



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: March 4, 2005
RE: Meridian Automotive Systems / 069-20627-00043
FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

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

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) 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-MOD.dot 1/10/05



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

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Governor

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March 4, 2005

Mr. Dave Zimske
Meridian Automotive Systems
1890 Riverfork Drive West
Huntington, IN 46750

Re: **069-20627-00043**
Minor Source Modification to:
Part 70 Operating Permit No.: **T 069-5943-00043**

Dear Mr. Zimske:

Meridian Automotive Systems was issued Part 70 Operating Permit T 069-5943-00043 on September 17, 2001 for a stationary high-pressure fiberglass-reinforced plastics manufacturing and painting source. An application to modify the source was received on January 27, 2005. Pursuant to 326 IAC 2-7-10.5 the following emission unit is approved for construction at the source:

- (g) One (1) touch-up spray booth, identified as SB-M-T, equipped with manual spray guns and dry filters for particulate control, installed in 2004, exhausting to Stack E-11, capacity: 30.63 fiberglass reinforced parts per hour.

The following construction conditions are applicable to the proposed project:

General Construction Conditions

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

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

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

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter contact Michael S. Schaffer, c/o OAQ, 100 North Senate Avenue, Indianapolis, Indiana, 46204, at 631-691-3395, ext. 23 or in Indiana at 1-800-451-6027 (ext 631-691-3395).

Sincerely,

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

Attachments - MSM and TSD
MSS:MES

cc: File - Huntington County
Huntington County Health Department
Air Compliance Section Inspector - Ryan Hillman
Compliance Branch
Administrative and Development Section
Technical Support and Modeling - Michele Boner



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PART 70 MINOR SOURCE MODIFICATION OFFICE OF AIR QUALITY

**Meridian Automotive Systems
1890 Riverfork Drive West
Huntington, Indiana 46750**

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 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.

Second Minor Source Modification No.: 069-20627-00043	Conditions Affected: A.2 and D.1.1 - D.1.15 Quarterly Reports
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: March 4, 2005

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SECTION A

SOURCE SUMMARY

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

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

- (a) One (1) automatic spray booth, identified as SB-M-Pr, equipped with electrostatic air atomization spray guns and a waterwash system as overspray control, installed on December 11, 1987, exhausted to Stack EP 4, capacity: 530 fiberglass reinforced parts per day.
- (b) One (1) automatic spray booth, identified as SB-A-Pr, equipped with electrostatic air atomization and electrostatic rotary spray guns and a waterwash system as overspray control, installed on December 11, 1987, exhausted to Stacks EP 6 and EP 7, capacity: 530 fiberglass reinforced parts per day.
- (c) One (1) splatter coat spray booth, identified as SB-M-S, equipped with electrostatic air atomization spray guns and a waterwash system as overspray control, installed on December 11, 1987, exhausted to Stack EP 3, capacity: 530 fiberglass reinforced parts per day.
- (d) One (1) splatter coat spray booth, identified as SB-A-S, equipped with three (3) electrostatic air atomization and electrostatic rotary spray guns and a waterwash system as overspray control, installed on December 11, 1987, modified for the addition of one (1) high volume low pressure (HVLP) spray gun in 2004, exhausted to Stacks EP 1 and EP 2, capacity: 735.12 fiberglass reinforced parts per day.
- (e) One (1) mono coat spray booth, identified as SB-A-M, equipped with four (4) electrostatic air atomization spray guns and a waterwash system as overspray control, installed on December 11, 1987, modified for the addition of one (1) high volume low pressure (HVLP) spray gun in 2004, exhausted to Stacks EP 5A and EP 5B, capacity: 735.12 fiberglass reinforced parts per day.
- (f) One (1) mono coat spray booth, identified as SB-M-M, equipped with electrostatic air atomization spray guns and a waterwash system as overspray control, installed on December 11, 1987, exhausted to Stack EP 8, capacity: 530 fiberglass reinforced parts per day.
- (g) One (1) touch-up spray booth, identified as SB-M-T, equipped with manual spray guns and dry filters for particulate control, installed in 2004, exhausting to Stack E-11, capacity: 30.63 fiberglass reinforced parts per hour.
- (h) One (1) natural gas fired hook oven, identified as AFT-1, installed in 1995, exhausted to Stack EP 10, rated at 1.1 million British thermal units per hour, capacity: 40 pounds of waste per hour.
- (i) One (1) hepburn 1,000 ton vacuum assisted reinforced plastic molding press, identified as PR 810, installed in 1987, capacity: 432 fiberglass reinforced parts per day.
- (j) Two (2) erie vacuum assisted reinforced plastic molding presses, identified as PR 1511 and PR 1512, PR 1512 is a 500 ton press, installed in 1987, PR 1511 is a 1,500 ton press, installed September 2000, capacity: 864 fiberglass reinforced parts per day. SMC is molded in press 1512 and a hole is pressed in the molded SMC in press 1511. Emissions only occur from press PR 1512.

