



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: January 8, 2007
RE: Grote Industries, Inc. / 077-21436-00003
FROM: Nisha Sizemore
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 03/23/06



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Indianapolis, Indiana 46204-2251
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**FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP)
OFFICE OF AIR QUALITY**

**Grote Industries, LLC
2600 Lanier Drive
Madison, Indiana 47250**

(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.

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.

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.

Operation Permit No.: F077-21436-00003	
Issued by: Original document signed by Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: January 5, 2007 Expiration Date: January 5, 2012

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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 plastic and metal automotive parts manufacturing plant.

Authorized individual:	Plant Manager
Source Address:	2600 Lanier Drive, Madison, Indiana 47250
Mailing Address:	2600 Lanier Drive, Madison, Indiana 47250
General Source Phone:	(812) 273-2121
SIC Code:	3647, 3231
Source Location Status:	Jefferson County: Madison Township Nonattainment for PM2.5 Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD and Nonattainment NSR; Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) One Plastic Painting Process consisting of the following emission units:
 - (1) One (1) Spray HSML and Plastic Parts Booth, identified as EU78, constructed in 1983, with a maximum unit capacity of one thousand two hundred (1200) pieces per hour, using an electric drying oven, using dry filters to control particulate emissions, and exhausting to stack 3-36.
 - (2) One (1) Hand Spray Plastic Parts Booth, identified as EU79, constructed in 1989, with a maximum capacity of two hundred fifty (250) pieces per hour, using dry filters to control particulate emissions, and exhausting to stack 3-35.
 - (3) One (1) Upspray Machine Plastic Parts Booth, identified as EU81, constructed in 1986, with a maximum unit capacity of three hundred (300) pieces per hour, using dry filters to control particulate emissions, and exhausting to stack 3-34.
- (b) One (1) Closed Top Solvent-based Mask Washer, identified as EU129, constructed in 1994, with a batch process maximum unit capacity varying from two (2) to one hundred (100) pieces per hour, exhausting to stacks 3-37 and 3-38.
- (c) One (1) Robot Plastic Parts Paint Spray Booth, identified as EU167, constructed in 2000, with a maximum capacity of six hundred (600) units per hour, using an electric drying oven, using dry filters to control particulate emissions, and exhausting to stack 3-45

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

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour and Propane or liquefied petroleum gas, or butane-fired

combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour, consisting of forty one (41) natural gas-fired space heaters, air make-up heaters, process heaters, a small boiler and a small hot water heater, identified as EUs 99, 100, 101, 103 through 119, 134, 137, 155, 157, 158, 159, 161, 162, 163, 165, 166, 168, 198, 202, 203, 206, 207, 208, 216, 217, and 218, with a combined maximum heat input capacity of 25.49 MMBtu per hour, with the capability to use propane fuel as a back-up fuel, and exhausting to stacks 1-12, 1-36, 1-RT1, 1-RT3, 1-RT4, 2-40, 2-9, 2-21, 2-RT1, 2-RT2, 3-27, 3-28, 3-29, 3-30, 3-MAH1, W-2, W-5, W-RT1, 1-38, 1-39, 1-RT9, [no stack], 1-71, 1-64, 1-65, 1-66, 1-70, 1-RT11, 2-24, 2-39, 3-15, 1-MAH-1, 2-45, 2-54, 2-55, 1-RT5, 1-RT7, 1-RT10, 1-RT2, 1-RT6 and 1-RT8, respectively.

- (b) Degreasing operations that do not exceed 145 gallons each per 12 months, and are not subject to 326 IAC 20-6, consisting of five (5) cold cleaner degreasers, identified as emission units EU209, EU210, EU211, EU212, and EU213, each with remote solvent reservoirs, each constructed in 1998 or after. [326 IAC 8-3-2]
- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPs consisting of brazing equipment, cutting torches, soldering equipment, welding equipment, identified as EU93, EU95, EU124, EU125, EU126, EU127, EU138, EU181, EU182, EU183, EU184, EU186, EU195, EU196, EU197, EU200, and EU215. [326 IAC 6-3-2]
- (d) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, consisting of two (2) Maintenance Abrasive Blasters, identified as EU160 and EU221, each with a maximum throughput of 80 pounds of abrasive materials per hour and exhausting inside the building. [326 IAC 6-3-2(e)]
- (e) Activities with potential uncontrolled emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM10; 3 lb/hr or 15 lb/day VOC; 5 lb/day or 1.0 ton/yr of a single HAP, or 12.5 lb/day 2.5 ton/yr of any combination of HAPs, consisting of:
 - (1) One (1) Injection Molding Process, consisting of thirty-one (31) emission units, identified as EU57 – EU62, EU74 – EU76, EU139 – EU142, EU169 – EU171, EU173 – EU179, EU 193, EU194, EU201, EU 204, EU205, EU214, EU220, and EU223, consisting of vertical and horizontal molding using many different thermoplastic and other similar materials with a maximum capacity of 788 pounds of molded product per hour, exhausting inside the building. [326 IAC 6-3-2]
 - (2) Five (5) PVC Plug Molders, identified as EU27 – EU30 and EU38, with a maximum unit capacity of four-hundred eighty (480) pieces per hour, exhausting inside the building. [326 IAC 6-3-2]
 - (3) Sixteen (16) Metal Presses, identified as EU4 – EU10, and EU16 - EU24, each with a maximum throughput of 833 pounds of metal per hour, exhausting inside the building. [326 IAC 6-3-2]
 - (4) Two (2) Adhesive Robots, identified as EU147 and EU148, producing no particulate emissions, and exhausting inside the building.
 - (5) Two (2) belt sanders, identified as EU188 and EU189, using no controls, and exhausting inside the building. [326 IAC 6-3-2]
 - (6) Stamp Pad process (EU 145) using minimal quantities of red and white inks and ink thinner to stamp wording on directional signals.
 - (7) Facility-wide Isopropyl Alcohol cleanup operations (EU 149).

- (8) Wire machine (EU 199) for printing numbers on wires.
- (f) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
- (g) VOC and HAP storage containers (EU222) with capacity less than or equal to one thousand (1,000) gallons and annual throughputs equal to or less than twelve thousand (12,000) gallons.
- (h) Application of oils, greases, lubricants, and/or nonvolatile material, as temporary protective coatings.
- (i) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (j) Infrared cure equipment.
- (k) Activities associated with rolling oil recovery systems with batch capacity less than or equal to one hundred (100) gallons.
- (l) Any operation using aqueous solutions containing less than or equal to one percent (1%) by weight of VOCs excluding HAPs.
- (m) Water based adhesives that are less than or equal to five percent (5%) by volume of VOCs excluding HAPs.
- (n) Asbestos abatement projects regulated by 326 IAC 14-10.
- (o) Blowdown for the following: sight glass, boiler, cooling tower, compressors and/or pumps.
- (p) One (1) emergency generator (EU219) using diesel fuel, rated at 168 brake-horsepower, 125 kilowatts and 1.18 MMBtu/hr maximum heat input capacity.
- (q) A laboratory with research and development activities (EU156, EU164, EU190), as described in 326 IAC 2-7-1(21)(D).
- (r) Conveyors, consisting of enclosed systems for conveying plastic raw material and plastic finished goods.
- (s) Noncontact cooling tower systems with natural draft cooling towers not regulated under a NESHAP, or forced and induced draft cooling tower systems not regulated under a NESHAP.

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

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

SECTION B GENERAL CONDITIONS

B.1 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.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5] [IC 13-15-3-6(a)] [326 IAC 2-8-3(h)]

- (a) This permit, F077-21439-00003, 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 of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal 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.

B.3 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted 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 and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

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

- (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.: 317-233-0178 (ask for Compliance Section)
Facsimile No.: 317-233-6865

- (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 not need to be included in this report.

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

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

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

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

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

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

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
 - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) 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) 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)]

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 limitation 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 Source Modification Requirement [326 IAC 2-8-11.1]

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

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

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

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

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

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

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

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.

B.24 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to F077-21436-00003 and issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

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.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

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

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

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

C.7 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.8 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.9 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.10 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

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

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

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

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

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

C.11 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.12 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

C.13 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit(s) (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records;
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.

- (e) The Permittee shall maintain the following records:
 - (1) monitoring data;
 - (2) monitor performance data, if applicable; and
 - (3) corrective actions taken.

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 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

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

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

Stratospheric Ozone Protection

C.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)]: Surface Coating Operations

- (a) One Plastic Painting Process consisting of the following emission units:
 - (1) One (1) Spray HSML and Plastic Parts Booth, identified as EU78, constructed in 1983, with a maximum unit capacity of one thousand two hundred (1200) pieces per hour, using an electric drying oven, using dry filters to control particulate emissions, and exhausting to stack 3-36.
 - (2) One (1) Hand Spray Plastic Parts Booth, identified as EU79, constructed in 1989, with a maximum capacity of two hundred fifty (250) pieces per hour, using dry filters to control particulate emissions, and exhausting to stack 3-35.
 - (3) One (1) Upspray Machine Plastic Parts Booth, identified as EU81, constructed in 1986, with a maximum unit capacity of three hundred (300) pieces per hour, using dry filters to control particulate emissions, and exhausting to stack 3-34.
- (b) One (1) Closed Top Solvent-based Mask Washer, identified as EU129, constructed in 1994, with a batch process maximum unit capacity varying from two (2) to one-hundred (100) pieces per hour, exhausting to stacks 3-37 and 3-38.
- (c) One (1) Robot Plastic Parts Paint Spray Booth, identified as EU167, constructed in 2000, with a maximum capacity of six hundred (600) units per hour, using an electric drying oven, using dry filters to control particulate emissions, and exhausting to stack 3-45.

Insignificant Activities:

- (b) Degreasing operations that do not exceed 145 gallons each per 12 months, except if subject to 326 IAC 20-6, consisting of five (5) cold cleaner degreasers, identified as emission units EU209, EU210, EU211, EU212, and EU213, each with remote solvent reservoirs, each constructed in 1998 or after. [326 IAC 8-3-2]

(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 [326 IAC 2-8-4]

- (a) The total usage of VOC in the Spray HSML and Plastic Parts Booth (EU78), the Hand Spray Plastic Parts Booth (EU79), the Upspray Machine Plastic Parts Booth (EU81), the Closed Top Solvent-based Mask Washer (EU129), and the Robot Plastic Parts Paint Spray Booth (EU167), including cleanup solvents, minus the VOC content of any coating material or solvent waste shipped offsite, shall be limited to less than ninety (90) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Combined with other VOC emissions at the source, this condition will limit source-wide VOC emissions to less than 100 tons per year.
- (b) The total usage of a single HAP in the Spray HSML and Plastic Parts Booth (EU78), the Hand Spray Plastic Parts Booth (EU79), the Upspray Machine Plastic Parts Booth (EU81), the Closed Top Solvent-based Mask Washer (EU129), and the Robot Plastic Parts Paint Spray Booth (EU167), including cleanup solvents, minus the single HAP content of any coating material or solvent waste shipped offsite, shall be limited to less than nine and eight-tenths (9.8) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This condition will limit source-wide emissions of a single HAP to less than ten (10) tons per year.

- (c) The total usage of total HAPs in the Spray HSML and Plastic Parts Booth (EU78), the Hand Spray Plastic Parts Booth (EU79), the Upspray Machine Plastic Parts Booth (EU81), the Closed Top Solvent-based Mask Washer (EU129), and the Robot Plastic Parts Paint Spray Booth (EU167), including cleanup solvents, minus the HAP content of any coating material or solvent waste shipped offsite, shall be limited to less than twenty-four and eight tenths (24.8) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Combined with other HAP emissions at the source, this condition will limit source-wide emissions of any combination of HAPs to less than twenty-five (25) tons per year.

D.1.2 Volatile Organic Compound (VOC) Limitation [326 IAC 8-1-6][326 IAC 2-2]

Pursuant to Operating Permit T077-7670-00003, issued on April 18, 2001, the input of VOC to the plastic parts surface coating booths (EU78, EU79, EU81, and EU167), installed after January 1, 1980, shall each be limited to less than twenty-five (25) tons per twelve (12) consecutive month period including coatings, dilution solvents, and cleaning solvents minus the VOC content of any coating material or solvent waste shipped offsite. This usage limit is required to limit the potential to emit of VOC to less than twenty five (25) tons per twelve (12) consecutive month period from each booth. Compliance with this limit makes 326 IAC 8-1-6 (Best Available Control Technology) not applicable. Compliance with this limit also renders 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

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

Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating operations (EU78, EU79, EU81, EU167) shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.1.4 Hazardous Air Pollutant (HAP) Limitation [326 IAC 2-4.1-1]

Pursuant to Minor Source Modification 077-11312-00003, issued on October 28, 1999, the input of hazardous air pollutants (HAPs) to the Robotic Plastic Parts Spray Paint Booth (EU 167) including cleanup solvents, minus the HAP content of any coating material or solvent waste shipped offsite, shall be limited to less than ten (10) tons per twelve (12) consecutive months for a single HAP and less than twenty-five (25) tons per year for any combination of HAPs. Compliance with this limit shall render 326 IAC 2-4.1-1 (New Source Toxics Control) not applicable.

D.1.5 Volatile Organic Compounds (VOC) [326 IAC 8-3-2] [326 IAC 8-3-5]

- (a) Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for the Closed Top Solvent-based Mask Washer (EU129) and the insignificant degreasing operations (EU209, EU210, EU211, EU212, and EU213), the Permittee shall:
- (1) Equip the cleaner with a cover;
 - (2) Equip the cleaner with a facility for draining cleaned parts;
 - (3) Close the degreaser cover whenever parts are not being handled in the cleaner;
 - (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
 - (5) Provide a permanent, conspicuous label summarizing the operation requirements;
 - (6) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.
- (b) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for the Closed Top Solvent-based Mask Washer (EU129), the Permittee shall ensure that the following control equipment requirements are met:

- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in 326 IAC 8-3-5(b) (Condition D.1.5(c)).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (c) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), for the Closed Top Solvent-based Mask Washer (EU129), the Permittee shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

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 the spray booths (EU78, EU79, EU81, and EU167) and their control devices.

