



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: February 22, 2005
RE: Subaru of Indiana Automotive, Inc. / 157-20396-00050
FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision – Approval

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 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires 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 from 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-AM.dot 1/10/05



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

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Mr. Thomas Easterday
Subaru of Indiana Automotive, Inc.
P.O. Box 5689
Lafayette, IN 47903

February 22, 2005

Re: 157-20396-00050
First Administrative Amendment to
Part 70 157-5906-00050

Dear Mr. Easterday:

Subaru of Indiana Automotive, Inc. was issued a Part 70 permit on June 28, 2004 for an automotive assembly plant. A letter requesting a change was received on November 23, 2004. The requested change is as follows:

Subaru plans a change in the method of operation of the existing robotic spray applicators employed in the Plastic Bumper Coating Line (PBL). Electric voltage will be applied to the spray applicators to convert these applicators into electrostatic application system. The change will improve the transfer efficiency and will correspondingly result in lesser emissions. There will be no increase in production associated with the change.

The proposed change qualifies as a "revision to descriptive information where the revision will not trigger a new applicable requirements or violate a permit term" under 326 IAC 2-7-11, administrative amendment. Therefore, the Part 70 permit is hereby amended as follows (additions are **bolded** and deletions are ~~struck-through~~ for emphasis):

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

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

(a) through (d) no change

(e) Plastic Bumper Coating Line (PBL), identified as Unit 005, with a capacity of 60 units per hour, constructed in 1989, consisting of the following units:

- (1) One (1) PBL Paint Booth, utilizing ~~the air atomization method of spraying~~ **electrostatic application system**, using a water wash as particulate matter control, and exhausting to three (3) stacks, identified as BPR-1, BPR-2, and BPR-JR;

SECTION D.2 FACILITY OPERATION CONDITIONS

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

- (e) Plastic Bumper Coating Line (PBL), identified as Unit 005, with a capacity of 60 units per hour, constructed in 1989, consisting of the following units:
- (1) One (1) PBL Paint Booth, utilizing ~~the air atomization method of spraying~~ **electrostatic application system**, using a water wash as particulate matter control, and exhausting to three (3) stacks, identified as BPR-1, BPR-2, and BPR-JR;\
 - (2) One (1) PBL Booth Preheat, with one (1) natural gas-fired burner with a heat input capacity of 17.10 MMBtu/hr;
 - (3) One (1) PBL Booth Reheat, with two (2) insignificant natural gas-fired burners;
 - (4) One (1) PBL Oven, using a 2.0 MMBtu/hr natural gas-fired thermal incinerator as VOC control, and exhausting to one (1) stack, identified as BPR Inc.; and
 - (5) One (1) PBL Cool Down area.
- (h) One (1) paint mixing room for the Plastic Bumper Coating Line, identified as Unit 008, constructed in 1989, using no controls, and exhausting to three (3) vents, identified as Mix-1, Mix-2, and Mix-3.

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

All conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Aida De Guzman at (800) 451-6027, press 0 and ask for extension (3-4972), or dial (317) 233-4972.

Sincerely,

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

Attachments
APD

cc: File - Tippecanoe County
U.S. EPA, Region V
Tippecanoe County Health Department
Air Compliance Section Inspector – Wanda Stanfield
Compliance Data Section

Subaru of Indiana Automotive, Inc.
Lafayette, Indiana
Permit Reviewer: Aida De Guzman

Page 3 of 3
1st Administrative Amendment No.: 157-20396-00050

Administrative and Development



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY

Subaru of Indiana Automotive, Inc.
5500 State Road 38 East
Lafayette, Indiana 47903

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17. This permit also addresses certain New Source Review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-7-10.5, applicable to those conditions.

Table with 2 columns and 4 rows containing permit details: Operation Permit No., Issued by, Issuance Date, Expiration Date, First Administrative Amendment No., Pages Affected, Issued by (original), Issuance Date (original).