- (k) One (1) erie 1,500 ton vacuum assisted reinforced plastic molding press, identified as PR 1507, installed in 1987, capacity: 530 fiberglass reinforced parts per day.
- (l) One (1) hepburn 3,000 ton vacuum assisted reinforced plastic molding press, identified as PR 3001, installed in 1990, capacity: 265 fiberglass reinforced parts per day.
- (m) One (1) natural gas fired west plant air make up unit, identified as AMU-W, installed in 1987, rated at 12.6 million British thermal units per hour.
- (n) One (1) fiberglass mat natural gas curing oven, identified as PFO-2, installed in 2001, exhausting outside the plant, rated at 2.39 million British thermal units per hour, drying a maximum of 440 pounds of fiberglass mat per hour.
- (o) One (1) natural gas fired boiler, identified as 8409, equipped with low NO_x burners with flue gas recirculation, installed in 2000, exhausted through Stack EP 9, rated at 10.5 million British thermal units per hour.
- (p) One (1) 2,500 metric ton reinforced plastic molding press, identified as PR-2502, installed in 2000, capacity: 265 fiberglass reinforced parts per day.
- (q) Four (4) 1,500 metric ton reinforced plastic molding presses, identified as PR-1503 through PR-1506, installed in 2000, capacity: 365 fiberglass reinforced parts per day.
- (r) One (1) 600 metric ton reinforced plastic molding press, identified as PR-808, installed in 2000, capacity: 600 fiberglass reinforced parts per day.
- (s) One (1) 1,500 metric ton reinforced plastic molding press, identified as PR-1509, installed in 2000, capacity: 864 fiberglass reinforced parts per day.
- (t) One (1) fiberglass mat natural gas fired preform oven, identified as PFO-1, installed in 1999, exhausting to stack EP 13, rated at 2.39 million British thermal units per hour, with a throughput of 440 pounds of fiberglass per hour.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

C.14 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

- (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, 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 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 timeframe 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 a minor permit modification 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, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (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.

SECTION D.1

FACILITY OPERATION CONDITIONS

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

- (a) One (1) automatic spray booth, identified as SB-M-Pr, equipped with electrostatic air atomization spray guns and a waterwash system as overspray control, installed on December 11, 1987, exhausted to Stack EP4, capacity: 530 fiberglass reinforced parts per day.
- (b) One (1) automatic spray booth, identified as SB-A-Pr, equipped with electrostatic air atomization and electrostatic rotary spray guns and a waterwash system as overspray control, installed on December 11, 1987, exhausted to Stacks EP6 and EP7, capacity: 530 fiberglass reinforced parts per day.
- (c) One (1) splatter coat spray booth, identified as SB-M-S, equipped with electrostatic air atomization spray guns and a waterwash system as overspray control, installed on December 11, 1987, exhausted to Stack EP 3, capacity: 530 fiberglass reinforced parts per day.
- (d) One (1) splatter coat spray booth, identified as SB-A-S, equipped with three (3) electrostatic air atomization and electrostatic rotary spray guns and a waterwash system as overspray control, installed on December 11, 1987, modified for the addition of one (1) high volume low pressure (HVLP) spray gun in 2004, exhausted to Stacks EP 1 and EP 2, capacity: 735.12 fiberglass reinforced parts per day.
- (e) One (1) mono coat spray booth, identified as SB-A-M, equipped with four (4) electrostatic air atomization spray guns and a waterwash system as overspray control, installed on December 11, 1987, modified for the addition of one (1) high volume low pressure (HVLP) spray gun in 2004, exhausted to Stacks EP 5A and EP 5B, capacity: 735.12 fiberglass reinforced parts per day.
- (f) One (1) mono coat spray booth, identified as SB-M-M, equipped with electrostatic air atomization spray guns and a waterwash system as overspray control, installed on December 11, 1987, exhausted to Stack EP 8, capacity: 530 fiberglass reinforced parts per day.
- (g) One (1) touch-up spray booth, identified as SB-M-T, equipped with manual spray guns and dry filters for particulate control, installed in 2004, exhausting to Stack E-11, capacity: 30.63 fiberglass reinforced parts per hour.
- (i) One (1) hepburn 1,000 ton vacuum assisted reinforced plastic molding press, identified as PR 810, installed in 1987, capacity: 432 fiberglass reinforced parts per day.
- (j) Two (2) erie vacuum assisted reinforced plastic molding presses, identified as PR 1511 and PR 1512, PR 1512 is a 500 ton press, installed in 1987, PR 1511 is a 1,500 ton press, installed September 2000, capacity: 864 fiberglass reinforced parts per day. SMC is molded in press 1512 and a hole is pressed in the molded SMC in press 1511. Emissions only occur from press PR 1512.
- (k) One (1) erie 1,500 ton vacuum assisted reinforced plastic molding press, identified as PR 1507, installed in 1987, capacity: 530 fiberglass reinforced parts per day.
- (l) One (1) hepburn 3,000 ton vacuum assisted reinforced plastic molding press, identified as PR 3001, installed in 1990, capacity: 265 fiberglass reinforced parts per day.
- (p) One (1) 2,500 metric ton reinforced plastic molding press, identified as PR-2502, installed in 2000, capacity: 265 fiberglass reinforced parts per day.
- (q) Four (4) 1,500 metric ton reinforced plastic molding presses, identified as PR-1503 through PR-1506, installed in 2000, capacity: 365 fiberglass reinforced parts per day.
- (r) One (1) 600 metric ton reinforced plastic molding press, identified as PR-808, installed in 2000, capacity: 600 fiberglass reinforced parts per day.
- (s) One (1) 1,500 metric ton reinforced plastic molding press, identified as PR-1509, installed in 2000, capacity: 864 fiberglass reinforced parts per day.

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

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

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

Pursuant to CP 069-1857-00033 issued November 10, 1990, and 326 IAC 8-1-6 (New facilities: general reduction requirements), Best Available Control Technology (BACT) for the six (6) spray booths identified as SB-M-Pr, SB-A-Pr, SB-M-M, SB-A-M, SB-M-S, and SB-A-S has been determined to be the following:

- (a) The potential VOC delivered to the applicators shall not exceed 248.4 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) The above-named operations shall be restricted such that the VOC delivered to the applicators shall not exceed thirty (30) tons per month.
- (c) The use of high transfer efficiency electrostatic application is required as a technology which will reduce VOC emissions. Therefore, the State and Federal Rules for Prevention of Significant Deterioration do not apply.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 2-7-10.5] [326 IAC 8-1-6]

The VOC usage from SB-M-T shall not exceed 24.9 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this limitation shall render the requirements of 326 IAC 2-7-10.5(f), and 326 IAC 8-1-6 not applicable to spray booth SB-M-T.

