage shall be observed at least once per day when the catalytic oxidizer is in operation. When for any one reading, the duct pressure or fan amperage is outside the normal range as established in most recent compliant stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports. A reading that is outside the range as established in the most recent compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports shall be considered a deviation from this permit.

D.1.15 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the spray coating booth stack (stack 1) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.16 Record Keeping Requirements

(a) To document compliance with Conditions D.1.5 (d), (e), and (f) the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC emission limit established in Conditions D.1.5 (d), (e), and (f).

(1) The VOC and HAP content of each coating material and solvent used less water.

(2) The VOC and HAP content of the waste stream shipped out as determined in Condition D.1.11(b).

(3) The amount of coating material and solvent used on a monthly basis.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(4) The amount of the waste solvent shipped out.

(5) The VOC and HAP emissions for each month, calculated using the equation in Conditions D.1.5 (d), (e), and (f).

(6) The total VOC and HAP emissions for each compliance period.

(b) To document compliance with Condition D.1.13, the Permittee shall maintain continuous temperature records for the catalytic oxidizer (EU-07) and the 3-hour average temperature used to demonstrate compliance during the most recent compliant stack test.

(c) To document compliance with Condition D.1.14, the Permittee shall maintain daily records of the duct pressure or fan amperage for the catalytic oxidizer (EU-07).

(d) To document compliance with Condition D.1.15, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(e) To document compliance with Condition D.1.9, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.

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

D.1.17 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.5 (d), (e), and (f) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by an “authorized individual” as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, including the following:

(1) One (1) natural gas fired boiler, to be constructed in 2005, with a maximum heat input capacity of 5.0 MMBtu/hr. [326 IAC 6-2-4]

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

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 PM Emissions [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4(a) (PM Emissions for Sources of Indirect Heating), PM emissions from the 5 MMBtu/hr natural gas fired boiler shall not exceed 0.60 lbs/MMBtu.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]

(l) Other emission units, not regulated by a NESHAP, with PM10, NOx, and SO_2 emissions less than five (5) pounds per hour or twenty-five (25) pounds per day, CO emissions less than twenty-five (25) pounds per day, VOC emissions less than three (3) pounds per hour or fifteen (15) pounds per day, lead emissions less than six-tenths (0.6) tons per year or three and twenty-nine hundredths (3.29) pounds per day, and emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP, or emitting greater than one (1) pound per day but less than twelve and five tenths (12.5) pounds per day or two and five tenths (2.5) ton per year of any combination of HAPs:

(1) One (1) steel shot blast machine, identified as EU-08, to be constructed in 2005, with a maximum abrasive usage of 5.0 pounds per hour and the maximum throughput rate of 5,000 pounds of metal parts per hour, controlled by a dust collector. [326 IAC 6-3-2]

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

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.3.1 Particulate Emission Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the blast machine EU-08 shall be limited to 7.58 lbs/hr when the process weight rate is 5,000 lbs/hr.

The pounds per hour limitations were calculated using one of the following equations:

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

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

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)] Insignificant Activities:

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, including the following:

(2) One (1) natural gas fired oven, to be constructed in 2005, used in conjunction with the dip coating operation EU-01, with a maximum heat input capacity of 1.0 MMBtu/hr.

(3) One (1) natural gas fired oven, to be constructed in 2005, used in conjunction with the dip coating operation EU-02, with a maximum heat input capacity of 2.0 MMBtu/hr.

(4) Two (2) natural gas fired ovens, to be constructed in 2005, equipped with spray coating operations EU-04 and EU05, each with a maximum heat input capacity of 0.5 MMBtu/hr.

(b) Combustion source flame safety purging on startup.

(c) Machining where an aqueous cutting coolant continuously floods the machining interface.

(d) Closed loop heating and cooling systems.

(e) Solvent recycling systems with batch capacity less than or equal to 100 gallons.

(f) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.

(g) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(i) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

(j) On-site fire and emergency response training approved by the department.

(k) Filter or coalescer media changeout.

(l) Other emission units, not regulated by a NESHAP, with PM10, NOx, and SO_2 emissions less than five (5) pounds per hour or twenty-five (25) pounds per day, CO emissions less than twenty-five (25) pounds per day, VOC emissions less than three (3) pounds per hour or fifteen (15) pounds per day, lead emissions less than six-tenths (0.6) tons per year or three and twenty-nine hundredths (3.29) pounds per day, and emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP, or emitting greater than one (1) pound per day but less than twelve and five tenths (12.5) pounds per day or two and five tenths (2.5) ton per year of any combination of HAPs:

(2) One (1) parts washer with acid and base cycles, identified as EU-06, to be constructed in 2005, with a maximum usage of 15 gallons per hour of 31.4% hydrochloric acid solution.

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

Emission Limitations and Standards [326 IAC 2-8-4(1)]

There are no specific state or federal rules applicable to these emission units.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Parts Finishing Group – Indiana
Source Address: 210 South Progress Drive East, Kendallville, Indiana 46755
Mailing Address: 24600 Industrial Highway, Warren, Michigan 48089
FESOP No.: F113-20355-00084

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

Please check what document is being certified:

☐ Annual Compliance Certification Letter

☐ Test Result (specify)_____

☐ Report (specify)_____

☐ Notification (specify)_____

☐ Affidavit (specify)_____

☐ Other (specify)_____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Signature:
Printed Name:
Title/Position:
Date:

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

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT

Source Name:	Parts Finishing Group – Indiana
Source Address:	210 South Progress Drive East, Kendallville, Indiana 46755
Mailing Address:	24600 Industrial Highway, Warren, Michigan 48089
FESOP No.:	F113-20355-00084

This form consists of 2 pages **Page 1 of 2**

☐ This is an emergency as defined in 326 IAC 2-7-1(12)

- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (**2**) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

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

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

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

A certification is not required for this report.

