



# 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 46204-2251  
(317) 232-8603  
(800) 451-6027  
www.in.gov/idem

February 10, 2006

Mr. Dixon Churchill  
Toyota Industrial Equipment Manufacturing, Inc.  
5555 Inwood Drive  
P.O. Box 2487  
Columbus, IN 47202-2487

Re: **005-21912-00040**  
Significant Source Modification to:  
Part 70 Operating Permit No.: **T 005-7545-00040**

Dear Mr. Churchill:

Toyota Industrial Equipment Manufacturing, Inc. was issued Part 70 Operating Permit **T 005-7545-00040** on April 14, 1999 for the industrial truck manufacturing source located at 5555 Inwood Drive, Columbus, Indiana 47202. An application to modify the source was received on October 28, 2005. Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for construction at the source:

One (1) counter-weight paint line, identified as U013, constructed in 2006, consisting of:

- (a) One (1) paint booth, identified as U013a, equipped with electrostatic air atomized spray guns and a dry filter as overspray control, exhausting through stack S013b, capacity: 15 gallons of coating per hour.
- (b) One (1) paint booth, identified as U013b, equipped with electrostatic air atomized spray guns and a dry filter as overspray control, exhausting to stack S013d, capacity: 15 gallons of coating per hour.
- (c) Three (3) infrared ovens, each exhausting to one (1) stack, S013a, S013c and S013e.

The following construction conditions are applicable to the proposed project:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

3. Effective Date of the Permit  
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.
6. Pursuant to 326 IAC 2-7-10.5(l) the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

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

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter contact CarrieAnn Paukowits, c/o OAQ, 100 North Senate Avenue, Indianapolis, Indiana, 46204-2251, at 631-691-3395, ext. 18 or in Indiana at 1-800-451-6027 (ext 631-691-3395).

Sincerely,

Original signed by

Paul Dubenetzky, Assistant Commissioner  
Office of Air Quality

Attachments (Technical Support Document and Changed Permit Conditions)

CAP/MES

cc: File - Bartholomew County  
Bartholomew County Health Department  
Air Compliance Section Inspector - Vaughn Ison  
Compliance Branch  
Administrative and Development Section  
Technical Support and Modeling - Michele Boner  
Marv Johnson, Toyota Industrial Equipment Manufacturing, Inc.  
Julie A. Wagner, Environmental Quality Management, Inc.



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**PART 70 OPERATING PERMIT  
OFFICE OF AIR QUALITY**

**Toyota Industrial Equipment Manufacturing, Inc.  
5555 Inwood Drive  
Columbus, Indiana 47202**

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T 005-7545-00040	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: April 14, 1999  Expiration Date: April 14, 2004
Second Significant Source Modification No.: 005-21912-00040	Sections/Conditions Affected: A.2, D.1.2, D.1.3, D.1.4 added, D.1.7 (previously D.1.6), D.1.8 removed, D.1.9, D.1.10, D.1.11, D.1.12 through D.1.15 added (all of Section D.1 is shown, for clarity), one (1) report form revised and two (2) report forms added
Original signed by: Paul Dubenetzky, Assistant Commissioner Office of Air Quality	Issuance Date: February 10, 2006

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) primer coat paint booth, identified as U001, constructed in 1989, equipped with a robotic spray system using air assisted airless, electrostatic spray guns and a horizontal water curtain with a downdraft water-floor followed by a demister as overspray control, exhausting to stacks S001a and S001b, capacity: 30.7 gallons and 327.9 pounds of coatings per hour.
- (b) One (1) top coat paint booth, identified as U002, constructed in 1989, equipped with air assisted airless, electrostatic spray guns and a horizontal water curtain with a downdraft water-floor followed by a demister as overspray control, exhausting to stacks S002a and S002b, capacity: 30.7 gallons and 327.9 pounds of coatings per hour.
- (c) One (1) counter-weight paint booth, identified as U003, constructed in 1993, equipped with air-assisted airless spray guns and a water curtain followed by a baffle demister as overspray control, exhausting to stacks S003a and S003b, capacity: 30.7 gallons and 327.9 pounds of coatings per hour.
- (d) One (1) touch-up paint booth, identified as U004, constructed in 1989, equipped with air-assisted airless spray guns and dry filters as overspray control, exhausting to stack S004, capacity: 42.1 gallons and 443.8 pounds of coatings per hour.
- (e) One (1) D-500 paint booth, identified as U005, constructed in 1996, equipped with air-assisted airless spray guns and dry filters as overspray control, exhausting to stack S005a, capacity: 7.68 gallons and 82.0 pounds of coatings per hour.
- (f) One (1) large parts shot blast cabinet, identified as U009, constructed in 1989, exhausting to a dust collector (C009) and exiting into the building, capacity: 132,000 pounds of steel shot per hour.
- (g) One (1) steel shot blast unit, with a maximum blast rate of 115,500 pounds per hour, controlled by a dust collector, designated as U011, and exhausts inside the building.
- (h) One (1) compressed natural gas (CNG) fueling station for the one (1) time filling of a maximum of one-thousand (1,000) forklift fuel tanks per twelve (12)-consecutive month period, and the testing of the CNG forklift engines with individual heat input capacities no more than 0.521 million British thermal units per hour.
- (i) One (1) steel shot blast unit, identified as U012, equipped with a dust collector, identified as C012, and exhausting inside the building, capacity: 56,500 pounds of steel shot per hour.
- (j) One (1) counter-weight paint line, identified as U013, constructed in 2006, consisting of:
  - (1) One (1) paint booth, identified as U013a, equipped with electrostatic air atomized spray guns and a dry filter as overspray control, exhausting through stack S013b, capacity: 15 gallons of coating per hour.
  - (2) One (1) paint booth, identified as U013b, equipped with electrostatic air atomized spray guns and a dry filter as overspray control, exhausting to stack S013d, capacity: 15 gallons of coating per hour.
  - (3) Three (3) infrared ovens, each exhausting to one (1) stack, S013a, S013c and S013e.

## SECTION D.1 FACILITY OPERATION CONDITIONS

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

- (a) One (1) primer coat paint booth, identified as U001, constructed in 1989, equipped with a robotic spray system using air assisted airless, electrostatic spray guns and a horizontal water curtain with a downdraft water-floor followed by a demister as overspray control, exhausting to stacks S001a and S001b, capacity: 30.7 gallons and 327.9 pounds of coatings per hour.
- (b) One (1) top coat paint booth, identified as U002, constructed in 1989, equipped with air assisted airless, electrostatic spray guns and a horizontal water curtain with a downdraft water-floor followed by a demister as overspray control, exhausting to stacks S002a and S002b, capacity: 30.7 gallons and 327.9 pounds of coatings per hour.
- (c) One (1) counter-weight paint booth, identified as U003, constructed in 1993, equipped with air-assisted airless spray guns and a water curtain followed by a baffle demister as overspray control, exhausting to stacks S003a and S003b, capacity: 30.7 gallons and 327.9 pounds of coatings per hour.
- (d) One (1) touch-up paint booth, identified as U004, constructed in 1989, equipped with air-assisted airless spray guns and dry filters as overspray control, exhausting to stack S004, capacity: 42.1 gallons and 443.8 pounds of coatings per hour.
- (e) One (1) D-500 paint booth, identified as U005, constructed in 1996, equipped with air-assisted airless spray guns and dry filters as overspray control, exhausting to stack S005a, capacity: 7.68 gallons and 82.0 pounds of coatings per hour.
- (j) One (1) counter-weight paint line, identified as U013, constructed in 2006, consisting of:
  - (1) One (1) paint booth, identified as U013a, equipped with electrostatic air atomized spray guns and a dry filter as overspray control, exhausting through stack S013b, capacity: 15 gallons of coating per hour.
  - (2) One (1) paint booth, identified as U013b, equipped with electrostatic air atomized spray guns and a dry filter as overspray control, exhausting to stack S013d, capacity: 15 gallons of coating per hour.
  - (3) Three (3) infrared ovens, each exhausting to one (1) stack, S013a, S013c and S013e.