D.1.3 PSD Minor Limit [326 IAC 2-2]

The seven (7) surface coating booths, identified as SB-M-PR, SB-A-PR, SB-M-S, SB-A-S, SB-A-M, SB-M-M, and SB-M-T, the eleven (11) molding presses, the one (1) natural gas-fired preform oven, and the one (1) natural gas-fired curing oven total VOC usage shall be limited to a total of 239.2 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This usage limit, combined with the full potential to emit VOC from the one (1) boiler, one (1) west plant air make-up unit, one (1) hook oven and all of the insignificant activities shall limit the total source-wide VOC emissions to less than two hundred and fifty (250) tons per twelve (12) consecutive month period. Compliance with this limit makes the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

D.1.4 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to 40 CFR 52 Subpart P, the PM from each of the seven (7) spray booths, 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:

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

D.1.5 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the seven (7) spray booths shall be controlled by waterwash systems or dry particulate filters, and the Permittee shall operate the control devices in accordance with manufacturer's specifications. This requirement to operate the control is not federally enforceable.

D.1.6 Volatile Organic Compounds [326 IAC 8-1-6]

Any change or modification which would increase the potential to emit VOC to twenty-five (25) tons per year or more from any of the eleven (11) reinforced plastic molding presses shall obtain prior approval from IDEM, OAQ.

D.1.7 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 2 to 40 CFR Part 63, Subpart PPPP] [40 CFR 63.4501]

The provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart PPPP. The Permittee must comply with these requirements on and after April 19, 2007.

D.1.8 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products [40 CFR Part 63, Subpart PPPP] [40 CFR 63.4481] [40 CFR 63.4482] [40 CFR 63.4483(b)] [40 CFR 63.4581]

- (a) The provisions of 40 CFR Part 63, Subpart PPPP (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/plastic/plasticpg.html>. Pursuant to 40 CFR 63.4483(b), the Permittee must comply with these requirements on and after April 19, 2007.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.
- (c) The following emissions units comprise the affected source that is subject to 40 CFR 63, Subpart PPPP:
 - (1) All coating operations as defined in 40 CFR 63.4581;
 - (2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
 - (3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and
 - (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.
- (d) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.4581, and are applicable to the affected source.

D.1.9 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.1.10 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 through D.1.3 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.

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

D.1.11 Monitoring

- (a) Weekly inspections shall be performed to verify that the water level of the water pans meet the source's recommended level. To monitor the performance of the water pans, the water level of the pans shall be maintained weekly at a level where surface agitation indicates impact of the air flow. Water shall be kept free of solids and floating material that reduces the capture efficiency of the water pan. To monitor the performance of the baffles, quarterly inspections of the baffle panels shall be conducted to verify placement and configuration meet recommendations of the source. In addition, weekly observations shall be made of the overspray from the surface coating booth stacks EP 1 through EP 8 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) 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 Stack E-11 while SB-M-T is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (c) Monthly inspections shall be performed of the coating emissions from the stack (EP 1 through EP 8 as well as E-11) 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.
- (d) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

D.1.12 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 through D.1.3 and D.1.6, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in

Conditions D.1.1 through D.1.3 and D.1.6.

- (1) The amount and VOC content of each coating material and solvent used.
 - (2) The total amount of coating material and solvent used as well as the amount of coating used at SB-M-T 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.
 - (3) The total VOC usage as well as the VOC usage at SB-M-T for each month.
- (b) To document compliance with Condition D.1.12, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.13 Notification Requirements [40 CFR 63.4510]

- (a) General. The Permittee must submit the notifications in 40 CFR 40 CFR 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply to the affected source by the dates specified in those sections, except as provided in 40 CFR 63.4510, paragraphs (b) and (c).
- (b) Initial notification. The Permittee must submit the initial notification no later than April 19, 2005. If using compliance with the Automobiles and Light-Duty Trucks NESHAP (40 CFR Part 63, Subpart IIII) under 40 CFR 63.4881(d) to constitute compliance with this subpart for the plastic part coating operations, then the Permittee must include a statement to this effect in the initial notification and no other notifications are required under this subpart. If complying with another NESHAP that constitutes the predominant activity at the facility under 40 CFR 63.4481(e)(2) to constitute compliance with this subpart for the plastic coating operations, then the Permittee must include a statement to this effect in the initial notification and no other notifications are required under this subpart.
- (c) Notification of compliance status. The Permittee must submit the notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR 63.4540, 40 CFR 63.4550, or 40 CFR 63.4560 that applies to the affected source. The notification of compliance status must contain the information specified in 40 CFR 63.4510(c), paragraphs (1) through (11) and in 40 CFR 63.9(h).

D.1.14 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12] [326 IAC 2-7-5]

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

- (a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Part 70 permit the

applicable requirements of 40 CFR 63, Subpart PPPP, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.

- (b) The significant permit modification application shall be submitted no later than July 19, 2006.
- (c) The significant permit modification application shall be submitted to:

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

D.1.15 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 through D.1.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

Part 70 Quarterly Report

Source Name: Meridian Automotive Systems
Source Address: 1890 Riverfork Drive West, Huntington, Indiana 46750
Mailing Address: 1890 Riverfork Drive West, Huntington, Indiana 46750
Part 70 Permit No.: T 069-5943-00043
Facilities: Six (6) spray booths (SB-M-PR, SB-A-PR, SB-M-S, SB-A-S, SB-A-M and SB-M-M)
Parameter: VOC usage
Limit: Total of 248.4 tons per twelve (12) consecutive month period with compliance determined at the end of each month
Total of thirty (30) tons per month

