



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: December 12, 2005
RE: DynAmerica Manufacturing LLC / 035-21285-00042
FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures
FNPER.dot 1/10/05



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204-2251
(317) 232-8603
(800) 451-6027
www.in.gov/idem

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

**DynAmerica Manufacturing, L.L.C.
401 South Blaine Street
Muncie, Indiana 47302**

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17. This permit also addresses new source review requirements and is intended to fulfill the new source review procedures and permit revision requirements pursuant to 326 IAC 2-8-11.1, applicable to those conditions.

Operation Permit No.: F035-21285-00042	
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: December 12, 2005 Expiration Date: December 12, 2010

TABLE OF CONTENTS

SECTION A	SOURCE SUMMARY	4
A.1	General Information [326 IAC 2-8-3(b)]	
A.2	Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]	
A.3	Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(l)]	
A.4	FESOP Applicability [326 IAC 2-8-2]	
A.5	Prior Permits Superseded [326 IAC 2-1.1-9.5]	
SECTION B	GENERAL CONDITIONS	6
B.1	Permit No Defense [IC 13]	
B.2	Definitions [326 IAC 2-8-1]	
B.3	Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5]	
B.4	Enforceability [326 IAC 2-8-6]	
B.5	Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]	
B.6	Severability [326 IAC 2-8-4(4)]	
B.7	Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]	
B.8	Duty to Provide Information [326 IAC 2-8-4(5)(E)]	
B.9	Compliance Order Issuance [326 IAC 2-8-5(b)]	
B.10	Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]	
B.11	Annual Compliance Certification [326 IAC 2-8-5(a)(1)]	
B.12	Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]	
B.13	Emergency Provisions [326 IAC 2-8-12]	
B.14	Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]	
B.15	Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]	
B.16	Permit Renewal [326 IAC 2-8-3(h)]	
B.17	Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]	
B.18	Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]	
B.19	Permit Revision Requirement [326 IAC 2-8-11.1]	
B.20	Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2] [IC 13-17-3-2] [IC 13-30-3-1]	
B.21	Transfer of Ownership or Operational Control [326 IAC 2-8-10]	
B.22	Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]	
B.23	Credible Evidence [326 IAC 2-8-4(3)] [326 IAC 2-8-5] [62 FR 8314] [326 IAC 1-1-6]	
SECTION C	SOURCE OPERATION CONDITIONS	15
	Emissions Limitations and Standards [326 IAC 2-8-4(1)]	
C.1	Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]	
C.2	Overall Source Limit [326 IAC 2-8]	
C.3	Opacity [326 IAC 5-1]	
C.4	Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.5	Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]	
C.6	Fugitive Dust Emissions [326 IAC 6-4]	
C.7	Operation of Equipment [326 IAC 2-8-5(a)(4)]	
C.8	Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
	Testing Requirements [326 IAC 2-8-4(3)]	
C.9	Performance Testing [326 IAC 3-6]	
	Compliance Requirements [326 IAC 2-1.1-11]	
C.10	Compliance Requirements [326 IAC 2-1.1-11]	

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

- C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]
- C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

- C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]
- C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

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

- C.15 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]
- C.16 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

Stratospheric Ozone Protection

- C.17 Compliance with 40 CFR 82 and 326 IAC 22-1

SECTION D.1 FACILITY OPERATION CONDITIONS..... 20

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

- D.1.1 FESOP and Emission Offset Minor Limit [326 IAC 2-3] [326 IAC 2-8]
- D.1.2 HAPs Limitations [326 IAC 2-4.1-1] [326 IAC 2-8-4]
- D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-2-9] [326 IAC 8-1-2(a)(9)]
- D.1.4 Compliance Schedule [326 IAC 2-8-5 (a)(3)]
- D.1.5 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]
- D.1.6 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

Compliance Determination Requirements

- D.1.7 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 8-1-2] [326 IAC 8-1-4]

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

- D.1.8 Record Keeping Requirements
- D.1.9 Reporting Requirements

CERTIFICATION 23
EMERGENCY OCCURRENCE REPORT 24
FESOP QUARTERLY REPORT 26
FESOP QUARTERLY REPORT 27
FESOP QUARTERLY REPORT 28
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT 29

SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary metal seat belt manufacturing and coating source.

Authorized individual:	Finishing Operations Manager
Source Address:	401 South Blaine Street, Muncie, Indiana 47302
Mailing Address:	P.O. Box 2407, Muncie, Indiana, 47307
General Source Phone:	1-765-286-1980
SIC Code:	3479
Source Location Status:	Delaware
	Nonattainment for Ozone under the eight hour standard
	Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP)
	Minor Source, under PSD and Emission Offset Rules;
	Minor Source, Section 112 of the Clean Air Act

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

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

- (a) One (1) dip coating line, identified as Coating Line #1, exhausting to Stack S-1, capacity: 66,720 pieces of various metal parts per hour and 21.3 pounds of various coatings per hour.
- (b) One (1) dip coating line, identified as Coating Line #2, exhausting to Stack S-4, capacity: 66,720 pieces of various metal parts per hour and 21.3 pounds of various coatings per hour.

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

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

Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:

- (a) One (1) curing oven, identified as Oven #1, firing natural gas, exhausting to Stacks S-2 and S-3, rated at 1.2 million British thermal units per hour.
- (b) One (1) curing oven, identified as Oven #2, firing natural gas, exhausting to Stacks S-5 and S-6, rated at 1.2 million British thermal units per hour.
- (c) One (1) Heat Treat Oven, identified as Oven #3, firing natural gas, rated at 3.0 million British thermal units per hour.
- (d) One (1) Heat Treat Oven, identified as Oven #4, firing natural gas, rated at 2.0 million British thermal units per hour.