Compliance Determination Requirements

D.1.7 Volatile Organic Compounds (VOC)[326 IAC 8-1-2][326 IAC 8-1-4]

- (a) Compliance with the VOC and HAP usage limitations contained in Conditions D.1.1, D.1.2, and D.1.4 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. Compliance with the VOC and HAP usage limitations contained in conditions D.1.1, D.1.2, and D.1.4 shall be demonstrated within 30 days of the end of each month.
- (b) Each time credit is taken for waste shipped off-site, the Permittee shall determine the VOC, single HAP and total HAP content of the combined coating material and solvent waste shipped off-site pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by EPA Reference Method 24 and the sampling procedures in 326 IAC 8-1-4 or other methods as approved by the Commissioner. If a shipment consists of separate containers, the Permittee shall sample each container. The testing shall be conducted in accordance with Section C - Performance Testing, except for notifying IDEM of the test in paragraph (a), all of paragraph (b), and all of paragraph (c).
- (c) Each time credit is taken for waste shipped off-site, compliance with the VOC and HAP usage limitations contained in conditions D.1.1, D.1.2, and D.1.4 shall be based on the total VOC/HAP used for the previous month, minus the VOC/HAP shipped off-site during that same month, and adding it to the previous 11 months total VOC/HAP usage, minus the VOC/HAP shipped off-site during that same period, so as to arrive at VOC/HAP emissions for the most recent twelve (12) consecutive month period.

- (1) For the VOC limits in Conditions D.1.1 and D.1.2, the VOC emissions for a month can be arrived at using the following equation:

$$\text{VOC emitted} = \text{VOC}_U - \text{VOC}_R$$

Where

VOC_U = The total amount of VOC, in tons, delivered to the coating applicators, including coatings, dilution solvents, and cleaning solvents; and

VOC_R = The total amount of VOC, in tons, shipped off-site, including coatings, dilution solvents, and cleaning solvents.

- (2) For the HAP limits in Conditions D.1.1 and D.1.4, the HAP emissions for a month can be arrived at using the following equation:

$$\text{HAP emitted} = \text{HAP}_U - \text{HAP}_R$$

Where

HAP_U = The total amount of HAP, in tons, delivered to the coating applicators, including coatings, dilution solvents, and cleaning solvents; and

HAP_R = The total amount of HAP, in tons, shipped off-site, including coatings, dilution solvents, and cleaning solvents.

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

D.1.8 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (3-34, 3-35, 3-36, 3-45) while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

D.1.9 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1, D.1.2, D.1.4, and D.1.7(a), the Permittee shall maintain records in accordance with (1) through (3) below when taking no credit for the VOC and HAP content of any coating material or solvent waste shipped off-site. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limits, the HAP emission limits, and the compliance determination requirements established in Conditions D.1.1, D.1.2, D.1.4, and D.1.7(a). Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) The amount, VOC content and HAP content of each coating material and solvent used, on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;
 - (2) The total VOC and HAP usage for each month; and
 - (3) The weight of VOCs and HAPs emitted for each compliance period.
- (b) To document compliance with Conditions D.1.1, D.1.2, D.1.4, D.1.7(a), D.1.7(b), and D.1.7(c), the Permittee shall maintain records in accordance with (1) through (5) below when taking credit for the VOC and HAP content of any coating material or solvent waste shipped off-site. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limits, the HAP emission limits, and the compliance determination requirements established in Conditions D.1.1, D.1.2, D.1.4, D.1.7(a), D.1.7(b), and D.1.7(c). Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) The amount, VOC content and HAP content of each coating material and solvent used, on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;
 - (2) The quantity of coating material and solvent waste shipped offsite each month. Non-VOC waste shall not be commingled with VOC and/or HAP containing waste, if the VOC and/or HAP content of waste shipped offsite is deducted from the reported monthly VOC and/or HAP usage;

- (3) The total VOC and HAP usage for each month;
 - (4) The weight of VOCs and HAPs emitted for each compliance period; and
 - (5) The results of the laboratory analysis of the VOC and HAP content of the coating material and solvent waste collected and drummed for disposal offsite. A representative sample of the waste to be shipped offsite shall be analyzed for each waste shipment if the waste VOC and HAP content is deducted from the monthly VOC and HAP usage reported.
- (c) To document compliance with Condition D.1.8, the Permittee shall maintain a log of weekly overspray observations and daily and monthly inspections.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.10 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1, D.1.2, and D.1.4, shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 FACILITY OPERATION CONDITIONS

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

- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPs consisting of brazing equipment, cutting torches, soldering equipment, welding equipment, identified as EU93, EU95, EU124, EU125, EU126, EU127, EU138, EU181, EU182, EU183, EU184, EU186, EU195, EU196, EU197, EU200, and EU215. [326 IAC 6-3-2]
- (d) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations, consisting of two (2) Maintenance Abrasive Blasters, identified as EU160 and EU221 each with a maximum throughput of 80 pounds of abrasive materials per hour, and exhausting inside the building. [326 IAC 6-3-2(e)]
- (e) Activities with potential uncontrolled emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM10; 3 lb/hr or 15 lb/day VOC; 5 lb/day or 1.0 ton/yr of a single HAP, or 12.5 lb/day 2.5 ton/yr of any combination of HAPs, consisting of:
 - (1) One (1) Injection Molding Process, consisting of thirty-one (31) emission units, identified as EU57 – EU62, EU74 – EU76, EU139 – EU142, EU169 – EU171, EU173 – EU179, EU193, EU194, EU201, EU204, EU205, EU214, EU220, and EU223, consisting of vertical and horizontal molding using many different thermoplastic, and other similar materials with a maximum capacity of 788 pounds of molded product per hour, exhausting inside the building. [326 IAC 6-3-2]
 - (2) Five (5) PVC Plug Molders, identified as EU27 – EU30 and EU38, with a maximum unit capacity of four-hundred eighty (480) pieces per hour, exhausting inside the building. [326 IAC 6-3-2]
 - (3) Sixteen (16) Metal Presses, identified as EU4 – EU10, and EU16 - EU24, exhausting inside the building. [326 IAC 6-3-2]
 - (4) Two (2) Adhesive Robots, identified as EU147 and EU148, producing no particulate emissions, and exhausting inside the building.
 - (5) Two (2) belt sanders, identified as EU188 and EU189, using no controls, and exhausting inside the building. [326 IAC 6-3-2]

(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.2.1 Particulate [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2(e), the particulate emissions from the grinding and machining operations (EU160, EU221) operating at a process weight rate less than 100 pounds per hour shall each be limited to less than 0.551 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2, the particulate emissions from the following insignificant activities shall each be limited as shown in the following table:

Emission Unit Description	Emission Unit ID	Maximum Throughput (lbs/hr)	Allowable Emissions 326 IAC 6-3-2
Brazing, Cutting, Soldering, Welding	EUs 93, 95, 124, 125, 126, 127, 138, 181, 182, 183, 184, 186, 195, 196, 197, 200, and 215	150 (each)	0.723
Injection Molding	EUs 57 – 62, 74 – 76, 139 – 142, 169 – 171, 173 – 179, 193, 194, 201, 204, 205, 214, 220, and 223	200 (each)	0.877
Plug Molders	EUs 27 – 30, 38	150 (each)	0.723
Metal Presses	EUs 4 – 10, 16 - 24	833 (each)	2.28
Belt Sanders	EUs 188 and 189	200 (each)	0.877

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

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

D.2.2 Particulate Control

Pursuant to 326 IAC 6-3-2, and in order to comply with Condition D.2.1, the filters for the grinding and machining operations (EU160 and EU221) shall be in operation and control emissions from the grinding and machining operations at all times these facilities are in operation.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Grote Industries, LLC
Source Address: 2600 Lanier Drive, Madison, Indiana 47250
Mailing Address: 2600 Lanier Drive, Madison, Indiana 47250
FESOP No.: F077-21436-00003

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: 317-233-0178
Fax: 317-233-6865**

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

Source Name: Grote Industries, LLC
Source Address: 2600 Lanier Drive, Madison, Indiana 47250
Mailing Address: 2600 Lanier Drive, Madison, Indiana 47250
FESOP No.: F077-21436-00003

This form consists of 2 pages

Page 1 of 2

<input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) <ul style="list-style-type: none">• The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16

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

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

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

Page 2 of 2

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

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

A certification is not required for this report.

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

FESOP Quarterly Report

Source Name: Grote Industries, LLC
 Source Address: 2600 Lanier Drive, Madison, Indiana 47250
 Mailing Address: 2600 Lanier Drive, Madison, Indiana 47250
 FESOP No.: F077-21436-00003
 Facility: Surface Coating (EU78, EU79, EU81, EU167), and Mask Washer (EU129)
 Parameter: Total VOC Usage, including cleanup solvents, less coating material and solvent waste shipped offsite.
 Limit: Less than ninety (90) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

Month	Column 1	Column 2	Column 3 = Col. 1 – Col. 2	Column 4	Column 3 + Column 4
	Total VOC This Month	VOC Drummed for Offsite Disposal This Month	Net VOC Usage This Month	Net VOC Usage Previous 11 Months	12 Months Total
Month 1					
Month 2					
Month 3					

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.

Deviation has been reported on: _____

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

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Grote Industries, LLC
 Source Address: 2600 Lanier Drive, Madison, Indiana 47250
 Mailing Address: 2600 Lanier Drive, Madison, Indiana 47250
 FESOP No.: F077-21436-00003
 Facility: Surface Coating (EU78, EU79, EU81, EU167), and Mask Washer (EU129)
 Parameter: Total Single HAP Usage, less coating material and solvent waste shipped offsite.
 Limit: Less than nine and eight-tenths (9.8) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

Month	Column 1	Column 2	Column 3 = Col.1 – Col. 2	Column 4	Column 3 + Column 4
	Total Single HAP This Month	Total Single HAP Drummed for Offsite Disposal This Month	Net Single HAP Usage This Month	Net Single HAP Usage Previous 11 Months	12 Months Total
Month 1					
Month 2					
Month 3					

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.

Deviation has been reported on: _____

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

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Grote Industries, LLC
 Source Address: 2600 Lanier Drive, Madison, Indiana 47250
 Mailing Address: 2600 Lanier Drive, Madison, Indiana 47250
 FESOP No.: F077-21436-00003
 Facility: Surface Coating (EU78, EU79, EU81, EU167), and Mask Washer (EU129)
 Parameter: Total Combination of HAPs Usage, less coating material and solvent waste shipped offsite.
 Limit: Less than twenty-four and eight tenths (24.8) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

	Column 1	Column 2	Column 3 = Col. 1– Col. 2	Column 4	Column 3 + Column 4
Month	Total Combination HAPs This Month	Total Combination HAPs Drummed for Offsite Disposal This Month	Net Combination HAPs Usage This Month	Net Combination HAPs Usage Previous 11 Months	12 Months Total
Month 1					
Month 2					
Month 3					

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

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

Attach a signed certification to complete this report.

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

FESOP Quarterly Report - 326 IAC 8-1-6 BACT

Source Name: Grote Industries, LLC
 Source Address: 2600 Lanier Drive, Madison, Indiana 47250
 Mailing Address: 2600 Lanier Drive, Madison, Indiana 47250
 FESOP No.: F077-21436-00003
 Facility: Surface Coating Booths EU78, EU79, EU81 and EU167
 Parameter: VOC, including coatings and solvents, less coating material and solvent waste shipped offsite.
 Limit: Each less than twenty-five (25) tons per twelve consecutive month period, with compliance determined at the end of each month.

YEAR: _____

Month	Column 1	Column 2	Column 3 = Col. 1 - Col. 2	Column 4	Column 5 = Columns 3+4
	Total VOC This Month	VOC Drummed for Offsite Disposal	Net VOC Usage This Month	Net VOC Usage Previous 11 Months	12 Month Total
Month 1: EU78					
Month 1: EU79					
Month 1: EU81					
Month 1: EU167					
Month 2: EU78					
Month 2: EU79					
Month 2: EU81					
Month 2: EU167					
Month 3: EU78					
Month 3: EU79					
Month 3: EU81					
Month 3: EU167					

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

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

Attach a signed certification to complete this report.

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

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

Source Name: Grote Industries, LLC
Source Address: 2600 Lanier Drive, Madison, Indiana 47250
Mailing Address: 2600 Lanier Drive, Madison, Indiana 47250
FESOP No.: F077-21436-00003

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. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked ΔNo deviations occurred this reporting period@.</p>	
<p><input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.</p>	
<p><input type="checkbox"/> 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

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

Source Background and Description

Source Name:	Grote Industries, LLC
Source Location:	2600 Lanier Drive, Madison, Indiana 47250
County:	Jefferson
SIC Code:	3647, 3231
Operation Permit No.:	T077-7670-00003
Operation Permit Issuance Date:	April 18, 2001
FESOP Transition No.:	F077-21436-00003
Permit Reviewer:	ERG/ST

The Office of Air Quality (OAQ) has reviewed a FESOP Transition application from Grote Industries, LLC relating to the operation of a stationary plastic and metal automotive parts manufacturing plant.

History

Grote Industries, Inc. manufactures plastic and metal automotive parts. This source was issued Title V Operating Permit T007-7670-00003 on April 18, 2001. On July 12, 2005, the source submitted an application to renew their operating permit and requesting to transition to FESOP status. The application also stated that the metal surface coating booths listed in Section D.2 of their current Title V permit have been removed. This FESOP includes limits on the volatile organic compounds and hazardous air pollutants that can be released by the source.

Permitted Emission Units and Pollution Control Equipment

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

- (a) One Plastic Painting Process consisting of the following emission units:
 - (1) One (1) Spray HSML and Plastic Parts Booth, identified as EU78, constructed in 1983, with a maximum unit capacity of one thousand two hundred (1200) pieces per hour, using an electric drying oven, using dry filters to control particulate emissions, and exhausting to stack 3-36.
 - (2) One (1) Hand Spray Plastic Parts Booth, identified as EU79, constructed in 1989, with a maximum capacity of two hundred fifty (250) pieces per hour, using dry filters to control particulate emissions, and exhausting to stack 3-35.
 - (3) One (1) Upspray Machine Plastic Parts Booth, identified as EU81, constructed in 1986, with a maximum unit capacity of three hundred (300) pieces per hour, using dry filters to control particulate emissions, and exhausting to stack 3-34.

