



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
(800) 451-6027

Patrick E. Winchester
Venture Technologies, L.L.C.
P.O. Box 189
Elkhart, Indiana 46515

October 27, 2005

Re: 039-21696
First Minor Permit Modification to
Part 70 Permit No.: T039-15364-00498

Dear Mr. Winchester:

Venture Technologies, L.L.C, located at 2501 Jeanwood Drive, Elkhart, Indiana 46514 was issued a Part 70 permit T039-15364-00498 on February 3, 2003 for the operation of a stationary trailer frame fabrication and coating source. On August 5, 2005, IDEM, OAQ, received a letter from Venture Technologies, L.L.C. requesting a modification. The reason for this modification request is that Venture Technologies, L.L.C. has determined the installation and operation of additional facilities and equipment permitted under SSM 039-19497-00498 (December 20, 2004) and SPM 039-19563-00498 (January 14, 2005) will not be required. Therefore, Venture Technologies has requested all reference to the facilities be removed from the Part 70 Operating Permit (T039-15364-00498). Pursuant to 326 IAC 2-7-12 a minor permit modification to this permit is hereby approved as described in the attached Technical Support Document.

All other conditions of the permit shall remain unchanged and in effect. For your convenience the entire Part 70 Operating Permit as modified will be provided at issuance.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter please contact Jenny Acker, OAQ, 100 North Senate Avenue, Indianapolis, Indiana, 46204, or call at (800) 451-6027, and ask for Jenny Acker or extension 2-8253 or, or dial (317) 232-8253.

Sincerely,

Original Signed By:
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

JLA

cc: File - Elkhart County
U.S. EPA Region V
Elkhart County Health Department
Northern Regional Office
Air Compliance – Tony Pelath
Compliance Data Section
Administration & Development Section
Compliance Data Section





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PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

Venture Technologies, LLC 2501 Jeanwood Drive Elkhart, IN 46514

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 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.: T039-15364-00498	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: February 3, 2003 Expiration Date: February 3, 2008

First Review Request No.: RR 039-17362-00498, issued on June 7, 2003.
 First Significant Permit Modification No.: SPM 039-19563-00498, issued on January 14, 2005
 First Revocation No.: 039-21641-00498, issued on August 22, 2005

First Minor Permit Modification No.: 039-21696-00498	Conditions Affected:
Issued by: Original Signed By: Paul Dubenetzky, Assistant Commissioner Permit Branch Office of Air Quality	Issuance Date: October 27, 2005

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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 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary trailer frame fabrication and coating source.

Responsible Official:	Vice President of Manufacturing, Venture Technologies, LLC
Source Address:	2501 Jeanwood Drive, Elkhart, IN 46514
Mailing Address:	P.O. Box 189, Elkhart, IN 46515
Source Phone Number:	(574) 266-7356
SIC Code:	3499, 3714
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants Nonattainment for 8-hour ozone
Source Status:	Part 70 Permit Program Minor Source under PSD Major Source under Emission Offset 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 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

- (a) One (1) spray coating operation, ID B01 constructed in 2001, exhausting to stacks PB1, PB2, PB3, and BO1, consisting of the following equipment:
 - (1) one (1) paint booth, with a maximum capacity of four (4) commercial and one (1) military metal trailer frames per hour, with emissions controlled by dry filters, and
 - (2) one (1) flash-off/cool down area, and
 - (3) one (1) natural gas-fired bake/cure oven with a maximum heat input capacity of 3.5 MMBtu/hr.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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

- (a) One (1) aqueous pretreatment operation, constructed in 1998, exhausting to stacks S1 and S2, and vents EF1 and EF2, consisting of the following equipment:
 - (1) three (3) dip tanks, with an aggregate maximum capacity of 166.8 pounds of aqueous cleaner, aqueous rinse and phosphate solution per hour (insignificant per 326 IAC 2-7-1(21)(G)(ix)(DD)), and
 - (2) two (2) natural gas-fired 7.0 MMBtu/hr boilers used to provide hot water (insignificant per 326 IAC 2-7-1(21)(G)(i)(AA)(aa)). [326 IAC 6-2-4]