YEAR: _____

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

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Meridian Automotive Systems
 Source Address: 1890 Riverfork Drive West, Huntington, Indiana 46750
 Mailing Address: 1890 Riverfork Drive West, Huntington, Indiana 46750
 Part 70 Permit No.: T 069-5943-00043
 Facilities: 7 spray booths, 2 warehouse booths, 11 molding presses, 1 preform oven, 1 curing oven
 Parameter: VOC usage
 Limit: Total of less than 239.2 tons per twelve (12) consecutive month period with compliance determined at the end of each month

YEAR: _____

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

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Meridian Automotive Systems
Source Address: 1890 Riverfork Drive West, Huntington, Indiana 46750
Mailing Address: 1890 Riverfork Drive West, Huntington, Indiana 46750
Part 70 Permit No.: T 069-5943-00043
Facility: Touch-up spray booth (SB-M-T)
Parameter: VOC usage
Limit: Not to exceed 24.9 tons per twelve (12) consecutive month period with compliance determined at the end of each month

YEAR: _____

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

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

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Part 70 Minor Source Modification and Significant Permit Modification

Source Background and Description

Source Name:	Meridian Automotive Systems
Source Location:	1890 Riverfork Drive West, Huntington, Indiana 46750
County:	Huntington
SIC Code:	3089
Operation Permit No.:	T 069-5943-00043
Operation Permit Issuance Date:	September 17, 2001
Minor Source Modification No.:	MSM 069-20627-00043
Significant Permit Modification No.:	SPM 069-20681-00043
Permit Reviewer:	Michael S. Schaffer

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

- (g) One (1) touch-up spray booth, identified as SB-M-T, equipped with manual spray guns and dry filters for particulate control, installed in 2004, exhausting to Stack E-11, capacity: 30.63 fiberglass reinforced parts per hour.

History

On January 27, 2005 Meridian Automotive submitted an application to the OAQ requesting to operate the one (1) touch-up spray booth, identified SB-M-T. Spray booth SB-M-T was approved by the OAQ to be constructed through interim permit (069-19901i), issued on December 10, 2004. Meridian Automotive Systems was issued a Part 70 permit on September 17, 2001. Meridian Automotive Systems was also issued a First Minor Source Modification (MSM 069-19901) for the construction of new spray guns at SB-A-M and SB-A-S, on February 14, 2005. The subsequent minor permit modification (MPM 069-20440) to incorporate the requirements from MSM 069-19901 into the Part 70 Operating Permit is still pending.

In order to render the requirements of 326 IAC 8-1-6 not applicable to spray booth SB-M-T, Meridian Automotive Systems has requested that the VOC emissions from spray booth SB-M-T be limited to less than twenty-five (25) tons per year as part of this modification.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (EF)
EP-11	Touch-up Spray Booth (SB-M-T)	35.0	2.0	10,000	Ambient

Recommendation

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

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

An application for the purposes of this review was received on January 27, 2005.

Emission Calculations

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

Potential To Emit of Modification

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

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

Pollutant	Potential To Emit (tons/year)
PM	44.9
PM ₁₀	44.9
SO ₂	-
VOC	72.8
CO	-
NO _x	-

HAPs	Potential To Emit (tons/year)
Xylene	31.2
Toluene	7.42
Ethylbenzene	7.71
TOTAL*	38.9

- * At spray booth SB-M-T, the worst case combination of HAPs are emitted when the coatings are applied to Honda units, only. Therefore, the emissions from the coatings and solvents applied to Jeep units (which contain Toluene) have not been included in the calculation for the potential to emit of total HAPs.

Justification for Modification

The Part 70 Operating Permit is being modified through a Part 70 Minor Source Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5 (d)(4)(A) as a modification that limits the VOC usage from SB-M-T to less than twenty-five (25) tons per year.

The proposed operating conditions shall be incorporated into the Part 70 Operating Permit as a Significant Permit Modification (SPM 069-20681-00043) in accordance with 326 IAC 2-7-12(d)(1). The Significant Permit Modification will provide the source with approval to operate SB-M-T with a VOC usage limit that renders the requirements of 326 IAC 2-7-10.5(f) and 326 IAC 8-1-6 not applicable.

County Attainment Status

The source is located in Huntington County.

Pollutant	Status
PM ₁₀	attainment
SO ₂	attainment
NO ₂	attainment
1-Hour Ozone	attainment
8-Hour Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to ozone. Huntington County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (b) Huntington County has been classified as attainment or unclassifiable in Indiana for PM₁₀, SO₂, NO₂, CO, and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8,760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	26.9
PM ₁₀	28.8
SO ₂	1.28
VOC	Less than 250
CO	33.4
NO _x	41.3

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the twenty-eight (28) listed source categories.
- (b) These emissions are based on the information provided on Page 7 of 15 in the TSD to T 069-5943-00043, issued on September 17, 2001.

Potential to Emit of Modification After Issuance

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

Process/facility	Potential to Emit (tons/year)						
	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
Touch-up Spray Booth (SB-M-T)	2.24	2.24	-	24.9	-	-	38.9 Total
PSD Threshold Level	250	250	250	250	250	250	-

- (a) This modification to an existing minor stationary source is not major because the emission increase is less than the PSD threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.
- (b) As part of this modification, this source has requested the following limitations:
 - (1) In order render the requirements of 326 IAC 8-1-6 and 326 IAC 2-7-10.5(f) not applicable, the VOC usage from SB-M-T, shall not exceed 24.9 tons per twelve (12) consecutive month period with compliance determined at the end of each month; and
 - (2) In order for this source to continue to operate as a minor source under PSD rules, SB-M-T, will be included in the existing source-wide VOC usage limit contained in Condition D.1.2 of T 069-5943-00043, issued on September 17, 2001

Federal Rule Applicability

- (a) This significant permit modification does not involve a pollutant-specific emissions unit as defined in 40 CFR 64.1 for PM, PM₁₀, and VOC:
 - (1) with the potential to emit before controls equal to or greater than the major source

threshold for PM, PM₁₀, and VOC;

- (2) that is subject to an emission limitation or standard for PM, PM₁₀, and VOC; and
- (3) uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard.

