



*Mitchell E. Daniels, Jr.*  
Governor

*Thomas W. Easterly*  
Commissioner

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

TO: Interested Parties / Applicant  
DATE: February 24, 2006  
RE: GOTEC PLUS / 069-22308-00018  
FROM: Paul Dubenetzky  
Chief, Permits Branch  
Office of Air Quality

### **Notice of Decision: Approval – Effective Immediately**

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

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency  
401 M Street  
Washington, D.C. 20406

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



# 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  
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Robert F. Willis  
GOTEC PLUS USA, LLC  
P.O. Box 617  
Huntington, Indiana 46750

February 24, 2006

Re: **069-22308-00018**  
**First Minor Permit Modification to**  
**Part 70 No.: T 069-7676-00018**

Dear Mr. Willis:

GOTEC PLUS USA, LLC (previously Ken-Koat, Inc.) was issued Part 70 Operating Permit **T 069-7676-00018** on July 9, 1999, for a metal parts surface coating source, located at 1605 Riverfork Drive East, Huntington, Indiana 46750. An application to modify the source was received on November 30, 2005. Pursuant to the provisions of 326 IAC 2-7-12 a minor permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of the construction and operation of four (4) identical chain on edge machines, identified as COE-7, COE-8, COE-9 and COE-10, at the existing metal coating source. These machines will replace two (2) previously permitted machines, also identified as COE-7 and COE-8. One of the two (2) permitted machines never operated and the other operated briefly. The two (2) permitted machines have been removed from the source. The Permittee will remove additional permitted chain on edge machines in the future. The proposed machines will exhaust to the existing thermal oxidizer, identified as CE-3, and comply with the conditions in the existing permit.

The changes in the Part 70 Operating Permit are documented in the Technical Support Document. All other conditions of the permit shall remain unchanged and in effect. For your convenience, the entire revised Title V Operating Permit, with all modifications and amendments will be provided upon approval.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact CarrieAnn Paukowitz, 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

CAP/MES

Attachments

cc: File - Huntington County  
Huntington County Health Department  
Air Compliance Section Inspector – Ryan Hillman  
Compliance Branch  
Administrative and Development Section  
Technical Support and Modeling - Michele Boner  
Environmental Planning Specialists, Inc. - Thomas P. Sweat



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

**GOTEC PLUS USA, LLC  
1605 Riverfork Drive East  
Huntington, Indiana 46750**

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 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.: T069-7676-00018	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: July 9, 1999 Expiration Date: July 9, 2004

- First Administrative Amendment No. 069-13557-00018, issued December 13, 2000
- Second Administrative Amendment No. 069-12991-00018, issued May 10, 2001
- First Reopening No. 069-13321-00018, issued January 29, 2002
- First Significant Permit Modification No.: 069-18038-00018, issued January 29, 2004
- Second Significant Permit Modification No. 069-17051-00018, issued on March 16, 2005

First Minor Permit Modification No.: 069-22308-00018	Conditions/Sections Affected: Cover page, A.1, A.2, B.9 removed, B.25 (previously B.26), D.7, one report form, and source name and IDEM, OAQ, address in the entire permit
Issued by: Original Signed By: Paul Dubenetzkyy, Assistant Commissioner Office of Air Quality	Issuance Date: February 24, 2006

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## SECTION A

## SOURCE SUMMARY

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

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

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The Permittee owns and operates a stationary metal coating operation.

Responsible Official: Director of Sales and Administration  
Source Address: 1605 Riverfork Drive, Huntington, Indiana 46750  
Mailing Address: PO Box 1027, Huntington, Indiana 46750  
SIC Code: 3479  
County Location: Huntington  
County Status: Attainment for all criteria pollutants  
Source Status: Part 70 Permit Program  
Major Source, under PSD Rules;  
Major Source, Section 112 of the Clean Air Act

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

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

- (a) One (1) dip and spin for metal inserts, designated as DS-1, with a maximum adhesive application rate of 5.68 pounds per hour, which exhausts to one (1) stack designated as S-18.
- (b) One (1) dip conveyor designated as DC-1, with a maximum application rate of 34.93 pounds per hour, which utilizes one (1) dryer, and is controlled by thermal oxidizer, CE-3, which exhausts to one (1) stack designated as C3.
- (c) One (1) dip conveyor designated as DC-2, with emissions controlled by thermal oxidizer, CE-3, with the following equipment:
  - (1) One (1) coating tank with a maximum topcoat application rate of 12.00 pounds per hour, which exhausts to a stack designated as C3.
  - (2) One (1) primer tank with a maximum primer application rate of 8.20 pounds per hour, which exhausts to one (1) stack designated as C3.
  - (3) One (1) natural gas drying oven designated as OVEN-1, with a maximum heat input rate of 0.70 million Btu per hour, which exhausts to one (1) stack designated as C3.
- (d) One (1) ransburg coating process, designated as RCP, controlled by the thermal oxidizer, CE-3, with a maximum metal insert rate of 1000 pounds per hour with the following equipment:
  - (1) Two (2) electrostatic paint booths, designated as EPB-1 and EPB-2 respectively, each with a maximum application rate of 11.42 pounds per hour, each exhausting to the thermal oxidizer (CE-3) and stack C3.

- (2) One (1) natural gas fired oven, designated as OVEN-3, which exhausts to one (1) stack, designated as C4.
  
- (e) Four (4) HVLP spray booths for painting metal inserts, designated as SB-1, SB-2, SB-3 and SB-4, with a maximum adhesive application rate of 5.94 pounds per hour, 11.91 pounds per hour, 4.92 pounds per hour and 4.38 pounds per hour, respectively. All are equipped with dry filters for particulate matter control. SB-1 exhausts to one (1) stack designated as S-10, SB-2 exhausts to one (1) stack designated as S-11, SB-3 exhausts to one (1) stack designated as S-1, and SB-4 exhausts to one (1) stack designated as S-2.
  
- (f) One (1) open top degreaser, identified as DG, with a maximum trichloroethylene consumption rate of 12 gallons per day which exhausts internally.
  
- (g) Three (3) steel grit blasters, designated as SGB-1, SGB-2, and SGB-3, each with a maximum metal insert throughput of 1200 pounds per hour, controlled by a baghouse designated as CE-1, exhausting to one (1) stack designated as #C1.
  
- (h) One (1) aluminum oxide grit blaster, identified as ALOX-1, with a maximum metal insert throughput of 1200 pounds per hour, controlled by a baghouse designated as CE-2 and exhausting to a stack designated as #C2.
  
- (i) Two (2) HVLP chain on edge machines, designated as COE-3 and COE-4, with a maximum adhesive application rate of 9.38 pounds per hour, 21.51 pounds per hour and 16.08 pounds per hour, respectively. Each chain on edge machine is equipped with dry filters for particulate matter control. COE-3 and COE-4 exhaust to the thermal oxidizer, CE-3, to control VOC emissions, and stack C3.
  
- (j) One (1) HVLP chain on edge machine, designated as COE-5, with emissions controlled by thermal oxidizer, CE-3, with the following equipment:
  - (1) Two (2) coating booths with a maximum topcoat application rate of 18.70 pounds per hour, which exhausts to one (1) stack designated as C3.
  - (2) One (1) primer booth with a maximum primer application rate of 4.27 pounds per hour, which exhausts to one (1) stack designated as C3.
  - (3) One (1) electric heater which exhausts to one (1) stack designated as C3.
  
- (k) One (1) chain on edge machine, identified as COE-6, equipped with high volume, low pressure (HVLP) spray applicators, with emissions controlled by a thermal oxidizer, identified as CE-3, and dry filters, exhausting to stack C3 and consisting of the following equipment:
  - (1) Two (2) coating booths with a maximum topcoat application rate of 18.70 pounds per hour;
  - (2) One (1) primer booth with a maximum primer application rate of 4.27 pounds per hour; and
  - (3) One (1) electric heater.
  