- (b) One (1) Closed Top Solvent-based Mask Washer, identified as EU129, constructed in 1994, with a batch process maximum unit capacity varying from two (2) to one hundred (100) pieces per hour, exhausting to stacks 3-37 and 3-38.
- (c) One (1) Robot Plastic Parts Paint Spray Booth, identified as EU167, constructed in 2000, with a maximum capacity of six hundred (600) units per hour, using an electric drying oven, using dry filters to control particulate emissions, and exhausting to stack 3-45.

Unpermitted Emission Units and Pollution Control Equipment

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

Insignificant Activities

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour and Propane or liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour, consisting of forty one (41) natural gas-fired space heaters, air make-up heaters, process heaters and small boilers, identified as EUs 99, 100, 101, 103 through 119, 135, 137, 155, 157, 158, 159, 161, 162, 163, 165, 166, 168, 198, 202, 203, 206, 207, 208, 216, 217, and 218, with a combined maximum heat input capacity of 25.57 MMBtu per hour, with the capability to use propane fuel as a back-up fuel, and exhausting to stacks 1-12, 1-36, 1-RT1, 1-RT2, 1-RT3, 1-RT4, 2-40, 2-9, 2-21, 2-RT1, 2-RT2, 3-27, 3-28, 3-29, 3-30, 3-MAH1, W-2, W-5, W-RT1, 1-38, 1-39, 1-RT10, 1-71, 1-64, 1-65, 1-66, 1-70, 1-RT11, 2-24, 2-39, 3-15, 1-MAH-1, 2-45, 2-54, 2-55, 1-RT5, 1-RT7, 1-RT9, 1-RT2, 1-RT6 and 1-RT8, respectively.
- (b) Degreasing operations that do not exceed 145 gallons each per 12 months, and are not subject to 326 IAC 20-6, consisting of five (5) cold cleaner degreasers, identified as emission units EU209, EU210, EU211, EU212, and EU213, each with remote solvent reservoirs, each constructed in 1998 or after. [326 IAC 8-3-2]
- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPs consisting of brazing equipment, cutting torches, soldering equipment, welding equipment, identified as EU93, EU95, EU124, EU125, EU126, EU127, EU138, EU181, EU182, EU183, EU184, EU186, EU195, EU196, EU197, EU200, and EU215. [326 IAC 6-3-2]
- (d) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, consisting of two (2) Maintenance Abrasive Blasters, identified as EU160 and EU221, each with a maximum throughput of 80 pounds of abrasive materials per hour and exhausting inside the building. [326 IAC 6-3-2(e)]
- (e) Activities with potential uncontrolled emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM10; 3 lb/hr or 15 lb/day VOC; 5 lb/day or 1.0 ton/yr of a single HAP, or 12.5 lb/day 2.5 ton/yr of any combination of HAPs, consisting of:
 - (1) One (1) Injection Molding Process, consisting of thirty-one (31) emission units, identified as EU57 – EU62, EU64, EU74 – EU76, EU139 – EU142, EU169 – EU171, EU173 – EU179, EU 193, EU194, EU201, EU 204, EU205, EU214, and EU220 consisting of vertical and horizontal molding using many different thermoplastic and other similar materials with a maximum capacity of 788 pounds of molded product per hour, exhausting inside the building. [326 IAC 6-3-2]

- (2) Five (5) PVC Plug Molders, identified as EU27 – EU30 and EU38, with a maximum unit capacity of four-hundred eighty (480) pieces per hour, exhausting inside the building. [326 IAC 6-3-2]
- (3) Sixteen (16) Metal Presses, identified as EU4 – EU10, and EU16 - EU24, each with a maximum throughput of 833 pounds of metal per hour, exhausting inside the building. [326 IAC 6-3-2]
- (4) Two (2) Adhesive Robots, identified as EU147 and EU148, producing no particulate emissions, and exhausting inside the building.
- (5) Two (2) belt sanders, identified as EU188 and EU189, using no controls, and exhausting inside the building. [326 IAC 6-3-2]
- (6) Stamp Pad process (EU 145) using minimal quantities of red and white inks and ink thinner to stamp wording on directional signals.
- (7) Facility-wide Isopropyl Alcohol cleanup operations (EU 149).
- (8) Wire machine (EU 199) for printing numbers on wires.
- (f) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
- (g) VOC and HAP storage containers (EU222) with capacity less than or equal to one thousand (1,000) gallons and annual throughputs equal to or less than twelve thousand (12,000) gallons.
- (h) Application of oils, greases, lubricants, and/or nonvolatile material, as temporary protective coatings.
- (i) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (j) Infrared cure equipment.
- (k) Activities associated with rolling oil recovery systems with batch capacity less than or equal to one hundred (100) gallons.
- (l) Any operation using aqueous solutions containing less than or equal to one percent (1%) by weight of VOCs excluding HAPs.
- (m) Water based adhesives that are less than or equal to five percent (5%) by volume of VOCs excluding HAPs.
- (n) Asbestos abatement projects regulated by 326 IAC 14-10.
- (o) Blowdown for the following: sight glass, boiler, cooling tower, compressors and/or pumps.
- (p) One (1) emergency generator (EU219) using diesel fuel, rated at 168 brake-horsepower, 125 kilowatts and 1.18 MMBtu/hr maximum heat input capacity.
- (q) A laboratory with research and development activities (EU156, EU164, EU190), as described in 326 IAC 2-7-1(21)(D).
- (r) Conveyors, consisting of enclosed systems for conveying plastic raw material and plastic finished goods.
- (s) Noncontact cooling tower systems with natural draft cooling towers not regulated under a NESHAP, or forced and induced draft cooling tower systems not regulated under a NESHAP.

Existing Approvals

The source has been operating under Operating Permit T077-7670-00003, issued on April 18, 2001, with an expiration date of April 18, 2006, and the following amendments and revisions:

- (a) Minor Source Modification 077-11312-00003, issued on October 28, 1999;
- (b) Administrative Amendment 077-11542-00003 to MSM 077-11312-00003 077, issued on January 3, 2000; and
- (c) Administrative Amendment 077-18461-00003, issued on January 21, 2004.

All conditions from previous approvals were incorporated into this FESOP except the emission limits on metal surface coating booths in Section D.2 of T007-7670-00003 are removed, as the metal surface coating booths have been removed.

Enforcement Issues

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the FESOP Transition 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 Transition application for the purposes of this review was received on July 12, 2005.

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

Emission Calculations

See Appendix A of this document for detailed emissions calculations (pages 1 through 7).

Potential To Emit

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

Note: The Potential to Emit figures in the following table represent the potential to emit of this source under federally-enforceable requirements in its current Title V permit (T077-7670-00003, issued April 18, 2001). The source wide potential to emit of VOC is restricted by limits taken in previous permits on the individual facilities identified as EU78, EU79, EU81 and EU167 and by the unrestricted potential to emit of the remaining facilities (EU129, combustion units, and degreasers). Emission units EU78, EU79, EU81 and EU167 are limited by 326 IAC 8-1-6 conditions to less than 25 tons per year each of VOC. Emission unit EU167 is limited by 326 IAC 2-4.1 to less than ten (10) tons of a single HAP and less than twenty-five (25) tons of a combination of HAPs. The emission of HAPs from the other surface coating units is effectively limited by the VOC limits.

Pollutant	Potential To Emit (tons/year)
PM	5.8
PM-10	5.8
PM2.5	5.8
SO ₂	0.3
VOC	124
CO	13
NO _x	22.4

HAPs	Potential To Emit (tons/year)
Xylene	52.8
Toluene	20.4
Ethyl benzene	13.0
Naphthalene	10.6
MIK	2.26
TOTAL	99.1

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7. The source will be issued a FESOP because the source will limit its emissions below the Title V levels.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7. The source will be issued a FESOP because the source will limit its emissions below the Title V levels.
- (c) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD applicability.

Potential to Emit After Issuance

The source has opted to become 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.

Process/emission unit	Potential To Emit (tons/year)						HAPs
	PM	PM-10	SO ₂	VOC	CO	NO _x	
Spray Booth EU78	3.2 ^(a)	3.2 ^(a)	0	Less than 90	0	0	Single HAP: less than 9.8 Combination HAPs: Less than 24.8
Spray Booth EU79	0.1 ^(a)	0.1 ^(a)	0		0	0	
Spray Booth EU81	0.6 ^(a)	0.6 ^(a)	0		0	0	
Mask Washer EU129	0	0	0		0	0	
Spray Booth EU167	0.6 ^(a)	0.6 ^(a)	0		0	0	
Combustion Units	0.85	0.85	0.07	0.6	9.4	17.3	0.01
Degreasers ^b	0	0	0	2.4	0	0	0.0
Insig. Grinders ^b	0.24	0.24	0	0	0	0	0.002
Welding, Soldering, Brazing ^b	0.001	0.001	0	0	0	0	0.0008
Injection Molding, Plug Molders, Metal Presses ^b	0.013	0.013	0	0	0	0	0.0001
Emergency Generator	0.03	0.03	0.17	0.03	0.23	1.01	0.003
Total Emissions ^c	5.8	5.8	0.3	Less than 100	13.0	22.4	Single HAP: Less than 10 Comb. HAPs: Less than 25

(a) Particulate emissions from the spray booths are limited by 326 IAC 6-3-2.

VOC usage at spray booths EU78, EU79, EU81 and EU167 are each limited by conditions in the permit to less than 25 tons per year, which makes the requirements of 326 IAC 8-1-6 not applicable.

(b) The PTE figures for these insignificant emission units are from the source's Title V renewal application and represent the maximum potential to emit for these facilities.

(c) Total Emissions of VOC, a single HAP and a combination of HAPs are limited to less than 100 tons, 10 tons and 25 tons per twelve consecutive month period, respectively. These limits make the requirements of 326 IAC 2-7 not applicable to the source.

County Attainment Status

The source is located in Madison Township, Jefferson County.

Pollutant	Status
PM10	Attainment
PM2.5	Nonattainment
SO ₂	Unclassifiable
NO ₂	Attainment
1-hour Ozone	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) U.S.EPA in Federal Register Notice 70 FR 943 dated January 5, 2005 has designated Madison Township in Jefferson County as nonattainment for PM2.5. On March 7, 2005 the Indiana Attorney General's Office on behalf of IDEM filed a law suit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of non-attainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for violation of the Clean Air Act, the OAQ is following the U.S. EPA's guidance to regulate PM10 emissions as surrogate for PM2.5 emissions pursuant to the Non-attainment New Source Review requirements. See the State Rule Applicability-Entire Source section.
- (b) Volatile organic compounds (VOC) and Nitrogen Oxides 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 ozone. Jefferson County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability-Entire Source section.
- (c) Jefferson County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability-Entire Source section.

Source Status

Existing Source PSD, Non-attainment New Source Review and 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	5.8
PM10	5.8
PM2.5	5.8
SO ₂	0.3
VOC	less than 100
CO	13.0
NO _x	22.4
Single HAP	Less than 10
Combination HAPs	Less than 25

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

- (b) This existing source is not a major stationary source under Nonattainment New Source Review because no nonattainment regulated pollutant is emitted at a rate of 100 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 New Source Performance Standards for Fossil-Fuel-Fired Steam Generators, (326 IAC 12, 40 CFR 60, Subpart D) are not included in this permit for the two insignificant hot water boilers (EU161, EU163) because their maximum heat input is less than 250 MMBtu/hr.
- (c) The requirements of the New Source Performance Standards for Electric Utility Steam Generating Units, (326 IAC 12, 40 CFR 60, Subpart Da) are not included in this permit for the two insignificant hot water boilers (EU161, EU163) because they are not electric utility steam generating units.
- (d) The requirements of the New Source Performance Standards for Industrial-Commercial-Institutional Steam Generating Units, (326 IAC 12, 40 CFR 60, Subpart Db) are not included in this permit for the two insignificant hot water boilers (EU161, EU163) because they each have a heat input capacity less than 100 MMBtu/hr.
- (e) The requirements of the New Source Performance Standards for Small Industrial-Commercial-Institutional Steam Generating Units (326 IAC 12, 40 CFR 60, Subpart Dc) are not included in this permit for the two insignificant hot water boilers (EU161, EU163) because they each have a maximum design input capacity less than 10 MMBtu/hr.
- (f) The requirements of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products (40 CFR 63, Subpart PPPP) are not included in this permit for the surface coating booths at this source because the source has accepted federally enforceable limits on the amount of hazardous air pollutants (HAPs) emitted such that the amount of any single HAP emitted is limited to less than ten (10) tons per year and the amount of any combination of HAPs is limited to less than twenty-five (25) tons per year and they are taking the HAP limit prior to the April 19, 2007 compliance date for existing sources subject to 40 CFR 63, Subpart PPPP.
- (g) The requirements of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Metal Parts and Products (40 CFR 63, Subpart MMMM) are not included in this permit for the surface coating booths at this source because the source does not apply surface coatings to metal parts and products and the source has accepted federally enforceable limits on the amount of hazardous air pollutants (HAPs) emitted such that the amount of any single HAP emitted is limited to less than ten (10) tons per year and the amount of any combination of HAPs is limited to less than twenty-five (25) tons per year and they are taking the HAP limit prior to the January 2, 2007 compliance date for existing sources subject to 40 CFR 63, Subpart MMMM.
- (h) The requirements of the National Emission Standards for Halogenated Solvent Cleaning (326 IAC 20-6, 40 CFR 63, Subpart T) are not included in this permit for the significant and insignificant degreasing operations because these degreasing operations do not use a solvent containing methylene chloride, perchlorethylene, trichlorethylene, 1,1,1-trichlorethane, carbon tetrachloride, chloroform or any combination of these halogenated HAP solvents in a total concentration greater than five percent (5%) by weight as a cleaning or drying agent.
- (i) The requirements of the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD are not included in this permit for the two insignificant hot water boilers

(EU161, EU163) and the two insignificant process heaters (EU118, EU119) because the source has accepted federally enforceable limits on the amount of hazardous air pollutants (HAPs) emitted such that the amount of any single HAP emitted is limited to less than ten (10) tons per year and the amount of any combination of HAPs is limited to less than twenty-five (25) tons per year and they are taking the HAP limit prior to the September 13, 2007 compliance date for existing sources subject to this rule.