- (e) One (1) Bake Oven, identified as Oven #5, firing natural gas, rated at 0.1 million British thermal units per hour.
- (f) One (1) Endo Generator, identified as Generator #1, firing natural gas, rated at 1.3 million British thermal units per hour.
- (g) One (1) Endo Generator, identified as Generator #2, firing natural gas, rated at 1.3 million British thermal units per hour.
- (h) One (1) Boiler, identified as Boiler #1, firing natural gas, rated at 3.0 million British thermal units per hour.
- (i) Thirteen (13) space heaters, identified as Heaters 1-13, firing natural gas, with a combined heat input of 3.8 million British thermal units per hour.
- (j) One (1) Heat Treat Salt Tank Heater, identified as Heater 14, firing natural gas, with a combined heat input of 1.0 million British thermal units per hour.
- (k) One (1) Heat Treat Salt Tank Heater, identified as Heater 15, firing natural gas, with a combined heat input of 1.0 million British thermal units per hour.

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

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

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

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deletedby this permit.
- (b) All previous registrations and permits are superseded by this permit.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

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

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

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

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

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

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue,
Indianapolis, Indiana 46204-2251

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

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

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

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

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality

100 North Senate Avenue,
Indianapolis, Indiana 46204-2251

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

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

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

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

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

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue,
Indianapolis, Indiana 46204-2251

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does need to be included in this report.

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

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

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

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

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

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

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue,
Indianapolis, IN 46204-2251

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

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

- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

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

- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]

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

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

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

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

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue,
Indianapolis, Indiana 46204-2251

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

- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

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

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

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue,
Indianapolis, Indiana 46204-2251

and

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

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

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

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

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

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

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

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

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

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

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

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

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

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue,
Indianapolis, Indiana 46204-2251

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

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

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

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

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also satisfy the requirements of 326 IAC 2-3 (Emission Offset);
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

C.3 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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

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

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

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

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

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

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

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
- (A) Asbestos removal or demolition start date;
- (B) Removal or demolition contractor; or
- (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue,
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The

notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

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

C.9 Performance Testing [326 IAC 3-6]

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

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue,
Indianapolis, Indiana 46204-2251

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

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

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

C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

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

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

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

C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

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

C.15 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

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

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

C.16 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:
Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue,
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.17 Compliance with 40 CFR 82 and 326 IAC 22-1

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

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

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

- (a) One (1) dip coating line, identified as Coating Line #1, exhausting to Stack S-1, capacity: 66,720 pieces of various metal parts per hour and 21.3 pounds of various coatings per hour.
- (b) One (1) dip coating line, identified as Coating Line #2, exhausting to Stack S-4, capacity: 66,720 pieces of various metal parts per hour and 21.3 pounds of various coatings per hour.

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

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

D.1.1 FESOP and Emission Offset Minor Limit [326 IAC 2-3] [326 IAC 2-8]

Pursuant to F 035-12644-00042, issued on February 27, 2001, and revised by this permit F 035-21285-00042, the amount of VOC delivered to the dip tanks at the two (2) dip coating lines, identified as Coating Lines #1 and #2, including coatings, dilution solvents, and cleaning solvents shall be less than ninety-nine and five tenths (99.5) tons per twelve (12) consecutive month period with compliance determined at the end of each month. This usage limit is required to limit the potential to emit of VOC to less than one hundred (100) tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-3 (Emission Offset) and 326 IAC 2-7 (Part 70 Permit Program) not applicable.

D.1.2 HAPs Limitations [326 IAC 2-4.1-1] [326 IAC 2-8-4]

Pursuant to F 035-12644-00042, issued on February 27, 2001, and revised by this permit F 035-21285-00042:

- (a) The amount of any single HAP delivered to the dip tanks at the two (2) dip coating lines, identified as Coating Lines #1 and #2, including coatings, dilution solvents, and cleaning solvents, shall be less than nine and eighty-five hundredths (9.85) tons per twelve (12) consecutive month period with compliance determined at the end of each month. Therefore, the requirements of 326 IAC 2-4.1-1 and 326 IAC 2-7 do not apply.
- (b) The amount of the combination of all HAPs delivered to the dip tanks at the two (2) dip coating lines, identified as Coating Lines #1 and #2, including coatings, dilution solvents, and cleaning solvents, shall be less than twenty-four and eighty-four hundredths (24.84) tons per twelve (12) consecutive month period with compliance determined at the end of each month. Therefore, the requirements of 326 IAC 2-4.1-1 and 326 IAC 2-7 do not apply.

These usage limits are required to limit the potential to emit of any single HAPs to less than ten (10) tons per 12 consecutive month period and the combination of all HAPs to less than twenty-five (25) tons per 12 consecutive month period. Compliance with these limits makes 326 IAC 2-4.1-1 (New source toxics control) and 326 IAC 2-7 (Part 70 Permit Program) not applicable.

D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-2-9] [326 IAC 8-1-2(a)(9)]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the dip tanks at the two (2) dip coating lines, identified as Coating Lines #1 and #2, shall be limited to 3.5 pounds of VOCs per gallon of coating less water.

The Permittee does not comply with the content limit in this Condition. The Permittee must comply with Condition D.1.4.

D.1.4 Compliance Schedule [326 IAC 2-8-5 (a)(3)]

Pursuant to 326 IAC 2-8-5 (a)(3), Permittee shall comply with the following Compliance Schedule to come into compliance with 326 IAC 8 and Condition D.1.3:

- (a) Within sixty (60) days of issuance of this permit, 035-21285-00042, the Permittee will submit to IDEM a petition for a RACT plan, pursuant to 326 IAC 8-1-5.
- (b) Upon submission of said RACT plan, the Permittee will comply with the submitted RACT plan.
- (c) Upon the issuance of a Commissioner's Order, by the commissioner of IDEM, in response to the petition, the Permittee will comply with the Commissioner's Order.
- (d) Upon the promulgation of the revision of the SIP to include the RACT plan, by the EPA, the Permittee will comply with the SIP incorporated RACT plan.