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

FESOP Quarterly Report

Source Name: Parts Finishing Group – Indiana
Source Address: 210 South Progress Drive East, Kendallville, Indiana 46755
Mailing Address: 24600 Industrial Highway, Warren, Michigan 48089
FESOP No.: F113-20355-00084
Facility: Coating Operations EU-01 through EU-05
Parameter: VOC Emissions
Limit: Less than 98.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

VOC Emissions (tons/month) = (1 – 95% x 90%) U1 + (1 – 95% x 85%) U2 + (S-W)

Where: U1 = Total VOC usage from the use of coatings and thinners in EU-01 and EU-02.
U2= Total VOC Usage from the use of coatings and thinners in EU-03, EU-04, and EU-05.
S= Total VOC Usage from the use of cleaning solvents.
W= Total VOC in the waste solvent stream.

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 quarter.

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

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

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Parts Finishing Group – Indiana
Source Address: 210 South Progress Drive East, Kendallville, Indiana 46755
Mailing Address: 24600 Industrial Highway, Warren, Michigan 48089
FESOP No.: F113-20355-00084
Facility: Coating Operations EU-01 through EU-05
Parameter: Single HAP Emissions
Limit: Less than 9.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

$$HAP_i \text{ (tons/month)} = (1 - 95\% \times 90\%)\, X_i + (1 - 95\% \times 85\%)\, Y_i + S_i$$

Where: i= Type of HAP
X_i= HAP i input to EU-01 and EU-02 from the use of coatings and thinners (tons/month).
Y_i = HAP i input to EU-03, EU-04, and EU-5 from the use of coatings and thinners (tons/month).
S_i = HAP i input from the use of cleaning solvents (tons/month).

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 quarter.

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

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

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Parts Finishing Group – Indiana
Source Address: 210 South Progress Drive East, Kendallville, Indiana 46755
Mailing Address: 24600 Industrial Highway, Warren, Michigan 48089
FESOP No.: F113-20355-00084
Facility: Coating Operations EU-01 through EU-05
Parameter: Total HAP Emissions
Limit: Less than 24.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Total HAP emissions (tons/month) = $\sum_i HAP_i$

Where

HAP_i (tons/month) = (1 – 95% x 90%) X_i + (1 – 95% x 85%) Y_i + S_i
i= Type of HAP
X_i= HAP i input to EU-01 and EU-02 from the use of coatings and thinners (tons/month).
Y_i = HAP i input to EU-03, EU-04, and EU-5 from the use of coatings and thinners (tons/month).
S_i = HAP i input from the use of cleaning solvents (tons/month).

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 quarter.

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

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

Attach a signed certification to complete this report.

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

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Parts Finishing Group – Indiana
Source Address: 210 South Progress Drive East, Kendallville, Indiana 46755
Mailing Address: 24600 Industrial Highway, Warren, Michigan 48089
FESOP No.: F113-20355-00084

Months: _____ **to** _____ **Year:** _____

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked ANo deviations occurred this reporting period@.
☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.
☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

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

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

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

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

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

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the Technical Support Document
for Federally Enforceable State Operating Permit (FESOP)

Source Background and Description

Source Name:	Parts Finishing Group – Indiana
Source Location:	210 South Progress Drive East, Kendallville, Indiana 46755
County:	Noble
SIC Code:	3479
Operation Permit No.:	F113-20355-00084
Permit Reviewer:	ERG/YC

On May 27, 2005, the Office of Air Quality (OAQ) published a notice in the News-Sun, Kendallville, Indiana, stating that Parts Finishing Group – Indiana had applied for a Federally Enforceable State Operating Permit (FESOP) to operate a metal parts coating plant with control. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review, the OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted).

1, The rule citation for the facility description in all of the D sections has been corrected as follows:

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description ~~[326 IAC 2-7-5(15)]~~[326 IAC 2-8-4(10)]

(a) Two (2) dip coating operations, identified as EU-01 and EU-02, to be constructed in 2005, applying coatings to automobile metal parts, controlled by catalytic oxidizer EU-07, and exhausting to stack 1.

(b) Three (3) spray coating lines, identified as EU-03, EU-04, and EU-05, to be constructed in 2005, applying coatings to automobile metal parts, equipped with HVLP spray guns, using dry filters for particulate control and using catalytic oxidizer EU-07 for VOC and HAP control, and exhausting to stack 1.

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

…

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description ~~[326 IAC 2-7-5(15)]~~[326 IAC 2-8-4(10)]

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, including the following:

(1) One (1) natural gas fired boiler, to be constructed in 2005, with a maximum heat input capacity of 5.0 MMBtu/hr. [326 IAC 6-2-4]

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

…

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description ~~[326 IAC 2-7-5(15)]~~[326 IAC 2-8-4(10)]

(l) Other emission units, not regulated by a NESHAP, with PM10, NOx, and SO_2 emissions less than five (5) pounds per hour or twenty-five (25) pounds per day, CO emissions less than twenty-five (25) pounds per day, VOC emissions less than three (3) pounds per hour or fifteen (15) pounds per day, lead emissions less than six-tenths (0.6) tons per year or three and twenty-nine hundredths (3.29) pounds per day, and emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP, or emitting greater than one (1) pound per day but less than twelve and five tenths (12.5) pounds per day or two and five tenths (2.5) ton per year of any combination of HAPs:

(1) One (1) steel shot blast machine, identified as EU-08, to be constructed in 2005, with a maximum abrasive usage of 5.0 pounds per hour and the maximum throughput rate of 5,000 pounds of metal parts per hour, controlled by a dust collector. [326 IAC 6-3-2]

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

…

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description ~~[326 IAC 2-7-5(15)]~~[326 IAC 2-8-4(10)] Insignificant Activities:

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, including the following:

(2) One (1) natural gas fired oven, to be constructed in 2005, used in conjunction with the dip coating operation EU-01, with a maximum heat input capacity of 1.0 MMBtu/hr.