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

- (b) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.
- (c) This source is a major source of hazardous air pollutant (HAP) emissions (i.e., the source has the potential to emit ten (10) tons per year or greater of a single HAP or twenty-five (25) tons per year or greater of a combination of HAPs), uses more than 100 gallons (378 liters) of HAP coatings per year, and coats plastic parts as well as major components to automobiles and light duty trucks.

Therefore, the surface coating operations at this source may be subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Plastic Parts and Products, 40 CFR 63, Subpart PPPP or the NESHAP for Automobile and Light Duty Truck Surface Coating, 40 CFR 63, Subpart IIII.

Since the one (1) touch-up booth, identified as SB-M-T, is a surface coating operation as part of the existing source that may be subject to NESHAP Subparts IIII and PPPP, and the Initial Notification for NESHAP, Subpart PPPP is due to be submitted by no later than April 19, 2005, the applicable requirements for the NESHAP that the source wishes to comply with must be included in this modification.

Pursuant to 40 CFR 63.3081(c)(1), Meridian Automotive Systems has elected to make all of the plastic surface coating operations at this source subject to requirements of 40 CFR 63, Subpart PPPP, rather than the requirements of 40 CFR 63, Subpart IIII. As a result, pursuant to 40 CFR 63.4483(c)(1), the surface coating operations at this source will be considered an existing affected source since the source has surface coating operations that commenced construction prior to December 4, 2002.

- (1) The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR 63, Subpart PPPP. The Permittee must comply with these requirements on and after April 19, 2007.

The website <http://www.epa.gov/ttn/atw/plastic/plasticpg.html> provides a copy of the signed final rule.

- (2) This rule has a future compliance date; therefore, the specific details of the rule and how the Permittee will demonstrate compliance are not provided in the permit. The Permittee shall submit an application for a Significant Permit Modification no later than July 19, 2006, that will provide a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard. At that time, IDEM, OAQ will include the specific details of the rule and how the Permittee will demonstrate compliance. In addition, pursuant to 40 CFR 63, Subpart PPPP, the Permittee shall submit:

- (A) The Permittee must submit the notifications in 40 CFR 40 CFR 63.7(b) and

(c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply to the affected source by the dates specified in those sections, except as provided in 40 CFR 63.4510, paragraphs (b) and (c).

- (B) The Permittee must submit the initial notification no later than April 19, 2005. If using compliance with the Automobiles and Light-Duty Trucks NESHAP (40 CFR Part 63, Subpart IIII) under 40 CFR 63.4881(d) to constitute compliance with this subpart for the plastic part coating operations, then the Permittee must include a statement to this effect in the initial notification and no other notifications are required under this subpart. If complying with another NESHAP that constitutes the predominant activity at the facility under 40 CFR 63.4481(e)(2) to constitute compliance with this subpart for the plastic coating operations, then the Permittee must include a statement to this effect in the initial notification and no other notifications are required under this subpart.
- (C) The Permittee must submit the notification of compliance status required by 40 CFR 63.9(h) no later than thirty (30) calendar days following the end of the initial compliance period described in 40 CFR 63.4540, 40 CFR 63.4550, or 40 CFR 63.4560 that applies to the affected source. The notification of compliance status must contain the information specified in 40 CFR 63.4510(c), paragraphs (1) through (11) and in 40 CFR 63.9(h).

State Rule Applicability - Individual Facilities

326 IAC 2-7-10.5 (Part 70 Source Modification)

- (a) In order to limit the potential to emit VOC from this modification to less than twenty-five (25) tons per year, the VOC usage from the one (1) spray booth, identified as SB-M-T shall not exceed 24.9 tons per twelve consecutive month period with compliance determined at the end of each month.
- (b) Compliance with the limit in paragraph (a) shall render the requirements of 326 IAC 2-7-10.5(f) and 326 IAC 8-1-6 not applicable to this modification.

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

In order to remain a minor source pursuant to 326 IAC 2-2, PSD, Meridian Automotive Systems has elected to include the one (1) touch-up spray, identified as SB-M-T, in the existing minor limitation in Condition D.1.2 (now Condition D.1.3) of T 069-5943-00043, issued on September 17, 2001 as follows:

The seven (7) surface coating booths, identified as SB-M-PR, SB-A-PR, SB-M-S, SB-A-S, SB-A-M, SB-M-M, and SB-M-T, as well as the eleven (11) molding presses, the one (1) natural gas-fired preform oven, and the one (1) natural gas-fired curing oven total VOC usage shall be limited to a total of 239.2 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

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

Pursuant to 326 IAC 2-4.1-1(b)(2), a major source specifically regulated, or exempted from regulation, by a standard issued pursuant to Sections 112(d), 112(h), or 112(j) of the CAA is not subject to the requirements of 326 IAC 2-4.1-1. Since the one (1) spray booth, identified as SB-M-T is subject to the requirements of 40 CFR 63, Subpart PPPP (which is a Section 112(j) MACT), as part of the existing

source, the requirements of 326 IAC 2-4.1-1 do not apply to this modification.

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

326 IAC 6-3-2 (Process Operations)

Pursuant to 40 CFR 52 Subpart P the particulate matter (PM) from the one (1) touch-up booth, identified as SB-M-T, shall be limited by the following:

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

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

Under the rule revision, particulate from the surface coating at SB-M-T shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.

326 IAC 8-1-6 (New facilities; General Reduction Requirements)

The proposed spray booth, identified as SB-M-T will not be regulated by any other provision of 326 IAC 8 because there are no limitations in the other provisions of 326 IAC 8 that are applicable to the surface coating of plastic parts.

Therefore, as part of this modification, this source has elected to limit the VOC usage from the one (1) spray booth, identified as SB-M-T to no more than 24.9 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this limitation shall render the requirements of 326 IAC 8-1-6 not applicable to SB-M-T.