(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 Compound (VOC) [326 IAC 8-2-9]

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volume weighted average volatile organic compound (VOC) content of coating applied to the fork lift trucks and all metal parts and surfaces shall be limited to 3.5 pounds of VOCs per gallon of coating less water, as delivered to the applicator for any calendar day, 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 PSD Minor Limit [326 IAC 2-2]**

These facilities shall use no more than 245 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive months, based on a twelve (12) month rolling total. This usage limit is required to limit the potential to emit of VOC to less than 250 tons per year. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

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

Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating processes shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

**D.1.4 Hazardous Air Pollutants (HAPs) [326 IAC 2-4.1-1]**

- (a) The use of each individual HAP at the one (1) counter-weight paint line, identified as U013, including coatings, dilution solvents, and cleaning solvents shall be less than ten (10) tons per twelve (12) consecutive month period with compliance determined at the end of each month. This usage limit is required to limit the potential to emit of each individual HAP to less than ten (10) tons per year. Compliance with this limit makes 326 IAC 2-4.1-1 (New Source Toxics Control) not applicable.
- (b) The use of total HAPs at the one (1) counter-weight paint line, identified as U013, including coatings, dilution solvents, and cleaning solvents shall be less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month. This usage limit is required to limit the potential to emit of any combination of HAPs to less than twenty-five (25) tons per year. Compliance with this limit makes 326 IAC 2-4.1-1 (New Source Toxics Control) not applicable.

**D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

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

**Compliance Determination Requirements**

**D.1.6 Testing Requirements [326 IAC 2-7-6(1),(6)]**

The Permittee is not required to test these facilities by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC and PM limits specified in Conditions D.1.1, D.1.2 and D.1.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

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

- (a) Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC 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.
- (b) Compliance with the VOC content limit in Condition D.1.1(a) shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis on days when at least one (1) coating with a VOC content greater than 3.5 pounds per gallon is used. This volume weighted average shall be determined by the following equation:

$$A = [(C \times U) / U]$$

Where: A is the volume weighted average in pounds VOC per gallon less water as applied;

C is the VOC content of the coating in pounds VOC per gallon less water as applied;  
and  
U is the usage rate of the coating in gallons per day.

#### D.1.8 VOC Emissions

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Compliance with Condition D.1.2 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent twelve (12) months.

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

#### D.1.9 Monitoring

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- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the dry filters and water curtains. To monitor the performance of the dry filters and water curtains, weekly observations shall be made of the overspray from the touch-up paint booth, D-500 paint booth, primer coat paint booth, top coat paint booth, and counter-weight paint booth stacks (S001a, S001b, S002a, S002b, S003a, S003b, S004, S005a, S013b and S013d) while the booth exhausting to that stack is in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stacks (S001a, S001b, S002a, S002b, S003a, S003b, S004, S005a, S013b and S013d) and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

#### D.1.10 Record Keeping Requirements

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- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken daily or monthly, as indicated below, and shall be complete and sufficient to establish compliance with the VOC emission limits and VOC usage limits established in Conditions D.1.1(a) and D.1.2.
- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;
  - (2) A log of the dates of use;
  - (3) The volume weighted VOC content of the coatings used for each day, only when a coating with a VOC content greater than 3.5 pounds per gallon is used that day;
  - (4) The cleanup solvent usage for each day;
  - (5) The total VOC usage for each month; and
  - (6) The weight of VOCs emitted for each compliance period.

- (b) To document compliance with Condition D.1.4, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly, and shall be complete and sufficient to establish compliance with the HAP usage limit established in Condition D.1.4.
  - (1) The amount and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) The total individual HAP usage for each month; and
  - (3) The weight of HAPs emitted for each compliance period.
- (c) To document compliance with Condition D.1.9, the Permittee shall maintain a log of weekly overspray observations, and daily and monthly inspections.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.11 Reporting Requirements

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A quarterly summary of the information to document compliance with Conditions D.1.2 and D.1.4 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

#### National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-7-5(1)]

#### D.1.12 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]

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- (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.1.14, Notification Requirements.

#### D.1.13 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]

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- (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 U.S. 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.1.14, 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.1.14 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.1.15 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  
Indianapolis, Indiana 46204-2251

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

**Part 70 Quarterly Report**

Source Name: Toyota Industrial Equipment Manufacturing, Inc.  
 Source Address: 5555 Inwood Drive, Columbus, Indiana 47202  
 Mailing Address: 5555 Inwood Drive, P.O. Box 2487, Columbus, Indiana 47202-2487  
 Part 70 Permit No.: T 005-7545-00040  
 Facilities: One (1) touch-up paint booth, one (1) D-500 paint booth, one (1) primer coat paint booth, one (1) top coat paint booth, one (1) counter-weight paint booth, and one (1) counter-weight paint line (U013)  
 Parameter: VOC Usage  
 Limit: 245 tons per twelve (12) consecutive months

YEAR: \_\_\_\_\_

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

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

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

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

**Part 70 Quarterly Report**

Source Name: Toyota Industrial Equipment Manufacturing, Inc.  
 Source Address: 5555 Inwood Drive, Columbus, Indiana 47202  
 Mailing Address: 5555 Inwood Drive, P.O. Box 2487, Columbus, Indiana 47202-2487  
 Part 70 Permit No.: T 005-7545-00040  
 Facility: One (1) counter-weight paint line (U013)  
 Parameter: Individual HAP Usage  
 Limit: Less than 10 tons per twelve (12) consecutive month period, with compliance determined at the end of each month

YEAR: \_\_\_\_\_

Month	Individual HAP Usage (tons)	Individual HAP Usage (tons)	Individual HAP Usage (tons)
	This Month	Previous 11 Months	12 Month Total

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

Submitted by: \_\_\_\_\_  
 Title/Position: \_\_\_\_\_  
 Signature: \_\_\_\_\_  
 Date: \_\_\_\_\_  
 Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

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

**Part 70 Quarterly Report**

Source Name: Toyota Industrial Equipment Manufacturing, Inc.  
Source Address: 5555 Inwood Drive, Columbus, Indiana 47202  
Mailing Address: 5555 Inwood Drive, P.O. Box 2487, Columbus, Indiana 47202-2487  
Part 70 Permit No.: T 005-7545-00040  
Facility: One (1) counter-weight paint line (U013)  
Parameter: Total HAPs Usage  
Limit: Less than 25 tons per twelve (12) consecutive month period, with compliance determined at the end of each month

YEAR: \_\_\_\_\_

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

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

Submitted by: \_\_\_\_\_  
Title/Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

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

**Technical Support Document (TSD) for a Part 70  
Significant Source and Permit Modifications**

<b>Source Description and Location</b>
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<b>Source Name:</b>	<b>Toyota Industrial Equipment Manufacturing, Inc.</b>
<b>Source Location:</b>	<b>5555 Inwood Drive, Columbus, Indiana 47202</b>
<b>County:</b>	<b>Bartholomew</b>
<b>SIC Code:</b>	<b>3537</b>
<b>Operation Permit No.:</b>	<b>T 005-7545-00040</b>
<b>Operation Permit Issuance Date:</b>	<b>April 14, 1999</b>
<b>Significant Source Modification No.:</b>	<b>005-21912-00040</b>
<b>Significant Permit Modification No.:</b>	<b>005-22010-00040</b>
<b>Permit Reviewer:</b>	<b>CarrieAnn Paukowits</b>

<b>Existing Approvals</b>
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The source was issued a Part 70 Operating Permit T 005-7545-00040 on April 14, 1999. The source has since received the following approvals:

- (a) First Administrative Amendment No.: 005-10989-00040, issued on July 21, 1999;
- (b) Second Administrative Amendment No.: 005-11174-00040, issued on September 7, 1999;
- (c) Third Administrative Amendment No.: 005-11975-00040, issued on March 30, 2000;
- (d) Fourth Administrative Amendment No.: 005-13981-00040, issued on March 19, 2001;
- (e) First Reopening No.: 005-13154-00040, issued on October 25, 2001;
- (f) Fifth Administrative Amendment No.: 005-14983-00040, issued on October 26, 2001;
- (g) Sixth Administrative Amendment No.: 005-15791-00040, issued on April 25, 2002;
- (h) First Minor Permit Modification No.: 005-15701-00040, issued on April 29, 2002;
- (i) Seventh Administrative Amendment No.: 005-15778-00040, issued on September 23, 2002;
- (j) Eighth Administrative Amendment No.: 005-16721-00040, issued on December 27, 2002;
- (k) Ninth Administrative Amendment No.: 005-17135-00040, issued on February 10, 2003;
- (l) Tenth Administrative Amendment No.: 005-17384-00040, issued on July 1, 2003;
- (m) Eleventh Administrative Amendment No.: 005-18541-00040, issued on January 2, 2004;
- (n) First Significant Source Modification No.: 005-18706-00040, issued on June 18, 2004;
- (o) First Significant Permit Modification No.: 005-18853-00040, issued on July 2, 2004;

- (p) Twelfth Administrative Amendment No.: 005-19273-00040, issued on August 4, 2004;
- (q) Thirteenth Administrative Amendment No.: 005-20406-00040, issued on January 18, 2005;
- (r) Fourteenth Administrative Amendment No.: 005-21014-00040, issued on May 27, 2005; and
- (s) Second Significant Permit Modification No.: 005-21333-00040, issued on September 16, 2005.