…

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a New Source Review and a Federally Enforceable State Operating Permit (FESOP)

Source Background and Description

Source Name:	Parts Finishing Group – Indiana
Source Location:	210 South Progress Drive East, Kendallville, Indiana 46755
County:	Noble
SIC Code:	3479
Operation Permit No.:	F113-20355-00084
Permit Reviewer:	ERG/YC

The Office of Air Quality (OAQ) has reviewed a New Source Review and FESOP application from Parts Finishing Group – Indiana relating to the construction and operation of a metal parts coating plant.

Permitted Emission Units and Pollution Control Equipment

There are no permitted emission units at this source during this review process.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted emission units operating at this source during this review process.

New Emission Units and Pollution Control Equipment

The application includes information relating to the prior approval for the construction and operation of the following equipment pursuant to 326 IAC 2-8-4(11):

(a) Two (2) dip coating operations, identified as EU-01 and EU-02, to be constructed in 2005, applying coatings to automobile metal parts, controlled by catalytic oxidizer EU-07, and exhausting to stack 1.

(b) Three (3) spray coating lines, identified as EU-03, EU-04, and EU-05, to be constructed in 2005, applying coatings to automobile metal parts, equipped with HVLP spray guns, using dry filters for particulate control and using catalytic oxidizer EU-07 for VOC and HAP control, and exhausting to stack 1.

Insignificant Activities

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

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, including the following:

(1) One (1) natural gas fired boiler, to be constructed in 2005, with a maximum heat input capacity of 5.0 MMBtu/hr. [326 IAC 6-2-4]

(2) One (1) natural gas fired oven, to be constructed in 2005, used in conjunction with the dip coating operation EU-01, with a maximum heat input capacity of 1.0 MMBtu/hr.

(3) One (1) natural gas fired oven, to be constructed in 2005, used in conjunction with the dip coating operation EU-02, with a maximum heat input capacity of 2.0 MMBtu/hr.

(4) Two (2) natural gas fired ovens, to be constructed in 2005, equipped with spray coating operations EU-04 and EU05, each with a maximum heat input capacity of 0.5 MMBtu/hr.

(b) Combustion source flame safety purging on startup.

(c) Machining where an aqueous cutting coolant continuously floods the machining interface.

(d) Closed loop heating and cooling systems.

(e) Solvent recycling systems with batch capacity less than or equal to 100 gallons.

(f) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.

(g) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(h) Paved and unpaved roads and parking lots with public access.

(i) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

(j) On-site fire and emergency response training approved by the department.

(k) Filter or coalescer media changeout.

(l) Other emission units, not regulated by a NESHAP, with PM10, NOx, and SO_2 emissions less than five (5) pounds per hour or twenty-five (25) pounds per day, CO emissions less than twenty-five (25) pounds per day, VOC emissions less than three (3) pounds per hour or fifteen (15) pounds per day, lead emissions less than six-tenths (0.6) tons per year or three and twenty-nine hundredths (3.29) pounds per day, and emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP, or emitting greater than one (1) pound per day but less than twelve and five tenths (12.5) pounds per day or two and five tenths (2.5) ton per year of any combination of HAPs:

(1) One (1) steel shot blast machine, identified as EU-08, to be constructed in 2005, with a maximum abrasive usage of 5.0 pounds per hour and the maximum throughput rate of 5,000 pounds of metal parts per hour, controlled by a dust collector. [326 IAC 6-3-2]

(2) One (1) parts washer with acid and base cycles, identified as EU-06, to be constructed in 2005, with a maximum usage of 15 gallons per hour of 31.4% hydrochloric acid solution.

Existing Approvals

No air approval has been issued to this source.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

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

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

An administratively complete FESOP application for the purposes of this review was received on January 12, 2005. Additional information was received on March 23, 2005 and April 25, 2005.

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

Emission Calculations

See Appendix A of this document for detailed emission calculations (pages 1 through 6).

Potential to Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source or emissions unit 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 department, or the appropriate local air pollution control agency."

Pollutant	Potential to Emit (tons/yr)
PM	31.8
PM-10	31.8
SO_2	0.02
VOC	787
CO	3.31
NO_x	3.94

HAPs	Potential to Emit (tons/yr)
MIBK	148
Xylene	185
Ethyl Benzene	51.5
MEK	75.9
Formaldehyde	2.47
Toluene	317
Methanol	6.95
Total	786

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 2-7. The source will be issued a FESOP because the source will limit its emissions below the Title V levels.

(b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7. The source will be issued a FESOP because the source will limit its emissions below the Title V levels.

(c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD applicability.

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this FESOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

	Potential To Emit (tons/year)						
Process/Emission Unit	PM	PM-10	SO_2	VOC	CO	NO_x	HAPs
Dip Coating Operations* EU-01 and EU-02	-	-	-	Less than 98.0	-	-	Less than 9.0 for a single HAP and Less than 24.0 for total HAPs
Spray Coating Operations* EU-03, EU-04, and EU-05	Negligible	Negligible	-		-	-	
NG Combustion Units (Insignificant)	0.30	0.30	0.02	0.22	3.31	3.94	Negligible
Blast Machine EU-08 (Insignficant)	0.09	0.08	-	-	-	-	-
Other Insignificant Activities	Less than 1.0	Less than 1.0	-	Less than 1.0	-	-	Negligible
Total PTE of the Entire Source	1.39	1.38	0.02	Less than 99.2	3.31	3.94	Less than 9.0 for a single HAP and Less than 24.0 for total HAPs
Title V Thresholds	NA	100	100	100	100	100	10 for a single HAP and 25 for total HAPs

Note: "-" Pollutant not emitted by the facility.
* These units will be controlled by a catalytic oxidizer (EU-07).

County Attainment Status

The source is located in Noble County.

Pollutant	Status
PM-10	Attainment
PM -2.5	Attainment or Unclassifiable
SO_2	Attainment
NO_2	Attainment
1-hour Ozone	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

(a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC emissions and NOx are considered when evaluating the rule applicability relating to ozone. Noble County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NOx were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) Noble County has been classified as unclassifiable or attainment for PM 2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM 2.5 emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM 2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM 2.5 emissions.