- (b) One (1) epoxy and acrylic electrocoating operation, constructed in 1998, exhausting to vents EF1 through EF5 and stacks S3 through S6, consisting of the following equipment:
 - (1) fifteen (15) dip tanks, with an aggregate maximum capacity of 181.2 pounds resin per hour, 20 trailer frames per hour, 40 metal parts per hour, and 166.8 pounds of aqueous cleaner per hour, with an epoxy or acrylic dip application method (insignificant per 326 IAC 2-7-1(21)(G)(ix)(DD)),
 - (2) one (1) cool-down area,
 - (3) one (1) natural gas-fired E-coat cure oven, with a maximum heat input capacity of 1.9 MMBtu/hr (insignificant per 326 IAC 2-7-1(21)(G)(i)(AA)(aa)) [326 IAC 6-3-2], and
 - (4) one (1) natural gas-fired burn-off oven, with a maximum heat input capacity of 1.6 MMBtu/hr (insignificant per 326 IAC 2-7-1(21)(G)(i)(AA)(aa)). [326 IAC 4-2]
- (c) Activities with emissions equal to or less than the following thresholds: 5 tons per year PM or PM10, 1.0 ton per year of a single HAP, or 2.5 tons per year of any combination of HAPs: Eighty-five (85) MIG (Metal Inert Gas) welding stations with a capacity of 0.59 lb of wire per hour per station. [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 4000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, an woodworking operations. [326 IAC 6-3-2]
- (e) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, and soldering equipment. [326 IAC 6-3-2(c)]
- (f) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2] [326 IAC 8-3-5]

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

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 2-7-5(2)] [326 IAC 2-1.1-9.5]

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

B.3 Enforceability [326 IAC 2-7-7]

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.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

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 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

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.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

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

B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

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

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) 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 "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.
- (c) 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.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.
- (c) 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.
- (d) 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.

B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (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 a responsible official 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.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

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

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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (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 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

The PMP extension notification does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance

causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept 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.12 Emergency Provisions [326 IAC 2-7-16]

- (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.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe 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 Number: 1-800-451-6027 (ask for Office of Air Quality,
Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

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

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

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 2-7-5(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 "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) 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 2-7 and any other applicable rules.
- (g) 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.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced 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 Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) In addition to the nonapplicability determinations set forth in Sections D of this permit, the IDEM, OAQ has made the following determinations regarding this source:

Condition D.1.1(a), CP/MSOP 039-12883-00498, issued March 20, 2001, stating that the particulate matter from the spray coating operation shall be limited based on the equations contained therein, has not been incorporated into this permit because 326 IAC 6-3-2 was revised to state that particulate matter emissions from a spray coating operation are no longer specifically limited. Instead the rule states that a particulate

matter control device must be used. The revisions to 326 IAC 6-3-2 were adopted February 6, 2002, and became effective on June 12, 2002.

- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]

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

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

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

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

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

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination

[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit 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 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (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 2-7-9(a)(3)]
- (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 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(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 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-4]

- (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 2-7-4. 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 “responsible official” as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

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

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

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

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

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

(2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]

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 2-7 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 being needed to process the application.

- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]

If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

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

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

100 North Senate Avenue
Indianapolis, Indiana 46204

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]
[326 IAC 2-7-12(b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a 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 preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

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

and

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

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

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-

20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(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 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]

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 Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy any records that must be kept under the conditions of this permit;
- (c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] [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) Except as provided in 326 IAC 2-7-19(e), 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.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314]

Notwithstanding the conditions of this permit that state specific methods that may be used to demonstrate compliance with, or a violation of, applicable requirements, any person (including the Permittee) may also use other credible evidence to demonstrate compliance with, or a violation of, any term or condition of this permit.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(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), the allowable particulate emissions rate 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 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.3 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. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

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

C.5 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). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

Pursuant to 326 IAC 6-5-3(b), the source has requested to be exempted from this rule. Electro-Coat Technologies generates an estimated 0.44 tons per year fugitive particulate matter from vehicular traffic. As a result, IDEM agrees that the source does not have to limit fugitive particulate matter emissions pursuant to 326 IAC 6-5.

C.7 Operation of Equipment [326 IAC 2-7-6(6)]

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

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

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.

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

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

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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) 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 that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

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

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

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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 "responsible official" as defined by 326 IAC 2-7-1(34).
- (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 source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing and 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 2-7-5(1)] [326 IAC 2-7-6(1)]

C.12 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within sixty (60) 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 sixty (60) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management

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

in writing, prior to the end of the initial sixty (60) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

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

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

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

C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

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

within ninety (90) days after the date of issuance of this permit.

The ERP does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP).

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.16 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5]
[326 IAC 2-7-6]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
 - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
 - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
 - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

- (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
- (3) An automatic measurement was taken when the process was not operating.
- (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

- (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 documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

(a) In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2007 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

- (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
- (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The emission statement 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.19 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(a) Records of all required data, reports and support information 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 kept 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.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

- (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 "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.21 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 2-7-5(15)]: Spray coating operation

- (a) One (1) spray coating operation, ID B01 constructed in 2001, exhausting to stacks PB1, PB2, PB3, and BO1, consisting of the following equipment:
- (1) one (1) paint booth, with a maximum capacity of four (4) commercial and one (1) military metal trailer frames per hour, with emissions controlled by dry filters, and
 - (2) one (1) flash-off/cool down area, and
 - (3) one (1) natural gas-fired bake/cure oven with a maximum heat input capacity of 3.5 MMBtu/hr.