- (j) The requirements of the National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE) (40 CFR 63, Subpart ZZZZ) are not included in this permit for the 168 horsepower diesel emergency generator (EU219) because the source has accepted federally enforceable limits on the amount of hazardous air pollutants (HAPs) emitted such that the amount of any single HAP emitted is limited to less than ten (10) tons per year and the amount of any combination of HAPs is limited to less than twenty-five (25) tons per year and they are taking the HAP limit prior to the June 15, 2007 compliance date for existing sources subject to this rule.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

This source is not in 1 of the 28 source categories and there are no applicable New Source Performance Standards that were in effect on August 7, 1980; therefore, fugitive emissions are not counted towards applicability of PSD.

The operations for surface coating of automotive parts at this source were constructed in 1976. The source is located in Madison Township in Jefferson County. The source originally consisted of three (3) spray booths for coating metal parts (EU82, EU83, EU84) and one (1) spray booth for coating plastic parts (EU78). At the time of construction, the source accepted limits on VOC usage in the metal spray booths of less than 25 tons per year each in order to make the requirements of 326 IAC 8-2-9 not applicable, and the source accepted limits on the VOC usage in the plastic spray booth of less than 25 tons per year in order to make the requirements of 326 IAC 8-1-6 not applicable. [See State Rule Applicability – Individual Facilities: 326 IAC 8-1-6 for a discussion of the limits for EU78. Booth EU84 was removed in 2003.] The potential to emit of the entire source for PM, PM10, VOC, NO_x, SO₂, and CO, after limits, was less than 250 tons per year. The source was a minor source under PSD at the time of promulgation of the PSD rules.

In 1984, the source modified two (2) spray booths for coating metal parts (EU82, EU83). At the time these booths were modified, the source accepted limits on the VOC usage for each booth of less than 25 tons per year in order to make the requirements of 326 IAC 8-2-9 and 326 IAC 2-2 not applicable. [Booths EU82 and EU83 were removed in 2003.] This modification did not trigger PSD review because the increase in potential to emit of VOC and PM/PM10 due to the modification were less than 250 tons per year. After the modification, the potential to emit of the entire source for PM, PM10, VOC, NO_x, SO₂, and CO, after limits, was less than 250 tons per year. The source remained a minor source under PSD after this modification.

In 1986, the source added one (1) spray booth for coating plastic parts (EU81). At the time this booth was added, the source accepted limits on the VOC usage for the new booth of less than 25 tons per year to make the requirements of 326 IAC 8-1-6 and 326 IAC 2-2 not applicable. [See State Rule Applicability – Individual Facilities: 326 IAC 8-1-6 for a discussion of the limits for EU81.] This modification did not trigger PSD review because the increase in potential to emit of VOC and PM/PM10 due to the modification were less than 250 tons per year. After the modification, the potential to emit of the entire source for PM, PM10, VOC, NO_x, SO₂, and CO, after limits, was less than 250 tons per year. The source remained a minor source under PSD after this modification.

In 1989, the source added one (1) spray booth for coating plastic parts (EU79). At the time this booth was added, the source accepted limits on the VOC usage for the booth of less than 25 tons per year to make the requirements of 326 IAC 8-1-6 and 326 IAC 2-2 not applicable. [See State Rule Applicability – Individual Facilities: 326 IAC 8-1-6 for a discussion of the limits for EU79.] This modification did not trigger PSD review because the increase in potential to emit of VOC and

PM/PM10 due to the modification was less than 250 tons per year. After the modification, the potential to emit of the entire source for PM, PM10, VOC, NOx, SO₂, and CO, after limits, was less than 250 tons per year. The source remained a minor source under PSD after this modification.

In 1994, the source added one (1) Solvent-based Mask Washer for cleaning parts (EU129). This modification did not trigger PSD review because the increase in potential to emit of VOC due to the modification (22.6 tons per year) was less than 250 tons per year and the increase in potential to emit of PM/PM10 due to the modification was less than 250 tons per year. [See calculations in TSD Appendix A.] After the modification, the potential to emit of the entire source for PM, PM10, VOC, NOx, SO₂, and CO, after limits, was less than 250 tons per year. The source remained a minor source under PSD after this modification.

In 2000, under Minor Source Modification 077-11312-00003, the source added one (1) Robot Plastic Parts Paint Spray Booth for coating plastic parts (EU167). This modification did not trigger PSD review because the increase in potential to emit of VOC due to the modification (12.7 tons per year) was less than 250 tons per year and the increase in potential to emit of PM/PM10 due to the modification was less than 250 tons per year. [See calculations in TSD Appendix A.] After the modification, the potential to emit of the entire source for PM, PM10, VOC, NOx, SO₂, and CO, after limits, was less than 250 tons per year. The source remained a minor source under PSD after this modification.

The potential to emit of the entire source for PM, PM10, VOC, NOx, SO₂, and CO, after limits, is less than 250 tons per year. The source is a minor source under PSD.

326 IAC 2-3 (Nonattainment NSR)

Madison Township in Jefferson County has been designated as non-attainment for PM 2.5 in 70 FR 943 dated January 5, 2005. According to the April 5, 2005 EPA memo titled "Implementation of New Source Review Requirements in PM2.5 Nonattainment Areas" authored by Steve Page, Director of OAQPS, until EPA promulgates the PM2.5 major NSR regulations, states should assume that a major stationary source's PM10 emissions represent PM2.5 emissions. IDEM will use the PM10 nonattainment major NSR program as a surrogate to address the requirements of nonattainment major NSR for the PM2.5 NAAQS. A major source in a nonattainment area is defined as a source that emits or has the potential to emit 100 tpy of any regulated pollutant. Grote Industries, LLC has a limited potential to emit of PM10 below 100 tpy. Therefore, assuming that PM10 emissions represent PM2.5 emissions, this source is a minor source under Nonattainment NSR for any future modifications

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

- (a) The Spray HSML and Plastic Parts Booth (EU78), the Hand Spray Plastic Parts Booth (EU79), the Upspray Machine Plastic Parts Booth (EU81), and the Closed Top Solvent-based Mask Washer (EU129) were constructed prior to July 27, 1997. Therefore, the requirements of 326 IAC 2-4.1 do not apply.
- (b) The Robot Plastic Parts Paint Spray Booth (EU167) was constructed after July 27, 1997, and, at the time of construction, this emission unit had a potential to emit a single HAP in excess of ten (10) tons per year, before limits. At the time that this emission unit was constructed, the source agreed to limit the usage of HAP at this spray booth to less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. A condition requiring the source to limit the input of HAP to this emission unit was included in Minor Source Modification 077-11312-00003, issued on October 28, 1999 and in this renewal permit. Therefore, the requirements of 326 IAC 2-4.1 do not apply.
- (c) The source has not constructed any major sources of HAPs after July 27, 1997.

326 IAC 2-6 (Emission Reporting)

This source is located in Jefferson County and is not required to operate under a Part 70 permit. Therefore, 326 IAC 2-6 does not apply.

326 IAC 2-8-4 (FESOP)

The unrestricted potential emissions of VOC from the source exceed one hundred (100) tons per year. The unrestricted potential emissions of a single HAP from the source exceed ten (10) tons per year. The unrestricted potential emissions of a combination of HAPs from the source exceed twenty-five (25) tons per year. The Permittee has chosen to transition from a Title V (Part 70) permit to a FESOP. Pursuant to 326 IAC 2-8-4, and in order to limit the source-wide emissions of VOC, single HAP, and combination of HAPs to less than one-hundred (100), ten (10), and twenty-five (25) tons per year, respectively, the Permittee shall limit the usage of VOC and HAP as follows:

- (a) The total usage of VOC in the Spray HSML and Plastic Parts Booth (EU78), the Hand Spray Plastic Parts Booth (EU79), the Upspray Machine Plastic Parts Booth (EU81), the Closed Top Solvent-based Mask Washer (EU129), and the Robot Plastic Parts Paint Spray Booth (EU167), including cleanup solvents, minus any solvent shipped offsite, shall be limited to less than ninety (90) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Combined with other VOC emissions at the source, this condition will limit source-wide VOC emissions to less than 100 tons per year.
- (b) The total usage of a single HAP in the Spray HSML and Plastic Parts Booth (EU78), the Hand Spray Plastic Parts Booth (EU79), the Upspray Machine Plastic Parts Booth (EU81), the Closed Top Solvent-based Mask Washer (EU129), and the Robot Plastic Parts Paint Spray Booth (EU167), including cleanup solvents, minus any solvent shipped offsite, shall be limited to less than nine and eight-tenths (9.8) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This condition will limit source-wide emissions of a single HAP to less than ten (10) tons per year.
- (c) The total usage of any combination of HAPs in the Spray HSML and Plastic Parts Booth (EU78), the Hand Spray Plastic Parts Booth (EU79), the Upspray Machine Plastic Parts Booth (EU81), the Closed Top Solvent-based Mask Washer (EU129), and the Robot Plastic Parts Paint Spray Booth (EU167), including cleanup solvents minus any solvent shipped off-site, shall be limited to less than twenty-four and eight tenths (24.8) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Combined with other HAP emissions at the source, this condition will limit source-wide emissions of any combination of HAPs to less than twenty-five (25) tons per year.

Therefore, the requirements of 326 IAC 2-7 do not apply.

Note: The source has chosen to limit the usage of VOC at the significant emissions units to less than 90 tons per year in order to allow for future expansion in VOC usage by insignificant activities.

326 IAC 5-1 (Opacity Limitations)

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

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

326 IAC 6-4 (Fugitive Dust Emissions)

Pursuant to 326 IAC 6-4, the source shall not generate fugitive dust to the extent that some portion of the material escapes beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located.

326 IAC 8-6 (Organic Solvent Emission Limitations)

The Spray HSML and Plastic Parts Booth (EU78), the Hand Spray Plastic Parts Booth (EU79), the Upspray Machine Plastic Parts Booth (EU81), and the Robot Plastic Parts Paint Spray Booth (EU167) are located in Jefferson County and commenced operation after January 1, 1980. Therefore, the requirements of 326 IAC 8-6 do not apply.

State Rule Applicability – Plastic Surface Coating Operations

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

Pursuant to 326 IAC 6-3-2(d), particulate from the Spray HSML and Plastic Parts Booth (EU78), the Hand Spray Plastic Parts Booth (EU79), the Upspray Machine Plastic Parts Booth (EU81), and the Robot Plastic Parts Paint Spray Booth (EU167), shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.

326 IAC 8-1-6 (New Facilities, General Reduction Requirements)

- (a) The Spray HSML and Plastic Parts Booth (EU78), the Hand Spray Plastic Parts Booth (EU79), and the Upspray Machine Plastic Parts Booth (EU81) were constructed after January 1, 1980, apply surface coatings containing VOC to plastic parts, and, at the time of construction, each emission unit had a potential to emit VOC in excess of 25 tons per year, before limits. At the time that these emission units were constructed, the source agreed to limit the usage of VOC at each of these spray booths to less than 25 tons per year for each booth. The source shall limit the usage of VOC, including cleanup solvents, minus any solvent shipped offsite, in the Spray HSML and Plastic Parts Booth (EU78), the Hand Spray Plastic Parts Booth (EU79), and the Upspray Machine Plastic Parts Booth (EU81) to less than 25 tons each per twelve (12) consecutive month period, with compliance determined at the end of each month. Therefore, the requirements of 326 IAC 8-1-6 do not apply.
- (b) The Robot Plastic Parts Paint Spray Booth (EU167) was constructed after January 1, 1980, applies surface coatings containing VOC to plastic parts, and, at the time of construction, had a potential to emit VOC in excess of 25 tons per year, before limits. At the time that this emission unit was constructed, the source agreed to limit the usage of VOC at this spray booth to less than 25 tons per year. The source shall limit the usage of VOC, including cleanup solvents, minus any solvent shipped offsite, in the Robot Plastic Parts Paint Spray Booth (EU167) to less than 25 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Therefore, the requirements of 326 IAC 8-1-6 do not apply.

326 IAC 8-2-2 (Surface Coating Emission Limitations: Automobile and Light Duty Trucks)

The surface coatings booths at this source apply coatings to plastic automotive parts. These parts are not assembled into automobiles or light duty trucks at this manufacturing plant. Therefore, the requirements of 36 IAC 8-2-2 do not apply.

326 IAC 8-2-9 (Surface Coating Emission Limitations: Miscellaneous Metal Coating Operations)

The surface coatings booths at this source do not apply coatings to metal parts. The metal coating booths at this source were removed in 2003. The sixteen (16) insignificant metal stamping machines form metal parts out of either uncoated or pre-coated sheets of metal and do not apply surface coatings. Therefore, the requirements of 36 IAC 8-2-9 do not apply.

State Rule Applicability – Closed Top Solvent-based Mask Washer (EU129) and Degreasers (EU209, EU210, EU211, EU212, and EU213)

326 IAC 8-1-6 (New Facilities, General Reduction Requirements)

The Closed Top Solvent-based Mask Washer (EU129) was constructed after January 1, 1980. However, this facility is subject to another Article 8 Rule (326 IAC 8-3-2 and 326 IAC 8-3-5). Therefore, the requirements of 326 IAC 8-1-6 do not apply.

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

The Closed Top Solvent-based Mask Washer (EU129) and Degreasers (EU209, EU210, EU211, EU212, and EU213) are located in Jefferson County, were constructed after January 1, 1980 and are used to perform organic solvent degreasing operations. Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the Permittee of a cold cleaning facility shall:

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

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

- (a) The Degreasers (EU209, EU210, EU211, EU212, and EU213) are located in Jefferson County, were constructed after January 1, 1990, and are used to perform organic solvent degreasing operations. These units have remote solvent reservoirs; therefore, the requirements of 326 IAC 8-3-5 do not apply.
- (b) The Closed Top Solvent-based Mask Washer (EU129) is located in Jefferson County, was constructed after January 1, 1990, is used to perform organic solvent degreasing operations and does not have a remote solvent reservoir.

Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the Permittee shall ensure that the following control equipment requirements are met for the Closed Top Solvent-based Mask Washer (EU129):

- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
- (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

- (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
- (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), for cold cleaning facility construction of which commenced after July 1, 1990, the Permittee shall ensure that the following operating requirements are met for the Closed Top Solvent-based Mask Washer (EU129):

- (1) Close the cover whenever articles are not being handled in the degreaser.
- (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
- (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

State Rule Applicability – Insignificant Activities

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

- (a) Pursuant to 326 IAC 6-3-2(e), the particulate emissions from the grinding and machining operations (EU160, EU221) operating at a process weight rate less than 100 pounds per hour shall each be limited to less than 0.551 pounds per hour.