(c) Noble County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Source Status

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

Pollutant	Emissions (tons/yr)
PM	1.39
PM-10	1.38
SO_2	0.02
VOC	Less than 99.2
CO	3.31
NO_x	3.94
A single HAP	Less than 9.00
Combination HAPs	Less than 24.0

This new source is not a PSD major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) included in this permit.

(b) The source does not perform surface coating operations to metal furniture. Therefore, this source is not subject to the New Source Performance Standards for Surface Coating of Metal Furniture (40 CFR Part 60.310 - 60.316, Subpart EE).

(c) This source is not an automobile assembly plant. Therefore, this source is not subject to the New Source Performance Standard for Automobile and Light Duty Truck Surface Coating Operations (40 CFR 60.390 - 60.398, Subpart MM).

(d) The source does not perform metal coil surface coating operations. Therefore, this source is not subject to the New Source Performance Standards for Metal Coil Surface Coating (40 CFR Part 60.460 - 60.466, Subpart TT).

(e) The insignificant boiler at this source has a maximum heat input capacity less than 10 MMBtu/hr. Therefore, this boiler is not subject to the requirements of the New Source Performance Standards for Small Industrial - Commercial - Institutional Steam generating Units (326 IAC 12, 40 CFR 60.40c-48c, Subpart Dc).

(f) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14 and 20, and 40 CFR Part 61 and 63) included in this permit.

(g) This source does not use VOC containing solvents in the parts washer at this source. Therefore, the parts washer at this source is not subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Halogenated Solvent Cleaning (40 CFR Part 63.460 - 63.470, Subpart T).

(h) This source is not a major source for HAPs because they have elected to comply with FESOP limits such that the HAP emissions from the entire source are limited to less than

the Part 70 major source thresholds. Therefore, this source is not subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Miscellaneous Metal Parts and Products (40 CFR Part 63.3880 - 63.3981, Subpart MMMM).

(i) This source is not a major source for HAPs because they have elected to comply with FESOP limits such that the HAP emissions from the entire source are limited to less than the Part 70 major source thresholds. Therefore, the boiler at this source is not subject to the National Emission Standards for Hazardous Air Pollutants - Industrial/Commercial/Institutional Boilers and Process Heaters (40 CFR 63, Subpart DDDDD).

State Rule Applicability – Entire Source

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

This new source will be constructed in 2005. This source is not in 1 of 28 source categories defined in 326 IAC 2-2-1(p)(1). The potential to emit of VOC from this source is greater than 250 tons/yr before control. However, the Permittee elected to accept FESOP limitations to limit the VOC emissions from the entire source to less than 100 tons/yr (see the discussion for FESOP limits below). Therefore, the requirements of 326 IAC 2-2 (PSD) are not applicable.

326 IAC 2-4.1 (New Sources of Hazardous Air Pollutants)

This new source will be constructed in 2005. The potential to emit HAPs of the coating operations at this source is greater than 10 tons/yr for a single HAP and greater than 25 tons/yr for total HAPs before control. The source has elected to comply with the FESOP limitations to limit the HAP emissions from the entire source to less than 10 tons/yr for a single HAP and less than 25 tons/yr for total HAPs (see the discussion of FESOP limits below). Therefore, the requirements of 326 IAC 2-4.1 (MACT) are not applicable.

326 IAC 2-8-4 (FESOP)

This new source will be constructed in 2005. The potential to emit VOC of this source is greater than 100 tons/yr before control. In addition, the potential to emit HAPs of this source is greater than 10 tons/yr for a single HAP and greater than 25 tons/yr for total HAPs. In order to make the requirements of 326 IAC 2-7 (Part 70 Program) not applicable, the Permittee has elected to comply with the following FESOP limits:

(a) The emissions from the dip coating operations (EU-01 and EU-02) and the spray coating lines (EU-03, EU-04, and EU-05) shall be controlled by catalytic oxidizer EU-07 with a destruction efficiency of at least 95%.

(b) The capture efficiency for each of the dip coating operations (EU-01 and EU-02) shall be at least 90%.

(c) The capture efficiency for each of the spray coating lines (EU-03, EU-04, and EU-05 shall be at least 85%.

(d) The VOC emissions from the coating operations EU-01 through EU-05 shall not exceed 98.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month. The monthly VOC emissions from these coating operations shall be calculated as follows:

VOC Emissions (tons/month) = (1 – 95% x 90%) U1 + (1 – 95% x 85%) U2 + (S-W)

Where: U1 = Total VOC usage from the use of coatings and thinners in EU-01 and EU-02.
U2= Total VOC Usage from the use of coatings and thinners in EU-03, EU-04, and EU-05.
S= Total VOC Usage from the use of cleaning solvents.
W= Total VOC in the waste solvent stream.

(e) Emissions for any single HAP from the dip coating operations (EU-01 and EU-02) and the spray coating lines (EU-03, EU-04, and EU-05) shall not exceed 9.0 tons per twelve (12)

consecutive month period with compliance determined at the end of each month. The monthly emissions for an individual HAP shall be calculated using the following equation:

$$HAP_i \text{ (tons/month)} = (1 - 95\% \times 90\%)\, X_i + (1 - 95\% \times 85\%)\, Y_i + S_i$$

Where: i= Type of HAP
X_i= HAP i input to EU-01 and EU-02 from the use of coatings and thinners (tons/month).
Y_i = HAP i input to EU-03, EU-04, and EU-5 from the use of coatings and thinners (tons/month).
S_i = HAP i input from the use of cleaning solvents (tons/month).

(f) Total HAPs emissions from the from the dip coating operations (EU-01 and EU-02) and the spray coating lines (EU-03, EU-04, and EU-05) shall not exceed 24.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month. The total monthly HAP emissions shall be determined using the following equation:

$$\text{Total HAP emissions (tons/month)} = \sum_i HAP_i$$

Where HAP_i, shall be calculated using the equation in paragraph (e) above.