The source applied for a Part 70 Operating Permit Renewal (T 005-17756-00040) on July 14, 2003.

<b>County Attainment Status</b>
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The source is located in Bartholomew County.

Pollutant	Status
PM <sub>10</sub>	attainment
PM <sub>2.5</sub>	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
1-hour Ozone	attainment
8-hour Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and nitrogen oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Bartholomew County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Bartholomew County has been classified as attainment for PM<sub>2.5</sub>. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM<sub>2.5</sub> emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM<sub>2.5</sub> emissions, it has directed states to regulate PM<sub>10</sub> emissions as a surrogate for PM<sub>2.5</sub> emissions.
- (c) Bartholomew County has been classified as attainment or unclassifiable in Indiana for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (d) Fugitive Emissions  
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

**Source Status**

The table below summarizes the potential to emit of the entire source, prior to the proposed modification, after consideration of all enforceable limits established in the effective permits:

Pollutant	Emissions (tons/year)
PM	71.7
PM <sub>10</sub>	73.7
SO <sub>2</sub>	5.00
VOC	Less than 250
CO	5.99
NO <sub>x</sub>	5.60

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no regulated pollutant is emitted at a rate of two hundred and fifty (250) tons per year or more, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).
- (b) These emissions are based upon the Source Status table in the TSD for the First Significant Permit Modification, 005-18853-00040, and the potential to emit of all subsequent modifications.

The table below summarizes the potential to emit HAPs for the entire source, prior to the proposed modification, after consideration of all enforceable limits established in the effective permits:

HAPs	Potential To Emit (tons/year)
Ethyl benzene	2.60
Ethylene Glycol	0.083
Formaldehyde	0.007
Methanol	0.015
MEK	13.3
Toluene	0.486
Xylene	12.6
Chromium	0.152
Glycol Ethers	7.46
Manganese	2.81
Hexane	0.100
Nickel	0.152
<b>TOTAL</b>	<b>39.8</b>

This existing source is a major source of HAPs, as defined in 40 CFR 63.41, because HAP emissions are greater than ten (10) tons per year for a single HAP and greater than twenty-five (25) tons per

year for a combination of HAPs. Therefore, this source is a major source under Section 112 of the Clean Air Act (CAA).

### Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2002 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	Not reported
PM <sub>10</sub>	2.00
SO <sub>2</sub>	0.00
VOC	33.0
CO	3.00
NO <sub>x</sub>	4.00
HAP (Ethylene Glycol)	0.128
HAP (Propylene)	0.128
HAP (Manganese)	0.128
HAP (Nickel)	0.003

### Background and Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by Toyota Industrial Equipment Manufacturing, Inc. on October 28, 2005, relating to the construction of a new counter-weight paint system, identified as U013. The following is a list of the newly proposed emission units and pollution control devices:

One (1) counter-weight paint line, identified as U013, constructed in 2006, consisting of:

- (a) One (1) paint booth, identified as U013a, equipped with electrostatic air atomized spray guns and a dry filter as overspray control, exhausting through stack S013b, capacity: 15 gallons of coating per hour.
- (b) One (1) paint booth, identified as U013b, equipped with electrostatic air atomized spray guns and a dry filter as overspray control, exhausting to stack S013d, capacity: 15 gallons of coating per hour.
- (c) Three (3) infrared ovens, each exhausting to one (1) stack, S013a, S013c and S013e.

IDEM, OAQ, is also proposing additional changes, described as Changes 2 through 14 of the "Proposed Changes" section of this document.

### Enforcement Issues

There are no pending enforcement actions.

**Stack Summary**

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
S013a	Pre-heat infrared oven	37.5	2.0	3,600	200
S013b	Paint booth U013a	37.5	3.0	20,160	Ambient
S013c	Drying infrared oven for U013a	37.5	2.0	3,600	200
S013d	Paint Booth U013b	37.5	3.0	20,160	Ambient
S013e	Drying infrared oven for U013b	37.5	2.0	3,600	200

**Emission Calculations**

See Appendix A of this document for detailed emission calculations.

**Permit Level Determination – Part 70**

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

The following table is used to determine the appropriate permit level under 326 IAC 2-7-10.5. This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	261
PM <sub>10</sub>	261
SO <sub>2</sub>	-
VOC	453
CO	-
NO <sub>x</sub>	-

  

HAPs	Potential To Emit (tons/year)
Glycol Ethers	62.4
TOTAL	62.4

This source modification is subject to 326 IAC 2-7-10.5(f)(4), since the modification has the potential to emit twenty-five (25) tons per year or more of PM, PM<sub>10</sub> and VOC, and 326 IAC 2-7-10.5(f)(6), since this modification has the potential to emit greater than or equal to ten (10) tons per year of a single

hazardous air pollutant. Additionally, the modification will be incorporated into the Part 70 Operating Permit through a significant permit modification issued pursuant to 326 IAC 2-7-12(d)(1).

**Permit Level Determination – PSD or Emission Offset**

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this Part 70 source and permit modification, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/Emission Unit	Potential to Emit (tons/year)						
	PM	PM <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAP (Glycol Ethers)
Modification	0.157	0.157	-	245	-	-	< 10
Total for Source Before Modification	71.7	73.7	5.00	< 250	5.99	5.60	> 10
Total for Source After Modification	71.9	73.9	5.00	< 250	5.99	5.60	> 10
Significant Level or Major Source Threshold	250	250	250	250	250	250	

- (a) This modification to an existing minor stationary source is not major because the emission increase is less than the PSD major source thresholds. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.
- (b) The Permittee will continue to limit the VOC usage at the coating operations, including the one (1) proposed counter-weight paint line, to 245 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Therefore, the potential to emit VOC is still limited to less than 250 tons per year, and this source will still be a minor source pursuant to 326 IAC 2-2, PSD.

**Federal Rule Applicability Determination**

The following federal rules are applicable to the source due to this modification:

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.
- (b) This modification is for the addition of a miscellaneous metal parts and products facility at an existing major source of HAPs. The metal parts surface coating operations at this source are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63, Subpart Mmmm. This source is considered an existing affected source pursuant to 40 CFR 63.4482.

The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the affected source described in this section except when otherwise specified in 40 CFR 63 Subpart Mmmm.

This rule has a future compliance date; therefore, the specific details of the rule and how the

Permittee will demonstrate compliance are not provided in this modification. The Permittee shall submit an application for a significant permit modification that will specify the option or options for the emission limitations, standards, and methods for determining compliance chosen by the Permittee. This application must be submitted by April 2, 2006, which is nine months prior to the compliance date for 40 CFR 63, Subpart M. At that time, IDEM, OAQ will include the specific details of the rule and how the Permittee will demonstrate compliance. In addition, pursuant to 40 CFR 63, Subpart M, the Permittee shall submit a Notification of Compliance Status containing the information required by 40 CFR 63.9(h), no later than 30 calendar days following the end of the initial compliance period described in 40 CFR 63.3940, 63.3950, or 63.3960, that applies to the affected source.

- (c) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to new or modified emission units that involve a pollutant-specific emission unit and meet the following criteria:
- (1) has a potential to emit before or after controls equal to or greater than the major source threshold for the pollutant involved;
  - (2) is subject to an emission limitation or standard for that pollutant; and
  - (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

The following table is used to identify the applicability of each of the applicability criteria, under 40 CFR 64.1, to each new or modified emission unit involved:

Emission Unit	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	Major Source Threshold (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
One (1) paint booth (U013a)	Dry filters for Overspray (PM <sub>10</sub> )	Y	131	0.079	100	Y	N
One (1) paint booth (U013b)	Dry filters for Overspray (PM <sub>10</sub> )	Y	131	0.079	100	Y	N
Infrared Ovens	None	N	0	0	100	N	N

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are applicable to the two (2) paint booths, identified as U013a and U013b, upon issuance of the Title V Renewal. A CAM plan must be submitted as part of the Renewal application.