The filters for the grinding and machining operations (EU160, EU221) shall be in operation at all times these facilities are in operation, in order to comply with this limit.

- (b) Pursuant to 326 IAC 6-3-2, the particulate emissions from the following insignificant activities shall each be limited as shown in the following table:

Emission Unit Description	Emission Unit ID	Maximum Throughput (lbs/hr)	Allowable Emissions 326 IAC 6-3-2
Brazing, Cutting, Soldering, Welding	EUs 93, 95, 124, 125, 126, 127, 138, 181, 182, 183, 184, 186, 195, 196, 197, 200, and 215	150 (each)	0.723
Injection Molding	EUs 57 – 62, 64, 74 – 76, 139 – 142, 169 – 171, 173 – 179, 193, 194, 201, 204, 205, 214, and 220	200 (each)	0.877
Plug Molders	EUs 27 – 30, 38	150 (each)	0.723
Metal Presses	EUs 4 – 10, 16 - 24	833 (each)	2.28
Belt Sanders	EUs 188 and 189	200 (each)	0.877

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:

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

The particulate emissions from the welding, injection molding, plug molders, metal presses and belt sanders are negligible. These units are in compliance with the emission limits in 326 IAC 6-3-2 before the use of control devices.

Testing Requirements

The surface coating operations at this source are not required to perform testing for PM or PM10 because each of these emissions units accounts for a small portion of the total potential to emit PM or PM10 from the source before controls. The Permittee is not required to perform compliance stack tests on the surface coating facilities for VOC and HAP emissions because there are no VOC and HAPs control devices in operation and records must be kept of all VOCs and HAPs used at the source to ensure compliance with 326 IAC 2-8, 326 IAC 8-1-6, 326 IAC 2-2, and 40 CFR 63, Subpart PPPP.

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

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

The Spray HSML and Plastic Parts Booth (EU78), the Hand Spray Plastic Parts Booth (EU79), the Upspray Machine Plastic Parts Booth (EU81), and the Robot Plastic Parts Paint Spray Booth (EU167), have applicable compliance monitoring conditions as specified below:

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (3-34, 3-35, 3-36, 3-45) while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be

considered a deviation from this permit.

The dry filters for the surface coating operations must operate properly to ensure compliance with 326 IAC 6-3-2(d) (Particulate Emission Limitations for Manufacturing Processes).

Conclusion

The operation of this stationary plastic and metal automotive parts manufacturing plant shall be subject to the conditions of the attached proposed FESOP No.: F077-21436-00003.

Indiana Department of Environmental Management Office of Air Quality

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

Source Background and Description

Source Name: Grote Industries, LLC
Source Location: 2600 Lanier Drive, Madison, Indiana 47250
County: Jefferson
SIC Code: 3647, 3231
Operation Permit No.: F077-21436-00003
Permit Reviewer: ERG/ST

On February 11, 2006, the Office of Air Quality (OAQ) had a notice published in the Madison Courier, Madison, Indiana, stating that Grote Industries, LLC had applied for a Federally Enforceable State Operating Permit (FESOP) to operate a stationary plastic and metal automotive parts manufacturing plant with control. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On March 15, 2006, Grote Industries, LLC submitted comments on the proposed FESOP. The summary of the comments is as follows. New language is shown in **bold** and deleted language is shown in ~~strikethrough~~.

Comment 1:

In Section A.3(a), emission unit EU135, exhausting to stack 1-RT10, was mistakenly included. It should be replaced with emission unit EU134, exhausting to stack 1-RT9. Stack 1-RT2 is listed twice and the first listing should be deleted. The heat input capacity of this heater (EU134) is 0.1155 MMBtu per hour and the combined total heat input capacity for all of the combustion of units should be 25.49 MMBtu per hour.

Response to Comment 1:

The following changes were made as a result of this comment:

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

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour and Propane or liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour, consisting of forty one (41) natural gas-fired space heaters, air make-up heaters, process heaters and small boilers, identified as EUs 99, 100, 101, 103 through 119, ~~134~~, ~~135~~, 137, 155, 157, 158, 159, 161, 162, 163, 165, 166, 168, 198, 202, 203, 206, 207, 208, 216, 217, and 218, with a combined maximum heat input capacity of ~~25.57~~ **25.49** MMBtu per hour, with the capability to use propane fuel as a back-up fuel, and exhausting to stacks 1-12, 1-36, 1-RT1, ~~4-RT2~~, 1-RT3, 1-RT4, 2-40, 2-9, 2-21, 2-RT1, 2-RT2, 3-27, 3-28, 3-29, 3-30, 3-MAH1, W-2, W-5, W-RT1, 1-38, 1-39, ~~1-RT9~~ ~~4-RT10~~, **[no stack]**, 1-71,

1-64, 1-65, 1-66, 1-70, 1-RT11, 2-24, 2-39, 3-15, 1-MAH-1, 2-45, 2-54, 2-55, 1-RT5, 1-RT7, **1-RT10** ~~1-RT9~~, 1-RT2, 1-RT6 and 1-RT8, respectively.

No changes have been made to the TSD because the OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Comment 2:

In the time period between source review and Public Notice, the source replaced an existing injection molding machine (EU64) with a new injection molding machine (EU223). Please correct the descriptions in Section D.2 (Facility Description), Condition D.2.1, and on pages 2 and 13 of the TSD.

Response to Comment 2:

This replacement is exempt from the permit revision requirements in 326 IAC 2-8-11.1 because the emissions are below the levels specified in 326 IAC 2-8-11.1(d)(4) and, therefore, this change does not require a minor or significant permit modification. The permit has been changed to replace the insignificant injection molding machine EU64 with a new insignificant injection molding machine EU223 as follows:

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

...

(e) Activities with potential uncontrolled emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM10; 3 lb/hr or 15 lb/day VOC; 5 lb/day or 1.0 ton/yr of a single HAP, or 12.5 lb/day 2.5 ton/yr of any combination of HAPs, consisting of:

- (1) One (1) Injection Molding Process, consisting of thirty-one (31) emission units, identified as EU57 – EU62, ~~EU64~~, EU74 – EU76, EU139 – EU142, EU169 – EU171, EU173 – EU179, EU 193, EU194, EU201, EU 204, EU205, EU214, ~~and EU220~~, **and EU223** consisting of vertical and horizontal molding using many different thermoplastic and other similar materials with a maximum capacity of 788 pounds of molded product per hour, exhausting inside the building. [326 IAC 6-3-2]

...

SECTION D.2 FACILITY OPERATION CONDITIONS

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

...

(e) Activities with potential uncontrolled emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM10; 3 lb/hr or 15 lb/day VOC; 5 lb/day or 1.0 ton/yr of a single HAP, or 12.5 lb/day 2.5 ton/yr of any combination of HAPs, consisting of:

- (1) One (1) Injection Molding Process, consisting of thirty-one (31) emission units, identified as EU57 – EU62, ~~EU64~~, EU74 – EU76, EU139 – EU142, EU169 – EU171, EU173 – EU179, EU 193, EU194, EU201, EU 204, EU205, EU214, ~~and EU220~~, **and EU223** consisting of vertical and horizontal molding using many different thermoplastic, and other similar materials with a maximum capacity of 788 pounds of molded product per hour, exhausting inside the building. [326 IAC 6-3-2]

...

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

D.2.1 Particulate [326 IAC 6-3-2]

...

- (b) Pursuant to 326 IAC 6-3-2, the particulate emissions from the following insignificant activities shall each be limited as shown in the following table:

Emission Unit Description	Emission Unit ID	Maximum Throughput (lbs/hr)	Allowable Emissions 326 IAC 6-3-2
Brazing, Cutting, Soldering, Welding	EUs 93, 95, 124, 125, 126, 127, 138, 181, 182, 183, 184, 186, 195, 196, 197, 200, and 215	150 (each)	0.723
Injection Molding	EUs 57 – 62, 64 , 74 – 76, 139 – 142, 169 – 171, 173 – 179, 193, 194, 201, 204, 205, 214, and 220, and 223	200 (each)	0.877
Plug Molders	EUs 27 – 30, 38	150 (each)	0.723
Metal Presses	EUs 4 – 10, 16 - 24	833 (each)	2.28
Belt Sanders	EUs 188 and 189	200 (each)	0.877

...

No changes have been made to the TSD because the OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Comment 3:

In Condition B.13(e), the regulatory citation for the requirements for inclusion of Preventative Maintenance Plans in a FESOP should be 326 IAC 2-8-3(c)(6).

Response to Comment 3:

The permit has been changed as follows:

B.4314 Emergency Provisions [326 IAC 2-8-12]

...

- (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)(~~b6~~) be revised in response to an emergency.

Comment 4:

In the Grote Industries Title V permit, Condition C.17(f) allows IDEM, at its discretion, to excuse failure to perform monitoring and recordkeeping if the Permittee provides adequate justification and documents that the failure does not exceed 5% of the operating time in any quarter. Grote Industries requests that this wording be included in the current permit.

Response to Comment 4:

Between the time that the source's Title V permit was issued on April 18, 2001, and when the source's FESOP was placed on Public Notice on February 11, 2006, IDEM has reconsidered the requirement to develop and follow a Compliance Response Plan. The Permittee is still required to take reasonable response steps when a compliance monitoring parameter is determined to be out of range or abnormal. The requirement to take reasonable response steps will ensure that the control equipment is returned to proper operation as soon as practicable, while still allowing the Permittee the flexibility to respond to situations that were not anticipated.

Proper monitoring of ordinary operating conditions and deviations, as required in Sections B, C and D of the permit, is necessary to ensure compliance with the FESOP limits. The applicable rules, 326 IAC 2-8-4 and 326 IAC 2-8-5, require that the Permittee provide all reasonable information to demonstrate compliance with the applicable requirements in the FESOP. The rules do not specifically allow for any gaps in required monitoring, as Grote Industries has proposed in their comment. Further, failure to perform required compliance monitoring constitutes a violation of the permit requirements, which is a violation of the Clean Air Act. Compliance monitoring conditions are in the permit in order to ensure continuous compliance with the requirements. Allowing a certain number of missed measurements would allow sporadic use of compliance monitoring, which would not accomplish the purpose of compliance monitoring. No changes were made as a result of this comment.

Comment 5:

In Condition D.1.5(b)(3), the reference to "subsection b" is ambiguous and could be construed to mean Condition D.1.5(b). Please change the term to reference Condition D.1.5(c) or the regulatory citation at 326 IAC 8-3-5(b).

Response to Comment 5:

The permit has been changed as follows:

D.1.5 Volatile Organic Compounds (VOC) [326 IAC 8-3-2] [326 IAC 8-3-5]

...

(b) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for the Closed Top Solvent-based Mask Washer (EU129), the Permittee shall ensure that the following control equipment requirements are met:

...

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in ~~subsection (b)~~ **326 IAC 8-3-5(b) (Condition D.1.5(c))**.

...

Comment 6:

Grote Industries requests that Condition D.1.6 be clarified to state that the Preventative Maintenance Plan applies only to the spray booths and not to the Mask Washer and the Cold Cleaners.

Response to Comment 6:

The Cold Cleaners (EU209, EU210, EU211, EU212, and EU213) and the Mask Washer (EU129) are not required to have a preventative maintenance plan because the VOC emissions from each of these units is small and there are no control devices in operation. The permit has been changed as follows:

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 **the spray booths (EU78, EU79, EU81, and EU167)** ~~these facilities~~ and their control devices.

Comment 7:

There are no volatile organic compound content limitations in the permit for coatings, thinners, and cleanup solvents used in the paint booths or the Mask Washer. Grote Industries requests that Condition D.1.7 be clarified to reflect this. Also, Grote Industries requests that the wording "less solvent shipped offsite" be included in the FESOP Quarterly Reporting forms in order to more accurately reflect the wording and intent in Conditions D.1.1, D.1.2, and D.1.4. Also, Column 3 of the FESOP Quarterly Report 326 IAC 8-1-6 BACT form should include the algorithm for calculating net VOC usage.

Response to Comment 7:

There are no limits on VOC content of a coating, thinner or solvent contained in the FESOP. The Permittee is required to keep records of total VOC usage. IDEM has clarified the language in Conditions D.1.1, D.1.2, and D.1.4. IDEM has added the following Compliance Determination and Record Keeping Requirements for determining and keeping records of the VOC and HAP content of any coating material and solvent waste shipped offsite. The Permittee must test each batch of waste shipped off-site for which the Permittee wants to take credit. The Permittee may, at their discretion, test some waste shipments and not others, but may only take credit for shipments that are tested. IDEM has revised the reporting forms accordingly. The permit has been changed as follows:

D.1.1 FESOP [326 IAC 2-8-4]

- (a) The total usage of VOC in the Spray HSML and Plastic Parts Booth (EU78), the Hand Spray Plastic Parts Booth (EU79), the Upspray Machine Plastic Parts Booth (EU81), the Closed Top Solvent-based Mask Washer (EU129), and the Robot Plastic Parts Paint Spray Booth (EU167), including cleanup solvents, minus **the VOC content of any coating material or solvent waste** shipped offsite, shall be limited to less than ninety (90) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Combined with other VOC emissions at the source, this condition will limit source-wide VOC emissions to less than 100 tons per year.
- (b) The total usage of a single HAP in the Spray HSML and Plastic Parts Booth (EU78), the Hand Spray Plastic Parts Booth (EU79), the Upspray Machine Plastic Parts Booth (EU81), the Closed Top Solvent-based Mask Washer (EU129), and the Robot Plastic Parts Paint Spray Booth (EU167), including cleanup solvents, minus **the single HAP content of any coating material or solvent waste** shipped offsite, shall be limited to less than nine and eight-tenths (9.8) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This condition will limit source-wide emissions of a single HAP to less than ten (10) tons per year.
- (c) The total usage of total HAPs in the Spray HSML and Plastic Parts Booth (EU78), the Hand Spray Plastic Parts Booth (EU79), the Upspray Machine Plastic Parts Booth (EU81), the Closed Top Solvent-based Mask Washer (EU129), and the Robot Plastic Parts Paint Spray Booth (EU167), including cleanup solvents, minus **the HAP content of any coating material or solvent waste** shipped offsite, shall be limited to less than twenty-four and eight tenths (24.8) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Combined with other HAP emissions at the source, this condition will limit source-wide emissions of any combination of HAPs to less than twenty-five (25) tons per year.