Unless otherwise specified in the RACT plan, the Commissioner's Order, or the SIP, at all times the Permittee will comply with Condition D.1.5.

D.1.5 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (f), all solvents sprayed from the application equipment of dip tanks at the two (2) dip coating lines, identified as Coating Lines #1 and #2, during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

D.1.6 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.1.7 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC content and usage and HAP usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC and HAP 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.

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

D.1.8 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the HAP usage limits established in Condition D.1.1 and D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) The VOC and HAP content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on 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 volume weighted VOC content of the coatings used for each month;
 - (4) The cleanup solvent usage for each month;
 - (5) The total VOC and HAP usage for each month; and
 - (6) The weight of VOCs and HAPs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.9 Reporting Requirements

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

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: DynAmerica Manufacturing, L.L.C.
Source Address: 401 South Blaine Street, Muncie, Indiana 47302
Mailing Address: P.O. Box 2407, Muncie, Indiana, 47307
FESOP No.: F035-21285-00042

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
Indianapolis, Indiana 46204-2251
Phone: 317-233-5674
Fax: 317-233-5967**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: DynAmerica Manufacturing, L.L.C.
Source Address: 401 South Blaine Street, Muncie, Indiana 47302
Mailing Address: P.O. Box 2407, Muncie, Indiana, 47307
FESOP No.: F035-21285-00042

This form consists of 2 pages

Page 1 of 2

<p>9 This is an emergency as defined in 326 IAC 2-7-1(12) ☐The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and ☐The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16</p>
--

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

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

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

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

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

A certification is not required for this report.

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

FESOP QUARTERLY REPORT

Source Name: DynAmerica Manufacturing, L.L.C.
Source Address: 401 South Blaine Street, Muncie, Indiana 47302
Mailing Address: P.O. Box 2407, Muncie, Indiana, 47307
FESOP No.: F035-21285-00042
Facility: Two (2) dip coating lines, identified as Coating Lines #1 and #2
Parameter: VOC Usage
Limit: The amount of VOC delivered to the dip tanks at the two (2) dip coating lines, identified as Coating Lines #1 and #2, including coatings, dilution solvents, and cleaning solvents shall be less than ninety-nine and five tenths (99.5) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

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

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

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

Attach a signed certification to complete this report.

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

FESOP QUARTERLY REPORT

Source Name: DynAmerica Manufacturing, L.L.C.
Source Address: 401 South Blaine Street, Muncie, Indiana 47302
Mailing Address: P.O. Box 2407, Muncie, Indiana, 47307
FESOP No.: F035-21285-00042
Facility: Two (2) dip coating lines, identified as Coating Lines #1 and #2
Parameter: HAP usage
Limit: The amount of any single HAP delivered to the dip tanks at the two (2) dip coating lines, identified as Coating Lines #1 and #2, including coatings, dilution solvents, and cleaning solvents, shall be less than nine and eighty-five hundredths (9.85) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

HAP: _____ YEAR: _____

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

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

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

Attach a signed certification to complete this report.

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

FESOP QUARTERLY REPORT

Source Name: DynAmerica Manufacturing, L.L.C.
 Source Address: 401 South Blaine Street, Muncie, Indiana 47302
 Mailing Address: P.O. Box 2407, Muncie, Indiana, 47307
 FESOP No.: F035-21285-00042
 Facility: Two (2) dip coating lines, identified as Coating Lines #1 and #2
 Parameter: HAP Usage
 Limit: The amount of the combination of all HAPs delivered to the dip tanks at the two (2) dip coating lines, identified as Coating Lines #1 and #2, including coatings, dilution solvents, and cleaning solvents, shall be less than twenty-four and eighty-four hundredths (24.84) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

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

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

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

Attach a signed certification to complete this report.

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

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

Source Name: DynAmerica Manufacturing, L.L.C.
Source Address: 401 South Blaine Street, Muncie, Indiana 47302
Mailing Address: P.O. Box 2407, Muncie, Indiana, 47307
FESOP No.: F035-21285-00042

Months: _____ to _____ Year: _____

Page 1 of 2

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<p><input type="radio"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.</p>	
<p><input type="radio"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD</p>	
<p>Permit Requirement (specify permit condition #)</p>	
<p>Date of Deviation:</p>	<p>Duration of Deviation:</p>
<p>Number of Deviations:</p>	
<p>Probable Cause of Deviation:</p>	
<p>Response Steps Taken:</p>	
<p>Permit Requirement (specify permit condition #)</p>	
<p>Date of Deviation:</p>	<p>Duration of Deviation:</p>
<p>Number of Deviations:</p>	
<p>Probable Cause of Deviation:</p>	
<p>Response Steps Taken:</p>	

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

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

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

Source Name:	DynAmerica Manufacturing, L.L.C.
Source Location:	401 South Blaine Street, Muncie, IN 47302
County:	Delaware
SIC Code:	3479
Operation Permit No.:	035-12644-00042
Operation Permit Issuance Date:	February 27, 2001
Permit Renewal No.:	035-21285-00042
Permit Reviewer:	Jed D. Wolkins

On October 6, 2005, the Office of Air Quality (OAQ) had a notice published in the Muncie Star Press, Muncie, Indiana, stating that DynAmerica Manufacturing, L.L.C. had applied for a FESOP renewal to operate a stationary metal seat belt manufacturing and coating source. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review, the OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table Of Contents has been modified to reflect these changes.