<b>State Rule Applicability Determination</b>
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The following state rules are applicable to the source due to the modification:

326 IAC 2-2 (PSD)

PSD applicability is discussed under the Permit Level Determination - PSD and Emission Offset section.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

- (a) The operation of the one (1) counter-weight paint line, identified as U013, has the potential to emit greater than ten (10) tons per year of a single HAP. The applicant has agreed to limit the HAP usage at the one (1) counter-weight paint line, identified as U013, to less than ten (10) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Therefore, the potential to emit each individual HAP is limited to less than ten (10) tons per year, and 326 IAC 2-4.1 will not apply.
- (b) The operation of the one (1) counter-weight paint line, identified as U013, has the potential to emit greater than twenty-five (25) tons per year of total HAPs. The applicant has agreed to limit the total HAP usage at the one (1) counter-weight paint line, identified as U013, to less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Therefore, the potential to emit total HAPs is limited to less than twenty-five (25) tons per year, and 326 IAC 2-4.1 will not apply.

#### 326 IAC 2-6 (Emission Reporting)

Since this source is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, this source is subject to 326 IAC 2-6 (Emission Reporting). In accordance with the compliance schedule in 326 IAC 2-6-3, an emission statement must be submitted triennially. The first report is due no later than July 1, 2006, and subsequent reports are due every three (3) years thereafter. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

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

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.

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate from the one (1) counter-weight paint line, identified as U013, shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

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

The one (1) proposed counter-weight paint line has actual VOC emissions greater than fifteen (15) pounds per day. Therefore, the one (1) proposed counter-weight paint line is subject to the requirements of 326 IAC 8-2-9. 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 one (1) counter-weight paint line, identified as U013, shall be limited to 3.5 pounds of VOC per gallon of coating less water.

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

Based on the VOC data sheets submitted by the source and calculations made, the one (1) proposed counter-weight paint line can comply with this requirement.

<b>Compliance Determination and Monitoring Requirements</b>
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Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain

compliance provisions, however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance determination requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

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

The compliance determination requirements applicable to this modification are as follows:

The one (1) proposed counter-weight paint line has applicable compliance determination conditions as specified below:

- (a) Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.
- (b) IDEM, OAQ, has determined that no testing is required for this unit at the present time.

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

The one (1) proposed counter-weight paint line has applicable compliance monitoring conditions as specified below:

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the dry filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the counter-weight paint booth stacks (S013b and S013d) while the booth exhausting to that stack is in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stacks (S013b and S013d) and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

These monitoring conditions are necessary because the dry filters must operate properly in order to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-7 (Part 70).

### Proposed Changes

The changes listed below have been made to Part 70 Operating Permit No. T 005-7545-00040. Deleted language appears as ~~strike throughs~~ and new language appears in **bold**:

#### Change 1:

The VOC limits in the permit will not change as a result of this modification. Conditions D.1.4 through D.1.7 have been renumbered as D.1.5 through D.1.8 as a result of the following changes. These changes have been made to Sections A and D.1 due to the addition of the one (1) proposed counter-weight paint line:

#### 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) primer coat paint booth, identified as U001, constructed in 1989, equipped with a robotic spray system using air assisted airless, electrostatic spray guns and a horizontal water curtain with a downdraft water-floor followed by a demister as overspray control, exhausting to stacks S001a and S001b, capacity: 30.7 gallons and 327.9 pounds of coatings per hour.
- (b) One (1) top coat paint booth, identified as U002, constructed in 1989, equipped with air assisted airless, electrostatic spray guns and a horizontal water curtain with a downdraft water-floor followed by a demister as overspray control, exhausting to stacks S002a and S002b, capacity: 30.7 gallons and 327.9 pounds of coatings per hour.
- (c) One (1) counter-weight paint booth, identified as U003, constructed in 1993, equipped with air-assisted airless spray guns and a water curtain followed by a baffle demister as overspray control, exhausting to stacks S003a and S003b, capacity: 30.7 gallons and 327.9 pounds of coatings per hour.
- (d) One (1) touch-up paint booth, identified as U004, constructed in 1989, equipped with air-assisted airless spray guns and dry filters as overspray control, exhausting to stack S004, capacity: 42.1 gallons and 443.8 pounds of coatings per hour.
- (e) One (1) D-500 paint booth, identified as U005, constructed in 1996, equipped with air-assisted airless spray guns and dry filters as overspray control, exhausting to stack S005a, capacity: 7.68 gallons and 82.0 pounds of coatings per hour.
- (f) One (1) large parts shot blast cabinet, identified as U009, constructed in 1989, exhausting to a dust collector (C009) and exiting into the building, capacity: 132,000 pounds of steel shot per hour.
- (g) One (1) steel shot blast unit, with a maximum blast rate of 115,500 pounds per hour, controlled by a dust collector, designated as U011, and exhausts inside the building.
- (h) One (1) compressed natural gas (CNG) fueling station for the one (1) time filling of a maximum of one-thousand (1,000) forklift fuel tanks per twelve (12)-consecutive month period, and the testing of the CNG forklift engines with individual heat input capacities no more than 0.521 million British thermal units per hour.
- (i) One (1) steel shot blast unit, identified as U012, equipped with a dust collector, identified as C012, and exhausting inside the building, capacity: 56,500 pounds of steel shot per hour.

- (j) **One (1) counter-weight paint line, identified as U013, constructed in 2006, consisting of:**
  - (1) **One (1) paint booth, identified as U013a, equipped with electrostatic air atomized spray guns and a dry filter as overspray control, exhausting through stack S013b, capacity: 15 gallons of coating per hour.**
  - (2) **One (1) paint booth, identified as U013b, equipped with electrostatic air atomized spray guns and a dry filter as overspray control, exhausting to stack S013d, capacity: 15 gallons of coating per hour.**
  - (3) **Three (3) infrared ovens, each exhausting to one (1) stack, S013a, S013c and S013e.**

**SECTION D.1 FACILITY OPERATION CONDITIONS**

<b>Facility Description [326 IAC 2-7-5(15)]</b>	
(a)	One (1) primer coat paint booth, identified as U001, constructed in 1989, equipped with a robotic spray system using air assisted airless, electrostatic spray guns and a horizontal water curtain with a downdraft water-floor followed by a demister as overspray control, exhausting to stacks S001a and S001b, capacity: 30.7 gallons and 327.9 pounds of coatings per hour.
(b)	One (1) top coat paint booth, identified as U002, constructed in 1989, equipped with air assisted airless, electrostatic spray guns and a horizontal water curtain with a downdraft water-floor followed by a demister as overspray control, exhausting to stacks S002a and S002b, capacity: 30.7 gallons and 327.9 pounds of coatings per hour.
(c)	One (1) counter-weight paint booth, identified as U003, constructed in 1993, equipped with air-assisted airless spray guns and a water curtain followed by a baffle demister as overspray control, exhausting to stacks S003a and S003b, capacity: 30.7 gallons and 327.9 pounds of coatings per hour.
(d)	One (1) touch-up paint booth, identified as U004, constructed in 1989, equipped with air-assisted airless spray guns and dry filters as overspray control, exhausting to stack S004, capacity: 42.1 gallons and 443.8 pounds of coatings per hour.
(e)	One (1) D-500 paint booth, identified as U005, constructed in 1996, equipped with air-assisted airless spray guns and dry filters as overspray control, exhausting to stack S005a, capacity: 7.68 gallons and 82.0 pounds of coatings per hour.
(j)	<b>One (1) counter-weight paint line, identified as U013, constructed in 2006, consisting of:</b> <ul style="list-style-type: none"><li>(1) <b>One (1) paint booth, identified as U013a, equipped with electrostatic air atomized spray guns and a dry filter as overspray control, exhausting through stack S013b, capacity: 15 gallons of coating per hour.</b></li><li>(2) <b>One (1) paint booth, identified as U013b, equipped with electrostatic air atomized spray guns and a dry filter as overspray control, exhausting to stack S013d, capacity: 15 gallons of coating per hour.</b></li><li>(3) <b>Three (3) infrared ovens, each exhausting to one (1) stack, S013a, S013c and S013e.</b></li></ul>

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

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

These facilities shall use no more than 245 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive months, based on a twelve (12) month rolling total. This usage limit is required to limit the potential to emit of VOC to less than 250 tons per year. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and ~~40 CFR 52.21~~ not applicable.