D.1.2 Volatile Organic Compound (VOC) Limitation [326 IAC 8-1-6][326 IAC 2-2]

Pursuant to Operating Permit T077-7670-00003, issued on April 18, 2001, the input of VOC to the plastic parts surface coating booths (EU78, EU79, EU81, and EU167), installed after January 1, 1980, shall each be limited to less than twenty-five (25) tons per twelve (12) consecutive month period including coatings, dilution solvents, and cleaning solvents minus **the VOC content of any coating material or solvent waste** shipped offsite. This usage limit is required to limit the potential to emit of VOC to less than twenty five (25) tons per twelve (12) consecutive month period from each booth. Compliance with this limit makes 326 IAC 8-1-6 (Best Available Control Technology) not applicable. Compliance with this limit also renders 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.1.4 Hazardous Air Pollutant (HAP) Limitation [326 IAC 2-4.1-1]

Pursuant to Minor Source Modification 077-11312-00003, issued on October 28, 1999, the input of hazardous air pollutants (HAPs) to the Robotic Plastic Parts Spray Paint Booth (EU 167), **including cleanup solvents, minus the HAP content of any coating material or solvent waste shipped offsite**, shall be limited to less than ten (10) tons per twelve (12) consecutive months for a single HAP and less than twenty-five (25) tons per year for any combination of HAPs. Compliance with this limit shall render 326 IAC 2-4.1-1 (New Source Toxics Control) not applicable.

D.1.7 Volatile Organic Compounds (VOC)[326 IAC 8-1-2][326 IAC 8-1-4]

(a) Compliance with the VOC ~~and HAP content~~ and usage limitations contained in Conditions D.1.1, ~~and D.1.2~~, **and D.1.4** 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. **Compliance with the VOC and HAP usage limitations contained in conditions D.1.1, D.1.2, and D.1.4 shall be demonstrated within 30 days of the end of each month.**

(b) **Each time credit is taken for waste shipped off-site, the Permittee shall determine the VOC, single HAP and total HAP content of the combined coating material and solvent waste shipped off-site pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by EPA Reference Method 24 and the sampling procedures in 326 IAC 8-1-4 or other methods as approved by the Commissioner. If a shipment consists of separate containers, the Permittee shall sample each container. The testing shall be conducted in accordance with Section C - Performance Testing, except for notifying IDEM of the test in paragraph (a), all of paragraph (b), and all of paragraph (c).**

(c) **Each time credit is taken for waste shipped off-site, compliance with the VOC and HAP usage limitations contained in conditions D.1.1, D.1.2, and D.1.4 shall be based on the total VOC/HAP used for the previous month, minus the VOC/HAP shipped off-site during that same month, and adding it to the previous 11 months total VOC/HAP usage, minus the VOC/HAP shipped off-site during that same period, so as to arrive at VOC/HAP emissions for the most recent twelve (12) consecutive month period.**

(1) **For the VOC limits in Conditions D.1.1 and D.1.2, the VOC emissions for a month can be arrived at using the following equation:**

$$\text{VOC emitted} = \text{VOC}_U - \text{VOC}_R$$

Where

VOC_U = The total amount of VOC, in tons, delivered to the coating applicators, including coatings, dilution solvents, and cleaning solvents; and

VOC_R = The total amount of VOC, in tons, shipped off-site, including coatings, dilution solvents, and cleaning solvents.

- (2) For the HAP limits in Conditions D.1.1 and D.1.4, the HAP emissions for a month can be arrived at using the following equation:

$$\text{HAP emitted} = \text{HAP}_U - \text{HAP}_R$$

Where

HAP_U = The total amount of HAP, in tons, delivered to the coating applicators, including coatings, dilution solvents, and cleaning solvents; and

HAP_R = The total amount of HAP, in tons, shipped off-site, including coatings, dilution solvents, and cleaning solvents.

D.1.9 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1, D.1.2, and D.1.4, **and D.1.7(a)**, the Permittee shall maintain records in accordance with (1) through (5) below **when taking no credit for the VOC and HAP content of any coating material or solvent waste shipped off-site**. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limits and the HAP emission limits, **and the compliance determination requirements** established in Conditions D.1.1, D.1.2, and D.1.4, **and D.1.7(a)**. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The amount, VOC content and HAP content of each coating material and solvent used, on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;
- ~~(2) The quantity of cleanup solvent shipped offsite each month. Non-VOC waste shall not be commingled with VOC and/or HAP containing waste, if the VOC and/or HAP content of waste shipped offsite is deducted from the reported monthly VOC and/or HAP usage.~~
- ~~(3) 2~~ The total VOC and HAP usage for each month; and
- ~~(4) 3~~ The weight of VOCs and HAPs emitted for each compliance period.
- ~~(5) The results of the laboratory analysis of the VOC and HAP content of the solvent collected and drummed for disposal offsite. A representative sample of the solvent to be shipped offsite shall be analyzed for each waste shipment if the solvent VOC and HAP content is deducted from the monthly VOC and HAP usage reported.~~
- (b) To document compliance with Conditions D.1.1, D.1.2, D.1.4, D.1.7(a), D.1.7(b), and D.1.7(c), the Permittee shall maintain records in accordance with (1) through (5) below **when taking credit for the VOC and HAP content of any coating material or solvent waste shipped off-site**. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limits, the HAP emission limits, and the compliance determination requirements established in Conditions D.1.1, D.1.2, D.1.4, D.1.7(a), D.1.7(b), and D.1.7(c). Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

- (1) **The amount, VOC content and HAP content of each coating material and solvent used, on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;**
 - (2) **The quantity of coating material and solvent waste shipped offsite each month. Non-VOC waste shall not be commingled with VOC and/or HAP containing waste, if the VOC and/or HAP content of waste shipped offsite is deducted from the reported monthly VOC and/or HAP usage;**
 - (3) **The total VOC and HAP usage for each month;**
 - (4) **The weight of VOCs and HAPs emitted for each compliance period; and**
 - (5) **The results of the laboratory analysis of the VOC and HAP content of the coating material and solvent waste collected and drummed for disposal offsite. A representative sample of the waste to be shipped offsite shall be analyzed for each waste shipment if the waste VOC and HAP content is deducted from the monthly VOC and HAP usage reported.**
- (b c) To document compliance with Condition D.1.8, the Permittee shall maintain a log of weekly overspray observations and daily and monthly inspections.
- (e d) 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
COMPLIANCE DATA SECTION**

FESOP Quarterly Report

Source Name: Grote Industries, LLC
Source Address: 2600 Lanier Drive, Madison, Indiana 47250
Mailing Address: 2600 Lanier Drive, Madison, Indiana 47250
FESOP No.: F077-21436-00003
Facility: Surface Coating (EU78, EU79, EU81, EU167), and Mask Washer (EU129)
Parameter: Total VOC Usage, including cleanup solvents, **less coating material and solvent waste shipped offsite.**
Limit: Less than ninety (90) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

...

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

FESOP Quarterly Report

Source Name: Grote Industries, LLC
Source Address: 2600 Lanier Drive, Madison, Indiana 47250
Mailing Address: 2600 Lanier Drive, Madison, Indiana 47250
FESOP No.: F077-21436-00003

Facility: Surface Coating (EU78, EU79, EU81, EU167), and Mask Washer (EU129)
 Parameter: Total Single HAP Usage, **less coating material and solvent waste shipped offsite.**
 Limit: Less than nine and eight-tenths (9.8) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

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

FESOP Quarterly Report

Source Name: Grote Industries, LLC
 Source Address: 2600 Lanier Drive, Madison, Indiana 47250
 Mailing Address: 2600 Lanier Drive, Madison, Indiana 47250
 FESOP No.: F077-21436-00003
 Facility: Surface Coating (EU78, EU79, EU81, EU167), and Mask Washer (EU129)
 Parameter: Total Combination of HAPs Usage, **less coating material and solvent waste shipped offsite.**
 Limit: Less than twenty-four and eight tenths (24.8) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

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

FESOP Quarterly Report - 326 IAC 8-1-6 BACT

Source Name: Grote Industries, LLC
 Source Address: 2600 Lanier Drive, Madison, Indiana 47250
 Mailing Address: 2600 Lanier Drive, Madison, Indiana 47250
 FESOP No.: F077-21436-00003
 Facility: Surface Coating Booths EU78, EU79, EU81 and EU167
 Parameter: VOC, including coatings and solvents, less **coating material and solvent waste** shipped offsite.
 Limit: Each less than twenty-five (25) tons per twelve consecutive month period, with compliance determined at the end of each month.

YEAR: _____

Month	Column 1	Column 2	Column 3 Column 3 = Col. 1- Col. 2	Column 4	Column 5 = Columns 3+4
	Total VOC This Month	VOC Drummed for Offsite Disposal	Net VOC Usage This Month	Net VOC Usage Previous 11 Months	12 Month Total
Month 1: EU78					
Month 1: EU79					
Month 1: EU81					
Month 1: EU167					
Month 2: EU78					
Month 2: EU79					

Month 2: EU81					
Month 2: EU167					
Month 3: EU78					
Month 3: EU79					
Month 3: EU81					
Month 3: EU167					

Comment 8:

In Condition D.1.7, Grote Industries requests clarification on the requirements to prepare or obtain from the manufacturer the “as applied” VOC data sheets. Grote currently employs daily log sheets that indicate the amount of coatings and thinners used at each booth. Grote believes that these records would suffice for the “as applied” VOC data sheets.

Response to Comment 8:

Condition D.1.7 requires that the Permittee either: prepare the “as applied” VOC data sheets, or, obtain the “as applied” VOC data sheets from the manufacturer of the coatings. As the Permittee has indicated that they thin the coatings onsite, it is appropriate that the Permittee prepare the “as applied” VOC data sheets. The records kept by the Permittee must be sufficient to establish compliance with the limits in Conditions D.1.1, D.1.2, and D.1.4. No changes have been made as a result of this comment.

Comment 9:

Grote Industries permanently removed the metal surface coating booths in December 2003. The requirements for the metal surface coating booths were removed from the Title V permit in Administrative Amendment 077-18461-00003, issued on January 21, 2004. This affects the History and Existing Approvals sections of the TSD on pages 1 and 4, respectively.

Response to Comment 9:

The History section of the TSD that was placed on Public Notice states that “On July 12, 2005, the source submitted an application to renew their operating permit and requesting to transition to FESOP status. The application also stated that the metal surface coating booths listed in Section D.2 of their current Title V permit have been removed.” The Existing Approvals section of the TSD that was placed on Public Notice states that “ All conditions from previous approvals were incorporated into this FESOP except the emission limits on metal surface coating booths in Section D.2 of T007-7670-00003 are removed, as the metal surface coating booths have been removed.” The TSD sufficiently documents that the metal surface coating booths have been permanently removed from the source.

No changes have been made to the TSD because the OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Comment 10:

In the Potential To Emit After Issuance table on page 5 of the TSD, The HAP methyl isobutyl ketone (MIBK) should be listed in the table, and not MIK. This change should also be made in Appendix A, page 2.

Response to Comment 10:

The proper abbreviation for methyl isobutyl ketone is MIBK and not MIK. The Potential To Emit After Issuance table on page 5 of the TSD should read "MIBK" and not "MIK". Appendix A to this TSD Addendum (Emission Calculation spread sheets) has been included to show this change. No changes have been made to the TSD because the OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Comment 11:

Emission unit EU163 is a hot water heater with capacity less than 120 gallons and is exempt from the requirements of 40 CFR 63, Subpart DDDDD, pursuant to 40 CFR 63.7491(h). This emissions unit provides hot water for the employee washrooms at the plant. Emission unit EU161 is an existing small hot water boiler and is exempt from the requirements of 40 CFR 63, Subpart DDDDD, pursuant to 40 CFR 63.7506(c)(3). This emissions unit heats and circulates hot water for building comfort heat, and it is designed such that it cannot heat water to the boiling point. Therefore, Grote Industries requests that these two (2) insignificant combustion units (EU161 and EU163) be deleted from the discussion under the Federal Rule Applicability, item (i) on page 7 of the TSD, or that this section be revised accordingly.

Response to Comment 11:

The applicability of the NSPS and NESHAP are discussed for all emission units located at a source to which the NSPS and/or NESHAP may be applicable, and the reasons are stated for why the rules do or do not apply to that emission unit. These insignificant combustion units (a hot water heater and a small boiler) are exempt from the NESHAP requirements, pursuant to 40 CFR 63.7485, because these emission units are not located at a major source of HAP as defined in §63.2. Therefore, this source is not subject to 40 CFR 63, Subpart DDDDD. In addition, the emission unit identified as EU163 meets the definition of a hot water heater in 40 CFR 63.7575 because this is a vessel "with a capacity of no more than 120 U.S. gallons in which water is heated by combustion of gaseous or liquid fuel and is withdrawn for use external to the vessel at pressures not exceeding 160 psig, including the apparatus by which the heat is generated and all controls and devices necessary to prevent water temperatures from exceeding 210°F." Pursuant to 40 CFR 63.4791(h) and 40 CFR 63.7575, hot water heaters are exempt from regulation under the NESHAP. Therefore, these units are not subject to 40 CFR 63, Subpart DDDDD. The emission unit identified as EU161 meets the definition of a boiler in 40 CFR 63.7575 because it is "an enclosed device using controlled flame combustion and having the primary purpose of recovering thermal energy in the form of steam or hot water." Pursuant to 40 CFR 63.7506(c)(3), existing small gaseous-fueled boilers are exempt from regulation under the NESHAP. To clarify the true nature and status of these emission units, the permit has been changed as follows:

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

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour and Propane or liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour, consisting of forty one (41) natural gas-fired space heaters, air make-up heaters, process heaters, and a small boilers and a small hot water heater, identified as EUs 99, 100, 101, 103 through 119, 134 435, 137, 155, 157, 158, 159, 161, 162, 163, 165, 166, 168, 198, 202, 203, 206, 207, 208, 216, 217, and 218, with a combined maximum heat input capacity of ~~25.57~~ **25.49** MMBtu per hour, with the capability to use propane fuel as a back-up fuel, and exhausting to stacks 1-12, 1-36, 1-RT1, ~~4-RT2~~, 1-RT3, 1-RT4, 2-40, 2-9, 2-21, 2-RT1, 2-RT2, 3-27, 3-28, 3-29, 3-30, 3-MAH1, W-2, W-5, W-RT1, 1-38, 1-39, 1-

~~RT9~~ ~~RT10~~, [no stack], 1-71, 1-64, 1-65, 1-66, 1-70, 1-RT11, 2-24, 2-39, 3-15, 1-MAH-1, 2-45, 2-54, 2-55, 1-RT5, 1-RT7, **1-RT10** ~~1-RT9~~, 1-RT2, 1-RT6 and 1-RT8, respectively.