Change 1: IDEM has added the addition 4 digit zip code to the IDEM address. Therefore, all references to the IDEM address have been changed to:

100 North Senate Avenue
Indianapolis, Indiana 46204 -**2251**

These changes are not going to be specifically shown here. If the changes occur in a condition shown below, the change will be shown. The affected conditions are:

- B.11 Annual Compliance Certification
- B.13 Emergency Provisions
- B.14 Deviations from Permit Requirements and Conditions
- B.16 Permit Renewal
- B.17 Permit Amendment or Revision
- B.18 Operational Flexibility
- B.21 Transfer of Ownership or Operational Control
- C.8 Asbestos Abatement Projects
- C.9 Performance Testing
- C.16 General Reporting Requirements

The Emergency Occurrence Report and the Letterhead are also affected.

Change 2: IDEM has determined that the Permittee is not required to keep records of all preventive maintenance. However, where the Permittee seeks to demonstrate that an emergency has occurred, the Permittee must provide, upon request, records of preventive maintenance in order to establish that the

lack of proper maintenance did not cause or contribute to the deviation. Therefore, IDEM has deleted paragraph (b) of Section B – Preventive Maintenance, and has amended the Section B – Emergency Provisions condition as follows:

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

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall **prepare**, maintain and implement Preventive Maintenance Plans (PMPs), including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) ~~The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.~~
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs does not require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).
- (cd) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

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

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue,
Indianapolis, Indiana 46204-2251

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

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

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) **The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.**
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation

of 326 IAC 2-8 and any other applicable rules.

- (g) Operations may continue during an emergency only if the following conditions are met:
- (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.
- Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

Change 3: IDEM has clarified the Section B Operational Flexibility condition as follows:

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

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
 - (3) The changes do not result in emissions which exceed the **limitations provided in emissions allowable under** this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue,
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region V

Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

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

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

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

- (b) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

Change 4: Upon further review, IDEM has determined that it is the Permittee's responsibility to include routine control device inspection requirements in the applicable preventive maintenance plan. In addition, the requirement to keep records of the inspections has been removed.

D.1.8 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the HAP usage limits established in Condition D.1.1 and D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The VOC and HAP content of each coating material and solvent used.
- (2) The amount of coating material and solvent less water used on 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 volume weighted VOC content of the coatings used for each month;
 - (4) The cleanup solvent usage for each month;
 - (5) The total VOC and HAP usage for each month; and
 - (6) The weight of VOCs and HAPs emitted for each compliance period.
- (b) ~~To document compliance with Condition D.1.6, the Permittee shall maintain a log of 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.

**Indiana Department of Environmental Management
Office of Air Quality**

Technical Support Document (TSD) for a Federally Enforceable State Operating Permit
(FESOP) Renewal

Source Background and Description

Source Name:	DynAmerica Manufacturing, L.L.C.
Source Location:	401 South Blaine Street, Muncie, IN 47302
County:	Delaware
SIC Code:	3479
Operation Permit No.:	035-12644-00042
Operation Permit Issuance Date:	February 27, 2001
Permit Renewal No.:	035-21285-00042
Permit Reviewer:	Jed D. Wolkins

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from DynAmerica Manufacturing, L.L.C. relating to the operation of a stationary metal seat belt manufacturing and coating source.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) dip coating line, identified as Coating Line #1, installed in 1980, reconstructed in November, 2000, exhausting to Stack S-1, capacity: 66,720 pieces of various metal parts per hour and 21.3 pounds of various coatings per hour.
- (b) One (1) dip coating line, identified as Coating Line #2, installed in 1980, reconstructed in November, 2000, exhausting to Stack S-4, capacity: 66,720 pieces of various metal parts per hour and 21.3 pounds of various coatings per hour.

Insignificant Activities

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

Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:

- (a) One (1) curing oven, identified as Oven #1, firing natural gas, exhausting to Stacks S-2 and S-3, rated at 1.2 million British thermal units per hour.
- (b) One (1) curing oven, identified as Oven #2, firing natural gas, exhausting to Stacks S-5 and S-6, rated at 1.2 million British thermal units per hour.
- (c) One (1) Heat Treat Oven, identified as Oven #3, firing natural gas, rated at 3.0 million British thermal units per hour.

- (d) One (1) Heat Treat Oven, identified as Oven #4, firing natural gas, rated at 2.0 million British thermal units per hour.
- (e) One (1) Bake Oven, identified as Oven #5, firing natural gas, rated at 0.1 million British thermal units per hour.
- (f) One (1) Endo Generator, identified as Generator #1, firing natural gas, rated at 1.3 million British thermal units per hour.
- (g) One (1) Endo Generator, identified as Generator #2, firing natural gas, rated at 1.3 million British thermal units per hour.
- (h) One (1) Boiler, identified as Boiler #1, firing natural gas, rated at 3.0 million British thermal units per hour.
- (i) Thirteen (13) space heaters, identified as Heaters 1-13, firing natural gas, with a combined heat input of 3.8 million British thermal units per hour.
- (j) One (1) Heat Treat Salt Tank Heater, identified as Heater 14, firing natural gas, with a combined heat input of 1.0 million British thermal units per hour.
- (k) One (1) Heat Treat Salt Tank Heater, identified as Heater 15, firing natural gas, with a combined heat input of 1.0 million British thermal units per hour.

Existing Approvals

The source has been operating under the previous FESOP 035-12644-00042 issued on February 21, 2001, with an expiration date of February 27, 2006, and the following amendments and revisions:

- (a) Administrative Amendment 035-19734-00042 issued on August 13, 2004.

All conditions from previous approvals were incorporated into this FESOP except the following:

The following terms and conditions from previous approvals have been revised in this FESOP: (The **bold** language is new language that has been added, and the language with a ~~line through it~~ has been removed.)