- (l) One (1) chain on edge machine, identified as COE-7, installed in 2006, equipped with high volume, low pressure (HVLP) spray applicators, with emissions controlled by an existing thermal oxidizer, identified as CE-3, and dry filters, exhausting to stack C3 and consisting of the following equipment:

- (1) Two (2) topcoat application sections with a maximum topcoat application rate of 13.0 pounds per hour, total;
  - (2) One (1) primer application section with a maximum primer application rate of 8.5 pounds per hour; and
  - (3) One (1) electric heater.
- (m) One (1) chain on edge machine, identified as COE-8, installed in 2006, equipped with high volume, low pressure (HVLP) spray applicators, with emissions controlled by an existing thermal oxidizer, identified as CE-3, and dry filters, exhausting to stack C3 and consisting of the following equipment:
- (1) Two (2) topcoat application sections with a maximum topcoat application rate of 13.0 pounds per hour, total;
  - (2) One (1) primer application section with a maximum primer application rate of 8.5 pounds per hour; and
  - (3) One (1) electric heater.
- (n) One (1) chain on edge machine, identified as COE-9, installed in 2006, equipped with high volume, low pressure (HVLP) spray applicators, with emissions controlled by an existing thermal oxidizer, identified as CE-3, and dry filters, exhausting to stack C3 and consisting of the following equipment:
- (1) Two (2) topcoat application sections with a maximum topcoat application rate of 13.0 pounds per hour, total;
  - (2) One (1) primer application section with a maximum primer application rate of 8.5 pounds per hour; and
  - (3) One (1) electric heater.
- (o) One (1) chain on edge machine, identified as COE-10, installed in 2006, equipped with high volume, low pressure (HVLP) spray applicators, with emissions controlled by an existing thermal oxidizer, identified as CE-3, and dry filters, exhausting to stack C3 and consisting of the following equipment:
- (1) Two (2) topcoat application sections with a maximum topcoat application rate of 13.0 pounds per hour, total;
  - (2) One (1) primer application section with a maximum primer application rate of 8.5 pounds per hour; and
  - (3) One (1) electric heater.

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

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

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

- (1) One (1) natural gas boiler with a maximum heat input capacity of 5.23 million Btu per hour.
  - (2) One (1) burn-off oven, designated as BURN, maximum heat input capacity of 1 million Btu per hour, ventilated to an afterburner with 90% control efficiency, which exhausts to one (1) stack designated as C4.
  - (3) One (1) natural gas fired thermal oxidizer designated as CE-3, with a maximum heat input capacity of 6.00 million Btu per hour, with a minimum oxidizing zone temperature of 140°F.
- (b) Infrared cure equipment.
  - (c) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.
  - (d) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.
  - (e) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
  - (f) Paved and unpaved roads and parking lots with public access.
  - (g) Other activities or categories not previously identified:

Insignificant Thresholds:

Lead (Pb) = 0.6 ton/year or 3.29 lbs/day; Carbon Monoxide (CO) = 25 lbs/day  
Sulfur Dioxides (SO<sub>2</sub>) = 5 lbs/hour or 25 lbs/day; Particulate Matter (PM) = 5 lbs/hour or 25 lbs/day  
Nitrogen Oxides (NOX) = 5 lbs/hour or 25 lbs/day; Volatile Organic compounds (VOC) = 3 lbs/hour or 15 lbs/day

- (1) Two (2) hand painting operations for metal inserts, designated as HPO1 and HPO2, each with a maximum adhesive application rate of 1.04 pounds per hour, coated by either brushes or a small dip pot, which exhausts indoors as fugitive VOC emissions.
- (2) Three (3) phosphate cleaning lines, consisting of a series of washes and rinses, which exhausts to one (1) stack designated as S-26.

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

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

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

## **SECTION B GENERAL CONDITIONS**

### **B.1 Permit No Defense [IC 13]**

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- (a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."

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

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

### **B.3 Permit Term [326 IAC 2-7-5(2)]**

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This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

### **B.4 Enforceability [326 IAC 2-7-7(a)]**

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

### **B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]**

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The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

### **B.6 Severability [326 IAC 2-7-5(5)]**

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

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

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

### **B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]**

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

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

- (b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.

- (c) Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAQ, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAQ, or the U.S. EPA, to furnish copies of requested records directly to U.S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

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

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

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

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

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

and

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;

- (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);
- (5) Any insignificant activity that has been added without a permit revision; and
- (6) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

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

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

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (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 Management  
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.
- (c) PMP's shall be submitted to IDEM, OAQ, upon request and shall be subject to review and approval by IDEM, OAQ.

B.12 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, 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 Management, 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 Management  
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 "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) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) 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.

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

- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.
- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
  - (1) The applicable requirements are included and specifically identified in this permit; or
  - (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
  - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

- (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
- (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(7)]

B.14 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

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

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

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

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
  - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
  - (2) An emergency as defined in 326 IAC 2-7-1(12); or
  - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
  - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

**B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)]  
[326 IAC 2-7-8(a)] [326 IAC 2-7-9]**

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated non-compliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
- (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

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

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

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

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
- (1) A timely renewal application is one that is:
    - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
    - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

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

- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]  
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]  
If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

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

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251
- Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

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

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

B.20 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

- (a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.
- (b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

**B.21 Operational Flexibility [326 IAC 2-7-20]**

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- (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 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 Management  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251  
  
and  
  
United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590  
  
in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and
  - (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.  
  
Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b), (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 "responsible official" as defined by 326 IAC 2-7-1(34).

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

**B.22 Construction Permit Requirement [326 IAC 2]**

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Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

**B.23 Inspection and Entry [326 IAC 2-7-6(2)]**

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Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
  - (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
  - (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
  - (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
  - (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-7-6(6)]
- (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAQ, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAQ, nor an authorized representative, may disclose the

information unless and until IDEM, OAQ, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]

- (2) The Permittee, and IDEM, OAQ, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

B.24 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

The application which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

B.25 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) Failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing and Training Section), to determine the appropriate permit fee.

B.26 Advanced Source Modification Approval [326 IAC 2-7-5(16)]

The requirements to obtain a source modification approval under 326 IAC 2-7-10.5 or a permit modification under 326 IAC 2-7-12 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3 and such modifications occur only during the term of this permit.

## SECTION C

## SOURCE OPERATION CONDITIONS

<b>Entire Source</b>
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### Emission Limitations and Standards [326 IAC 2-7-5(1)]

**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(c)]**

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

**C.2 Opacity [326 IAC 5-1]**

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

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

**C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]**

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

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

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

**C.5 Fugitive Dust Emissions [326 IAC 6-4]**

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

**C.6 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.

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

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

**C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]**

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least

thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

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

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

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAQ.

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

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

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAQ within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAQ, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

#### **C.10 Compliance Schedule [326 IAC 2-7-6(3)]**

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The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements; and
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) Will comply with such applicable requirements that become effective during the term of this permit.

#### **C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

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Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend the compliance schedule an additional ninety (90) days provided the Permittee notifies:

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

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

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

#### **C.12 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]**

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- (a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter

should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.

- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

**C.13 Monitoring Methods [326 IAC 3]**

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Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

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

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

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

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

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

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

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

within one hundred eighty (180) days from the date on which chain on edge machine (COE-5) commences operation.

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

- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

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

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

- (a) Submit:
  - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
  - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
  - (3) A verification to IDEM, OAQ, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAQ, that the Risk Management Plan is being properly implemented.

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

C.16 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]  
[326 IAC 1-6]

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- (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 "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.

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

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAQ, within thirty (30) days of receipt of the test results.

The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAQ shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAQ within thirty (30) days of receipt of the notice of deficiency. IDEM, OAQ reserves the authority to use enforcement activities to resolve noncompliant stack tests.

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
- (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
  - (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:
- Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Management  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251
- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

### C.19 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- (a) With the exception of performance tests conducted in accordance with Section C – Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.20 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) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

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

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) All instances of deviations as described in Section B - Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

### **Stratospheric Ozone Protection**

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

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

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

## SECTION D.1

## FACILITY OPERATION CONDITIONS

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

- (c) One (1) dip conveyor designated as DC-2, with emissions controlled by thermal oxidizer, CE-3, with the following equipment:
  - (1) One (1) coating tank with a maximum topcoat application rate of 12.00 pounds per hour, which exhausts to a stack designated as C3.
  - (2) One (1) primer tank with a maximum primer application rate of 8.20 pounds per hour, which exhausts to one (1) stack designated as C3.
  - (3) One (1) natural gas drying oven designated as OVEN-1, with a maximum heat input rate of 0.70 million Btu per hour, which exhausts to one (1) stack designated as C3.
- (a)(3) One (1) natural gas fired thermal oxidizer designated as CE-3, with a maximum heat input capacity of 6.00 million Btu per hour, with a minimum oxidizing zone temperature of 1400F.