Combined with the VOC emissions from the insignificant activities, the VOC emissions from the entire source are limited to less than 100 tons/yr. Combined with the HAP emissions from the insignificant activities, the HAP emissions from the entire source are limited to less than 10 tons/yr for a single HAP and less than 25 tons/yr for combined HAP. Therefore, the requirements of 326 IAC 2-7 (Part 70 Program) are not applicable.

326 IAC 2-6 (Emission Reporting)
This source is located in Noble County, the potential to emit of all criteria pollutants is less than one hundred (100) tons per year, and the source does not need to operate under a Part 70 Permit. Therefore, 326 IAC 2-6 does not apply.

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

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

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

State Rule Applicability - Dip Coating Operations EU-01 and EU-02

326 IAC 8-2-9 (Miscellaneous Metal Coating Operations)
The proposed dip coating operations EU-01 and EU-02 will perform metal coating operations and the source operates under the Standard Industrial Classification (SIC) Code major group #34. In addition, these dip coating operations will be constructed after July 1, 1991 and have actual VOC emissions greater than 15 lbs/day. Therefore, the VOC content of the coatings applied in dip coating operations EU-01 and EU-02 shall be limited as follows:

(a) Three and five tenths (3.5) pounds VOC per gallon of coating, excluding water, delivered to the applicators that apply extreme performance coatings.

(b) Solvent sprayed from the application equipment during clean-up or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is completed, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Pursuant to 326 IAC 8-1-2 (b), the VOC emissions from the coating operations EU-01 and EU-02 shall be limited to no greater than the equivalent emissions, expressed as pounds of VOC per gallon of coating solids.

This equivalency was determined by the following equation:

$$E = L / (1 - (L/D)) = 3.5 / (1 - 3.5 / 7.36) = 6.67$$

Where

L= Applicable emission limit from 326 IAC 8 in pounds of VOC per gallon of coating;
D= Density of VOC in coating in pounds per gallon of VOC;
E= Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.

Actual solvent density shall be used to determine compliance of the surface coating operation using the compliance methods in 326 IAC 8-1-2 (a).

Pursuant to 326 IAC 8-1-2(c), the overall control efficiency of the thermal oxidizer shall be no less than the equivalent overall efficiency calculated by the following equation:

$$O = \frac{(V - E)}{V} X\ 100 = \frac{(29.3 - 6.67)}{29.3} \times 100 = 77\%$$

Where:

V = The actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content of all coatings, as applied to the subject coating line as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids as applied. The VOC content of the worst case coating is used in the above equation.
E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.
O = Equivalent overall efficiency of the capture system and control device as a percentage.

Therefore, the overall efficiency of the thermal oxidizer shall be greater than 77%.

326 IAC 8-1-6 (General Reduction Requirements for VOC Emissions)
Since the requirements of 326 IAC 8-2-9 apply to the proposed dip coating operations EU-01 and EU-02, the requirements of 326 IAC 8-1-6 (BACT) are not applicable.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
There is no particulate emitted from the dip coating operations. Therefore, the requirements of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) are not applicable.

State Rule Applicability – Spray Coating Lines EU-03, EU-04, and EU-05

326 IAC 8-2-9 (Miscellaneous Metal Coating Operations)
The proposed spray coating lines EU-03, EU-04, and EU-05 will perform metal coating operations and the source operates under the Standard Industrial Classification (SIC) Code of major group #34. In addition, these spray booths will be constructed after July 1, 1991 and have actual VOC

emissions greater than 15 lbs/day. Therefore, the VOC content of the coatings applied to this facility shall be limited as follows:

(a) Three and five tenths (3.5) pounds VOC per gallon of coating, excluding water, delivered to the applicators that apply extreme performance coatings.

(b) Solvent sprayed from the application equipment during clean-up or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is completed, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

According to the MSDS provided by the Permittee, the VOC content of the coatings used for the spray coating lines is greater than the VOC content limit above. In order to comply with the VOC content limit above, the Permittee will use a catalytic oxidizer (EU-07).

Pursuant to 326 IAC 8-1-2 (b), the VOC emissions from the coating operations EU-03, EU-04, and EU-05 shall be limited to no greater than the equivalent emissions, expressed as pounds of VOC per gallon of coating solids.

This equivalency was determined by the following equation:

$$E = L / (1 - (L/D)) = 3.5 / (1 - 3.5 / 7.36) = 6.67$$

Where

L= Applicable emission limit from 326 IAC 8 in pounds of VOC per gallon of coating;
D= Density of VOC in coating in pounds per gallon of VOC;
E= Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.

Actual solvent density shall be used to determine compliance of the surface coating operation using the compliance methods in 326 IAC 8-1-2 (a).

Pursuant to 326 IAC 8-1-2(c), the overall control efficiency of the thermal oxidizer shall be no less than the equivalent overall efficiency calculated by the following equation:

$$O = \frac{(V - E)}{V} X\ 100 = \frac{(29.3 - 6.67)}{29.3} \times 100 = 77\%$$

Where:

V = The actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content of all coatings, as applied to the subject coating line as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids as applied. The VOC content of the worst case coating is used in the above equation.
E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.
O = Equivalent overall efficiency of the capture system and control device as a percentage.

Therefore, the overall efficiency of the thermal oxidizer shall be greater than 77%.

326 IAC 8-1-6 (General Reduction Requirements for VOC Emissions)

Since the requirements of 326 IAC 8-2-9 apply to the spray coating lines EU-03, EU-04, and EU-05, the requirements of 326 IAC 8-1-6 (BACT) are not applicable.

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

On June 12, 2002, revisions to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) became effective; this rule was previously referred to as 326 IAC 6-3 (Process

Operations). As of the date this permit is being issued, these revisions have not been approved by EPA into the Indiana State Implementation Plan (SIP); therefore, the following requirement from the previous version of 326 IAC 6-3 (Process Operations), which has been approved into the SIP, remains an applicable requirement until the revisions to 326 IAC 6-3 are approved into the SIP and the condition is modified in a subsequent permit action.