- (a) 035-12644-00042 issued on February 21, 2001:

Condition D.1.16 : **Pursuant to F 035-12644-00042, issued on February 21, 2001, and revised by this permit F 035-21285-00042**, the amount of VOC delivered to the dip tanks at the two (2) dip coating lines, identified as Coating Lines #1 and #2, including coatings, dilution solvents, and cleaning solvents shall be less than ~~a total of ninety-nine and five tenths (99.95)~~ **ninety-nine and five tenths (99.95)** tons per twelve (12) consecutive month period **with compliance determined at the end of each month. This usage limit is required to limit the potential to emit of VOC to less than one hundred (100) tons per twelve (12) consecutive month period.** ~~Therefore, the requirements of 326 IAC 2-7 do not apply~~ **Compliance with this limit makes 326 IAC 2-3 (Emission Offset) and 326 IAC 2-7 (Part 70 Permit Program) not applicable.**

Reason revised: The limit was reduced to account for emissions from the natural gas combustion units. Emission Offset was added to the list of not applicable rules, since the county is now nonattainment for ozone.

- (b) 035-12644-00042 issued on February 21, 2001:

Condition D.1.27 : Pursuant to F 035-12644-00042, issued on February 21, 2001, and revised by this permit F 035-21285-00042:

- (a) ~~The worst case amount of any~~ single HAP delivered to the dip tanks at the two (2) dip coating lines, identified as Coating Lines #1 and #2, **including coatings, dilution solvents, and cleaning solvents**, shall be less than ~~a total of nine and eighty-five hundredths (9.9885)~~ **nine and eighty-five hundredths (9.985)** tons per twelve (12) consecutive month period **with compliance determined at the end of each month**. Therefore, the requirements of 326 IAC 2-4.1-1 and 326 IAC 2-7 do not apply.
- (b) The **amount of the** combination of **all** HAPs delivered to the dip tanks at the two (2) dip coating lines, identified as Coating Lines #1 and #2, **including coatings, dilution solvents, and cleaning solvents**, shall be less than ~~a total of twenty-four and eighty-four hundredths (24.984)~~ **twenty-four and eighty-four hundredths (24.984)** tons per twelve (12) consecutive month period **with compliance determined at the end of each month**. Therefore, the requirements of 326 IAC 2-4.1-1 and 326 IAC 2-7 do not apply.

These usage limits are required to limit the potential to emit of any single HAPs to less than ten (10) tons per 12 consecutive month period and the combination of all HAPs to less than twenty-five (25) tons per 12 consecutive month period. Compliance with these limits makes 326 IAC 2-4.1-1 (New source toxics control) and 326 IAC 2-7 (Part 70 Permit Program) not applicable.

Reason revised: The limit was reduced to account for emission from the natural gas combustion units.

- (c) 035-12644-00042 issued on February 21, 2001:

~~Condition D.1.38 : (a)—~~Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the dip tanks at **the two (2) dip coating lines, identified as** Coating Lines #1 and #2, shall be limited to ~~3.05~~ **3.05** pounds of VOCs per gallon of coating less water.

The Permittee does not comply with the content limit in this Condition. The Permittee must comply with Condition D.1.4.

~~Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.~~

- ~~(b) — Pursuant to CP 035-9338-00042, issued on June 23, 1998, and 326 IAC 8-1-2(a)(9), the source shall comply with 326 IAC 8-2-9 by adopting an equivalent emission limitation of 8.4 pounds of VOC per gallon of solids deposited, based on an actual measured transfer efficiency higher than the specified baseline transfer efficiency of sixty percent (60%).~~

Reason revised: The limit was increased because the coating applied is an extreme performance coating. The Permittee does not comply with the limit so paragraph (b) was removed and the statement requiring compliance with Condition D.1.4 was added. Condition D.1.4 contains the Compliance Schedule. The requirement for cleanup or color changes has been moved to a separate condition, since the Permittee can comply with this part of the rule.

The following terms and conditions from previous approvals have been determined no longer applicable; therefore, were not incorporated into this FESOP:

- (a) All construction conditions from all previously issued permits.

Reason not incorporated: All facilities previously permitted have already been constructed; therefore, the construction conditions are no longer necessary as part of the operating permit. Any facilities that were previously permitted but have not yet been constructed would need new pre-construction approval before beginning construction.

- (b) 035-12644-00042 issued on February 21, 2001
Condition D.1.5: Pursuant to 326 IAC 6-3-2, the PM from the two (2) dip coating lines, identified as Coating Lines #1 and #2, 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:

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

Reason not incorporated: The 326 IAC 6-3 revisions that became effective on June 12, 2002 will be approved into the State Implementation Plan on September 23, 2005. These rules will replace the previous version of 326 IAC 6-3 (Process Operations) that had been part of the SIP; therefore, the requirements of the previous version of 326 IAC 6-3-2 will no longer be applicable to this source. Condition D.1.5 which contained these requirements has been removed.

Enforcement Issue

- (a) IDEM is aware that Coating Line #1 and Coating Line #2 are not in compliance with the following emission limitation:

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

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating applied to the seat belt parts shall be limited to 3.5 pounds of VOC per gallon of coating less water for extreme performance coatings.

- (b) IDEM is reviewing this matter and has taken appropriate action. The compliance schedule in this proposed permit will satisfy the requirements of the above stated requirement.

Recommendation

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

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

An administratively complete FESOP renewal application for the purposes of this review was received on May 16, 2005.

A notice of completeness letter was mailed to the source on June 28, 2005 .

Emission Calculations

See Appendix A of this document for detailed emission calculations pages 1 through 4.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous FESOP.