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

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

D.1.1 Volatile Organic Compounds (VOC) from Miscellaneous Metal Coating [326 IAC 8-2-9]

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating applied to the metal components in the spray coating operation, ID B01 be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.
- (b) Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.1.2 General Provisions Relating to VOC Rules: Military Specifications [326 IAC 8-1-7]

If emission limitations set forth in 326 IAC 8 conflict with military specifications, the owner or operator of a source may petition the commissioner to have military specifications be the controlling limitation. If the commissioner approves the petition, the modified limitation shall be submitted to the U.S. EPA as a SIP revision.

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

D.1.4 Particulate [326 IAC 6-3-2(d)]

- (a) Pursuant to CP/MSOP 039-12883-00498, issued March 20, 2001, and 326 IAC 6-3-2(d), the spray booth, ID B01 shall be controlled by a dry particulate filter, and the control device shall be operated in accordance

Compliance Determination Requirements

D.1.5 Volatile Organic Compounds (VOC)

Compliance with the VOC content limitation contained in Condition D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.1.6 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the dry filters used to control emissions from the spray coating operation, ID B01. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks PB1 and PB2 while the booth is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

D.1.7 Record Keeping Requirements

- (a) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits established in Condition D.1.2.
 - (1) The VOC content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on daily basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (3) The volume weighted VOC content of the coatings used for each month;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.7, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2

FACILITY OPERATION CONDITIONS

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

- (a) One (1) aqueous pretreatment operation, constructed in 1998, exhausting to stacks S1 and S2, and vents EF1 and EF2, consisting of the following equipment:
 - (1) three (3) dip tanks, with an aggregate maximum capacity of 166.8 pounds of aqueous cleaner, aqueous rinse and phosphate solution per hour (insignificant per 326 IAC 2-7-1(21)(G)(ix)(DD)), and
 - (2) two (2) natural gas-fired 7.0 MMBtu/hr boilers used to provide hot water (insignificant per 326 IAC 2-7-1(21)(G)(i)(AA)(aa)). [326 IAC 6-2-4]
- (b) One (1) epoxy and acrylic electrocoating operation, constructed in 1998, exhausting to vents EF1 through EF5 and stacks S3 through S6, consisting of the following equipment:
 - (1) fifteen (15) dip tanks, with an aggregate maximum capacity of 181.2 pounds resin per hour, 20 trailer frames per hour, 40 metal parts per hour, and 166.8 pounds of aqueous cleaner per hour, with an epoxy or acrylic dip application method (insignificant per 326 IAC 2-7-1(21)(G)(ix)(DD)),
 - (2) one (1) cool-down area,
 - (3) one (1) natural gas-fired E-coat cure oven, with a maximum heat input capacity of 1.9 MMBtu/hr (insignificant per 326 IAC 2-7-1(21)(G)(i)(AA)(aa)) [326 IAC 6-3-2], and
 - (4) one (1) natural gas-fired burn-off oven, with a maximum heat input capacity of 1.6 MMBtu/hr (insignificant per 326 IAC 2-7-1(21)(G)(i)(AA)(aa)). [326 IAC 4-2]
- (c) Activities with emissions equal to or less than the following thresholds: 5 tons per year PM or PM10, 10 tons per year SO₂, NO_x, or VOC, 0.2 tons per year Pb, 1.0 tons per year of a single HAP, or 2.5 tons per year of any combination of HAPs: Eighty-five (85) MIG (Metal Inert Gas) welding stations with a capacity of 0.59 lb of wire per hour per station. [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 4000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, an woodworking operations. [326 IAC 6-3-2]
- (e) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-3-2(c)]
- (f) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2] [326 IAC 8-3-5]

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

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

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

- (a) Pursuant to CP/MSOP 039-12883-00498, issued March 20, 2001, CP 039-9800-00498, issued on August 13, 1998, and 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the coat curing operations shall be limited by the following:

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

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

- (b) Pursuant to CP 039-9800-00498, issued on August 13, 1998, and 326 IAC 6-3-2(e), the allowable particulate emission rate from the eighty-five (85) MIG (Metal Inert Gas) welding stations shall not exceed 0.551 pounds per hour for a process weight rate of less than 100 pounds per hour.
- (c) Pursuant to 326 IAC 6-3-2(e), the allowable particulate emission rate from the insignificant soldering, cutting, brazing, grinding, and machining operations shall not exceed 0.551 pounds per hour for a process weight rate of less than 100 pounds per hour.

D.2.2 Particulate Matter (PM) from Sources of Indirect Heating [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4, the particulate matter emissions from the two (2) natural gas-fired 7.0 MMBtu/hr boilers used in conjunction with the pretreatment operation, shall each not exceed 0.55 pounds per MMBtu energy input.