**D.1.3 ~~Particulate Matter (PM) [326 IAC 6-3-2(c)]~~**

~~Pursuant to PC (03) 1733, issued on March 3, 1989, the primer coat paint booth, top coat paint booth, and touch-up paint booth are subject to the requirements of 326 IAC 6-3-2(c). Pursuant to CP 005-2724-00057, issued on May 26, 1993, the counter-weight paint booth is subject to the requirements of 326 IAC 6-3-2(c). Pursuant to CP 005-5827-00040, issued on August 19, 1996, the D-500 paint booth is subject to the requirements of 326 IAC 6-3-2(c). The particulate matter (PM) emissions from the aforementioned facilities will be limited by the following:~~

~~Interpolation and extrapolation 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:~~

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

~~or~~

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

$$E = 55.0 P^{0.11} - 40 \text{ where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

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

Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating processes shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

**D.1.4 Hazardous Air Pollutants (HAPs) [326 IAC 2-4.1-1]**

- (a) The use of each individual HAP at the one (1) counter-weight paint line, identified as U013, including coatings, dilution solvents, and cleaning solvents shall be less than ten (10) tons per twelve (12) consecutive month period with compliance determined at the end of each month. This usage limit is required to limit the potential to emit of each individual HAP to less than ten (10) tons per year. Compliance with this limit makes 326 IAC 2-4.1-1 (New Source Toxics Control) not applicable.
- (b) The use of total HAPs at the one (1) counter-weight paint line, identified as U013, including coatings, dilution solvents, and cleaning solvents shall be less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month. This usage limit is required to limit the potential to emit of any combination of HAPs to less than twenty-five (25) tons per year. Compliance with this limit makes 326 IAC 2-4.1-1 (New Source Toxics Control) not applicable.

**D.1.67 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]**

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

IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

- (b) **Compliance with the VOC content limit in Condition D.1.1(a) shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis on days when at least one (1) coating with a VOC content greater than 3.5 pounds per gallon is used. This volume weighted average shall be determined by the following equation:**

$$A = [(C \times U) / U]$$

**Where: A is the volume weighted average in pounds VOC per gallon less water as applied;**

**C is the VOC content of the coating in pounds VOC per gallon less water as applied; and**

**U is the usage rate of the coating in gallons per day.**

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

- ~~(a) The horizontal water curtain followed by a demister shall be in operation at all times when the corresponding paint booth (primer coat paint booth or top coat paint booth) is in operation.~~
- ~~(b) The water curtain followed by a baffle demister shall be in operation at all times the counter-weight paint booth is in operation.~~
- ~~(c) The dry filters must be in operation at all times when the corresponding paint booth (touch up paint booth or D-500 paint booth) is in operation.~~

#### D.1.9 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the dry filters and water curtains. To monitor the performance of the dry filters and water curtains, weekly observations shall be made of the overspray from the touch-up paint booth, D-500 paint booth, primer coat paint booth, top coat paint booth, and counter-weight paint booth stacks (S001a, S001b, S002a, S002b, S003a, S003b, S004, and S005a, **S013b and S013d**) while the booth exhausting to that stack is in operation. ~~The Compliance Response Plan shall be followed whenever~~ **If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances.** Failure to take response steps in accordance with Section C - Compliance Monitoring Plan ~~Failure to Take Response Steps~~ **Response to Excursions or Exceedances**, shall be considered a ~~violation of~~ **deviation from** this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stacks (S001a, S001b, S002a, S002b, S003a, S003b, S004, and S005a, **S013b and S013d**) 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 w~~**When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances.** ~~The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step.~~ Failure to take response steps in accordance with Section C - Compliance Monitoring Plan ~~Failure to Take Response Steps~~ **Response to Excursions or Exceedances**, shall be considered a ~~violation of~~ **deviation from** this permit.
- ~~(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.~~

#### D.1.10 Record Keeping Requirements

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- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken daily or monthly, as indicated below, and shall be complete and sufficient to establish compliance with the VOC emission limits and VOC usage limits established in Conditions D.1.1(a) and D.1.2.
- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) The volume weighted VOC content of the coatings used for each day, only when a coating with a VOC content greater than 3.5 pounds per gallon is used that day;
  - (4) The cleanup solvent usage for each day;
  - (5) The total VOC usage for each month; and
  - (6) The weight of VOCs emitted for each compliance period.
- (b) **To document compliance with Condition D.1.4, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly, and shall be complete and sufficient to establish compliance with the HAP usage limit established in Condition D.1.4.**
- (1) **The amount and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;**
  - (2) **The total individual HAP usage for each month; and**
  - (3) **The weight of HAPs emitted for each compliance period.**
- ~~(b)(c)~~ (c) To document compliance with Condition ~~D.1.8 and D.1.9~~, the Permittee shall maintain a log of weekly overspray observations, **and** daily and monthly inspections, ~~and these additional inspections prescribed by the Preventive Maintenance Plan.~~
- ~~(e)(d)~~ (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.11 Reporting Requirements

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A quarterly summary of the information to document compliance with Conditions D.1.2 **and D.1.4** shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

**National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-7-5(1)]**

**D.1.12 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.1.14, Notification Requirements.

**D.1.13 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]**

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- (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.1.14, 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.1.14 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.1.15 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  
Indianapolis, Indiana 46204-2251**

The report form has been revised as follows:

Source Name:	Toyota Industrial Equipment Manufacturing, Inc.
Source Address:	5555 Inwood Drive, Columbus, Indiana 47202
Mailing Address:	5555 Inwood Drive, P.O. Box 2487, Columbus, Indiana 47202-2487
Part 70 Permit No.:	T 005-7545-00040
Facilities:	One (1) touch-up paint booth, one (1) D-500 paint booth, one (1) primer coat paint booth, one (1) top coat paint booth, <del>and</del> one (1) counter-weight paint booth, <b>and one (1) counter-weight paint line (U013)</b>
Parameter:	VOC Usage
Limit:	245 tons per twelve (12) consecutive months

The following report forms have been added:

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

**Part 70 Quarterly Report**

**Source Name:** Toyota Industrial Equipment Manufacturing, Inc.  
**Source Address:** 5555 Inwood Drive, Columbus, Indiana 47202  
**Mailing Address:** 5555 Inwood Drive, P.O. Box 2487, Columbus, Indiana 47202-2487  
**Part 70 Permit No.:** T 005-7545-00040  
**Facility:** One (1) counter-weight paint line (U013)  
**Parameter:** Individual HAP Usage  
**Limit:** Less than 10 tons per twelve (12) consecutive month period, with compliance determined at the end of each month

YEAR: \_\_\_\_\_

Month	Individual HAP Usage (tons)	Individual HAP Usage (tons)	Individual HAP Usage (tons)
	This Month	Previous 11 Months	12 Month Total

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

**Submitted by:** \_\_\_\_\_  
**Title/Position:** \_\_\_\_\_  
**Signature:** \_\_\_\_\_  
**Date:** \_\_\_\_\_  
**Phone:** \_\_\_\_\_

**Attach a signed certification to complete this report.**

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

**Part 70 Quarterly Report**

**Source Name:** Toyota Industrial Equipment Manufacturing, Inc.  
**Source Address:** 5555 Inwood Drive, Columbus, Indiana 47202  
**Mailing Address:** 5555 Inwood Drive, P.O. Box 2487, Columbus, Indiana 47202-2487  
**Part 70 Permit No.:** T 005-7545-00040  
**Facility:** One (1) counter-weight paint line (U013)  
**Parameter:** Total HAPs Usage  
**Limit:** Less than 25 tons per twelve (12) consecutive month period, with compliance determined at the end of each month

YEAR: \_\_\_\_\_

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

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

**Submitted by:** \_\_\_\_\_  
**Title/Position:** \_\_\_\_\_  
**Signature:** \_\_\_\_\_  
**Date:** \_\_\_\_\_  
**Phone:** \_\_\_\_\_

**Attach a signed certification to complete this report.**

**Change 2:**

The IDEM, OAQ, zip code has been updated in all places in the permit, as follows:

46204-2251

**Change 3:**

IDEM has determined that the Permittee is not required to keep records of all preventive maintenance. However, where the Permittee seeks to demonstrate that an emergency has occurred, the Permittee must provide, upon request, records of preventive maintenance in order to establish that the lack of proper maintenance did not cause or contribute to the deviation. Therefore, IDEM has amended Condition B.12 (Preventive Maintenance Plan), Condition B.13 (Emergency Provisions), and paragraph (b) of Condition D.1.9 (previously D.1.10) (as shown in Change 1), and deleted paragraph (b) of Condition D.2.8, paragraph (c) of Condition D.4.8 and paragraph (d) of Condition D.6.8 (previously Conditions D.2.9, D.4.9 and D.6.9) (as shown in Change 10), and paragraphs (b) and (c) of Condition C.19 (previously C.20). Changes to Conditions B.12, B.13 and C.19 are as follows:

B.12 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]

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(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) 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;
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

~~(b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.~~

~~(b)~~ **(b)** A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (c) **To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.**

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

(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, ~~except as provided in 326 IAC 2-7-16.~~

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a ~~health-based~~ or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that 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 notice, either in writing or facsimile, of the emergency to:

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

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

The notice fulfills the requirement of 326 IAC 2-7-5(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 ~~A~~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) ~~for sources subject to this rule after the effective date of this rule.~~ This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) **The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(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 compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) ~~Operations may continue during an emergency only if the following conditions are met:~~
- (1) ~~—If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.~~
- (2) ~~—If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:~~
- (A) ~~—The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and~~
- (B) ~~—Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.~~
- ~~Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.~~
- (h) **The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.**

C.2019 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data 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 and available upon the request of an IDEM, OAQ, representative. 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 written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- ~~(b) —Records of required monitoring information shall include, where applicable:~~
- (1) ~~—The date, place, and time of sampling or measurements;~~

- ~~(2) — The dates analyses were performed;~~
  - ~~(3) — The company or entity performing the analyses;~~
  - ~~(4) — The analytic techniques or methods used;~~
  - ~~(5) — The results of such analyses; and~~
  - ~~(6) — The operating conditions existing at the time of sampling or measurement.~~
- (c) — Support information shall include, where applicable:
- ~~(1) — Copies of all reports required by this permit;~~
  - ~~(2) — All original strip chart recordings for continuous monitoring instrumentation;~~
  - ~~(3) — All calibration and maintenance records;~~
  - ~~(4) — Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator-s standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C— Compliance Monitoring Plan— Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.~~
- ~~(d)~~(b) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

**Change 4:**

IDEM has clarified the Condition B.22 (Operational Flexibility) as follows:

**B.22 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 approval required by 326 IAC 2-1 has been obtained;
  - (3) The changes do not result in emissions which exceed the ~~emissions allowable under~~ **limitations provided in** this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
  - (4) The Permittee notifies the:  
  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251

and

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

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

- (5) The Permittee maintains records on-site, **on a rolling five (5) year basis**, which document, ~~on a rolling five (5) year basis~~, all such changes and emissions trading **trades** that are subject to 326 IAC 2-7-20(b), (c), or (e). ~~and makes~~ **The Permittee shall make** 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), (c)(1), and (e)(2).

- (b) 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 by the Permittee does not require the certification by the ~~A~~responsible official~~@~~ as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]  
The Permittee may trade **emissions** increases and decreases ~~in emissions in~~ at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(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.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

#### Change 5:

The name and phone number of the appropriate IDEM, OAQ Section has been revised in Condition B.26, Annual Fee Payment:

B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt

of a billing. 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 317-233-0425 **4230** (ask for ~~OAQ, Technical Support and Modeling~~ **OAQ, Billing, Licensing, and Training** Section), to determine the appropriate permit fee.

#### **Change 6:**

Indiana was required to incorporate credible evidence provisions into state rules consistent with the SIP call published by U.S. EPA in 1997 (62 FR 8314). Indiana has incorporated the credible evidence provision in 326 IAC 1-1-6. This rule is effective March 16, 2005; therefore, the Condition B.28 reflecting this rule will be incorporated into the permit as follows:

#### **B.28 Credible Evidence [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [62 FR 8314] [326 IAC 1-1-6]**

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

#### **Change 7:**

Since the requirements of Condition C.6 (Operation of Equipment) have been incorporated in the D Sections, Condition C.6 has been removed from the permit, as follows, and the remainder of Section C is renumbered accordingly:

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

~~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.~~

#### **Change 8:**

IDEM realizes that the instrument specifications can only be practically applied to analog units, and has therefore clarified Condition C.12 (formerly C.13) to state that the condition only applies to analog units. IDEM has also determined that the accuracy of the instruments is not nearly as important as whether the instrument has a range that is appropriate for the normal expected reading of the parameter. Therefore, the accuracy requirements have been removed from Condition C.12 (formerly C.13) as follows:

#### ~~C.123 Pressure Gauge Instrument Specifications [326 IAC 2-1.1-11][326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]~~

- (a) ~~Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed~~ **When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected normal maximum reading for the normal range shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( 2%) of full scale reading.**
- (b) **The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that**

**an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.**

**Change 9:**

IDEM has reconsidered the requirement to develop and follow Compliance Monitoring and Compliance Response Plans. The Permittee will still be required to take reasonable response steps when a compliance monitoring parameter is determined to be out of range or abnormal. Replacing the requirement to develop and follow Compliance Monitoring and Compliance Response Plans with a requirement to take reasonable response steps will ensure that the control equipment is returned to proper operation as soon as practicable, while still allowing the Permittee the flexibility to respond to situations that were not anticipated. The following changes have been made to Condition 15 (formerly C.16):

**C.165 Compliance Monitoring Plan — Failure to Take Response Steps Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6][326 IAC 1-6]**

- ~~(a) — The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:~~
- ~~(1) — This condition;~~
  - ~~(2) — The Compliance Determination Requirements in Section D of this permit;~~
  - ~~(3) — The Compliance Monitoring Requirements in Section D of this permit;~~
  - ~~(4) — The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and~~
  - ~~(5) — A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP-s shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:~~
    - ~~(A) — Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and~~
    - ~~(B) — A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.~~
- ~~(b) — For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.~~
- ~~(c) — After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:~~

- ~~(1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.~~
- ~~(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;~~
- ~~(3) An automatic measurement was taken when the process was not operating; or~~
- ~~(4) The process has already returned to operating within a normal parameters and no response steps are required.~~
- ~~(d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.~~
- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.**
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:**
  - (1) initial inspection and evaluation;**
  - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or**
  - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.**
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:**
  - (1) monitoring results;**
  - (2) review of operation and maintenance procedures and records;**
  - (3) inspection of the control device, associated capture system, and the process.**
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.**
- (e) The Permittee shall maintain the following records:**
  - (1) monitoring data;**

- (2) monitor performance data, if applicable; and
- (3) corrective actions taken.

**Change 10:**

IDEM has determined that it is the Permittee's responsibility to include routine control device inspection requirements in the applicable preventive maintenance plan. Since the Permittee is in the best position to determine the appropriate frequency of control device inspections and the details regarding which components of the control device should be inspected, Conditions D.2.7, D.4.6 and D.6.7 requiring control device inspections have been removed from the permit. In addition, the requirement to keep records of the inspections in Conditions D.2.8 (formerly D.2.9), D.4.8 (formerly D.4.9) and D.6.8 (formerly D.6.9) has been removed.

~~D.2.7 Dust Collector Inspections~~

~~An inspection shall be performed each calendar quarter of all filters controlling the shot blasting operations when venting to the atmosphere. A dust collector inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.~~

~~D.4.6 Dust Collector Inspections~~

~~An inspection shall be performed each calendar quarter of all the dust collector. Defective cartridges and collectors shall be replaced. A record shall be kept of the results of the inspection and the number of dust collectors and cartridges replaced.~~

~~D.6.7 Dust Collector Inspections~~

~~An inspection shall be performed each calendar quarter of all cartridges controlling the process when venting to the atmosphere. A dust collector inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. Inspections required by this condition shall not be performed in consecutive months. All defective cartridges shall be replaced.~~

D.2.98 Record Keeping Requirements

- (a) To document compliance with Condition D.2.5, the Permittee shall maintain records of daily visible emission notations of the shot blast stacks exhaust on days when the shot blasters are exhausting to the outside atmosphere.
- (b) To document compliance with Condition D.2.6, the Permittee shall maintain the following:
  - (1) Weekly records of the following operational parameters during normal operation when venting to the atmosphere:
    - (A) ~~Inlet and outlet differential static pressure drop during normal operation when venting to the atmosphere.;~~ and
    - (B) ~~Cleaning cycle: frequency and differential pressure.~~
  - (2) ~~Documentation of all response steps implemented, per event.~~
  - (3) ~~Operation and preventive maintenance logs, including work purchases orders, shall be maintained.~~
  - (4) ~~Quality Assurance/Quality Control (QA/QC) procedures.~~