Pollutant	Unrestricted Potential Emissions (tons/yr)
PM	9.3
PM-10	9.7
SO ₂	0.0
VOC	140.7
CO	7.0
NO _x	8.3

HAPs	Unrestricted Potential Emissions (tons/yr)
Xylene	2.3
Napthalene	3.5
Ethyl Benzene	0.3
Glycol Ethers	88.0
Sum of combustion HAPs	0.2
Total	94.4

Potential to Emit After Issuance

The source has opted to remain a FESOP source. The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this FESOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit. Since the source has not constructed any new emission units, the source's potential to emit is based on the emission units included in the original FESOP.

Process/emission unit	Potential To Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Coating Lines #1 and #2	9.1	9.1	-	<99.5	-	-	<9.85 single <24.84 total
Insignificant Activities	0.2	0.6	0.0	0.5	7.0	8.3	0.15 single 0.16 total
Total Emissions	9.3	9.7	0.0	<100	7.0	8.3	<10 single <25 total

County Attainment Status

The source is located in Delaware County.

Pollutant	Status
PM-2.5	Attainment
PM-10	Attainment
SO ₂	Attainment
NO ₂	Attainment

1-hour Ozone	Attainment
8-hour Ozone	Moderate nonattainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. Delaware County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for nonattainment new source review.
- (b) Delaware County has been classified as attainment or unclassifiable in Indiana for PM-2.5, PM-10, SO2, NO2, Ozone under the one hour standard, 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.
- (c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

Existing Source PSD, Part 70, or FESOP Definition (emissions after controls, based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/yr)
PM	9.3
PM-10	9.7
SO ₂	0.0
VOC	<100
CO	7.0
NO _x	8.3
Single HAP	<10
Combination HAPs	<25

- (a) This existing source is not a major stationary source because no nonattainment regulated pollutant is emitted at a rate of 100 tons per year or greater, no attainment regulated pollutant is emitted at a rate of 250 tons per year or greater, and it is not in one of the 28 listed source categories.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit.
- (b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart M (Surface Coating of Miscellaneous Metal Parts and Products) are not included in this permit. The source is not a major source of HAPs.

- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart DDDDD (Industrial, Commercial, and Institutional Boilers and Process Heaters) are not included in this permit. The source is not a major source of HAPs.

State Rule Applicability – Entire Source

326 IAC 1-5-2 (Emergency Reduction Plans)

The source is not required to submit an Emergency Reduction Plan.

326 IAC 1-6-3 (Preventive Maintenance Plan)

- (a) If required by specific condition(s) in Section D of the permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the PMPs, including any required record keeping as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

326 IAC 1-7-1 (Stack Height Provisions)

The current stacks at the source are not subject to the provisions of 326 IAC 1-7-3 (a), since each stack has less than twenty-five (25) tons per year of potential emissions of PM and SO₂.

326 IAC 2-2 (Prevention of Significant Deterioration)

The total source potential emissions of PM, PM-10, PM-2.5, SO₂, NO_x, VOC, CO, and Lead are less than 250 tons per year. The VOC delivered to the dip tanks at the two (2) dip coating lines is limited to less than 99.5 tons per twelve consecutive month period. This limits the source wide potential emission of VOC to less than 100 tons per year. The source is not one of the 28 listed sources. No applicable New Source Performance Standard was in effect prior to August 7, 1980. The source was constructed in 1980. New dip lines were constructed in November, 2000 to replace the existing dip lines. The VOC PTE of the modification was less the 250 tons per year. The Permittee has not conducted any other modifications to trigger PSD and is currently considered a minor PSD source. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) do not apply.

326 IAC 2-3 (Emission Offset)

The total source potential emissions of NO_x are less than 100 tons per year. The total source potential emissions of VOC are limited to less than 100 tons per year. The VOC delivered to the dip tanks at the two (2) dip coating lines is limited to less than 99.5 tons per twelve consecutive month period. This limits the source wide potential emission of VOC to less than 100 tons per year. The source is not one of the 28 listed sources. No applicable New Source Performance Standard was in effect prior to August 7, 1980. The source was constructed in 1980. New dip

lines were constructed in November, 2000 to replace the existing dip lines. This modification happened before the non attainment designation; therefore, the modification was not subject to review under 326 IAC 2-3. Compliance with emissions limitations previously established under 326 IAC 2-8 ensure that the source is a minor Emission Offset source. The Permittee has not conducted any modifications to trigger Emission Offset and is currently considered a minor Emission Offset source. Therefore the requirements of 326 IAC 2-3 (Emission Offset) do not apply.

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

This source is not subject to 326 IAC 2-4.1-1 (New Source Toxics Control). The source is not a major source of HAPs. The source was existing as of July 27, 1997. The dip lines were reconstructed in November, 2000. The Permittee agreed to limit emissions of any single HAP to less than ten (10) tons per year and the combination of all HAPs to less than twenty-five (25) tons per year from the entire source. Any single HAP delivered to the dip tanks at the two (2) dip coating lines is limited to less than 9.85 tons per twelve consecutive month period. The combination of all HAPs delivered to the dip tanks at the two (2) dip coating lines is limited to less than 24.84 tons per twelve consecutive month period. Therefore, the requirements of 326 IAC 2-4.1-1 are not applicable. The Permittee has not otherwise constructed or reconstructed a major source of HAPs.

326 IAC 2-6 (Emission Reporting)

This source is located in Delaware County. The source is not required to have an operating permit under 326 IAC 2-7. The source PTE of Lead is less than five (5) tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 2-8-4 (FESOP)

The potential to emit of the entire source before any limit is greater than 100 tons/yr for VOC and less than 100 tons/yr for all other criteria pollutants. Pursuant to 326 IAC 2-8-4 (FESOP), and FESOP 035-12644-00042, issued on February 27, 2001, the Permittee has accepted a delivery rate limit to limit the VOC emissions from the entire source to less than 100 tons per year. The existing limit is revised to:

The amount of VOC delivered to the dip tanks at the two (2) dip coating lines, identified as Coating Lines #1 and #2, including coatings, dilution solvents, and cleaning solvents, shall be less than a total of 99.5 tons per twelve (12) consecutive month period.