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

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

#### D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), no owner or operator of a facility engaged in the surface coating of miscellaneous metal parts or products may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of 3.5 pounds of VOC per gallon of coating less water.
- (b) When operating the thermal oxidizer, CE-3, to achieve the limit established under 326 IAC 8-2-9 (3.5 pounds of VOC emitted to the atmosphere per gallon of coating less water) the thermal oxidizer shall maintain an overall VOC control efficiency of 92.2% for each facility. If total enclosure of all facilities is achieved, an overall VOC control efficiency of 92.2% for the total of all facilities will ensure an overall VOC control efficiency of 92.2% for each facility. This efficiency and the use of the thermal oxidizer are required by 326 IAC 8-1-2 (a)(2). Based upon 326 IAC 8-1-2(c) and the overall control efficiency of 92.2%, the VOC content of the coating in pounds per gallon of solids delivered to DC-2, the following facilities listed in Section D.2 (RCP, COE-3 and COE-4) and COE-5 listed in Section D.5 shall be limited to 85.5. This overall efficiency of 92.2% shall be maintained in order to demonstrate compliance with 326 IAC 8-2-9 and 326 IAC 8-1-2(a)(2).

#### D.1.2 New Source Toxics Control [326 IAC 2-1-3.4]

The allowable HAP emissions shall be based on the Maximum Achievable Control Technology (MACT) analysis determined by the Office of Air Quality. The MACT for DC-2, shall be the use of the thermal oxidizer, CE-3, as described in Condition D.1.1(b), in combination with the application method of dip coating. The overall efficiency of this control device shall be 92.2%.

#### D.1.3 PSD Modification [326 IAC 2-2] [40 CFR 52.21]

Any change or modification which may increase the VOC PTE of DC-2, CE-3 and COE-5 (listed in Section D.5) to greater than 249 tons per year, shall require prior approval from the Office of Air Quality before such change may occur.

**D.1.4 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 DC-2 and any control devices (CE-3).

**Compliance Determination Requirements**

**D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)]**

During the period between 30 and 36 months after issuance of SSM 069-12898-00018, in order to demonstrate compliance with Condition D.1.1, the Permittee shall perform VOC testing utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.

**D.1.6 Volatile Organic Compounds (VOC)**

Compliance with the VOC content and usage limitations contained in Condition D.1.1 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.

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

**D.1.7 Recuperative Thermal Oxidizer Operations**

- (a) When operating the thermal oxidizer to achieve the limit established under 326 IAC 8-2-9, 3.5 pounds of VOC per gallon of coating less water, the thermal oxidizer shall maintain a minimum operating temperature of 1400°F, or a minimum operating temperature as determined by the most recent compliance test, to maintain a minimum overall VOC control efficiency of 92.2%. The recuperative thermal oxidizer shall operate at all times, to demonstrate compliance with Conditions D.1.1 and D.1.2, when DC-2 is in operation.
- (b) The owner or operator shall install, calibrate, operate and maintain a device that continuously records the combustion temperature of any effluent gases incinerated to achieve compliance with the limit in Condition D.1.2.
  - (1) This device shall have an accuracy of " 2.0°C or " 0.75 percent of the temperature range measured in degrees Celsius, whichever is greater.
- (c) Any change or modification which may increase the VOC actual emissions to 250 tons per year or more shall require prior approval from OAQ before such change may occur.

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

**D.1.8 Record Keeping Requirements**

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAPs usage limits and the VOC and HAPs emission limits established in Conditions D.1.1 and D.1.2.
  - (1) The amount of VOC 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) A log of the dates of use;
  - (3) The cleanup solvent usage for each month;
  - (4) The total VOC usage for each month;
  - (5) The total HAPs usage for each month; and
  - (6) Monthly emissions in pounds of VOC and HAPs.
- (b) Continuous or intermittent readings of the minimum operating temperature shall be maintained to document compliance with Condition D.1.9.
- (c) Record of all malfunctions (any sudden unavoidable failure of the thermal oxidizers, CE01, CE02, and CE03) which result in violations of the Office of Air Management rules shall be kept for a period of three (3) years and made available to OAQ upon request. When a malfunction resulting in a limit or parameter deviation occurs that lasts in excess of one (1) hour, notification of the condition shall be made to OAQ no later than four (4) daytime business hours after the occurrence.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 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.

## SECTION D.2

## FACILITY OPERATION CONDITIONS

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

- (b) One (1) dip conveyor designated as DC-1, with a maximum application rate of 34.93 pounds per hour, which utilizes one (1) dryer, and is controlled by thermal oxidizer, CE-3, which exhausts to one (1) stack designated as C3.
- (c) One (1) dip and spin for metal inserts, designated as DS-1, with a maximum adhesive application rate of 5.68 pounds per hour, which exhausts to one (1) stack designated as S-18.
- (d) One (1) ransburg coating process, designated as RCP, controlled by the thermal oxidizer, CE-3, with a maximum metal insert rate of 1000 pounds per hour with the following equipment:
  - (1) Two (2) electrostatic paint booths, designated as EPB-1 and EPB-2 respectively, each with a maximum application rate of 11.42 pounds per hour, each exhausting to the thermal oxidizer (CE-3) and stack C3.
  - (2) One (1) natural gas fired oven, designated as OVEN-3, which exhausts to one (1) stack, designated as C4.
- (e) Four (4) HVLP spray booths for painting metal inserts, designated as SB-1, SB-2, SB-3 and SB-4, with a maximum adhesive application rate of 5.94 pounds per hour, 11.91 pounds per hour, 4.92 pounds per hour and 4.38 pounds per hour, respectively. All are equipped with dry filters for particulate matter control. SB-1 exhausts to one (1) stack designated as S-10, SB-2 exhausts to one (1) stack designated as S-11, SB-3 exhausts to one (1) stack designated as S-1, and SB-4 exhausts to one (1) stack designated as S-2.
- (i) Two (2) HVLP chain on edge machines, designated as COE-3 and COE-4, with a maximum adhesive application rate of 9.38 pounds per hour, 21.51 pounds per hour and 16.08 pounds per hour, respectively. Each chain on edge machine is equipped with dry filters for particulate matter control. COE-3 and COE-4 exhaust to the thermal oxidizer, CE-3, to control VOC emissions, and stack C3.

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

#### D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), no owner or operator of a facility engaged in the surface coating of miscellaneous metal parts or products may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of 3.5 pounds of VOC per gallon of coating less water.
- (b) When operating the thermal oxidizer, CE-3, to achieve the limit established under 326 IAC 8-2-9 (3.5 pounds of VOC emitted to the atmosphere per gallon of coating less water) the thermal oxidizer shall maintain a minimum overall VOC control efficiency of 92.2% for each facility. If total enclosure of all facilities is achieved, an overall VOC control efficiency of 92.2% for the total of all facilities will ensure an overall VOC control efficiency of 92.2% for each facility. This efficiency and the use of the thermal oxidizer are required by 326 IAC 8-1-2 (a)(2).

Based upon 326 IAC 8-1-2(c) and the overall control efficiency of 92.2%, the VOC content of the coating in pounds per gallon of solids delivered to any of the facilities listed above in Section D.2 (DC-1, RCP, COE-3 and COE-4) and the facilities listed in Section

D.1 (DC-2) and COE-5 listed in Section D.5 shall be limited to 85.5. This overall efficiency of 92.2% shall be maintained in order to demonstrate compliance with 326 IAC 8-2-9 and 326 IAC 8-1-2(a)(2).

- (c) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), solvent sprayed from the 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) The input of VOC to DC-1, RCP, COE-3, and COE-4 and the usage of cleanup solvent for DC-1, RCP, COE-3, and COE-4 (the usage of cleanup solvent may need to take into account any recycling of cleanup rags or reused solvent) shall be limited to 2564 tons used per twelve (12) consecutive months period. This limitation will prevent the VOC emissions from DC-1, RCP, COE-3, and COE-4 from being greater than 200 tons per twelve (12) consecutive month period. This limitation is based upon the use of a control device with an overall control efficiency of 92.2%.
- (e) The input of VOC including cleanup solvent, minus the VOC solvent shipped out delivered to the applicators of SB-1, SB-2, SB-3 and SB-4 shall each be limited to less than 25 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 8-2-9 will not apply.
- (f) The input VOC of DS-1 shall be limited to less than 25 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 8-2-9 will not apply.

#### D.2.2 PSD Modification [326 IAC 2-2] [40 CFR 52.21]

The VOC input of the above listed facilities in Section D.2 (DC-1, DS-1, RCP, SB-1 - SB-4, COE-3 and COE-4), and Section D.4 (DG) shall be limited to less than 250 tons per twelve (12) consecutive month period. This production limitation is equivalent to a VOC potential to emit of less than 250 tons per twelve (12) consecutive month period, therefore, the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 and 40 CFR 52.21, will not apply.