Pursuant to 40 CFR 52, Subpart P, the particulate emissions from each of the spray coating lines EU-03, EU-04, and EU-05 shall be limited by the following:

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

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

Under the rule revision, particulate from these painting lines shall be controlled by dry filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications. The Permittee will install dry filters with these spray booths to ensure compliance with 40 CFR 52, Subpart P and the revised 326 IAC 6-3-2.

State Rule Applicability – 5 MMBtu/hr Boiler (Insignificant)

326 IAC 6-2-4 (PM Emissions for Sources of Indirect Heating)

Pursuant to 326 IAC 6-2-4(a), indirect heating facilities constructed after September 12, 1983, shall be limited by the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

Where: Pt = emission rate limit (lbs/MMBtu)
Q = total source heat input capacity (MMBtu/hr)

For the 5.0 MMBtu/hr boiler, the emission rate limit calculated from the equation above equals:

$$Pt = \frac{1.09}{(5.0)^{0.26}} = 0.72 \text{ lbs/MMBtu}$$

However, 326 IAC 6-2-4(a) also states that if Q is less than 10 MMBtu/hr, Pt shall not exceed 0.6. Therefore, the PM emission limit for the 5 MMBtu/hr boiler is 0.6 lbs/MMBtu.

State Rule Applicability – Blast Machine EU-08 (Insignificant)

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

The allowable particulate emissions from the blast machine EU-08 shall be limited to 7.58 lbs/hr when the process weight rate is 5,000 lbs/hr.

The pounds per hour limitation was calculated with the following equation:

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

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

According to the emission calculations in Appendix A, the potential to emit particulate from this blast machine is less than 7.58 lbs/hr before control. Therefore, this unit is in compliance with particulate emission limits in 326 IAC 6-3-2.

State Rule Applicability – Parts Washer (Insignificant)

326 IAC 8-3-2 (Cold Cleaning Operations)

The parts washer at this source will not use any solvent containg VOC as the cleaning solution. Therefore, the requirements 326 IAC 8-3-2 (Cold Cleaning Operations) are not applicable.

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

The parts washer at this source will not use any solvent containing VOC as the cleaning solution. Therefore, the requirements 326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control) are not applicable.

State Rule Applicability – Natural Gas Fired Ovens (Insignificant)

There are no specifically applicable requirements for these units.

Testing Requirements

In order to comply with the FESOP limits, the Permittee shall perform the following tests within 60 days after achieving the maximum production, but no later than 180 days after initial startup:

(a) The VOC destruction efficiency test for the catalytic oxidizer EU-07. This test shall be repeated at least once every five (5) years from the date of the last valid compliance demonstration.

(b) The capture efficiencies for the dip coating operations EU-01 and EU-02.

(c) The capture efficiencies for the spray coating lines EU-03, EU-04, and EU05.

(d) The VOC and HAP contents of the waste solvent.

Compliance Requirements

Permits issued under 326 IAC 2-8 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 2-8-4. 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 approporiate corrective actions within a specific time period.

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

1. The catalytic oxidizer EU-07, which will be used to control the emissions from the dip coating operations (EU-01 and EU-02) and the spray coating lines (EU-03, EU-04, and EU-05), has applicable compliance monitoring conditions as specified below:

    (a) A continuous temperature monitoring system shall be calibrated, maintained, and operated on the catalytic oxidizer for measuring operating temperature. For purposes of this condition, continuous means no less than once per minute. The output of this system shall be recorded as a 3-hour average. From the date of issuance of this permit until the approved stack test results are available, the

Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports whenever the 3-hour average temperature of the catalytic oxidizer is below 600°F. A 3-hour average temperature that is below 600°F is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports shall be considered a deviation from this permit.

(b) The Permittee shall determine the 3-hour average temperature from the most recent valid stack test that demonstrates compliance with limits in this permit, as approved by IDEM, OAQ.

(c) On and after the date the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports whenever the 3-hour average temperature of the catalytic oxidizer is below the 3-hour average temperature as observed during the compliant stack test.

(d) The Permittee shall determine fan amperage or duct pressure from the most recent valid stack test that demonstrates compliance with limits in this permit, as approved by IDEM, OAQ.

(e) The duct pressure or fan amperage shall be observed at least once per day when the catalytic oxidizer is in operation. When for any one reading, the duct pressure or fan amperage is outside the normal range as established in most recent compliant stack test, the Permittee shall take reasonable response steps in accordance with Section C -Compliance Response Plan - Preparation, Implementation, Records, and Reports. A reading that is outside the range as established in the most recent compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports shall be considered a deviation from this permit.

These monitoring conditions are necessary because the catalytic oxidizer (EU-07) must operate properly at all times the dip coating operations (EU-01 and EU-02) and the spray coating lines (EU-03, EU-04, and EU-05) are in operation to ensure compliance with 326 IAC 2-8-4 (FESOP), 326 IAC 2-2 (PSD), and 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), and to make the requirements of NESHAP, Subpart MMMM and Subpart DDDDD not applicable.

2. The spray coating operations EU-03, EU-04, and EU-5 have applicable compliance monitoring conditions as specified below:

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission occurs or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C

- Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

These monitoring conditions are necessary because these spray coating lines must operate properly to ensure compliance with 40 CFR 52, Subpart P and 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Operations).

Conclusion

The construction and operation of this metal coating plant shall be subject to the conditions of FESOP 113-20355-00084.