This limitation is based on the following equation:

$$Pt = \frac{1.09}{Q^{0.26}} \quad \begin{array}{l} Pt = \text{Pounds of particulate matter emitted per million} \\ \text{Btu (lb/MMBtu) heat input.} \\ Q = \text{Total source maximum operating capacity rating in} \\ \text{million Btu per hour (MMBtu/hr) heat input. The} \\ \text{maximum operating capacity is specified in the facility's} \\ \text{permit application, except when some lower capacity is} \\ \text{contained in the facility's operation permit; in which case,} \\ \text{the capacity specified in the operation permit shall be} \\ \text{used (} Q = 14.0 \text{ MMBtu/hr).} \end{array}$$

D.2.3 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations) for cold cleaning degreasing (item f in facility descriptions) operations constructed after January 1, 1980, the owner or operator 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; and

- (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.

D.2.4 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility (item f in facility description) construction of which commenced after July 1, 1990, 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^oC) (one hundred degrees Fahrenheit (100^oF));
 - (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^oC) (one hundred degrees Fahrenheit (100^oF)), 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^oC) (one hundred degrees Fahrenheit (100^oF)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9^oC) (one hundred twenty degrees Fahrenheit (120^oF)):
 - (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.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, 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.2.5 Incinerator Requirements [326 IAC 4-2]

Pursuant to 326 IAC 4-2, the burn-off oven used in conjunction with the electrocoating operation shall:

- (a) Consist of primary and secondary chambers or the equivalent;
- (b) Be equipped with a primary burner unless burning wood products;
- (c) Comply with 326 IAC 5-1 and 326 IAC 2;
- (d) Be maintained properly as specified by the manufacturer and approved by the commissioner;
- (e) Be operated according to the manufacturer's recommendations and only burn waste approved by the commissioner;
- (f) Comply with other state and/or local rules or ordinances regarding installation and operation of incinerators;
- (g) Be operated so that emissions of hazardous material including but not limited to viable pathogenic bacteria, dangerous chemicals or gases, or noxious odors are prevented;
- (h) Not emit particulate matter in excess of five-tenths (0.5) pounds of particulate matter per one thousand (1,000) pounds of dry exhaust gas at standard condition corrected to fifty percent (50%) excess air; and
- (i) Not create a nuisance or fire hazard.

If the Permittee fails to comply with (a) through (i) above, the burning shall be terminated immediately.

D.2.6 Volatile Organic Compounds (VOC) from Miscellaneous Metal Coating [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating applied to the metal components in the electro-coating operation shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings. Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.2.7 General Provisions Relating to VOC Rules: Military Specifications [326 IAC 8-1-7]

If emission limitations set forth in 326 IAC 8 conflict with military specifications, the owner or operator of a source may petition the commissioner to have military specifications be the controlling limitation. If the commissioner approves the petition, the modified limitation shall be submitted to the U.S. EPA as a SIP revision.

D.2.8 Hazardous Air Pollutants (HAPs) [326 IAC 2-4.1]

Pursuant to CP/MSOP 039-12883-00498, issued March 20, 2001, any change or modification which may increase any single HAP potential emissions to 10 tons per year or more, or combination of HAPs potential emissions to 25 tons per year or more, from the electro-coating operation shall require prior approval by the IDEM, OAQ before such changes may take place.

Compliance Determination Requirements

D.2.9 Volatile Organic Compounds (VOC)

Compliance with the VOC content limitation contained in Condition D.2.6 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.2.10 Record Keeping Requirements

- (a) To document compliance with Conditions D.2.6 and D.2.8, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC content and the HAP emission limits established in Conditions D.2.6 and D.2.8.
- (1) The VOC (and HAP) content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on daily basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (3) The volume weighted VOC (and HAP) content of the coatings used for each month;
 - (4) The total VOC (and HAP) usage for each month; and
- (b) 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

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Venture Technologies, LLC
Source Address: 2501 Jeanwood Drive, Elkhart, IN 46514
Mailing Address: P.O. Box 189, Elkhart, IN 46515
Part 70 Permit No.: 039-15364-00498

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:

Phone:

Date:

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

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Venture Technologies, LLC
Source Address: 2501 Jeanwood Drive, Elkhart, IN 46514
Mailing Address: P.O. Box 189, Elkhart, IN 46515
Part 70 Permit No.: 039-15364-00498

This form consists of 2 pages

Page 1 of 2

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

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

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

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

Page 2 of 2

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

Form Completed by:

Title / Position:

Date:

Phone:

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY Compliance Data Section

PART 70 OPERATING PERMIT QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Venture Technologies, LLC
Source Address: 2501 Jeanwood Drive, Elkhart, IN 46514
Mailing Address: P.O. Box 189, Elkhart, IN 46515
Part 70 Permit No.: 039-15364-00498

Months: _____ to _____ Year: _____

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<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<p><input type="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 Part 70 Minor Permit Modification

Source Background and Description

Source Name:	Venture Technologies, LLC
Source Location:	2501 Jeanwood Drive, Elkhart, Indiana 46514
County:	Elkhart
SIC Code:	3499, 3714
Operation Permit No.:	T039-15364-00498
Operation Permit Issuance Date:	February 3, 2003
First Minor Permit ModificationNo.:	039-21696-00498
Permit Reviewer:	Jenny Acker

The Office of Air Quality (OAQ) has reviewed an application from Venture Technologies, LLC relating to the following emission and pollution control devices:

- (a) One (1) Spray Coating operation, ID B02 which consists of four (4) air assisted spray systems, with a total maximum capacity of eleven (11) metal trailer frames per hour, venting outside the building, with dry filters to control the particulate (PM) overspray emissions. Painted trailer frames will be air dried in an open room; and
- (b) One (1) Power Wash Station, which will utilize water for washing metal trailer frames.