Combined with the VOC emissions from combustion, the VOC emissions from the entire source are limited to less than 100 tons/yr. Compliance with these limits makes the requirements of 326 IAC 2-7 (Part 70 Program) not applicable.

In addition, the potential to emit of the entire source before any limit is greater than ten (10) tons per year for a single HAP and greater than twenty-five (25) tons per year for the combination of all HAPs. Pursuant to 326 IAC 2-8-4 (FESOP), and FESOP 035-12644-00042, issued on February 27, 2001, the Permittee has accepted delivery rate limits to limit the HAP emissions from the entire source to less than ten (10) tons per year for any single HAP and to less than twenty-five (25) tons per year for the combination of all HAPs. The existing limits are revised to:

- (a) The amount of any single HAP delivered to the dip tanks at the two (2) dip coating lines, identified as Coating Lines #1 and #2, shall be less than a total of 9.85 tons per twelve (12) consecutive month period.
- (b) The amount of the combination of all HAPs delivered to the dip tanks at the two (2) dip coating lines, identified as Coating Lines #1 and #2, shall be less than a total of 24.84 tons per twelve (12) consecutive month period.

326 IAC 5-1 (Opacity Limitations)

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

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

State Rule Applicability – Individual Facilities

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

Pursuant to 326 IAC 6-3-1(b), the two (2) dip coating lines, identified as Coating Lines #1 and #2, are not subject to 326 IAC 6-3 as they all use dip coating.

40 CFR 52 Subpart P (Particulate Matter (PM))

The 326 IAC 6-3 revisions that became effective on June 12, 2002 were approved into the State Implementation Plan on September 23, 2005. These rules will replace the previous version of 326 IAC 6-3 (Process Operations) that had been part of the SIP; therefore, the requirements of the previous version of 326 IAC 6-3-2 will no longer be applicable to this source. Since this permit, 035-21285-00042, will be issued after September 23, 2005, the requirements of Subpart P have not been included in the permit.

326 IAC 4-2 (Incinerators)

The Bake Oven is not subject 326 IAC 4-2. The Bake Oven is not an incinerator. The Bake Oven heats metal parts for stress relief. The Bake Oven operates at 400 degrees F. The Bake Oven does not burn waste substances.

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

- (a) Permittee applies extreme performance coatings to seat belt parts at the two (2) dip tanks. Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the dip tanks at the two (2) dip coating lines, identified as Coating Lines #1 and #2, shall be limited to 3.5 pounds of VOCs per gallon of coating less water.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

326 IAC 2-8-5 (a)(3) (Compliance Schedule)

The Permittee is not complying with the numeric emission limitation in 326 IAC 8-2-9. The Permittee will submit a petition for a site-specific reasonably available control technology (RACT) plan in order to come into compliance with 326 IAC 8. The Permittee will meet the following timeline:

- (a) Within sixty (60) days of issuance of this permit, 035-21285-00042, the Permittee will submit to IDEM a petition for a RACT plan.
- (b) Upon submission of said RACT plan, the Permittee will comply with the submitted RACT plan.

- (c) Upon the issuance of a Commissioner's Order, in response to the petition, by the commissioner of IDEM, the Permittee will comply with the Commissioner's Order.
- (d) Upon the promulgation of the revision of the SIP to include the RACT plan, by the EPA, the Permittee will comply with the SIP incorporated RACT plan.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

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

There are no compliance monitoring requirements applicable to this source.

Conclusion

The operation of this stationary metal seat belt manufacturing and coating source shall be subject to the conditions of the **FESOP 035-21285-00042**.

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

Company Name: DynAmerica Manufacturing, L.L.C.
Address City IN Zip: 401 South Blaine Street, Muncie, IN 47302
FESOP: 035-21285-00042
Plt ID: 035-00042
Reviewer: Jed D. Wolkins
Date: 6/23/2005

Material	Density (lbs/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (units/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (pounds per hour)	Potential VOC (pounds per day)	Potential VOC (tons per year)	Particulate Potential (tons/yr)	lbs VOC/gal solids	Transfer Efficiency
Line 1																
EPC-1586C	8.54	76.07%	60.0%	16.1%	61.4%	20.30%	0.00003	66720	3.56	1.37	2.35	56.48	10.31	1.53	6.76	90%
Kolor-N-Kote	9.90	52.70%	31.5%	21.2%	37.4%	37.40%	0.00003	53240	3.35	2.10	3.62	86.89	15.86	3.54	5.61	90%
B06/SC150*(1)	10.55	49.33%	0.0%	49.3%	0.0%	23.17%	0.00005	41630	5.20	5.20	10.05	241.27	44.03	4.52	22.46	90%
B17/PM Acetate	9.14	62.90%	0.0%	62.9%	0.0%	25.85%	0.00005	41630	5.75	5.75	12.80	307.30	56.08	3.31	22.24	90%
B06/SC150*(2)	10.55	54.86%	0.0%	54.9%	0.0%	32.42%	0.00003	53240	5.79	5.79	10.60	254.40	46.43	3.82	17.85	90%
A04/PM Acetate	9.21	70.37%	0.0%	70.4%	0.0%	18.78%	0.00002	53240	6.48	6.48	6.90	165.63	30.23	1.27	34.51	90%
B06/SC150*(2)	10.55	54.85%	0.0%	54.9%	0.0%	32.42%	0.00003	53240	5.79	5.79	10.60	254.35	46.42	3.82	17.85	90%
P06G/PM Acetate	8.81	75.14%	0.0%	75.1%	0.0%	16.52%	0.00005	53240	6.62	6.62	16.00	384.02	70.08	2.32	40.07	90%
Line 2																
EPC-1586C	8.54	76.07%	60.0%	16.1%	61.4%	20.30%	0.00003	66720	3.56	1.37	2.35	56.48	10.31	1.53	6.76	90%
Kolor-N-Kote	9.90	52.70%	31.5%	21.2%	37.4%	37.40%	0.00003	53240	3.35	2.10	3.62	86.89	15.86	3.54	5.61	90%
B06/SC150*(1)	10.55	49.33%	0.0%	49.3%	0.0%	23.17%	0.00005	41630	5.20	5.20	10.05	241.27	44.03	4.52	22.46	90%
B17/PM Acetate	9.14	62.90%	0.0%	62.9%	0.0%	25.85%	0.00005	41630	5.75	5.75	12.80	307.30	56.08	3.31	22.24	90%
B06/SC150*(2)	10.55	54.86%	0.0%	54.9%	0.0%	32.42%	0.00003	53240	5.79	5.79	10.60	254.40	46.43	3.82	17.85	90%
A04/PM Acetate	9.21	70.37%	0.0%	70.4%	0.0%	18.78%	0.00002	53240	6.48	6.48	6.90	165.63	30.23	1.27	34.51	90%
B06/SC150*(2)	10.55	54.85%	0.0%	54.9%	0.0%	32.42%	0.00003	53240	5.79	5.79	10.60	254.35	46.42	3.82	17.85	90%
P06G/PM Acetate	8.81	75.14%	0.0%	75.1%	0.0%	16.52%	0.00005	53240	6.62	6.62	16.00	384.02	70.08	2.32	40.07	90%