Appendix A: Emission Calculations
VOC Emissions
From Dip Coating Operations EU-01 and EU-02

Company Name: Parts Finishing Group - Indiana
Address: 210 S. Progress Drive East, Kendallville, IN 46755
FESOP: 113-20355-00084
Reviewer: ERG/YC
Date: May 12, 2005

Material	Density (lbs/gal)	Weight % Volatile (H_2O & Organics)	Weight % Water	Weight % Organics	Maximum Usage (gal/hr)*	Pounds VOC per gallon of coating	PTE of VOC before Control (lbs/hr)	PTE of VOC before Control (lbs/day)	PTE of VOC before Control (tons/yr)
Base Coat (Worst Case)	7.81	81.0%	0.0%	81.0%	1.20	6.33	7.60	182	33.3
Cover Coat (Worst Case)	8.25	78.0%	0.0%	78.0%	1.20	6.44	7.73	186	33.9
Reducer - Toluene	7.26	100%	0.0%	100%	0.96	7.26	6.98	168	30.6
Reducer - Xylene	7.25	100%	0.0%	100%	0.96	7.25	6.97	167	30.5
Reducer - MEK	6.74	100%	0.0%	100%	0.96	6.74	6.48	156	28.4
Reducer - Methanol	6.60	100%	0.0%	100%	0.24	6.60	1.59	38.1	6.95
Clean Up Solvent - Toluene	7.26	100%	0.0%	100%	0.29	7.26	2.09	50.3	9.17
Clean Up Solvent - MEK	6.74	100%	0.0%	100%	0.29	6.74	1.94	46.7	8.52
Total							**41.4**		**181**

* This is the total coating usage for dip coating operations EU-01 and EU-02.

Note: These coating operations will be controlled by a RTO (EU-07). There are no PM/PM10 emissions from the dip coating operations.

METHODOLOGY

Pounds of VOC per Gallon Coating = Density (lbs/gal) * Weight % Organics
PTE of VOC before Control (lbs/hr) = Pounds of VOC per Gallon coating (lbs/gal) * Max. Throughput (unit/hr) * Max. Usage (gal/unit)
PTE of VOC before Control (lbs/day) = Pounds of VOC per Gallon coating (lbs/gal) * Max. Throughput (unit/hr) * Max. Usage (gal/unit) * (24 hr/day)
PTE of VOC before Control (tons/yr) = Pounds of VOC per Gallon coating (lbs/gal) * Max. Throughput (unit/hr) * Max. Usage (gal/unit) * (8760 hr/yr) * (1 ton/2000 lbs)

Appendix A: Emission Calculations
HAP Emissions
From Dip Coating Operations EU-01 and EU-02

Company Name: Parts Finishing Group - Indiana
Address: 210 S. Progress Drive East, Kendallville, IN 46755
FESOP: 113-20355-00084
Reviewer: ERG/YC
Date: May 12, 2005

Material	Density (lbs/gal)	Maximum Usage (gal/hr)*	Weight % MIBK	PTE of MIBK (tons/yr)	Weight % Xylene	PTE of Xylene (tons/yr)	Weight % Ethyl Benzene	PTE of Ethyl Benzene (tons/yr)	Weight % MEK	PTE of MEK (tons/yr)	Weight % Formaldehyde	PTE of Formaldehyde (tons/yr)	Weight % Toluene	PTE of Toluene (tons/yr)	Weight % Methanol	PTE of Methanol (tons/yr)
Base Coat (Worst Case)	7.81	1.20	60.0%	24.7	15.0%	6.17	3.00%	1.23	2.00%	0.82	1.00%	0.41				
Cover Coat (Worst Case)	8.25	1.20			15.0%	6.51	3.00%	1.30					60.0%	26.1		
Reducer - Toluene	7.26	0.96											100%	30.6		
Reducer - Xylene	7.25	0.96			75.0%	22.9	25.0%	7.63								
Reducer - MEK	6.74	0.96							100%	28.4						
Reducer - Methanol	6.60	0.24													100%	6.95
Clean Up Solvent - Toluene	7.26	0.29											100%	9.17		
Clean Up Solvent - MEK	6.74	0.29							100%	8.52						
Total				**24.7**		**35.6**		**10.2**		**37.7**		**0.41**		**65.8**		**6.95**

* This is the total coating usage for dip coating operations EU-01 and EU-02.

Note: These coating operations will be controlled by a RTO (EU-07).

Total HAPs = 181 tons/yr

METHODOLOGY

PTE of HAP (tons/yr) = Density (lbs/gal) x Max. Usage (gal/hr) x Weight % HAP x 8760 hr/yr x 1 ton/2000 lbs

Appendix A: Emission Calculations
VOC and PM/PM10 Emissions
From Spray Coating Lines EU-03, EU-04, and EU-05

Company Name: Parts Finishing Group - Indiana
Address: 210 S. Progress Drive East, Kendallville, IN 46755
FESOP: 113-20355-00084
Reviewer: ERG/YC
Date: May 12, 2005

Material	Density (lbs/gal)	Weight % Volatile (H_2O & Organics)	Weight % Water	Weight % Organics	Maximum Usage (gal/hr)*	Pounds VOC per gallon of coating	PTE of VOC before Control (lbs/hr)	PTE of VOC before Control (lbs/day)	PTE of VOC before Control (tons/yr)	PTE of PM/PM10 before Control** (lbs/hr)	PTE of PM/PM10 before Control** (tons/yr)	Transfer Efficiency***
Base Coat (Worst Case)	7.81	81.0%	0.0%	81.0%	6.01	6.33	38.0	912	167	3.12	13.7	65%
Cover Coat (Worst Case)	8.25	78.0%	0.0%	78.0%	6.01	6.44	38.7	928	169	3.82	16.7	65%
Reducer - Toluene	7.26	100%	0.0%	100%	3.61	7.26	26.2	628	115	0.00	0.00	100%
Reducer - Xylene	7.25	100%	0.0%	100%	3.61	7.25	26.1	627	115	0.00	0.00	100%
Reducer - MEK	6.74	100%	0.0%	100%	0.96	6.74	6.48	156	28.4	0.00	0.00	100%
Clean Up Solvent - Toluene	7.26	100%	0.0%	100%	0.19	7.26	1.40	33.5	6.12	0.00	0.00	100%
Clean Up Solvent - MEK	6.74	100%	0.0%	100%	0.19	6.74	1.30	31.1	5.68	0.00	0.00	100%
Total							**138**		**605**		**30.4**	

* This is the total usage for spray booths EU-03, EU-04, and EU-05.
**Assume all the PM emissions are PM10 emissions.
*** HVLP application method is used in this booth. The transfer efficiency is from an HVLP document prepared by BINKS.
Note: These spray booths will be controlled by dryer filters and a RTO (EU-07).