- Inc. (emissions from the entrance to and exit from the Intermediate Coating Oven use no controls and exhaust to one (1) stack, identified as Surfacer Hood Exhaust); and
- (6) One (1) Intermediate Cool Down area, using no controls, and exhausting to one (1) stack, identified as Surfacer Cooling.
- (e) Plastic Bumper Coating Line (PBL), identified as Unit 005, with a capacity of 60 units per hour, constructed in 1989, consisting of the following units:
- (1) One (1) PBL Paint Booth, utilizing electrostatic application system, using a water wash as particulate matter control, and exhausting to three (3) stacks, identified as BPR-1, BPR-2, and BPR-JR;
 - (2) One (1) PBL Booth Preheat, with one (1) natural gas-fired burner with a heat input capacity of 17.10 MMBtu/hr;
 - (3) One (1) PBL Booth Reheat, with two (2) insignificant natural gas-fired burners;
 - (4) One (1) PBL Oven, using a 2.0 MMBtu/hr natural gas-fired thermal incinerator as VOC control, and exhausting to one (1) stack, identified as BPR Inc.; and
 - (5) One (1) PBL Cool Down area.
- (f) Anticorrosion Coating, identified as Unit 006, with a capacity of 60 units per hour, constructed in 1989, and including the following equipment:
- (1) One (1) Black Coat and Wax Booth, utilizing the air-assisted method of spraying, using a dry filter as particulate matter control, exhausting to BCW Stack;
 - (2) One (1) Black and Wax Coat natural gas-fired burner, with a heat input capacity of 24.0 MMBtu/hr;
 - (3) One (1) Anticorrosion Coating Booth, utilizing the air-assisted method of spraying, using a water wash as particulate matter control, exhausting to Anticorrosion Stack; and
 - (4) One (1) insignificant Anticorrosion Coating natural gas-fired burner.
- (g) Final Repair (Touchup) painting, identified as Unit 007, with a capacity of 10 units per hour, constructed in 1989, and including the following equipment:
- (1) One (1) Touchup IPC Booth, located in the In-Process Control area, utilizing the air atomization method of spraying;
 - (2) One (1) Touchup Trim Booth, located in the Trim area, utilizing the air atomization method of spraying, using a dry filter as particulate matter control; and
 - (3) One (1) insignificant Touchup Trim natural gas-fired burner.
- (h) One (1) paint mixing room for the Plastic Bumper Coating Line, identified as Unit 008, constructed in 1989, using no controls, and exhausting to three (3) vents, identified as Mix-1, Mix-2, and Mix-3.

SECTION D.2 FACILITY OPERATION CONDITIONS

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

- (e) Plastic Bumper Coating Line (PBL), identified as Unit 005, with a capacity of 60 units per hour, constructed in 1989, consisting of the following units:
- (1) One (1) PBL Paint Booth, utilizing electrostatic application system, using a water wash as particulate matter control, and exhausting to three (3) stacks, identified as BPR-1, BPR-2, and BPR-JR;
 - (2) One (1) PBL Booth Preheat, with one (1) natural gas-fired burner with a heat input capacity of 17.10 MMBtu/hr;
 - (3) One (1) PBL Booth Reheat, with two (2) insignificant natural gas-fired burners;
 - (4) One (1) PBL Oven, using a 2.0 MMBtu/hr natural gas-fired thermal incinerator as VOC control, and exhausting to one (1) stack, identified as BPR Inc.; and
 - (5) One (1) PBL Cool Down area.
- (h) One (1) paint mixing room for the Plastic Bumper Coating Line, identified as Unit 008, constructed in 1989, using no controls, and exhausting to three (3) vents, identified as Mix-1, Mix-2, and Mix-3.

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

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

D.2.1 General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A][Table 2 to 40 CFR Part 63, Subpart IIII][Table 2 to 40 CFR Part 63, Subpart PPPP][40 CFR 63.3101][40 CFR 63.4501]

- (a) The provisions of 40 CFR Part 63, Subpart A - General Provisions (which are incorporated by reference as 326 IAC 20-1-1):
- (1) Apply to the affected source to the extent expressly specified by Table 2 to 40 CFR Part 63, Subpart PPPP and Table 2 to 40 CFR Part 63, Subpart IIII; and
 - (2) To the extent applicable to the affected source, are incorporated in this condition by reference. The Permittee must comply with these requirements on and after April 19, 2007 (for 40 CFR 63, Subpart PPPP) and June 25, 2007 (for 40 CFR Part 63, Subpart IIII).
- (b) Since the applicable requirements addressed by paragraph (a) of this condition are included and specifically identified (by reference) in this permit, the permit shield established by Section B of this permit in the condition titled Permit Shield, and authorized by 326 IAC 2-7-15, applies to paragraph (a) of this condition.

D.2.2 National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products: Limitations and Requirements [40 CFR Part 63, Subpart PPPP] [40 CFR 63.4481] [40 CFR 63.4482]

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