- ~~(5)~~ — Operator standard operating procedures (SOP).
  - ~~(6)~~ — Manufacturer's specifications or its equivalent.
  - ~~(7)~~ — Equipment "troubleshooting" contingency plan.
  - ~~(8)~~**(2)** Documentation of the dates vents are redirected.
- ~~(b)~~ — To document compliance with Condition D.2.7, the Permittee shall maintain records of the results of the inspections required under Condition D.2.7 and the dates the vents are redirected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**D.4.98** Record Keeping Requirements

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- (a) To document compliance with Condition D.4.5, the Permittee shall maintain records of daily visible emission notations of the mechanical blasting booth at the point of exhaust on days when the blasting booth is exhausting to the outside atmosphere.
- (b) To document compliance with Condition D.4.76, the Permittee shall maintain the following:
- (1) Weekly records of the following operational parameters during normal operation when venting to the atmosphere:
    - ~~(A)~~ — Inlet and outlet differential static pressure **drop during normal operation when venting to the atmosphere.;** and
    - ~~(B)~~ — Cleaning cycle: frequency and differential pressure.
  - ~~(2)~~ — Documentation of all response steps implemented, per event.
  - ~~(3)~~ — Operation and preventive maintenance logs, including work purchases orders, shall be maintained.
  - ~~(4)~~ — Quality Assurance/Quality Control (QA/QC) procedures.
  - ~~(5)~~ — Operator standard operating procedures (SOP).
  - ~~(6)~~ — Manufacturer's specifications or its equivalent.
  - ~~(7)~~ — Equipment "troubleshooting" contingency plan.
  - ~~(8)~~**(2)** Documentation of the dates vents are redirected.
- ~~(c)~~ — To document compliance with Condition D.4.6 and D.4.8, the Permittee shall maintain records of the results of the inspections, parts replaced and corrective actions taken if necessary.
- ~~(d)~~**(c)** All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**D.6.98** Record Keeping Requirements

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- (a) To document compliance with Condition D.6.5, the Permittee shall maintain records of visible emission notations of the dust collector (C012) exhaust once per **shift day** when exhausting to the atmosphere.
- (b) To document compliance with Condition D.6.6, the Permittee shall maintain records once per **shift day** of the ~~total static~~ pressure drop during normal operation when venting to the atmosphere.
- ~~(c) To document compliance with Condition D.6.7, the Permittee shall maintain records of the results of the inspections required under Condition D.6.7 and the dates the vents are redirected.~~
- ~~(d) To document compliance with Condition D.6.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.~~
- ~~(e)~~**(c)** All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### Change 11:

IDEM has determined that once per day monitoring of visible emission notations and once per day monitoring of the dust collector is generally sufficient to ensure proper operation of the shotblaster (U012) stack exhausts and the control device. IDEM has also determined that monitoring these parameters once per day is sufficient to satisfy the requirements of the Part 70 rules at 326 IAC 2-7-5 and 326 IAC 2-7-6. Condition D.6.8 (formerly D.6.9) has been revised as shown in Change 10. Conditions D.6.5 and D.6.6 have been changed as follows:

#### D.6.5 Visible Emissions Notations

- (a) Visible emission notations of the dust collector (C012) exhaust shall be performed once per **shift day** during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) ~~The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an~~ **If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances.** Failure to take response steps in accordance with Section C - ~~Compliance Monitoring Plan - Failure to Take Response Steps~~ **Response to Excursions or Exceedances** shall be considered a deviation from this permit.

#### D.6.6 Parametric Monitoring

The Permittee shall record the ~~total static~~ pressure drop across the dust collector used in conjunction with the one (1) shot blast unit (U012), at least once per **shift day** when the shot blast unit is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the dust collector is outside the normal range of 0.1 and 6.0 inches of water or a range established during

the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - ~~Compliance Monitoring Plan - Failure to Take Response Steps~~ **Response to Excursions or Exceedances**. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - ~~Compliance Monitoring Plan - Failure to Take Response Steps~~ **Response to Excursions or Exceedances** shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - ~~Pressure Gauge Instrument Specifications~~ **Instrument Specifications**, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

#### **Change 12:**

Paragraph (a) of Conditions D.2.7 (formerly D.2.8), D.4.7 (formerly D.4.8) and D.6.7 (formerly D.6.8) (Dust Collector Failure Detection) or (Failure Detection) has been deleted. For multi-compartment control devices, the permit will not specify what actions the Permittee needs to take in response to a broken compartment. However, a requirement has been added to Conditions D.2.4, D.4.4 and D.6.4 requiring the Permittee to notify IDEM if a broken compartment is detected and the control device will not be repaired for more than ten (10) days. This notification allows IDEM to take any appropriate actions if the emission unit will continue to operate for a long period of time while the control device is not operating in optimum condition.

Paragraph (b) of Conditions D.2.7 (formerly D.2.8), D.4.7 (formerly D.4.8) and D.6.7 (formerly D.6.8) (Dust Collector Failure Detection) or (Failure Detection) has been revised for those processes that operate in batch mode. The condition required an emission unit to be shut down immediately in case of control device failure. However, IDEM is aware there can be safety issues with shutting down a process in the middle of a batch. IDEM also realizes that in some situations, shutting down an emissions unit mid-process can cause equipment damage. Therefore, since it is not always possible to shut down a process with material remaining in the equipment, IDEM has revised the condition to state that in the case of control device failure, the feed to the process must be shut off immediately, and the process shall be shut down as soon as practicable.

#### **D.2.4 Particulate Matter (PM) Control [326 IAC 2-7-6(6)]**

- (a) The dust collector (C009) shall be in operation at all times when the one (1) large parts shot blast cabinet is in operation.
- (b) **In the event that control device failure is observed in a multi-compartment control device, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.**

#### **D.2.87 Dust Collector Failure Detection**

~~In the event that a dust collector failure has been observed:~~

- ~~(a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).~~

- ~~(b)~~ (a) For a single compartment dust collectors **controlling emissions from a process operated continuously**, a failed units and the associated process ~~will~~ **shall** be shut down immediately until the failed units ~~have~~ **has** been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a single compartment dust collector **controlling emissions from a batch process**, the feed to the process shall be shut down immediately until the failed units ~~have~~ **has** been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Dust collector failure can be indicated by a significant drop in the dust collector=s pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

#### D.4.4 Particulate Matter (PM) Control [326 IAC 2-7-6(6)]

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- (a) Pursuant to CP005-10284-00040, the dust collector for PM control shall be in operation at all times when the shot blast unit is in operation.
- (b) In the event that control device failure is observed in a multi-compartment control device, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

#### D.4.87 Failure Detection

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In the event that a dust collector=s failure has been observed:

- ~~(a)~~ The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions)
- (b) (a) For a single compartment dust collectors **controlling emissions from a process operated continuously**, a failed units and the associated process ~~will~~ **shall** be shut down immediately until the failed units ~~have~~ **has** been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a single compartment dust collector **controlling emissions from a batch process**, the feed to the process shall be shut down immediately until the failed units ~~have~~ **has** been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the

**requirements of the emergency provisions of this permit (Section B - Emergency Provisions).**

**Dust collector failure can be indicated by a significant drop in the dust collector=s pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.**

**D.6.4 Particulate Control [326 IAC 2-7-6(6)]**

- (a)** In order to comply with Conditions D.6.1 and D.6.2, the dust collector, identified as C012, for particulate control shall be in operation and control emissions from the one (1) shot blast unit (U012) at all times that the shot blast unit is in operation.
- (b)** **In the event that control device failure is observed in a multi-compartment control device, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.**

**D.6.87 Failure Detection**

~~In the event that dust collector failure has been observed:~~

- ~~(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C Compliance Monitoring Plan Failure to Take Response Steps, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.~~
- (b) (a)** **For a single compartment units controlling emissions from a process operated continuously, if failure is indicated by a significant drop in the baghouse=s pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then a failed units and the associated process shall be shut down immediately until the failed units have has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).**
- (b)** **For a single compartment dust collector controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed units have has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency**

**Provisions).**

**Dust collector failure can be indicated by a significant drop in the dust collector=s pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.**

**Change 13:**

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.