Venture Technologies, LLC has determined that the construction and operation of the above mentioned emission units and pollution control devices will not be required.

History

On August 17, 2004, Venture Technologies, LLC submitted an application to the OAQ requesting to add additional surface coating lines to their existing plant. A Significant Source Modification (039-19497-00498) was issued on December 20, 2004 and a Significant Permit Modification (039-19563-00498) was issued on January 14, 2005.

On August 5, 2005, Venture Technologies, LLC, submitted an application to the OAQ requesting the revocation of Significant Source Modification No.: 039-19497-00498 and Significant Permit Modification No.: 039-19563-00498. Revocation No.: 039-21641-00498 to Significant Source Modification No. 039-19497-00498, was issued on August 22, 2005.

A Minor Permit Modification will be issued to incorporate Revocation No.: 039-19497 into the Part 70 Operating Permit No.: 039-15364-00498.

Existing Approval

The source has been operating under the following approvals:

- (a) Part 70 Permit No. T039-15364-00498, issued on February 3, 2003
- (b) Review Request No. RR 039-17362-00498, issued on June 7, 2003.
- (c) Significant Source Modification No. 039-19497-00498, issued on December 20, 2004
- (d) Significant Permit Modification No. 039-19563-00498, issued on January 14, 2005
- (e) Revocation No. 039-21641-00498, issued on August 22, 2005.

Recommendation

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

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

An application for the purposes of this review was received on August 5, 2005.

Emission Calculations

See Appendix A, pages 1 through 2, of this document for detailed Hazardous Air Pollutants (HAPs) emissions calculations.

The calculations have been taken from the Part 70 Operating Permit No. T039-15364-00498, issued to Venture Technologies, LLC on February 3, 2003. These calculations were used to determine the potential to emit because there has been no change to the source operations since issuance of the Part 70 Operating Permit No. 039-15364-00498.

Justification for Modification

This modification meets the criteria for a Minor Permit Modification, under 326 IAC 2-7-12.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM-2.5	Attainment
PM-10	Attainment
SO ₂	Attainment
NO ₂	Attainment
1-Hour Ozone	Attainment
8-Hour Ozone	Nonattainment
CO	Attainment
Lead	Not Determined

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.
- (b) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air

Quality Standards (NAAQS) for ozone. Therefore, VOC emissions and NOx are considered when evaluating the rule applicability relating to ozone. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NOx were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (c) Elkhart County has been classified as attainment for PM-2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM-2.5 emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM-2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM-2.5 emissions.
- (d) Elkhart County has been classified as attainment or unclassifiable in Indiana for PM-10, SO₂, NO₂, CO, and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (e) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

Existing Source PSD Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and limits, taken from the Part 70 permit T039-15364-00498):

Pollutant	Emissions (tons/year)
PM	11.2
PM-10	11.2
SO ₂	0.17
VOC	195.5
CO	22.6
NOx	26.9

HAPs	Emissions (tons/year)
Ethylbenzene	0.16
HMDI	0.30
Manganese	0.11
Stryene	6.33
Glycol Ether	9.59
Xylene	0.57
TOTAL	17.06

- (a) This existing source is a major stationary source under 326 IAC 2-3, because at least one non-attainment pollutant (VOC) is emitted at greater than 100 tons per year.
- (b) This existing source is not a major source under 326 IAC 2-2, because other criteria pollutants (PM, PM10, SO2, NOx and CO) are not emitted at a rate of 250 tons per year or greater. The source is not one of the 28 listed source categories.

Changes to the Part 70 Permit

- 1. The Part 70 permit (039-15364-00498) will be modified as follows (additions are **bolded** and deletions are ~~struck-through~~ for emphasis):

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary trailer frame fabrication and coating source.