#### D.2.3 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the four (4) HVLP spray booths, the two (2) chain on edge machines and the ransburg coating process shall not exceed allowable PM emission rate based on the following equation:

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

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

#### D.2.4 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 DC-1, SB-1 - SB-4, RCP, COE-3 and COE-4 and any control devices.

### **Compliance Determination Requirements**

#### D.2.5 Testing Requirements [326 IAC 2-7-6(1),(6)]

During the period between 30 and 36 months after issuance of SSM 069-12898-00018, in order to demonstrate compliance with Condition D.2.1, the Permittee shall perform VOC testing utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in

accordance with Section C- Performance Testing.

#### D.2.6 Volatile Organic Compounds (VOC)

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Compliance with the VOC content and usage limitations contained in Condition D.2.1 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.

#### D.2.7 VOC Emissions

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Compliance with Conditions D.2.1 and D.2.2 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

#### D.2.8 Particulate Matter (PM)

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The dry filters for PM control shall be in operation at all times when the four (4) HVLP spray booths (SB-1 - SB-4), the two (2) chain on edge machines (COE-3 and COE-4) and the ransburg coating process (RCP) are in operation.

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

#### D.2.9 Recuperative Thermal Oxidizer Operations

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- (a) When operating the thermal oxidizer to achieve the limit established under 326 IAC 8-2-9, 3.5 pounds of VOC per gallon of coating less water, the thermal oxidizer shall maintain a minimum operating temperature of 1400°F, or a minimum operating temperature as determined by the most recent compliance test, to maintain a minimum overall VOC control efficiency of 92.2%. The recuperative thermal oxidizer shall operate at all times, to demonstrate compliance with Condition D.2.1, when DC-1, RCP, COE-3 and COE-4 are in operation.
- (b) The owner or operator shall install, calibrate, operate and maintain a device that continuously records the combustion temperature of any effluent gases incinerated to achieve compliance with the limit in Condition D.1.2.
  - (1) This device shall have an accuracy of " 2.5EC or " 0.75 percent of the temperature range measured in degrees Celsius, whichever is greater.
- (c) Any change or modification which may increase the VOC actual emissions to 250 tons per year or more shall require prior approval from OAQ before such change may occur.

#### D.2.10 Monitoring

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- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (S-1, S-2, S-6, S-10, S-11, and C3) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

#### D.2.11 Record Keeping Requirements

- (a) To document compliance with Condition D.2.1, the Permittee shall maintain records in accordance with (1) through (7) below. Records maintained for (1) through (7) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAPs usage limits and the VOC and HAPs emission limits established in Condition D.2.1.
- (1) The amount of VOC 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) A log of the dates of use;
  - (3) The daily volume weighted VOC content of the coatings as applied on days when a coating with a VOC content greater than 85.5 pounds of VOC per gallon of solids is used;
  - (4) The cleanup solvent usage for each month;
  - (5) The total VOC usage for each month;
  - (6) The total HAPs usage for each month; and
  - (7) Monthly emissions in pounds of VOC and HAPs.
- (b) Continuous or intermittent readings of the minimum operating temperature shall be maintained to document compliance with Condition D.1.9.
- (c) Record of all malfunctions (any sudden unavoidable failure of the thermal oxidizers, CE01, CE02, and CE03) which result in violations of the Office of Air Management rules shall be kept for a period of three (3) years and made available to OAQ upon request. When a malfunction resulting in a limit or parameter deviation occurs that lasts in excess of one (1) hour, notification of the condition shall be made to OAQ no later than four (4) daytime business hours after the occurrence.
- (d) To document compliance with Conditions D.2.8 and D.2.10, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.2.12 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.1 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.

## SECTION D.3

## FACILITY OPERATION CONDITIONS

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

- (a) Three (3) steel grit blasters, designated as SGB-1, SGB-2, and SGB-3, each with a maximum metal insert throughput of 1200 pounds per hour, controlled by a baghouse designated as CE-1, exhausting to one (1) stack designated as #C1.
- (b) One (1) aluminum oxide grit blaster, identified as ALOX-1, with a maximum metal insert throughput of 1200 pounds per hour, controlled by a baghouse designated as CE-2 and exhausting to a stack designated as C2.

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

#### D.3.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the three (3) steel grit blasters and the aluminum oxide grit blaster shall not exceed allowable PM emission rate based on the following equation:

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

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

- (a) The allowable PM emission rate from the three (3) steel grit blasters shall not exceed 2.91 pounds per hour per blaster when operating at a total process weight rate of 1200 pounds per hour per blaster.
- (b) The allowable PM emission rate from ALOX-1 shall not exceed 2.91 pounds per hour when operating at a total process weight rate of 1200 pounds per hour.

### Compliance Determination Requirements

#### D.3.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility 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 PM limit specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

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

#### D.3.3 Particulate Matter (PM)

The baghouses for PM control shall be in operation at all times when the three (3) steel grit blasters and ALOX-1 are in operation.

## SECTION D.4

## FACILITY OPERATION CONDITIONS

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

One (1) open top degreaser, identified as DG, with a maximum trichloroethylene consumption rate of 12 gallons per day which exhausts internally.

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

#### D.4.1 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR Part 63, Subpart A]

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

#### D.4.2 Open Top Vapor Degreaser Operations and Control [326 IAC 8-3-3] [326 IAC 8-3-6]

- (a) The Permittee shall ensure that the following control equipment requirements are met:
- (1) Equip DG with a cover that can be opened and closed easily without disturbing the vapor zone.
  - (2) Equip DG with the following switches:
    - (A) A condenser flow switch and thermostat which shuts off sump heat if condenser coolant stops circulating or becomes too warm.
    - (B) A spray safety switch which shuts off spray pump if the vapor level drops more than ten (10) centimeters (four (4) inches).
  - (3) Equip DG with a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
  - (4) Equip DG with one (1) of the following control devices:
    - (A) A freeboard ratio of seventy-five hundredths (0.75) or greater and a powered cover if the degreaser opening is greater than one (1) square meter (ten and eight-tenths (10.8) square feet).
    - (B) A refrigerated chiller.
    - (C) An enclosed design in which the cover opens only when the article is actually entering or exiting the degreaser.
    - (D) A carbon adsorption system with ventilation which, with the cover open, achieves a ventilation rate of greater than or equal to fifteen (15) cubic meters per minute per square meter (fifty (50) cubic feet per minute per square foot) of air to solvent interface area, and an average of less than twenty-five (25) parts per million of solvent is exhausted over one (1) complete adsorption cycle.
    - (E) Other systems of demonstrated equivalent or better control as those outlined above. Such systems shall be submitted to the U.S. EPA as a SIP revision.

- (b) The Permittee shall ensure that the following operating requirements are met:
- (1) Keep the cover closed at all times except when processing work loads through the degreaser.
  - (2) Minimize solvent carryout emissions by:
    - (A) Racking articles to allow complete drainage;
    - (B) Moving articles in and out of the degreaser at less than three and three-tenths (3.3) meters per minute (eleven (11) feet per minute).
  - (3) Prohibit the entrance into the degreaser of porous or absorbent materials such as, but not limited to, cloth, leather, wood, or rope.
  - (4) Prohibit the occupation of more than one-half ( $\frac{1}{2}$ ) of the degreaser's open top area with the workload.
  - (5) Prohibit the loading of the degreaser to the point where the vapor level would drop more than ten (10) centimeters (four (4) inches) when the workload is removed.
  - (6) Prohibit solvent spraying above the vapor level.
  - (7) Repair solvent leaks immediately, or shut down the degreaser if leaks cannot be repaired immediately.
  - (8) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.
  - (9) Prohibit the exhaust ventilation rate from exceeding twenty (20) cubic meters per minute per square meter (sixty-five (65) cubic feet per minute per square foot) of degreaser opening unless a greater ventilation rate is necessary to meet Occupational Safety and Health Administration (OSHA) requirements.
  - (10) Prohibit the use workplace fans near the degreaser opening.
  - (11) Prohibit visually detectable water in the solvent exiting the water separator.

#### D.4.3 Halogenated Solvent Cleaning Machine NESHAP [40 CFR Part 63, Subpart T]

This facility is subject to 40 CFR Part 63, Subpart T, (Halogenated Solvent Cleaning Machine NESHAP), which is incorporated by reference as 326 IAC 20-6-1. A copy of the rule is attached.