No changes have been made to the TSD because the OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Comment 12:

Internal combustion engines with a capacity less than 500 horsepower are exempt from the requirements of 40 CFR 63, Subpart ZZZZ per 40 CFR 63.6590(a). The emergency generator has a capacity of 168 horsepower. Therefore, Grote Industries requests that the discussion under Federal Rule Applicability, item (j) on page 7 of the TSD, be deleted or revised accordingly.

Response to Comment 12:

The applicability of the NSPS and NESHAP are discussed for all emission units located at a source to which the NSPS and/or NESHAP may be applicable, and the reasons are stated why the rules apply or do not apply to that emission unit. This internal combustion engine is not subject to the NESHAP requirements, pursuant to 40 CFR 63.6585, because this reciprocating internal combustion engine (RICE) is not located at a major source of HAP as defined in §63.2. In addition, pursuant to 40 CFR 63.6590, this existing 168 horsepower emergency generator is not an affected source, because it has a site-rating of less than 500 brake horsepower.

No changes have been made to the TSD because the OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Comment 13:

In the State Rule Applicability - Entire Source section of the TSD, the discussion of PSD applicability should be corrected as follows: Replace the (2) paragraphs starting with "The operation for surface and "In 1984, the source..." with the following:

"The surface coating of automotive parts started at this source in 1970 when the facility was converted from making medicine cabinets to automotive parts. The source is located in Madison Township in Jefferson County. In 1976, the source constructed three (3) spray booths for coating metal parts (EU82, EU83, and EU84). In 1984, the metal framing of the spray booths was changed but the spraying equipment was not changed. There was no change in the potential to emit of the metal spray booths; therefore, they were still regulated under the rules in place in 1976. The VOC usage in the entire metal spraying operation was limited to less than one-hundred (100) tons per twelve month period in order to make the requirements of 326 IAC 8-6-2 not applicable. The potential to emit of the entire source for PM, PM10, VOC, NOX, SO2 and CO, after limits was less than 250 tons per year. The source was a minor source under PSD at the time of the promulgation of the PSD rules. The metal spray booth operation consisting of emission units (EU82, EU83, and EU84) was removed in 2003.

In 1983, the source added one (1) spray booth for coating plastic parts (EU78). The source accepted limits on VOC usage in the plastic spray booth of less than 25 tons per year in order to make the requirements of 326 IAC 8-1-6 and 326 IAC 2-2 not applicable. [See State Rule Applicability - Individual Facilities: 326 IAC 8-1-6 for a discussion of the limits for EU78]. This modification did not trigger PSD review because the increase in potential to emit of VOC and PM/PM10 due to the modification was less than 250 tons per year. After the modification, the potential to emit of the entire source for PM, PM10, VOC, NOX, SO2, and CO after limits was

less than 250 tons per year. The source remained a minor source under PSD after this modification.”

Response to Comment 13:

IDEM agrees with the corrections and clarifications provided by Grote in this comment regarding the applicability of 326 IAC 2-2(PSD). However, no changes have been made to the TSD because the OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Comment 14:

In the State Rule Applicability – Entire Source section, on page 9 of the TSD, revise the discussion of particulate matter to specify that the Mask Washer (EU129) does not create particulate matter.

Response to Comment 14:

The first full paragraph on page 9 of the TSD states, “In 1994, the source added one (1) Solvent-based Mask Washer for cleaning parts (EU129). This modification did not trigger PSD review because the increase in potential to emit of VOC due to the modification (22.6 tons per year) was less than 250 tons per year and the increase in potential to emit of PM/PM10 due to the modification was less than 250 tons per year. ...”

The phrase “... and the increase in potential to emit of PM/PM10 due to the modification was less than 250 tons per year” should not have been included in this discussion because the Mask Washer (EU129) has no potential to emit particulates.

No changes have been made to the TSD because the OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Comment 15:

Grote Industries requests clarification on the requirement to submit an Annual Emissions Statement (AES) for 2006. As a Title V facility, Grote Industries is currently required to submit an AES to IDEM by July 1, 2006. It is our understanding that, if the FESOP is issued prior to the July 1, 2006 deadline for submitting the AES, then Grote Industries would be relieved of the requirement to submit this report.

Response to Comment 15:

The Permittee is required to comply with the terms and conditions of the permit that is currently in effect. On the date that the FESOP is issued, the Permittee will no longer be required to submit an Annual Emission Statement per Condition C.19 of their current Title V Operating Permit (T077-7670-00003).

Comment 16:

Methyl Ethyl Ketone was de-listed as a HAP by USEPA on December 19, 2005 (FR 75047). Grote Industries requests clarification on whether Methyl Ethyl Ketone should be considered a HAP for emission recordkeeping and reporting required by the FESOP conditions.

Response to Comment 16:

Methyl Ethyl Ketone is no longer defined as a HAP by U.S.EPA and IDEM. MEK emissions should not be considered a HAP when determining compliance with the FESOP HAP limits.

OAQ Changes:

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, if applicable, to reflect these changes.

1. IDEM has moved the Permit No Defense condition to the Title page of the permit. Conditions in Section B have been renumbered to reflect this change.

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

Grote Industries, LLC
2600 Lanier Drive
Madison, Indiana 47250

(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.

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.

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.

~~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.~~

2. The following Section B conditions have been revised, deleted or added to the permit to clarify the permit and condition terms and rules cites have been updated. Section B has been renumbered as necessary.

B.32 Permit Term [326 IAC 2-8-4(2)] [326 IAC 2-1.1-9.5] [IC 13-15-3-6(a)] [326 IAC 2-8-3(h)]

- (a) This permit, **F077-21436-00003**, 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 **of this permit**.

- (b) **If IDEM, OAQ, upon receiving a timely and complete renewal 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.**

B.3 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) **the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or**

- (b) **the emission unit to which the condition pertains permanently ceases operation.**

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

...

- (b) ~~Timely Submittal of Permit Renewal [326 IAC 2-8-3]~~
 - (1) A timely renewal application is one that is:
 - (A)(1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

 - (B)(2) 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.

- 3. IDEM has decided to remove (d) concerning nonroad engines from B.17 Permit Amendment or Modification. 40 CFR 89, Appendix A specifically indicates that states are not precluded from regulating the use and operation of nonroad engines, such as regulations on hours of usage, daily mass emission limits, or sulfur limits on fuel; nor are permits regulating such operations precluded, once the engine is no longer new.

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

...

~~(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.~~

4. In IDEM Nonrule Policy Documents, a table is given as an example for how sources can submit annual compliance certifications. B.11 Annual Compliance Certification is being revised to remove "in letter form" so that it does not contradict the guidance.

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

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

5. The title of Condition B.19 has been updated to more accurately reflect the intent of the condition.

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

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC ~~2-7-10-52-8-11.1~~.

6. The phone number and the fax number listed in Condition B.13 Emergency Provisions and on the Emergency Occurrence Report have been corrected.

B.13 Emergency Provisions [326 IAC 2-7-16]

...

(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:

...

- (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;

IDEM:

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

Telephone No.: 317-233-~~5674~~**0178** (ask for Compliance Section)

Facsimile No.: 317-233-~~5967~~**6865**

...

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
Indianapolis, Indiana 46204-2251
Phone: 317-233-~~5674~~ 0178
Fax: 317-233-~~5967~~ 6865**

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

Source Name: Grote Industries, LLC
Source Address: 2600 Lanier Drive, Madison, Indiana 47250
Mailing Address: 2600 Lanier Drive, Madison, Indiana 47250
FESOP No.: F077-21436-00003

This form consists of 2 pages

Page 1 of 2

9 This is an emergency as defined in 326 IAC 2-7-1(12)
9The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-~~5674~~**0178**, ask for Compliance Section); and
9The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-~~5967~~**6865**), and follow the other requirements of 326 IAC 2-7-16.

7. Upon further review, IDEM has decided to move Condition A.5 to Section B of the permit, in order to include it in a section with similar requirements. The Permit as been changed as follows:

A.5B.24 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of ~~previous~~ permits **established prior to F077-21436-00003** and issued pursuant to permitting programs approved into the state implementation plan have been either
- (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

8. IDEM has made the following change to clarify Condition B.18.

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

- (a) ...
- (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.

Appendix A: Emissions Calculations
VOC and Particulate Emissions from Surface Coating Operations

Company Name: Grote Industries, LLC
Address: 2600 Lanier Drive, Madison, Indiana 46250
FESOP: 077-21436-00003
Reviewer: ERG/ST
Date: December 13, 2005

Booth	Material	Density (lb/gal)	Weight % Volatile (H ₂ O & Organics)	Weight % Water	Weight % Organics	Weight % Solids	Max. Usage (gal/unit)	Maximum Throughput (unit/hour)	PTE VOC (tons/year)	Transfer Efficiency	PTE PM/PM10 Uncontrolled (tons/year)	Control Efficiency	PTE PM/PM10 Controlled (tons/year)
HMSL and Plastic (EU78)	Aluminum AE3001	8.17	54.8%	0.0%	54.8%	45.2%	0.0020	1441	56.5	75%	11.7	80%	2.33
	Aluminum MW-L293	7.40	73.8%	0.0%	73.8%	26.2%	0.0082	356	69.8	75%	6.20	80%	1.24
	Aluminum MO-L376	7.96	63.1%	0.0%	63.1%	37.0%	0.0025	800	44.0	75%	6.44	80%	1.29
	Gray Primer	9.05	50.9%	0.0%	50.9%	49.1%	0.0181	184	67.2	75%	16.2	80%	3.24
	Med. Parchment	7.65	75.1%	0.0%	75.1%	25.0%	0.0052	649	84.9	75%	7.05	80%	1.41
	Midnight Black	7.58	61.1%	0.0%	61.1%	39.0%	0.0137	300	83.3	75%	13.3	80%	2.66
	Light Flint	9.73	60.3%	48.2%	12.1%	39.7%	0.0068	481	16.9	75%	13.8	80%	2.77
	Basecoat Silver	7.41	85.5%	0.0%	85.5%	14.5%	0.0036	540	53.9	75%	2.29	80%	0.46
	Clearcoat	7.62	72.4%	0.0%	72.4%	27.6%	0.0036	540	46.9	75%	4.48	80%	0.90
	Light Camel	9.66	61.2%	49.2%	12.0%	38.9%	0.0052	481	12.7	75%	10.3	80%	2.06
Charcoal Black	8.80	69.4%	55.0%	14.3%	30.6%	0.0059	481	15.7	75%	8.38	80%	1.68	
Medium Light Stone	9.54	60.0%	48.8%	11.2%	40.0%	0.0068	481	15.3	75%	13.7	80%	2.7	
Hand Spray (EU79)	Black Lacquer	7.71	73.4%	0.0%	73.4%	26.6%	0.0044	30	3.27	75%	0.30	80%	0.06
	Black Lacquer	7.71	73.4%	0.0%	73.4%	26.6%	0.0044	35	3.82	75%	0.35	80%	0.07
	Black Lacquer	7.71	73.4%	0.0%	73.4%	26.6%	0.0005	106	1.31	75%	0.12	80%	0.02
	Argent 51641 W 7E	7.39	79.9%	0.0%	79.9%	20.1%	0.0022	40	2.28	75%	0.14	80%	0.03
	Whiteout Primer	7.99	73.3%	0.0%	73.3%	26.7%	0.0036	40	3.70	75%	0.34	80%	0.07
Upspray (EU81)	Aluminum	8.17	54.8%	0.0%	54.8%	45.2%	0.0025	300	14.7	75%	3.04	80%	0.61
	UN - 1263	7.50	68.5%	0.0%	68.5%	31.5%	0.0018	300	12.1	75%	1.40	80%	0.28
Mask Washer (EU129)	Solvent 2230	7.05	100%	0.0%	100%	0.0%	0.0073	100	22.6	NA	NA	NA	NA
Robot (EU167)	Black Lacquer	8.81	60.1%	0.0%	60.1%	39.9%	0.0060	75	10.4	75%	1.73	80%	0.35
	Ebony	7.66	78.4%	0.0%	78.4%	21.6%	0.0020	100	5.26	75%	0.36	80%	0.07
	White Lacquer	9.35	51.7%	0.0%	51.7%	48.3%	0.0020	300	12.7	75%	2.97	80%	0.59
Worst Case Totals									139		22.6		4.5

Worst case emissions for each booth are bolded.

Note: A "piece" or "unit" will vary in size. PTE calculations are based on worst case scenarios, or the type of work piece/unit and coating that will result in the highest use of VOC per unit time for a particular spray booth.