METHODOLOGY

Pounds of VOC per Gallon Coating = Density (lbs/gal) * Weight % Organics
PTE of VOC before Control (lbs/hr) = Pounds of VOC per Gallon coating (lbs/gal) * Max. Throughput (unit/hr) * Max. Usage (gal/unit)
PTE of VOC before Control (lbs/day) = Pounds of VOC per Gallon coating (lbs/gal) * Max. Throughput (unit/hr) * Max. Usage (gal/unit) * (24 hr/day)
PTE of VOC before Control (tons/yr) = Pounds of VOC per Gallon coating (lbs/gal) * Max. Throughput (unit/hr) * Max. Usage (gal/unit) * (8760 hr/yr) * (1 ton/2000 lbs)
PTE of PM/PM10 before Control (lbs/hr) = Max. Throughput (unit/hr) * Max. Usage (gal/unit) * Density (lbs/gal) * (1- Weight % Volatile) * (1-Transfer efficiency)
PTE of PM/PM10 before Control (tons/yr) = Max. Throughput (unit/hr) * Max. Usage (gal/unit) * Density (lbs/gal) * (1- Weight % Volatile) * (1-Transfer efficiency) * (8760 hrs/yr) *(1 ton/2000 lbs)

Appendix A: Emission Calculations
HAP Emissions
From Spray Coating Lines EU-03, EU-04, and EU-05

Company Name: Parts Finishing Group - Indiana
Address: 210 S. Progress Drive East, Kendallville, IN 46755
FESOP: 113-20355-00084
Reviewer: ERG/YC
Date: May 12, 2005

Material	Density (lbs/gal)	Maximum Usage (gal/hr)*	Weight % MIBK	PTE of MIBK (tons/yr)	Weight % Xylene	PTE of Xylene (tons/yr)	Weight % Ethyl Benzene	PTE of Ethyl Benzene (tons/yr)	Weight % MEK	PTE of MEK (tons/yr)	Weight % Formaldehyde	PTE of Formaldehyde (tons/yr)	Weight % Toluene	PTE of Toluene (tons/yr)
Base Coat (Worst Case)	7.81	6.01	60.0%	123	15.0%	30.8	3.00%	6.17	2.00%	4.11	1.00%	2.06		
Cover Coat (Worst Case)	8.25	6.01			15.0%	32.6	3.00%	6.51					60.0%	130
Reducer - Toluene	7.26	3.61											100%	115
Reducer - Xylene	7.25	3.61			75.0%	85.9	25.0%	28.6						
Reducer - MEK	6.74	0.96							100%	28.4				
Clean Up Solvent - Toluene	7.26	0.19											100%	6.12
Clean Up Solvent - MEK	6.74	0.19							100%	5.68				
Total				**123**		**149**		**41.3**		**38.2**		**2.06**		**251**

* This is the total usage for spray booths EU-03, EU-04, and EU-05.

Note: These spray booths will be controlled by dryer filters and a RTO (EU-07).

Total HAPs = 605 tons/yr

METHODOLOGY

PTE of HAP (tons/yr) = Density (lbs/gal) x Max. Usage (gal/hr) x Weight % HAP x 8760 hr/yr x 1 ton/2000 lbs

Appendix A: Emission Calculations
Natural Gas Combustion
(MMBtu/hr < 100)
From Natural Gas Fired Ovens and Boiler

Company Name: Parts Finishing Group - Indiana
Address: 210 S. Progress Drive East, Kendallville, IN 46755
FESOP: 113-20355-00084
Reviewer: ERG/YC
Date: May 12, 2005

Heat Input Capacity MMBtu/hr		Potential Throughput MMCF/yr
9.00	(5 Units Total)	78.8

	Pollutant					
	PM*	PM10*	SO_2	**NO_x	VOC	CO
Emission Factor in lbs/MMCF	7.6	7.6	0.6	100	5.5	84.0
Potential to Emit in tons/yr	**0.30**	**0.30**	**0.02**	**3.94**	**0.22**	**3.31**

*PM and PM10 emission factors are condensable and filterable PM10 combined.
**Emission factors for NO_x: Uncontrolled = 100 lbs/MMCF.
Emission factors are from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (AP-42 Supplement D 3/98)

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF/yr) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Potential to Emit (tons/yr) = Potential Throughput (MMCF/yr) x Emission Factor (lbs/MMCF) x 1 ton/2000 lbs

Appendix A: Emission Calculations
PM and PM10 Emissions
From the Blast Machine (EU-08)

Company Name: Parts Finishing Group - Indiana
Address: 210 S. Progress Drive East, Kendallville, IN 46755
FESOP: 113-20355-00084
Reviewer: ERG/YC
Date: May 12, 2005

Type of Abrasive Used: Steel Shots

Max. Abrasive Input Rate (lbs/hr)	PM Emission Factor* (lbs/lbs)	PTE of PM before Control (lbs/hr)	PTE of PM before Control (tons/yr)	PM10 Emission Factor* (lbs/lbs PM)	PTE of PM10 before Control (lbs/hr)	PTE of PM10 before Control (tons/yr)
5.00	0.004	0.02	0.09	0.86	0.02	0.08

* The emission factors are from grit blasting from Air Quality Permits, Vol.1, Section 3 "Abrasive Blasting" (1991 Edition) by Stappa Alapco.

Methodology

PTE of PM before Control (lbs/hr) = Max. Abrasive Usage (lbs/hr) x PM Emission Factor (lbs/lbs)
PTE of PM before Control (tons/yr) = Max. Abrasive Usage (lbs/hr) x PM Emission Factor (lbs/lbs) x 8760 hr/yr x 1 ton/2000 lbs
PTE of PM10 before Control = Potential PM Emissions x PM10 Emission Factor