The requirements of the revised rule are the same as the requirements of the old rule for most processes at this source. Changes to the requirements for surface coating in Section D.1 are shown in Change 1. The following changes have been made to Conditions C.1, D.2.1, D.3.3, D.4.1, D.5.1 and D.6.3:

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

Pursuant to 326 IAC 6-3-2(e)(2), the allowable particulate matter emissions rate from any process not exempt under 326 IAC 6-3-1(b) or (c) already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than one hundred (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.

**D.2.1 Particulate Matter (PM) [326 IAC 6-3-2]**

Pursuant to 326 IAC 6-3-2 (Process Operations Particulate Emission Limitations for Manufacturing Processes), the allowable PM particulate emission rate from the one (1) large parts shot blast cabinet shall not exceed 47.2 pounds per hour when operating at a process weight rate of 132,000 pounds per hour.

The pounds per hour limitation was calculated with the following equations:

Interpolation and extrapolation of the data for the process weight rate greater than 60,000 pounds per hour shall be accomplished by use of the equation:

$$55.0P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

**D.3.3 Particulate Matter (PM) [326 IAC 6-3-2]**

(a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emission rate The particulate matter (PM) from the one (1) counter-weight sanding booth, identified as I003, one (1) powder coat line, identified as I011, and ninety-nine (99) welding stations shall each not exceed 0.551 pounds per hour for a process weight rate of less than 100 pounds per hour.

(b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emission rate The particulate matter (PM) from the insignificant activities of brazing, cutting, soldering, remaining welding, grinding and machining, and iron phosphate washing shall be limited to 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:

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

- (c) Pursuant to **326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)**, the particulate emission rate Pursuant to ~~Exempt Construction and Operation Status, CP 005-10221-00040~~, the powder coating booths and the washer/ treatment process shall comply with 326 IAC 6-3-2(e) using the following equation:

$$E = 4.10P^{0.67} \quad \text{where: } E = \text{rate of emission in pounds per hour,} \\ P = \text{process weight in tons per hour, if} \\ P \text{ is equal to or less than 60,000 lbs/hr (30 tons/hr).}$$

#### D.4.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to ~~CP005-10284-00040~~ and 326 IAC 6-3-2 (**Process Operations Particulate Emission Limitations for Manufacturing Processes**), the allowable PM particulate emission rate from the shot blast unit shall not exceed 45.9 pounds per hour when operating at a process weight rate of 115,500 pounds per hour. The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate in excess of 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour.}$$

#### Change 14:

All remaining references to the Compliance Response Plan in the permit have been removed as follows:

#### D.2.5 Visible Emissions Notations

- (a) Daily visible emission notations of the shot blast units at the point of exhaust shall be performed during normal daylight operations when exhausting to the outside atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) ~~The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an~~ **If abnormal emissions is are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.**

#### D.2.6 Parametric Monitoring

The Permittee shall record the ~~total static~~ pressure drop across the dust collector (C009) used in conjunction with the shot blasting processes, at least once weekly when the shot blasting is in

operation when venting to the atmosphere. ~~Unless operated under conditions for which the Compliance Response Plan specifies otherwise~~ **When for any one reading**, the pressure drop across the dust collector ~~shall be maintained within~~ **is outside** the normal range of 0.1 and 6.0 inches of water or a range established during the latest stack test, **the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances.** The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading. **A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.**

The instrument used for determining the pressure shall comply with Section C - ~~Pressure Gauge Instrument~~ **Instrument** Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

#### D.4.5 Visible Emissions Notations

---

- (a) Daily visible emission notations of the shot blast unit at the point of exhaust shall be performed during normal daylight operations when exhausting to the outside atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) ~~The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an~~ **If** abnormal emissions **is are** observed, **the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.**

#### D.4.6 Parametric Monitoring

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The Permittee shall record the ~~total static~~ pressure drop across the dust collector (U011) used in conjunction with the shot blast unit, at least once weekly when the shot blast unit is in operation when venting to the atmosphere. ~~Unless operated under conditions for which the Compliance Response Plan specifies otherwise~~ **When for any one reading**, the pressure drop across the dust collector ~~shall be maintained within~~ **is outside** the normal range of 0.1 and 6.0 inches of water or a range established during the latest stack test, **the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances.** The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading. **A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.**

The instrument used for determining the pressure shall comply with Section C - ~~Pressure Gauge Instrument~~ **Instrument** Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

**Conclusion and Recommendation**

The construction and operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 005-21912-00040 and Significant Permit Modification No. 005-22010-00040. The staff recommends to the Commissioner that these Part 70 Significant Source and Significant Permit Modifications be approved.

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

**Company Name: Toyota Industrial Equipment Manufacturing, Inc.  
Address City IN Zip: 5555 Inwood Drive, Columbus, Indiana 47202  
Source Modification Number: 005-21912-00040  
Permit Modification Number: 005-22010-00040  
Reviewer: CarrieAnn Paukowits  
Application Date: October 28, 2005**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/hr)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
<b>U013a - Paint Booth 1</b>															
Buff Primer (AXDA204)	11.40	30.240%	0.0%	30.2%	0.0%	82.00%	15.0	3.45	3.45	51.71	1241	226	131	4.20	75%
Grey Polyurethane Enamel (KAA0045)	10.81	29.640%	0.0%	29.6%	0.0%	72.40%	15.0	3.20	3.20	48.06	1153	211	125	4.43	75%
Orange Polyurethane Enamel (KAEA019)	9.51	34.720%	0.0%	34.7%	0.0%	61.80%	15.0	3.30	3.30	49.53	1189	217	102	5.34	75%
<b>U013b - Paint Booth 2</b>															
Buff Primer (AXDA204)	11.40	30.240%	0.0%	30.2%	0.0%	82.00%	15.0	3.45	3.45	51.71	1241	226	131	4.20	75%
Grey Polyurethane Enamel (KAA0045)	10.81	29.640%	0.0%	29.6%	0.0%	72.40%	15.0	3.20	3.20	48.06	1153	211	125	4.43	75%
Orange Polyurethane Enamel (KAEA019)	9.51	34.720%	0.0%	34.7%	0.0%	61.80%	15.0	3.30	3.30	49.53	1189	217	102	5.34	75%

PM Control Efficiency: 99.94%

**State Potential Emissions**

**Add worst case coating to all solvents**

<b>Uncontrolled</b>	<b>103</b>	<b>2482</b>	<b>453</b>	<b>261</b>
<b>Controlled</b>	<b>103</b>	<b>2482</b>	<b>453</b>	<b>0.157</b>

**METHODOLOGY**

Calculations based on VOC data sheets for as applied coatings, supplied by the coating manufacturer.  
Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water)  
Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % Organics)  
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)  
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)  
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)  
Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1- Weight % Volatiles) \* (1-Transfer efficiency) \*(8760 hrs/yr) \*(1 ton/2000 lbs)  
Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids)  
Total = Worst Coating + Sum of all solvents used

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

**Company Name: Toyota Industrial Equipment Manufacturing, Inc.  
Address City IN Zip: 5555 Inwood Drive, Columbus, Indiana 47202  
Source Modification Number: 005-21912-00040  
Permit Modification Number: 005-22010-00040  
Reviewer: CarrieAnn Paukowits  
Application Date: October 28, 2005**

Material	Density (Lb/Gal)	Gallons of Material (gal/hr)	Weight % Glycol Ethers		Glycol Ether Emissions (ton/yr)	Total Emissions (ton/yr)
<b>U013a - Paint Booth 1</b>						
Buff Primer (AXDA204)	11.79	13.636	0.00%		0.00	0.00
Grey Polyurethane Enamel (KAA0045)	10.86	13.125	5.00%		31.22	31.22
Orange Polyurethane Enamel (KAEA019)	9.62	13.125	0.00%		0.00	0.00
<b>U013b - Paint Booth 2</b>						
Buff Primer (AXDA204)	11.79	13.636	0.00%		0.00	0.00
Grey Polyurethane Enamel (KAA0045)	10.86	13.125	5.00%		31.22	31.22
Orange Polyurethane Enamel (KAEA019)	9.62	13.125	0.00%		0.00	0.00

Total State Potential Emissions

**62.4**

**62.4**

**METHODOLOGY**

The Glycol Ether is Ethylene Glycol Monobutyl Ether Acetate

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

Gallons of material is based on the percentage of the material containing the HAP in the coating formulation.