Responsible Official: Vice President of Manufacturing, Venture Technologies, LLC
 Source Address: 2501 Jeanwood Drive, Elkhart, IN 46514
 Mailing Address: P.O. Box 189, Elkhart, IN 46515
 Source Phone Number: (574) 266-7356
 SIC Code: 3499, 3714
 County Location: Elkhart
 Source Location Status: Attainment for all criteria pollutants
 Nonattainment for 8-hour ozone
 Part 70 Permit Program
 Source Status: **Minor Source under PSD**
 Major Source, under ~~8-hour ozone and PSD Emission Offset~~
Major 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 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

- (a) One (1) spray coating operation, ID B01 constructed in 2001, exhausting to stacks PB1,

PB2, PB3, and BO1, consisting of the following equipment:

- (1) one (1) paint booth, with a maximum capacity of four (4) commercial and one (1) military metal trailer frames per hour, with emissions controlled by dry filters, and
- (2) one (1) flash-off/cool down area, and
- (3) one (1) natural gas-fired bake/cure oven with a maximum heat input capacity of 3.5 MMBtu/hr.

~~(b) One (1) Spray Coating operation, ID B02 which consists of four (4) air assisted spray systems, with a total maximum capacity of eleven (11) metal frames per hour, venting outside the building, with dry filters to control the particulate (PM) overspray emissions. Painted trailer frames will be air dried in an open room.~~

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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

- (a) One (1) aqueous pretreatment operation, constructed in 1998, exhausting to stacks S1 and S2, and vents EF1 and EF2, consisting of the following equipment:
 - (1) three (3) dip tanks, with an aggregate maximum capacity of 166.8 pounds of aqueous cleaner, aqueous rinse and phosphate solution per hour (insignificant per 326 IAC 2-7-1(21)(G)(ix)(DD)), and
 - (2) two (2) natural gas-fired 7.0 MMBtu/hr boilers used to provide hot water (insignificant per 326 IAC 2-7-1(21)(G)(i)(AA)(aa)). [326 IAC 6-2-4]
- (b) One (1) epoxy and acrylic electrocoating operation, constructed in 1998, exhausting to vents EF1 through EF5 and stacks S3 through S6, consisting of the following equipment:
 - (1) fifteen (15) dip tanks, with an aggregate maximum capacity of 181.2 pounds resin per hour, 20 trailer frames per hour, 40 metal parts per hour, and 166.8 pounds of aqueous cleaner per hour, with an epoxy or acrylic dip application method (insignificant per 326 IAC 2-7-1(21)(G)(ix)(DD)),
 - (2) one (1) cool-down area,
 - (3) one (1) natural gas-fired E-coat cure oven, with a maximum heat input capacity of 1.9 MMBtu/hr (insignificant per 326 IAC 2-7-1(21)(G)(i)(AA)(aa)) [326 IAC 6-3-2], and
 - (4) one (1) natural gas-fired burn-off oven, with a maximum heat input capacity of 1.6 MMBtu/hr (insignificant per 326 IAC 2-7-1(21)(G)(i)(AA)(aa)). [326 IAC 4-2]
- (c) Activities with emissions equal to or less than the following thresholds: 5 tons per year PM or PM10, 1.0 ton per year of a single HAP, or 2.5 tons per year of any combination of HAPs: Eighty-five (85) MIG (Metal Inert Gas) welding stations with a capacity of 0.59 lb of wire per hour per station. [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 4000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive

blasting, pneumatic conveying, an woodworking operations. [326 IAC 6-3-2]

- (e) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, and soldering equipment. [326 IAC 6-3-2(c)]
- (f) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2] [326 IAC 8-3-5]
- ~~(g) One (1) Power Wash Station, which will utilize water for washing metal trailer frames.~~

SECTION D.1

FACILITY OPERATION CONDITIONS

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

- (a) One (1) spray coating operation, ID B01 constructed in 2001, exhausting to stacks PB1, PB2, PB3, and BO1, consisting of the following equipment:
 - (1) one (1) paint booth, with a maximum capacity of four (4) commercial and one (1) military metal trailer frames per hour, with emissions controlled by dry filters, and
 - (2) one (1) flash-off/cool down area, and
 - (3) one (1) natural gas-fired bake/cure oven with a maximum heat input capacity of 3.5 MMBtu/hr.
- ~~(b) One (1) Spray Coating operation, ID B02 which consists of four (4) air assisted spray systems, with a total maximum capacity of eleven (11) metal frames per hour, venting outside the building, with dry filters to control the particulate (PM) overspray emissions. Painted trailer frames will be air dried in an open room.~~

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

D.1.2 Volatile Organic Compounds (VOC) from Miscellaneous Metal Coating [326 IAC 8-2-9]

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating applied to the metal components in the spray coating operation, ID B01 be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.
- ~~(b) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the spray coating operation, ID B02 shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for air dried coatings.~~
- (e b) Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized .

D.1.5. General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A][Table 2 to 40 CFR Part 63, Subpart M] [40 CFR 63.3901]

- ~~(a) The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are~~

incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart M. The Permittee must comply with these requirements on and after January 2, 2004.