- (a) Pursuant to 40 CFR 63.463, the following design requirements for DG are applicable:
- (1) DG shall be designed or operated such that, it has an idling and downtime mode cover, as described in 40 CFR 63.463(d)(1)(i), that may be readily opened or closed, that completely covers the cleaning machine openings when in place, and is free of cracks, holes, and other defects.
  - (2) DG shall have a freeboard ratio of 0.75 or greater.
  - (3) DG shall have an automated parts handling system capable of moving parts or parts baskets at a speed of 3.4 meters per minutes (11 feet per minute) or less

from the initial loading of parts through removal of cleaned parts.

- (4) DG shall be equipped with a device that shuts off sump heat if the sump liquid solvent level drops to the sump heater coils.
  - (5) DG shall have a primary condenser.
  - (6) DG shall be equipped with a vapor level control device that shuts off sump heat if the vapor level rises above the height of the primary condenser.
  - (7) The Permittee is required to demonstrate that DG can achieve and maintain an idling emission limit of 0.22 kilograms per hour per square meter (0.045 pounds per hour per square foot) of solvent/air interface area as determined using Reference Method 307 in appendix A of this part.
    - (A) The Permittee shall conduct an initial performance test to demonstrate compliance with the applicable idling emission limit.
    - (B) The Permittee must establish parameters that will be monitored to demonstrate compliance.
      - (i) Ensure that the cover is in place whenever parts are not in the solvent cleaning machine and completely covers the cleaning machine openings when in place.
      - (ii) Ensure that the idling-mode cover is maintained free of cracks, holes, and other defects.
      - (iii) An exceedance has occurred if the requirements of (7)(B)(i) have not been met.
      - (iv) An exceedance has occurred if the requirements of (7)(B)(ii) have not been met and are not corrected within fifteen (15) days of detection.

Adjustments or repairs shall be made to the solvent cleaning system or control device to reestablish required levels. The parameter must be remeasured immediately upon adjustment or repair and demonstrated to be within required limits.
    - (C) Conduct the periodic monitoring of the parameters used to demonstrate compliance as described in 40 CFR 63.466 (f).
    - (D) Operate DG within parameters identified in the initial performance test.
    - (E) The Permittee shall report all exceedances and all corrections and adjustments made to avoid an exceedance as specified in 40 CFR 63.468 (h).
- (b) Pursuant to 40 CFR 63.463, the following work and operational practices for DG are applicable:
- (1) Control air disturbances across DG opening(s) by placing cover(s) to the solvent cleaning machine during the idling mode and the downtime mode unless either the solvent has been removed from the machine or maintenance or monitoring is being performed that requires the cover(s) to not be in place.

- (2) The parts baskets or the parts being cleaned in DG shall not occupy more than 50 percent of the solvent/air interface area unless the parts baskets or parts are introduced at a speed of 0.9 meters per minute (3 feet per minute) or less.
- (3) Any spraying operations shall be done within the vapor zone or within a section of the solvent cleaning machine that is not directly exposed to the ambient air.
- (4) Parts shall be oriented so that the solvent drains from them freely. Parts having cavities or blind holes shall be tipped or rotated before being removed from any solvent cleaning machine unless an equally effective approach has been approved by the commissioner.
- (5) Parts baskets or parts shall not be removed until dripping has stopped.
- (6) During startup, the primary condenser shall be turned on before the sump heater.
- (7) During shutdown, the sump heater shall be turned off and the solvent vapor layer allowed to collapse before the primary condenser is turned off.
- (8) When solvent is added or drained, the solvent shall be transferred using threaded or other leak proof couplings and the end of the pipe in the solvent sump shall be located beneath the liquid solvent surface.
- (9) Each solvent cleaning machine and associated controls shall be maintained as recommended by the manufacturers of the equipment or using alternative maintenance practices that have been demonstrated to the commissioner's satisfaction to achieve the same or better results as those recommended by the manufacturer.
- (10) Each operator shall complete and pass the applicable sections of the test of solvent cleaning operating procedures in appendix B of 40 CFR 63, if requested during an inspection by the commissioner.
- (11) Waste solvents, still bottoms, and sump bottoms shall be collected and stored in closed containers. The closed containers may contain a device that would allow pressure relief, but would not allow liquid solvent to drain from the container.
- (12) Sponges, fabric, wood, and paper products shall not be cleaned.

#### D.4.4 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The VOC input of the above listed facility in Section D.4 (DG), and the facilities listed in Section D.2 (DC-1, DS-1, RCP, SB-1-SB-4 and COE-1-COE-4) shall be limited to less than 250 tons per twelve consecutive month period. This production limitation is equivalent to a VOC potential to emit of less than 250 tons per twelve (12) consecutive month period, therefore, the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 and 40 CFR 52.21, will not apply.

#### D.4.5 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 DG and any control devices.

### **Compliance Determination Requirements**

#### D.4.6 Testing Requirements [326 IAC 2-7-6(1)]

- (a) The Permittee shall determine the idling emission rate of the solvent cleaning machine using reference method 307 in Appendix A to this part.

- (b) Based on the results of an idling emissions test conducted between January 15, 1999 and January 17, 1999, the idling emission rate was found to be 0.0104 pounds per square feet per hour of solvent/air interface area, which is less than the 0.045 pounds per hour per square foot of solvent/air interface area required by the NESHAP. Therefore, DG meets the NESHAP requirements.
- (c) 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 limit specified in Condition D.4.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

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

#### **D.4.7 Monitoring Requirements**

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- (a) The Permittee shall conduct a visual inspection to determine if the cover is opening and closing properly, completely covers the cleaning machine openings when closed, and is free of cracks, holes, and other defects. These results shall be recorded on a monthly basis.
- (b) The Permittee shall determine the hoist speed by measuring the time it takes for the hoist to travel a measured distance. The speed is equal to the distance in meters divided by the time in minutes (meters per minute).
  - (1) If an exceedance of the hoist speed occurs during quarterly monitoring, the monitoring frequency returns to monthly until another year of compliance without and exceedance is demonstrated.
  - (2) If the Permittee can demonstrate to IDEM, OAQ's satisfaction in the initial compliance report that the hoist cannot exceed a speed of 3.4 meters per minute (11 feet per minute), the required monitoring frequency is quarterly, including during the first year of compliance.

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

#### **D.4.8 Record Keeping Requirements**

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- (a) The Permittee shall maintain, in written or electronic form, records of the following information specified below, for the life time of the machine,
  - (1) Owners's manuals, or if not available, written maintenance and operating procedures, for the solvent cleaning machine and control equipment.
  - (2) The date of installation of the solvent cleaning machine and all of its control devices. If the exact date of the installation is not known, a letter certifying that the cleaning machine and its control devices were installed prior to, or on, November 29, 1993, or after November 29, 1993, may be substituted.
  - (3) Records of the halogenated HAP solvent content for each solvent used in a solvent cleaning machine.
- (b) The Permittee shall maintain, in written or electronic form, records of the following information specified below for a period of 5 years:
  - (1) The results of control device monitoring required under 40 CFR 63.466.

- (2) Information on the actions taken to comply with 40 CFR63.463(e) and (f). This information shall include records of written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to accepted levels.
- (3) Estimates of annual solvent consumption for each solvent cleaning machine.

#### D.4.9 Reporting Requirements

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A summary of the information to document compliance with Condition D.4.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, and to the following address:

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

- (a) An initial notification report for DG was submitted on December 7, 1998.
- (b) An idling emissions test report demonstrating compliance for DG was submitted on January 25, 1999. Please submit an initial statement of compliance for DG upon issuance of this permit. This statement shall include:
  - (1) The name and the address of the owner or operator.
  - (2) The address (i.e., physical location) of the solvent cleaning machine(s).
  - (3) A list of the control equipment used to achieve compliance for solvent cleaning machine.
  - (4) For each piece of control equipment required to be monitored, a list of the parameters that are monitored and the values of these parameters measured on or during the first month after the compliance date.
- (c) The Permittee shall submit an annual report by February 1 of the year following the one for which the reporting is being made. This report shall include the requirements as follows:
  - (1) A signed statement from the facility owner or his designee stating that, "All operators of solvent cleaning machines have received training on the proper operation of solvent cleaning machines and their control devices sufficient to pass the test required in 40 CFR 63.463 (d)(10)."
  - (2) An estimate of solvent consumption for each solvent cleaning machine during the reporting period.
- (d) The Permittee shall submit an exceedance report to the commissioner semiannually using the Semi-Annual Compliance Monitoring Report form provided with this permit, except when, the commissioner determines, on a case-by-case basis that more frequent reporting is necessary to accurately assess the compliance status of the source or, an exceedance occurs. Once an exceedance has occurred the Permittee shall follow a quarterly reporting format until a request to reduce reporting frequency under paragraph 40 CFR63.468 (i) of this section is approved. Exceedance reports shall be delivered or postmarked by the 30th day following the end of each calendar half or quarter, as appropriate. The exceedance report shall include the applicable information as given below:

- (1) Information on the actions taken to comply with 40 CFR63. 463(e) and (f). This information shall include records of written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to accepted levels.
  - (2) If an exceedance has occurred, the reason for the exceedance and a description of the actions taken.
  - (3) If no exceedances of a parameter have occurred, or a piece of equipment has not been inoperative, out of control, repaired, or adjusted, such information shall be stated in the report.
- (e) Pursuant to 40 CFR63.463 (i), the Permittee who is required to submit an exceedance report on a quarterly (or more frequent) basis may reduce the frequency of reporting to semiannual if the following conditions are met:
- (1) The source has demonstrated a full year of compliance without an exceedance.
  - (2) The Permittee continues to comply with all relevant recordkeeping and monitoring requirements specified in Subpart A (General Provisions) and in 40 CFR 63, Subpart T.
  - (3) The commissioner does not object to a reduced frequency of reporting for the affected source as provided in paragraphs (e)(3)(iii) of Subpart A (General Provisions) of 40 CFR 63.

## SECTION D.5

## FACILITY CONDITIONS

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

- (j) One (1) HVLP chain on edge machine, designated as COE-5, with VOC emissions controlled by thermal oxidizer, CE-3, with the following equipment:
  - (1) Two (2) coating booths with a maximum topcoat application rate of 18.70 pounds per hour, which exhausts to one (1) stack designated as C3.
  - (2) One (1) primer booth with a maximum primer application rate of 4.27 pounds per hour, which exhausts to one (1) stack designated as C3.
  - (3) One (1) electric heater which exhausts to one (1) stack designated as C3.

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 326 IAC 2-7-10.5, WITH CONDITIONS LISTED BELOW.

### Construction Conditions

#### General Construction Conditions

D.5.1 This permit 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.

#### Effective Date of the Permit

D.5.2 Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.

### Operation Conditions

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

##### D.5.3 Volatile Organic Compound (VOC) [326 IAC 8-2-9]

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), no owner or operator of a facility engaged in the surface coating of miscellaneous metal parts or products may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of 3.5 pounds of VOC per gallon of coating less water.
- (b) When operating the thermal oxidizer, CE-3, to achieve the limit established under 326 IAC 8-2-9 (3.5 pounds of VOC emitted to the atmosphere per gallon of coating less water) the thermal oxidizer shall maintain a minimum overall VOC control efficiency of 92.2% for each facility. If total enclosure of all facilities is achieved, an overall VOC control efficiency of 92.2% for the total of all facilities will ensure an overall VOC control efficiency of 92.2% for each facility. This efficiency and the use of the thermal oxidizer are required by 326 IAC 8-1-2 (a)(2). Based upon 326 IAC 8-1-2(c) and the overall control efficiency of 92.2%, the VOC content of the coating in pounds per gallon of solids delivered to the facilities listed above in Section D.5 (COE-5), the following facilities listed in Section D.1 (DC-2), and the following facilities listed in Section D.2 (RCP, COE-3 and COE-4) shall be limited to 85.5. This overall efficiency of 92.2% shall be maintained in order to demonstrate compliance with 326 IAC 8-2-9 and 326 IAC 8-1-2(a)(2).

**D.5.4 New Source Toxics Control [326 IAC 2-1-3.4]**

The allowable HAP emissions shall be based on the Maximum Achievable Control Technology (MACT) analysis determined by the Office of Air Quality. The MACT for the facilities listed above in section D.5, shall be the use of the thermal oxidizer, CE-3, as described in Condition D.1.1(b), in combination with the use of HVLP application. The overall efficiency of this control device shall be 92.2%.

**D.5.5 PSD Modification [326 IAC 2-2] [40 CFR 52.21]**

Any change or modification which may increase the VOC PTE of COE-5 and DC-2, CE-3 (listed in Section D.1) to greater than 249 tons per year, shall require prior approval from the Office of Air Quality before such change may occur.

**D.5.6 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 COE-5 and any control devices.

**Compliance Determination Requirements**

**D.5.7 Testing Requirements [326 IAC 2-7-6(1),(6)]**

During the period between 30 and 36 months after issuance of SSM 069-12898-00018, in order to demonstrate compliance with Condition D.5.3, the Permittee shall perform VOC testing utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.

**D.5.8 Volatile Organic Compounds (VOC)**

Compliance with the VOC content and usage limitations contained in Condition D.5.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

**D.5.9 Recuperative Thermal Oxidizer Operations**

- (a) When operating the thermal oxidizer to achieve the limit established under 326 IAC 8-2-9, 3.5 pounds of VOC per gallon of coating less water, the thermal oxidizer shall maintain a minimum operating temperature of 1400° F, or a minimum operating temperature as determined by the most recent compliance test, to maintain a minimum overall VOC control efficiency of 92.2%. The recuperative thermal oxidizer shall operate at all times, to demonstrate compliance with Conditions D.5.3 and D.5.4, when COE-5 is in operation.
- (b) Any change or modification which may increase the VOC actual emissions to 250 tons per year or more shall require prior approval from OAQ before such change may occur.

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

**D.5.10 Record Keeping Requirements**

- (a) To document compliance with Conditions D.5.3 and D.5.4, the Permittee shall maintain records in accordance with (1) through (7) below. Records maintained for (1) through (7) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAPs usage limits and the VOC and HAPs emission limits established in Conditions D.5.3 and D.5.4.
  - (1) The amount and VOC 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) A log of the dates of use;
  - (3) The daily volume weighted VOC content of the coatings as applied on days when a coating with a VOC content greater than 85.5 pounds of VOC per gallon of solids is used;
  - (4) The cleanup solvent usage for each month;
  - (5) The total VOC usage for each month;
  - (6) The total HAPs usage for each month; and
  - (7) Monthly emissions in pounds of VOC and HAPs.
- (b) To document compliance with Condition D.5.3(b), records of the minimum operating temperature shall be maintained daily.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.5.11 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.5.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

## SECTION D.6

## FACILITY OPERATION CONDITIONS

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

- (k) One (1) chain on edge machine, identified as COE-6, equipped with high volume, low pressure (HVLP) spray applicators, with emissions controlled by a thermal oxidizer, identified as CE-3, and dry filters, exhausting to stack C3 and consisting of the following equipment:
- (1) Two (2) coating booths with a maximum topcoat application rate of 18.70 pounds per hour;
  - (2) One (1) primer booth with a maximum primer application rate of 4.27 pounds per hour; and
  - (3) One (1) electric heater.

(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.6.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), no owner or operator of a facility engaged in the surface coating of miscellaneous metal parts or products may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of 3.5 pounds of VOC per gallon of coating excluding water, when using air dried or forced warm air dried coatings at temperatures up to ninety degrees Celsius (90EC), and extreme performance coatings designed for exposure to temperatures consistently above ninety-five degrees Celsius (95EC).
- (b) The thermal oxidizer shall be in operation at all times and maintain an overall VOC control efficiency of 92.2% for each facility. If total enclosure of all facilities is achieved, an overall VOC control efficiency of 92.2% for the total of all facilities will ensure an overall VOC control efficiency of 92.2% for each facility. Based upon 326 IAC 8-1-2(c) and the overall control efficiency of 92.2%, the VOC content of the coating shall not exceed 85.5 pounds per gallon of coating solids delivered to the applicator.
- (c) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), solvent sprayed from the application equipment during clean up 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.6.2 New Source Toxics Control [326 IAC 2-4.1-1]

The use of the thermal oxidizer, CE-3, as described in Condition D.6.1(b), shall limit the potential to emit each individual HAP to less than ten (10) tons per year and the total HAPs to less than twenty-five (25) tons per year. Therefore, this facility is a minor source of HAPs, and the requirements of 326 IAC 2-4.1-1 are not applicable.

#### D.6.3 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the PM from the one (1) chain on edge machine (COE-6) shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

#### D.6.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

### Compliance Determination Requirements

#### D.6.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

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During the period between 30 and 36 months after issuance of this permit, in order to demonstrate compliance with Condition D.6.1, the Permittee shall perform VOC testing utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.