METHODOLOGY

PTE VOC (tons/year) = Density (lbs/gal) x Weight % Organics x Max. Usage (gals/unit) x Max. Throughput (units/hour) x 8760 (hours/year) x 1 ton/2000 lbs

PTE PM/PM10 Uncontrolled (tons/yer) = Density (lbs/gal) x Weight % Solids x Max. Usage (gals/unit) x Max. Throughput (units/hour) x (1- Transfer Efficiency (%)) x 8760 (hours/year) x 1 ton/2000 lbs

PTE PM/PM10 Controlled (tons/year) = Density (lbs/gal) x Weight % Solids x Max. Usage (gals/unit) x Max. Throughput (units/hour) x (1- Transfer Efficiency (%)) x (1-Control Efficiency (%)) x 8760 (hours/year) x 1 ton/2000 lbs

Appendix A: Emission Calculations
HAP Emissions From Surface Coating Operations

Company Name: Grote Industries, LLC
Address: 2600 Lanier Drive, Madison, Indiana 46250
Permit Number: 077-21436-00003
Reviewer: ERG/ST
Date: December 13, 2005

Booth	Material	Density (lbs/gal)	Max. Usage (gal/unit)	Maximum Throughput (units/hour)	Weight % Xylene	Weight % Toluene	Weight % MEK	Weight % MIK	Weight % EGME	Weight % Naphthalene	Weight % Ethylbenzene
HMSL and Plastic (EU78)	Aluminum AE3001	8.17	0.0020	1441	35.0%	0.0%	0.0%	0.0%	0.0%	10.0%	10.0%
	Aluminum MW-L293	7.40	0.0082	356	2.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
	Aluminum MO-L376	7.96	0.0025	800	27.0%	31.0%	0.0%	0.0%	0.0%	0.0%	3.0%
	Gray Primer	9.05	0.0181	184	3.0%	0.0%	2.0%	0.0%	0.0%	0.0%	0.8%
	Med. Parchment	7.65	0.0052	649	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
	Midnight Black	7.58	0.0137	300	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
	Light Flint	9.73	0.0068	481	0.0%	0.0%	0.0%	0.0%	5.0%	0.0%	0.0%
	Basecoat Silver	7.41	0.0036	540	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.2%
	Clearcoat	7.62	0.0036	540	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
	Light Camel	9.66	0.0052	481	0.0%	0.0%	0.0%	0.0%	4.4%	0.0%	0.0%
Charcoal Black	8.80	0.0059	481	0.0%	0.0%	0.0%	0.0%	4.8%	0.0%	0.0%	
Medium Light Stone	9.54	0.0068	481	0.0%	0.0%	0.0%	0.0%	4.3%	0.0%	0.0%	
Hand Spray (EU79)	Black Lacquer	7.71	0.0044	30	50.8%	12.4%	0.0%	0.0%	0.0%	0.0%	0.0%
	Black Lacquer	7.71	0.0044	35	50.8%	12.4%	0.0%	0.0%	0.0%	0.0%	0.0%
	Black Lacquer	7.71	0.0005	106	50.8%	12.4%	0.0%	0.0%	0.0%	0.0%	0.0%
	Argent 51641 W 7E	7.39	0.0022	40	10.0%	10.0%	20.0%	0.0%	10.0%	0.0%	5.0%
	Whiteout Primer	7.99	0.0036	40	1.0%	20.0%	40.0%	0.0%	0.0%	0.0%	0.0%
Upspray (EU81)	Aluminum	8.17	0.0025	300	35.0%	0.0%	0.0%	0.0%	0.0%	1.0%	10.0%
	UN - 1263	7.50	0.0018	300	28.0%	36.0%	0.0%	0.0%	0.0%	0.0%	3.2%
Mask Washer (EU129)	Solvent 2230	7.05	0.0073	100	0.0%	70.0%	0.0%	10.0%	0.0%	0.0%	0.0%
Robot (EU167)	Black Lacquer	8.81	0.0060	75	26.9%	23.1%	0.0%	0.0%	0.0%	0.0%	0.0%
	Ebony	7.66	0.0020	100	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
	White Lacquer	9.35	0.0020	300	0.0%	1.0%	0.0%	0.0%	0.0%	0.0%	0.0%

Booth	Material	Density (lbs/gal)	Max. Usage (gal/unit)	Maximum Throughput (units/hour)	PTE Xylene (tons/year)	PTE Toluene (tons/year)	PTE MEK (tons/year)	PTE MIK (tons/year)	PTE EGME (tons/year)	PTE Naphthalene (tons/year)	PTE Ethylbenzene (tons/year)
HMSL and Plastic (EU78)	Aluminum AE3001	8.17	0.0020	1441	36.1	0.00	0.00	0.00	0.00	10.3	10.3
	Aluminum MW-L293	7.40	0.0082	356	1.89	0.00	0.00	0.00	0.00	0.00	0.00
	Aluminum MO-L376	7.96	0.0025	800	18.8	21.6	0.00	0.00	0.00	0.00	2.09
	Gray Primer	9.05	0.0181	184	3.96	0.00	2.64	0.00	0.00	0.00	1.06
	Med. Parchment	7.65	0.0052	649	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Midnight Black	7.58	0.0137	300	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Light Flint	9.73	0.0068	481	0.00	0.00	0.00	0.00	6.97	0.00	0.00
	Basecoat Silver	7.41	0.0036	540	0.00	0.00	0.00	0.00	0.00	0.00	0.13
	Clearcoat	7.62	0.0036	540	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Light Camel	9.66	0.0052	481	0.00	0.00	0.00	0.00	4.66	0.00	0.00
Charcoal Black	8.80	0.0059	481	0.00	0.00	0.00	0.00	5.22	0.00	0.00	
Medium Light Stone	9.54	0.0068	481	0.00	0.00	0.00	0.00	5.81	0.00	0.00	
Hand Spray (EU79)	Black Lacquer	7.71	0.0044	30	2.26	0.55	0.00	0.00	0.00	0.00	0.00
	Black Lacquer	7.71	0.0044	35	2.64	0.64	0.00	0.00	0.00	0.00	0.00
	Black Lacquer	7.71	0.0005	106	0.91	0.22	0.00	0.00	0.00	0.00	0.00
	Argent 51641 W 7E	7.39	0.0022	40	0.28	0.28	0.57	0.00	0.28	0.00	0.14
	Whiteout Primer	7.99	0.0036	40	0.05	1.01	2.02	0.00	0.00	0.00	0.00
Upspray (EU81)	Aluminum	8.17	0.0025	300	9.39	0.00	0.00	0.00	0.00	0.27	2.68
	UN - 1263	7.50	0.0018	300	4.97	6.39	0.00	0.00	0.00	0.00	0.56
Mask Washer (EU129)	Solvent 2230	7.05	0.0073	100	0.00	15.8	0.00	2.26	0.00	0.00	0.00
Robot (EU167)	Black Lacquer	8.81	0.0060	75	4.67	4.01	0.00	0.00	0.00	0.00	0.00
	Ebony	7.66	0.0020	100	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	White Lacquer	9.35	0.0020	300	0.00	0.25	0.00	0.00	0.00	0.00	0.00
Worst Case Material Totals					52.8	20.4	0.00	2.26	0.00	10.6	13.0
Worst Case Individual HAP Totals					52.8	48.4	4.66	2.26	7.25	10.6	13.1

Worst Case Materials Totals represents the greatest possible potential to emit for a combination of HAPs.

Worst Case Individual HAP Totals represents the greatest possible potential to emit for each individual HAP.

Note: A "piece" or "unit" will vary in size. PTE calculations are based on worst case scenarios, or the type of work piece/unit and coating that will result in the highest use of VOC per unit time for a particular spray booth.

METHODOLOGY

PTE HAPS (tons/year) = Density (lbs/gal) x Max. Usage (gal/unit) x Max. Throughput (units/hour) x Weight % HAP x 8760 (hours/year) x 1 ton/2000 lbs

Appendix A: Emissions Calculations
Natural Gas Fired Space Heaters, Air Make-up Units and Process Heaters

Company Name: Grote Industries, LLC
Address: 2600 Lanier Drive, Madison, Indiana 46250
FESOP: 077-21436-00003
Reviewer: ERG/ST
Date: December 13, 2005

Heat Input Capacity (MMBtu/hr)	Maximum Potential Throughput (MMCF/yr)
25.57	224.0

Emission Factors (lbs/MMCF)						
PM*	PM10*	SO ₂	NO _x **	CO	VOC	HAPs
7.6	7.6	0.6	100	84.0	5.5	0.09

Potential To Emit (tons/yr)						
PM	PM10	SO ₂	NO _x	CO	VOC	HAPs
0.85	0.85	0.07	11.20	9.41	0.62	0.010

* PM and PM10 emission factor are for condensible and filterable PM and PM10 combined.

**Emission factor for NOx: Uncontrolled = 100 lb/MMCF

Emission factors are from AP-42, Chapter 1.4 - Natural Gas Combustion, Tables 1.4-1, 1.4-2, 1.4-3 and 1.4-4. SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03. (AP-42 Supplement D 7/98)

1 MMBtu = 1,000,000 Btu

1 MMCF = 1,000,000 cubic feet of gas

All emission factors are based on normal firing.

Methodology

Max. Potential Throughput (MMCF/year) = Heat Input Capacity (MMBtu/hour) x 8,760 (hours/year) x 1 MMCF/1,000 MMBtu

PTE (tons/year) = Max. Potential Throughput (MMCF/year) x Emission Factor (lbs/MMCF) x 1 ton/2,000 lbs

**Appendix A: Emissions Calculations
Propane Fired Space Heaters, Air Make-up Units and Process Heaters**

Company Name: Grote Industries, LLC
Address: 2600 Lanier Drive, Madison, Indiana 46250
FESOP: 077-21436-00003
Reviewer: ERG/ST
Date: December 13, 2005

Heat Input Capacity (MMBtu/hr)	Maximum Potential Throughput (1,000 gal/yr)
25.57	2,475

Emission Factors (lbs/1,000 gal)					
PM*	PM10*	SO ₂	NO _x **	CO	VOC
0.4	0.4	0.016	14	1.9	0.5

Potential To Emit (tons/yr)					
PM	PM10	SO ₂	NO _x	CO	VOC
0.50	0.50	0.020	17.33	2.35	0.62

Emission factors are from AP-42, Chapter 1.5 - Emission Factors for LPG Combustion, Table 1.5-1, SCC #1-03-010-02, (AP-42 Supplement B

1 MMBtu = 1,000,000 Btu

1,000 gallons Propane = 90.5 MMBtu

All emission factors are based on normal firing.

Methodology

Max. Potential Throughput (1,000 gal/year) = Heat Input Capacity (MMBtu/hour) x 8,760 (hours/year) x 1,000 gals/90.5 MMBtu

PTE (tons/year) = Max. Potential Throughput (1,000 gals/year) x Emission Factor (lbs/1,000 gal) x 1 ton/2,000 lbs

Appendix A: Emission Calculations
Internal Combustion Engine - One (1) Diesel Emergency Generator

Company Name: Grote Industries, LLC
Address: 2600 Lanier Drive, Madison, Indiana 46250
FESOP: 077-21436-00003
Reviewer: ERG/ST
Date: December 13, 2005

Power Output Horse Power (HP)
168

Operation Limit hr/yr
500

S = Weight % Sulfur
0.5

Emission Factor in lb/HP-hr (>600 hp)	Pollutant					
	PM*	PM10*	SO ₂	NO _x	**VOC	CO
	7.00E-04	7.00E-04	4.05E-03 (8.09E-03*S)	2.40E-02	7.05E-04	5.50E-03
Potential to Emit in tons/yr	0.03	0.03	0.17	1.01	0.03	0.23

*Assume PM10 emissions are equal to PM emissions.

** Assume TOC (total organic compounds) emissions are equal to VOC emissions.

Emission factors are from AP-42, Table 3.4-1, SCC #2-02-004-01 (AP-42, 10/96).

Note: As defined in the September 6, 1995 memorandum from John S. Seitz of US EPA on the subject of "Calculating Potential to Emit for Emergency Generators", an emergency generator's sole function is to provide back-up power when power from the local utility is interrupted. The only circumstances under which an emergency generator would operate when utility power is available are during operator training or brief maintenance checks. The generator's potential to emit is based on an operating time of 500 hours per year as set forth in the EPA memo.

Methodology

PTE (tons/yr) = Power Output (HP) x Emission Factor (lb/HP-hr) x Operation Limit (hr/yr) x 1 ton/2000 lbs

Appendix A: Emission Calculations
Particulate Emissions from Grinding and Machining Operations

Company Name: Grote Industries, LLC
Address: 2600 Lanier Drive, Madison, Indiana 46250
FESOP: 077-21436-00003
Reviewer: ERG/ST
Date: December 13, 2005

Unit ID	Control Device	Outlet Grain Loading (gr/dscf)	Maximum Air Flow Rate (scfm)	Control Efficiency (%)	PTE of PM/PM10 After Control (lbs/hr)	PTE of PM/PM10 After Control (tons/yr)	PTE of PM/PM10 Before Control (lbs/hr)	PTE of PM/PM10 Before Control (tons/yr)
Grinding and Machining (EU160, EU221)	bag filter	0.0016	4,000	99.0%	0.055	0.24	5.49	24.0

Assume all PM emissions equal PM10 emissions.

Methodology

PTE of PM/PM10 After Control (lbs/hr) = Grain Loading (gr/dscf) x Max. Air Flow Rate (scfm) x 60 mins/hr x 1/7000 lb/gr

PTE of PM/PM10 After Control (tons/yr) = Grain Loading (gr/dscf) x Max. Air Flow Rate (scfm) x 60 mins/hr x 1/7000 lb/gr x 8760 hr/yr x 1 ton/2000 lbs

PTE of PM/PM10 Before Control (lbs/hr) = PTE of PM/PM10 After Control (lbs/hr) / (1-Control Efficiency)

PTE of PM/PM10 Before Control (tons/yr) = PTE of PM/PM10 After Control (tons/yr) / (1-Control Efficiency)

Compliance with 326 IAC 6-3-2 - Particulate Matter Emissions Limitations

Emission Unit ID	Process Rate (lbs/hr)	Maximum Allowable Emissions (lbs/hr)	Calculated Emissions (lbs/hr)
Grinding and Machining	80	0.55	0.05

The baghouses must be in operation at all times that the woodworking and machining operations are in operation in order to ensure compliance with 326 IAC 6-3-2(e).

Appendix A: Emissions Calculations
VOC Emissions from Five (5) Degreasers (EU209, EU210, EU211, EU212, EU213)

Company Name: Grote Industries, LLC
Address: 2600 Lanier Drive, Madison, Indiana 46250
FESOP: 077-21436-00003
Reviewer: ERG/ST
Date: December 13, 2005

Material	Density (lb/gal)	Weight % Organics	Weight % Solids	Max. Usage (gal/year)	PTE VOC (tons/year)
Crystal Clean 140+	6.67	100%	0.0%	145	2.42

The degreasers use Crystal Clean 140+ solvent, with a density of 6.67 pounds per gallon and a VOC content of 100 %. This solvent contains no HAPs.

METHODOLOGY

PTE VOC (tons/year) = Density (lbs/gal) x Weight % Organics x Max. Usage (gals/year) x 1 ton/2000 lbs x 5 units