- (b) ~~Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition, except as otherwise provided in this condition. The permit shield applies to Condition D.1.11, Notification Requirements.~~

~~D.1.6. National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products [40 CFR Part 63, Subpart M] [40 CFR 63.3882] [40 CFR 63.3883] [40 CFR 63.3980]~~

- (a) ~~The provisions of 40 CFR Part 63, Subpart M (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/misc/miscpg.html>. Pursuant to 40 CFR 63.3883(b), the Permittee must comply with these requirements on and after January 2, 2007.~~

- (b) ~~Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition, except as otherwise provided in this condition. The permit shield applies to Condition D.1.11, Notification Requirements.~~

- (c) ~~The affected source is the collection of all of the items listed in 40 CFR 63.3882, paragraphs (b)(1) through (4) that are used for surface coating of miscellaneous metal parts and products within each subcategory as defined in 40 CFR 63.3881(a), paragraphs (2) through (6).~~

~~(1) All coating operations as defined in 40 CFR 63.3981;~~

~~(2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;~~

~~(3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and~~

~~(4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.~~

- (d) ~~Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.3980, and are applicable to the affected source.~~

~~D.1.7.5 Particulate [326 IAC 6-3-2(d)]~~

- (a) ~~Pursuant to CP/MSOP 039-12883-00498, issued March 20, 2001, and 326 IAC 6-3-2(d), the spray booth, ID B01 shall be controlled by a dry particulate filter, and the control device shall be operated in accordance with manufacturer's specifications.~~

- (b) ~~Pursuant to 326 IAC 6-3-2, the new Spray Coating operation, ID B02 shall be controlled by a dry filter, waterwash, or an equivalent control device, subject to the following:~~

~~(1) The Permittee shall operate the control device in accordance with manufacturer's specifications.~~

~~D.1.8 Particulate Matter (PM) [40 CFR 52, Subpart P]~~

Pursuant to 40 CFR 52, Subpart P, the PM overspray from the Spray Coating operation, ID B02 shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

Compliance Determination Requirements

D.1.9 6 Volatile Organic Compounds (VOC)

Compliance with the VOC content limitation contained in Condition D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.1.10 7 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the dry filters used to control emissions from the spray coating operation, ID B01. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks PB1 and PB2 while the booth is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

D.1.11. Notification Requirements [40 CFR 63.3910]

- (a) ~~General. The Permittee must submit the applicable notifications in 40 CFR Part 63, Sections 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) by the dates specified in those sections, except as provided in 40 CFR 63.3910, paragraphs (b) and (c).~~
- (b) ~~Notification of compliance status. The Permittee must submit the notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR Part 63, Sections 63.3940, 63.3950, or 63.3960 that applies to the affected source. The notification of compliance status must contain the information specified in 40 CFR 63.3910(c), paragraphs (1)~~

through (11) and any additional information specified in 40 CFR 63.9(h).

~~D.1.12. Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]~~

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

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

~~Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015~~

~~D.1.13~~ **8** Record Keeping Requirements

- ~~(a) To document compliance with Condition D.1.2 the Permittee shall maintain records in accordance with (1) through (6 5) below. Records maintained for (1) through (6 5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits established in Conditions D.1.2.~~
 - ~~(1) The VOC content of each coating material and solvent used.~~
 - ~~(2) The amount of coating material and solvent less water used on daily basis.~~
 - ~~(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.~~
 - ~~(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.~~
 - ~~(3) The volume weighted VOC content of the coatings used for each month;~~
 - ~~(4) The total VOC usage for each month; and~~
 - ~~(5) The weight of VOCs emitted for each compliance period.~~
 - ~~(b) To document compliance with Condition D.1.40 7, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.~~
 - ~~(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.~~
2. The mailing address of IDEM, Office of Air Quality (OAQ) has changed. All references in the permit to "100 North Senate Ave, Post Office Box 6015, Indianapolis, Indiana 46206-6015" have

been changed to "100 North Senate Ave, Indianapolis, Indiana 46204".

3. The Section's name and phone number that collects operating fees has changed. The current name is the Billing, Licensing, and Training (BLT) Section. Condition B.24 has been revised as follows:

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] [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) Except as provided in 326 IAC 2-7-19(e), 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 317-233-4320 **4230** (ask for OAQ, ~~I/M & Billing~~ **Billing, Licensing, and Training** Section), to determine the appropriate permit fee.

Conclusion

The construction of the new painting operation shall be subject to the conditions of the attached **Minor Permit Modification 039-21696-00498**.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for a Minor Permit Modification to a Part 70 Operating Permit

Source Name:	Venture Technologies, LLC
Source Location:	2501 Jeanwood Drive, Elkhart, Indiana 46514
County:	Elkhart
SIC Code:	3499, 3714
Operation Permit No.:	T 039-15364-00498
Operation Permit Issuance Date:	February 3, 2003
Minor Permit Modification No.:	MPM 039-21696-00498
Permit Reviewer:	Jenny Acker

On September 2, 2005, the Office of Air Quality (OAQ) had a notice published in The Elkhart Truth, Elkhart, Indiana, stating that Venture Technologies, LLC had applied for a Minor Permit Modification to a Part 70 Operating Permit requesting the revocation of Significant Source Modification (039-19497-00498) and Significant Permit Modification (039-19563-00498). These permits were issued for the construction and operation of surface coating lines which Venture Technologies, LLC has determined will not be required.