#### D.6.6 Volatile Organic Compounds (VOC)

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Compliance with the VOC content limitation contained in Condition D.6.1 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.

#### D.6.7 Volatile Organic Compounds (VOC)

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Pursuant to 326 IAC 8-1-2(a)(7), when volume weighted averaging of the coatings is used to determine compliance with the limitation set in condition D.6.1. This volume weighted average shall be determined by the following equation:

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

Where: A is the volume weighted average in pounds VOC per gallon  
C is the VOC content of the coating in pounds VOC per gallon and U is the usage rate of the coating in gallons per unit, hour, day or other unit of time

#### D.6.8 Recuperative Thermal Oxidizer

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- (a) The thermal oxidizer shall operate at all times that the process is in operation. When operating, the thermal incinerator shall maintain a minimum operating temperature of 1400°F during operation until a temperature and fan amperage has been determined from the most recent compliant stack test, as approved by IDEM. The temperature correlates to an overall VOC control efficiency of 92.2%. Once a temperature and duct pressure or fan amperage are determined during a compliance stack test, the operating temperature shall be greater than or equal to that temperature and the duct pressure or fan amperage shall be within a range established by the compliance stack test.
- (b) When operating the thermal oxidizer to achieve compliance with 326 IAC 8-2-9, 3.5 pounds of VOC emitted to the atmosphere per gallon of coating less water, the thermal oxidizer shall maintain a minimum overall control efficiency of 92.2%. These efficiencies and the use of the thermal oxidizer are required by rule 326 IAC 8-1-2(a)(2).

#### D.6.9 Particulate Matter (PM)

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The dry filters for PM control shall be in operation and control emissions from the chain on edge machine (COE-6) at all times when the chain on edge machine is in operation.

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

### **D.6.10 Monitoring**

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- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack (C3) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

### **D.6.11 Parametric Monitoring**

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- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the recuperative thermal oxidizer for measuring operating temperature. The output of this system shall be recorded, and that temperature shall be maintained at a minimum of 1400°F during operation until a temperature has been determined from the most recent compliance stack test, as approved by IDEM, OAQ. Once a temperature has been determined from the most recent compliance stack test, the temperature shall be greater than or equal to the temperature used to demonstrate compliance during the most recent compliance stack test.
- (b) After the first compliance stack test, the duct pressure or fan amperage shall be observed at least once per week when the thermal oxidizer is in operation. This pressure or amperage shall be maintained within a range established in the most recent compliance stack test.
- (c) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the reading is outside the above mentioned range for any one reading. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

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

### **D.6.12 Record Keeping Requirements**

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- (a) To document compliance with Condition D.6.1, the Permittee shall maintain records in accordance with (1) through (7) below. Records maintained for (1) through (7) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC emission limits established in Condition D.6.1.
  - (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 cleanup solvent usage for each month;
  - (4) The total VOC usage for each month;
  - (5) The weight of VOCs emitted for each compliance period;
  - (6) The continuous temperature records for the thermal oxidizer and the temperature used to demonstrate compliance during the most recent compliance stack test; and
  - (7) After the first compliance stack test, weekly records of the duct pressure or fan amperage.
- (b) To document compliance with Conditions D.6.3 and D.6.9, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.7

## FACILITY OPERATION CONDITIONS

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

- (l) One (1) chain on edge machine, identified as COE-7, installed in 2006, equipped with high volume, low pressure (HVLP) spray applicators, with emissions controlled by an existing thermal oxidizer, identified as CE-3, and dry filters, exhausting to stack C3 and consisting of the following equipment:
  - (1) Two (2) topcoat application sections with a maximum topcoat application rate of 13.0 pounds per hour, total;
  - (2) One (1) primer application section with a maximum primer application rate of 8.5 pounds per hour; and
  - (3) One (1) electric heater.
- (m) One (1) chain on edge machine, identified as COE-8, installed in 2006, equipped with high volume, low pressure (HVLP) spray applicators, with emissions controlled by an existing thermal oxidizer, identified as CE-3, and dry filters, exhausting to stack C3 and consisting of the following equipment:
  - (1) Two (2) topcoat application sections with a maximum topcoat application rate of 13.0 pounds per hour, total;
  - (2) One (1) primer application section with a maximum primer application rate of 8.5 pounds per hour; and
  - (3) One (1) electric heater.
- (n) One (1) chain on edge machine, identified as COE-9, installed in 2006, equipped with high volume, low pressure (HVLP) spray applicators, with emissions controlled by an existing thermal oxidizer, identified as CE-3, and dry filters, exhausting to stack C3 and consisting of the following equipment:
  - (1) Two (2) topcoat application sections with a maximum topcoat application rate of 13.0 pounds per hour, total;
  - (2) One (1) primer application section with a maximum primer application rate of 8.5 pounds per hour; and
  - (3) One (1) electric heater.
- (o) One (1) chain on edge machine, identified as COE-10, installed in 2006, equipped with high volume, low pressure (HVLP) spray applicators, with emissions controlled by an existing thermal oxidizer, identified as CE-3, and dry filters, exhausting to stack C3 and consisting of the following equipment:
  - (1) Two (2) topcoat application sections with a maximum topcoat application rate of 13.0 pounds per hour, total;
  - (2) One (1) primer application section with a maximum primer application rate of 8.5 pounds per hour; and
  - (3) One (1) electric heater.

(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.7.1 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-9] [326 IAC 8-1-2]

- (a) Pursuant to 326 IAC 8-2-9, the Permittee shall not allow the discharge into the atmosphere of VOC in excess of three and five-tenths (3.5) for forced warm air dried coatings.
- (b) Pursuant to 326 IAC 8-1-2 (b), the VOC emissions from the four (4) chain on edge machines (COE-7, COE-8, COE-9 and COE-10) shall be limited to no greater than the equivalent emissions, expressed as pounds of VOC per gallon of coating solids, allowed in (a).

This equivalency was determined by the following equation:

$$E = L / (1 - (L/D))$$

Where

- L = Applicable emission limit from 326 IAC 8 in pounds of VOC per gallon of coating;
- D = Density of VOC in coating in pounds per gallon of VOC;
- E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.

Actual solvent density shall be used to determine compliance of the surface coating operation using the compliance methods in 326 IAC 8-1-2 (a).

- (c) The pounds of VOC per gallon of coating solids shall be limited to less than 6.67.

### D.7.2 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (f), all solvents sprayed from the application equipment of the four (4) chain on edge machines (COE-7, COE-8, COE-9 and COE-10) during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

### D.7.3 PSD Minor Limit [326 IAC 2-2]

- (a) The use of VOC, including coatings, dilution solvents, and cleaning solvents at the four (4) chain on edge machines (COE-7, COE-8, COE-9 and COE-10) shall be limited to 164 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month, and the proposed facilities shall use the existing thermal oxidizer (CE-3) at an overall control efficiency no less than 88.6%. Thus, the potential to emit VOC is limited to less than 40 tons per year, and the requirements of 326 IAC 2-2, PSD, are not applicable.
- (b) Any change or modification that increases the solids delivered to the applicators to 750 tons per twelve (12) consecutive month period or more shall increase the potential to emit PM<sub>10</sub> to 15 tons per year, based on a transfer efficiency of 60% and a control efficiency of 95%, and shall require prior IDEM, OAQ, approval. Therefore, the requirements of 326 IAC 2-2, PSD, are not applicable.

### D.7.4 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating manufacturing process 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. This requirement to operate the control is not federally enforceable.

D.7.5 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 2 to 40 CFR Part 63, Subpart M] [40 CFR 63.3901]

- (a) The provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart M. The Permittee must comply with these requirements on and after January 2, 2004.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition, except as otherwise provided in this condition. The permit shield applies to Condition D.7.15, Notification Requirements.

D.7.6 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products [40 CFR Part 63, Subpart M] [40 CFR 63.3882] [40 CFR 63.3883] [40 CFR 63.3980]

- (a) The provisions of 40 CFR Part 63, Subpart M (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/misc/miscpg.html>. Pursuant to 40 CFR 63.3883(b), the Permittee must comply with these requirements on and after January 2, 2007.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition. The permit shield applies to Condition D.1.15, 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, which are incorporated by reference.

D.7.7 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 their control devices.

## Compliance Determination Requirements

### D.7.8 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

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- (a) Pursuant to 326 IAC 8-1-2(a), the Permittee shall operate the thermal oxidizer to achieve compliance with Conditions D.7.1 and D.7.3.
- (b) Pursuant to 326 IAC 8-1-2(c) the overall control efficiency of the thermal oxidizer shall be no less than the equivalent overall efficiency calculated by the following equation:

$$O = \frac{V - E}{V} \times 100$$

Where:

- V = The actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content of all coatings, as applied to the subject coating line as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids as applied.
- E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.
- O = Equivalent overall efficiency of the capture system and control device as a percentage.