Compliance Requirements

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

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

The compliance monitoring requirements applicable to spray booth SB-M-T are as follows:

- (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 Stack E-11 while spray booth SB-M-T is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance 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 E-11 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.

The dry filters for spray booth SB-M-T must operate properly to ensure compliance with 326 IAC 5-1 (Opacity Limitations), 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

Testing Requirements

Compliance with the VOC usage limit on SB-M-T can be demonstrated through non-testing compliance determination requirements as well as record keeping and reporting requirements. In addition, there are no VOC, PM, and PM₁₀ emission factor limitations that are applicable to SB-M-T. Therefore, no stack testing will be required in this modification.

Proposed Changes

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

Change 1:

Paragraph (g) will be added to Condition A.2 as well as the equipment description box in Section D.1 as follows:

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

- (g) One (1) touch-up spray booth, identified as SB-M-T, equipped with manual spray guns and dry filters for particulate control, installed in 2004, exhausting to Stack E-11, capacity: 30.63 fiberglass reinforced parts per hour.**

SECTION D.1

FACILITY OPERATION CONDITIONS

- | |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none">(g) One (1) touch-up spray booth, identified as SB-M-T, equipped with manual spray guns and dry filters for particulate control, installed in 2004, exhausting to Stack E-11, capacity: 30.63 fiberglass reinforced parts per hour. |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

Change 2:

As a result of Change 1, Condition A.2 as well as the equipment descriptions boxes in Sections D.1 and D.2 will be relettered.

Change 3:

Condition C.14 (Compliance Monitoring Plan - Failure to Take Response Steps) has been replaced with the Compliance Response Plan (CRP) Requirements as follows:

~~C.14 — Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]~~

~~(a) — The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:~~

~~(1) — This condition;~~

~~(2) — The Compliance Determination Requirements in Section D of this permit;~~

~~(3) — The Compliance Monitoring Requirements in Section D of this permit;~~

~~(4) — The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and~~

~~(5) — A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:~~

~~(A) — Reasonable response steps that may be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and~~

~~(B) — A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.~~

~~(b) — For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps may constitute a violation of the permit.~~

~~(c) — Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:~~

~~(1) — A false reading occurs due to the malfunction of the monitoring equipment. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.~~

- ~~(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.~~
- ~~(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) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.~~
- ~~(e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.~~
- ~~(f) At its discretion, IDEM may excuse the Permittee's failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in any quarter~~

~~Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.~~

C.14 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

- (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, 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 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 timeframe 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 a minor permit modification 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, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (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.

Change 4:

The term “with compliance determined at the end of each month” will be added to Condition D.1.1(a) as follows:

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

Pursuant to CP 069-1857-00033 issued November 10, 1990, and 326 IAC 8-1-6 (New facilities: general reduction requirements), Best Available Control Technology (BACT) for the six (6) spray booths identified as SB-M-Pr, SB-A-Pr, SB-M-M, SB-A-M, SB-M-S, and SB-A-S has been determined to be the following:

- (a) The potential VOC delivered to the applicators shall not exceed 248.4 tons per twelve (12) consecutive month period **with compliance determined at the end of each month.**
- (b) The above-named operations shall be restricted such that the VOC delivered to the applicators shall not exceed thirty (30) tons per month.
- (c) The use of high transfer efficiency electrostatic application is required as a technology which will reduce VOC emissions. Therefore, the State and Federal Rules for Prevention of Significant Deterioration do not apply.

Change 5:

Since this source has elected to limit the VOC usage at the one (1) touch-up spray booth, identified as SB-M-T, as part of this modification, Conditions D.1.2 will be added as follows:

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 2-7-10.5] [326 IAC 8-1-6]

The VOC usage from SB-M-T shall not exceed 24.9 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this limitation shall render the requirements of 326 IAC 2-7-10.5(f), and 326 IAC 8-1-6 not applicable to spray booth SB-M-T.

Change 6:

In order for this source to continue to operate as a minor source under PSD rules, the operation spray booth SB-M-T will be incorporated into the PSD Minor limit in Condition D.1.2 (now Condition D.1.3) as follows:

D.1.2 3 PSD Minor Limit [326 IAC 2-2] [~~40 CFR 52.21~~]

The ~~six (6)~~ **seven (7)** surface coating booths, **identified as SB-M-PR, SB-A-PR, SB-M-S, SB-A-S, SB-A-M, SB-M-M, and SB-M-T**, the eleven (11) molding presses, the one (1) natural gas-fired preform oven, and the one (1) natural gas-fired curing oven total VOC usage shall be limited to **a total of 239.2 tons per consecutive twelve (12) consecutive month period, combined with compliance determined at the end of each month.** This usage limit, combined with the full potential to emit VOC from the one (1) boiler, one (1) west plant air make-up unit, one (1) hook oven and all of the insignificant activities shall limit the total source-wide VOC emissions to less than two hundred and fifty (250) tons per twelve (12) consecutive month period. Compliance with this limit makes the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) ~~and 40 CFR 52.21~~ not applicable.

Change 7:

Due to the June 12, 2002 rule revision for 326 IAC 6-3-2 and the addition of spray booth SB-M-T, Condition D.1.3 (now Condition D.1.4) will be revised, Condition D.1.5 will be added, and Condition D.1.8 will be deleted as follows:

D.1.3 4 Particulate Matter (PM) [~~326 IAC 6-3-2~~] [40 CFR 52 Subpart P]

Pursuant to ~~326 IAC 6-3-2~~ **40 CFR 52 Subpart P**, the total PM from **each of the six (6) seven (7)** spray booths, 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:

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

D.1.5 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the seven (7) spray booths shall be controlled by waterwash systems or dry particulate filters, and the Permittee shall operate the control devices in accordance with manufacturer's specifications. This requirement to operate the control is not federally enforceable.