Control Efficiency: 0.00%

State Potential Emissions

Add worst case coating to all solvents

Individual Lines	Uncontrolled	16.00	384.02	70.08	4.52
	Controlled	16.00	384.02	70.08	4.52
Lines 1 and 2 Combined		32.00	768.04	140.17	9.05

METHODOLOGY

- Pounds of VOC per Gallon Coating less Water = (Density (lbs/gal) * Weight % Organics) / (1-Volume % water)
- Pounds of VOC per Gallon Coating = (Density (lbs/gal) * Weight % Organics)
- Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
- Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
- Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lbs/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: DynAmerica Manufacturing, L.L.C.
Address City IN Zip: 401 South Blaine Street, Muncie, IN 47302
FESOP: 035-21285-00042
Plt ID: 035-00042
Reviewer: Jed D. Wolkins
Date: 6/23/2005

Material	Density (lbs/gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Napthalene	Weight % Ethyl Benzene	Weight % Glycol Ethers	Xylene Emissions (tons/yr)	Napthalene Emissions (tons/yr)	Ethyl Benzene Emissions (tons/yr)	Glycol Ethers Emissions (tons/yr)
Line 1											
B06	11.41	0.00003	41630	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
SC150	7.50	0.00001	41630	0.00%	9.90%	0.00%	0.00%	0.00	1.76	0.00	0.00
B17	9.42	0.00004	41630	1.67%	0.00%	0.00%	33.63%	1.15	0.00	0.00	23.18
PM Acetate	8.06	0.00001	41630	0.00%	0.00%	0.00%	100.00%	0.00	0.00	0.00	19.66
P06G	9.01	0.00003	53240	1.29%	0.00%	0.18%	61.56%	0.92	0.00	0.13	44.04
PM Acetate	8.06	0.00001	53240	0.00%	0.00%	0.00%	100.00%	0.00	0.00	0.00	21.33
Line 2											
B06	11.41	0.00003	41630	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
SC150	7.50	0.00001	41630	0.00%	9.90%	0.00%	0.00%	0.00	1.76	0.00	0.00
B17	9.42	0.00004	41630	1.67%	0.00%	0.00%	33.63%	1.15	0.00	0.00	23.18
PM Acetate	8.06	0.00001	41630	0.00%	0.00%	0.00%	100.00%	0.00	0.00	0.00	19.66
P06G	9.01	0.00003	53240	1.29%	0.00%	0.18%	61.56%	0.92	0.00	0.13	44.04
PM Acetate	8.06	0.00001	53240	0.00%	0.00%	0.00%	100.00%	0.00	0.00	0.00	21.33
Individual Total (each line)								1.15	1.76	0.13	44.04
Total (each line)								47.1			
METHODOLOGY											
Individual Total (Lines 1 and 2 combined)								2.30	3.52	0.26	88.08
Total (Lines 1 and 2 combined)								94.2			

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

**Appendix A: Emissions Calculations
 Natural Gas Combustion Only
 MM BTU/HR <100
 Small Industrial Boiler**

Company Name: DynAmerica Manufacturing, L.L.C.
Address City IN Zip: 401 South Blaine Street, Muncie, IN 47302
Permit Number: 035-21285-00042
Pit ID: 035-00042
Reviewer: Jed D. Wolkins
Date: 6/23/2005

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

18.9

165.6

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.2	0.6	0.0	8.3	0.5	7.0

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 4 for HAPs emissions calculations.

**Appendix A: Emissions Calculations
 Natural Gas Combustion Only
 MM BTU/HR <100
 Small Industrial Boiler
 HAPs Emissions**

Company Name: DynAmerica Manufacturing, L.L.C.
Address City IN Zip: 401 South Blaine Street, Muncie, IN 47302
Permit Number: 035-21285-00042
Pit ID: 035-00042
Reviewer: Jed D. Wolkins
Date: 6/23/2005

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	1.738E-04	9.934E-05	6.209E-03	1.490E-01	2.815E-04

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	4.139E-05	9.106E-05	1.159E-04	3.146E-05	1.738E-04

Methodology is the same as page 3.

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.