The notice also stated that OAQ proposed to issue a permit and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

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

1. The 326 IAC 6-3 revisions that became effective on June 12, 2002 were approved into the State Implementation Plan on September 23, 2005. These rules replace the previous version of 326 IAC 6-3 (Process Operations) that had been part of the SIP; therefore, the requirements of the previous version of 326 IAC 6-3-2 are no longer applicable to this source. Condition C.1 has been revised to remove (a) which contained these requirements, and Condition D.1.1 which contained these requirements has been removed. Since the requirements of the 326 IAC 6-3-2(d) that were effective June 12, 2002 are now federally enforceable, the last statement from C.1 has been removed.

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

- (a) ~~Pursuant to 40 CFR 52 Subpart P, the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.~~
- (b) Pursuant to 326 IAC 6-3-2(e)(2), the allowable particulate emissions rate 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. ~~This condition is not federally enforceable.~~

~~D.1.1 Particulate Matter (PM) [40 CFR 52 Subpart P] [326 IAC 6-3-2]~~

~~Pursuant to CP/MSOP 039-12883-00498, issued March 20, 2001, and 40 CFR 52 Subpart P, the particulate matter (PM) from the spray coating operation, ID B01 shall not exceed the pound per hour emission rate established as E in the following formula:~~

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

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

Appendix A: Emissions Calculations

HAP Emissions

From Surface Coating Operations

Company Name: Venture Technologies

Address City IN Zip: 53375 County Road 13, Elkhart, IN 46515

Permit #: MPM 039-21696-00498 (Calculations taken from T039-15364-00498)

Reviewer: ERG/BS (T039-15364-00498)

Date: October 17, 2002 (T039-15364-00498)

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Glycol Ether	Weight % Styrene	Weight % Ethyl Benzene	Weight % Methyl Isobutyl Ketone	Weight % HMDI	Weight % Xylene	Glycol Ether Emissions (ton/yr)	Styrene Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)	Methyl Isobutyl Ketone Emissions (ton/yr)	HMDI Emissions (ton/yr)	Xylene Emissions (ton/yr)
Paste CP639J	9.30	0.07000	20.000	1.14%	0.00%	0.00%	0.00%	0.00%	0.00%	0.65	0.00	0.00	0.00	0.00	0.00
Epoxy CF665-415	9.20	1.00000	40.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
SW F88B141	8.03	1.50000	4.000	4.00%	3.00%	0.00%	0.00%	0.00%	0.00%	8.44	6.33	0.00	0.00	0.00	0.00
SW Hardener (V66V29)	8.85	0.19000	4.000	0.00%	0.00%	0.00%	0.00%	1.00%	0.00%	0.00	0.00	0.00	0.00	0.29	0.00
SW Accelerator (V66VB11)	7.03	0.00900	4.000	0.00%	0.00%	9.00%	36.00%	0.00%	51.00%	0.00	0.00	0.10	0.00	0.00	0.57
383 Zenthane	10.10	0.60000	1.000	1.88%	0.00%	0.23%	4.54%	0.04%	0.00%	0.50	0.00	0.06	0.00	0.01	0.00
MAK Thinner	6.75	0.02800	1.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Clean up solvent	6.75	0.10000	5.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00

Total State Potential Emissions

subtotals	9.59	6.33	0.16	0.00	0.30	0.57
TOTAL	16.95					

METHODOLOGY

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

Appendix A: Emissions Calculations

PM and HAP Emissions

From Welding Operations

Company Name: Venture Technologies

Address City IN Zip: 53375 County Road 13, Elkhart, IN 46515

Permit #: MPM 039-21696-00498 (Calculations taken from T039-15364-00498)

Reviewer: ERG/BS (T039-15364-00498)

Date: October 17, 2002 (T039-15364-00498)

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	EMISSION FACTORS * (lb pollutant / lb electrode)				EMISSIONS (lb/hr)			
			PM = PM10	Mn	Ni	Cr	PM = PM10	Mn*	Ni*	Cr*
WELDING										
Metal Inert Gas (MIG) (carbon steel)	85	0.59	0.0055	0.0005	0	0	0.28	0.03	0	0
Potential Emissions lbs/hr							0.28	0.03	0.00	0.00
Potential Emissions lbs/day							6.62	0.60	0	0
Potential Emissions tons/year							1.21	0.11	0	0

* Mn, Ni, and Cr are HAPs.

METHODOLOGY

*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column. Consult AP-42 or other reference for different electrode types.

Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)

Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day

Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/day x 1 ton/2,000 lbs.

Welding and other flame cutting emission factors are from an internal training session document.

See AP-42, Chapter 12.19 for additional emission factors for welding.