D.1.8 ~~Particulate Matter (PM)~~

~~The waterwash system for PM control shall be in operation at all times when the six (6) spray booths are in operation.~~

Change 8:

The following requirements from 40 CFR 63, Subpart P that currently apply to this source will be added as Conditions D.1.7, D.1.8, D.1.13 and D.1.14.

D.1.7 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 2 to 40 CFR Part 63, Subpart P] [40 CFR 63.4501]

The provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart P. The Permittee must comply with these requirements on and after April 19, 2007.

D.1.8 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products [40 CFR Part 63, Subpart P] [40 CFR 63.4481] [40 CFR 63.4482] [40 CFR 63.4483(b)] [40 CFR 63.4581]

- (a) The provisions of 40 CFR Part 63, Subpart P (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/plastic/plasticpg.html>. Pursuant to 40 CFR 63.4483(b), the Permittee must comply with these requirements on and after April 19, 2007.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.
- (c) The following emissions units comprise the affected source that is subject to 40 CFR 63, Subpart P:
- (1) All coating operations as defined in 40 CFR 63.4581;
 - (2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
 - (3) All manual and automated equipment and containers used for conveying coat-

ings, thinners and/or other additives, and cleaning materials; and

- (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.
- (d) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.4581, and are applicable to the affected source.

D.1.13 Notification Requirements [40 CFR 63.4510]

- (a) **General.** The Permittee must submit the notifications in 40 CFR 40 CFR 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply to the affected source by the dates specified in those sections, except as provided in 40 CFR 63.4510, paragraphs (b) and (c).
- (b) **Initial notification.** The Permittee must submit the initial notification no later than April 19, 2005. If using compliance with the Automobiles and Light-Duty Trucks NESHAP (40 CFR Part 63, Subpart IIII) under 40 CFR 63.4881(d) to constitute compliance with this subpart for the plastic part coating operations, then the Permittee must include a statement to this effect in the initial notification and no other notifications are required under this subpart. If complying with another NESHAP that constitutes the predominant activity at the facility under 40 CFR 63.4481(e)(2) to constitute compliance with this subpart for the plastic coating operations, then the Permittee must include a statement to this effect in the initial notification and no other notifications are required under this subpart.
- (c) **Notification of compliance status.** The Permittee must submit the notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR 63.4540, 40 CFR 63.4550, or 40 CFR 63.4560 that applies to the affected source. The notification of compliance status must contain the information specified in 40 CFR 63.4510(c), paragraphs (1) through (11) and in 40 CFR 63.9(h).

D.1.14 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12] [326 IAC 2-7-5]

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

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

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

Change 9:

As the result of the addition of the usage limit for SB-M-T in Change 4 and the inclusion of SB-M-T in the VOC usage limit in Change 5, Condition D.1.6 (now Condition D.1.10) will be revised and Condition D.1.7 will be deleted as follows:

D.1.6 10 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 ~~and D.1.2 through D.1.3~~ shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) ~~using formulation data supplied by the coating manufacturer~~ **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.**

~~D.1.7~~ VOC Emissions

~~Compliance with Conditions D.1.1 and D.1.2 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the twelve (12) month period.~~

Change 10:

As a result of the addition of spray paint booth SB-M-T, the compliance monitoring requirements in Condition D.1.9 (now Condition D.1.11) will be revised as follows:

D.1.9 11 Monitoring

- (a) Weekly inspections shall be performed to verify that the water level of the water pans meet the source's recommended level. To monitor the performance of the water pans, the water level of the pans shall be maintained weekly at a level where surface agitation indicates impact of the air flow. Water shall be kept free of solids and floating material that reduces the capture efficiency of the water pan. To monitor the performance of the baffles, quarterly inspections of the baffle panels shall be conducted to verify placement and configuration meet recommendations of the source. In addition, weekly observations shall be made of the overspray from the surface coating booth stacks EP 1 through EP 8 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 Monitoring Plan - Failure to Take Response Steps,~~ **Compliance Response Plan - Preparation, Implementation, Records, and Reports,** shall be considered a ~~violation of~~ **deviation from** this permit.
- (b) **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 Stack E-11 while SB-M-T is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.**
- ~~(b)~~ (c) Monthly inspections shall be performed of the coating emissions from the stack (EP 1 through EP 8 **as well as E-11**) 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 ~~Compliance Monitoring Plan - Failure to Take Response Steps,~~

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

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

Change 11:

As the result of the addition of the usage limit for SB-M-T in Change 2 and the inclusion of SB-M-T in the VOC usage limit in Change 3, the record keeping and reporting requirements in Conditions D.1.10 and D.1.11 (now Conditions D.1.12 and D.1.15) will be revised as follows:

D.1.10 12 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1, ~~D.1.2 and D.1.4~~ **through D.1.3 and D.1.6**, the Permittee shall maintain records in accordance with (1) through ~~(5)~~ **(3)** below. Records maintained for (1) through ~~(5)~~ **(3)** shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.1, ~~D.1.2 and D.1.4~~ **through D.1.3 and D.1.6**.
- (1) The amount and VOC content of each coating material and solvent used. ~~Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;~~
- ~~(2)~~ ~~— A log of the dates of use;~~
- (2) The total amount of coating material and solvent used as well as the amount of coating used at SB-M-T 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.**
- ~~(3)~~ ~~— The cleanup solvent usage for each month;~~
- ~~(4)~~ **(3) The total VOC usage as well as the VOC usage at SB-M-T for each month. ; and**
- ~~(5)~~ ~~— The weight of VOCs emitted for each compliance period.~~
- (b) ~~To document compliance with Conditions D.1.8 and D.1.9, the Permittee shall maintain a log of weekly overspray observations, weekly observations of the water level in the pans quarterly inspections of water pans, and those additional inspections prescribed by the Preventive Maintenance Plan.~~ **To document compliance with Condition D.1.12, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.**
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.14 15 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 ~~and D.1.2~~ **through D.1.3** shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Change 12:

As result of Changes 2, 3, and 8, the two (2) quarterly report forms at the end of the Part 70 Operating Permit will be revised and another quarterly report form will be added as follows:

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

Part 70 Quarterly Report

Source Name: Meridian Automotive Systems
Source Address: 1890 Riverfork Drive West, Huntington, Indiana 46750
Mailing Address: 1890 Riverfork Drive West, Huntington, Indiana 46750
Part 70 Permit No.: T 069-5943-00043
Facilities: Six (6) spray booths **(SB-M-PR, SB-A-PR, SB-M-S, SB-A-S, SB-A-M and SB-M-M)**
Parameter: VOC usage
Limit: Total of 248.4 tons per twelve (12) consecutive month period **with compliance determined at the end of each month.**
Total of thirty (30) tons per month

YEAR: _____

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

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

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Meridian Automotive Systems
 Source Address: 1890 Riverfork Drive West, Huntington, Indiana 46750
 Mailing Address: 1890 Riverfork Drive West, Huntington, Indiana 46750
 Part 70 Permit No.: T 069-5943-00043
 Facilities: 67 spray booths, 2 warehouse booths, 11 molding presses, 1 preform oven, 1 curing oven
 Parameter: VOC usage
 Limit: Total of less than 239.2 tons per twelve (12) consecutive month period **with compliance determined at the end of each month.**

YEAR: _____

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

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

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Meridian Automotive Systems
Source Address: 1890 Riverfork Drive West, Huntington, Indiana 46750
Mailing Address: 1890 Riverfork Drive West, Huntington, Indiana 46750
Part 70 Permit No.: T 069-5943-00043
Facility: Touch-up spray booth (SB-M-T)
Parameter: VOC usage
Limit: Not to exceed 24.9 tons per twelve (12) consecutive month period with compliance determined at the end of each month

YEAR: _____

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

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

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Conclusion

The construction and operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Minor Source Modification No. 069-20627-00043 and Significant Permit Modification No. 069-20681-00043.

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

Company Name: Meridian Automotive Systems
Address City IN Zip: 1890 Riverfork Drive West, Huntington, Indiana 46750
Minor Source Modification: 069-20627
Significant Permit Modification: 069-20681
Pit ID: 069-00043
Reviewer: Michael S. Schaffer
Application Date: January 27, 2005

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
New Touch-up Booth SB-M-T																
<i>As Applied to Jeep Units</i>																
Medium Gray - R&H 05078 R 798WT	9.387	44.49%	0.00%	44.5%	0.00%	42.08%	0.1224	30.63	4.18	4.18	15.66	376	68.6	42.8	9.92	50%
Dark Khaki - R&H 03204 R 798WT	9.033	43.47%	0.00%	43.5%	0.00%	44.71%	0.1224	30.63	3.93	3.93	14.72	353	64.5	41.9	N/A	50%
Textured Black - R&H 90256 R 798TX	8.804	50.01%	0.00%	50.0%	0.00%	39.35%	0.1224	30.63	4.40	4.40	16.51	396	72.3	36.1	11.19	50%
Purge Solvent	6.81	10.00%	0.00%	10.0%	0.00%	0.00%	0.0051	30.63	0.681	0.681	0.106	2.55	0.466	2.10	N/A	50%
<i>As Applied to Honda Units</i>																
Textured Black - R&H 90256 R 798TX	8.804	50.01%	0.00%	50.0%	0.00%	39.35%	0.1224	30.63	4.40	4.40	16.5	396	72.3	36.1	11.2	50%
Purge Solvent	6.81	10.00%	0.00%	10.0%	0.00%	0.00%	0.0051	30.63	0.68	0.68	0.106	2.55	0.466	2.10	N/A	50%

Note that the worst case materials for VOC and PM emissions at SB-M-T are not only based on coatings and solvents, but are also based on type of vehicle being coated. PM Control Efficiency: 95.00%

R&H stands for Rohm & Haas

Total Uncontrolled	16.6	399	72.8	44.9
Total Controlled	16.6	399	72.8	2.24

State Potential Emissions

Add worst case coating to all solvents

METHODOLOGY

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

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

Company Name: Meridian Automotive Systems
Address City IN Zip: 1890 Riverfork Drive West, Huntington, Indiana 46750
Minor Source Modification: 069-20627
Significant Permit Modification: 069-20681
Plt ID: 069-00043
Reviewer: Michael S. Schaffer
Application Date: January 27, 2005

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Ethylbenzene	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Ethylbenzene Emissions (ton/yr)
New Touch-up Booth SB-M-T									
<i>As Applied to Jeep Units</i>									
Medium Gray - R&H 05078 R 798WT	9.387	0.1224	30.63	20.00%	0.00%	5.00%	30.83	0.00	7.71
Dark Khaki - R&H 03204 R 798WT	9.033	0.1224	30.63	20.00%	5.00%	5.00%	29.67	7.42	7.42
Textured Black - R&H 90256 R 798TX	8.804	0.1224	30.63	20.00%	0.00%	5.00%	28.91	0.00	7.23
Purge Solvent	6.81	0.0051	30.63	8.00%	0.00%	0.00%	0.37	0.00	0.00
<i>As Applied to Honda Units</i>									
Textured Black - R&H 90256 R 798TX	8.804	0.1224	30.63	20.00%	0.00%	5.00%	28.91	0.00	7.23
Purge Solvent	6.81	0.0051	30.63	8.00%	0.00%	0.00%	0.37	0.00	0.00
Worst Case Individual HAP							31.2	7.42	7.71
Worst Case Combination of HAPs									38.9

Total State Potential Emissions

METHODOLOGY

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