The Permittee will comply with this limit provided the daily weighted average VOC content of all coatings used at each of the four (4) chain on edge machines, identified as COE-7, COE-8, COE-9 and COE-10, as applied, is no more than 85.5 pounds per gallon of coating solids, and the overall control efficiency is no less than 92.2%.

### D.7.9 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

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Within sixty (60) days of achieving maximum capacity, but no more than one hundred and eighty (180) days after initial startup of each of the chain on edge machines, the Permittee shall conduct a performance test to verify VOC control efficiency as per Condition D.7.1 for the thermal oxidizer using methods as approved by the Commissioner. This test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

### D.7.10 VOC Emissions

---

Compliance with Condition D.7.3 shall be demonstrated within 30 days of the end of each month. This shall be based on the total volatile organic compounds emitted for the previous month, and adding it to previous 11 months total VOC emitted so as to arrive at VOC emissions for the most recent 12 consecutive month period. The VOC emissions for a month can be arrived at using the following equation for VOC usage:

$$\text{VOC emitted} = [(\text{VOC input}) \times (100 - \% \text{ overall control efficiency})] + [\text{uncontrolled VOC input}]$$

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

### D.7.11 Thermal Oxidizer Temperature

---

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. The output of this system shall be recorded as an hourly average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall take appropriate response

steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports whenever the hourly average temperature of the thermal oxidizer is below 1400°F. An hourly average temperature that is below 1400°F is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

- (b) The Permittee shall determine the hourly average temperature from the most recent valid stack test that demonstrates compliance with limits in Conditions D.7.1 and D.7.3(a), as approved by IDEM.
- (c) On and after the date the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports whenever the hourly average temperature of the thermal oxidizer is below the hourly average temperature as observed during the compliant stack test. An hourly average temperature that is below the hourly average temperature as observed during the compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

#### D.7.12 Parametric Monitoring

- (a) The Permittee shall determine fan amperage or duct pressure from the most recent valid stack test that demonstrates compliance with limits in Conditions D.7.1 and D.7.3(a), as approved by IDEM.
- (b) The duct pressure or fan amperage shall be observed at least once per day when the thermal oxidizer is in operation. When for any one reading, the duct pressure or fan amperage is outside the normal range as established in most recent compliant stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A reading that is outside the range as established in the most recent compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

#### D.7.13 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack (C3) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from of this permit.

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

### D.7.14 Record Keeping Requirements

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- (a) To document compliance with Conditions D.7.1, the Permittee shall maintain records in accordance with (1) through (7) below. Records maintained for (1) through (7) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC content and usage limits established in Conditions D.7.1.
- (1) The VOC content of each coating material and solvent used less water.
  - (2) The daily weighted average VOC content of all coatings used at each of the four (4) chain on edge machines, identified as COE-7, COE-8, COE-9 and COE-10, in pounds of VOC per gallon of coating solids, as applied.
  - (3) The amount of coating material and solvent used on a monthly basis.
    - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
    - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (4) The monthly cleanup solvent usage;
  - (5) The total VOC usage for each month;
  - (6) The continuous temperature records (on an hourly average basis) for the thermal oxidizer and the hourly average temperature used to demonstrate compliance during the most recent compliant stack test; and
  - (7) Daily records of the duct pressure or fan amperage.
- (b) To document compliance with Condition D.7.13, the Permittee shall maintain a log of weekly overspray observations, and daily and monthly inspections.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

### D.7.15 Notification Requirements [40 CFR 63.3910]

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- (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) Initial notification. The Permittee must submit the initial notification no later than 1 year after the effective date of 40 CFR Part 63, Subpart Mmmm.
- (c) Notification of compliance status. The Permittee must submit the notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR 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.7.16 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 Title V 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 Title V 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

D.7.17 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.7.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

**PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: GOTEC PLUS USA, LLC  
Source Address: 1605 Riverfork Drive East, Huntington, Indiana 46750  
Mailing Address: 1605 Riverfork Drive East, Huntington, Indiana 46750  
Part 70 Permit No.: 069-7676-00018

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

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify) \_\_\_\_\_
- Report (specify) \_\_\_\_\_
- Notification (specify) \_\_\_\_\_
- Other (specify) \_\_\_\_\_

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

Signature:

Printed Name:

Title/Position:

Date:

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

**PART 70 OPERATING PERMIT  
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: GOTEC PLUS USA, LLC  
Source Address: 1605 Riverfork Drive East, Huntington, Indiana 46750  
Mailing Address: 1605 Riverfork Drive East, Huntington, Indiana 46750  
Part 70 Permit No.: 069-7676-00018

**This form consists of 2 pages**

**Page 1 of 2**

Check either No. 1 or No.2
<input checked="" type="radio"/> 1. This is an emergency as defined in 326 IAC 2-7-1(12) <input type="radio"/> C The Permittee must notify the Office of Air Management (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and <input type="radio"/> C The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
<input checked="" type="radio"/> 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c) <input type="radio"/> C The Permittee must submit notice in writing within ten (10) calendar days

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

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

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

**Page 2 of 2**

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

Form Completed by: \_\_\_\_\_

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

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

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

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

**Part 70 Quarterly Report**

Source Name: GOTEC PLUS USA, LLC  
 Source Address: 1605 Riverfork Drive East, Huntington, Indiana 46750  
 Mailing Address: 1605 Riverfork Drive East, Huntington, Indiana 46750  
 Part 70 Permit No.: 069-7676-00018  
 Facility: DS-1  
 Parameter: VOC PTE  
 Limit: less than 25 tons per twelve (12) consecutive month period

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

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Usage (tons/month) <i>This Month</i>	VOC Usage (tons) <i>Previous 11 Months</i>	VOC Usage (tons) <i>12 Month Total</i>
Month 1			
Month 2			
Month 3			

**9** No deviation occurred in this quarter.

**9** Deviation/s occurred in this quarter.

Deviation has been reported on: \_\_\_\_\_

Form Completed by: \_\_\_\_\_

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

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

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

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

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

**Part 70 Quarterly Report**

Source Name: GOTEC PLUS USA, LLC  
 Source Address: 1605 Riverfork Drive East, Huntington, Indiana 46750  
 Mailing Address: 1605 Riverfork Drive East, Huntington, Indiana 46750  
 Part 70 Permit No.: 069-7676-00018  
 Facility: COE-1  
 Parameter: VOC PTE  
 Limit: less than 25 tons per twelve (12) consecutive month period

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

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Usage (tons/month) <i>This Month</i>	VOC Usage (tons) <i>Previous 11 Months</i>	VOC Usage (tons) <i>12 Month Total</i>
Month 1			
Month 2			
Month 3			

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

Form Completed by: \_\_\_\_\_

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

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

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

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

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

**Part 70 Quarterly Report**

Source Name: GOTEC PLUS USA, LLC  
 Source Address: 1605 Riverfork Drive East, Huntington, Indiana 46750  
 Mailing Address: 1605 Riverfork Drive East, Huntington, Indiana 46750  
 Part 70 Permit No.: 069-7676-00018  
 Facility: COE-2  
 Parameter: VOC PTE  
 Limit: less than 25 tons per twelve (12) consecutive month period

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

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Usage (tons/month) <i>This Month</i>	VOC Usage (tons) <i>Previous 11 Months</i>	VOC Usage (tons) <i>12 Month Total</i>
Month 1			
Month 2			
Month 3			

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

Form Completed by: \_\_\_\_\_  
 Title / Position: \_\_\_\_\_  
 Signature: \_\_\_\_\_  
 Date: \_\_\_\_\_  
 Phone: \_\_\_\_\_

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

**Part 70 Quarterly Report**

Source Name: GOTEC PLUS USA, LLC  
 Source Address: 1605 Riverfork Drive East, Huntington, Indiana 46750  
 Mailing Address: 1605 Riverfork Drive East, Huntington, Indiana 46750  
 Part 70 Permit No.: 069-7676-00018  
 Facility: SB-1  
 Parameter: VOC PTE  
 Limit: less than 25 tons per twelve (12) consecutive month period

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

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Usage (tons/month) <i>This Month</i>	VOC Usage (tons) <i>Previous 11 Months</i>	VOC Usage (tons) <i>12 Month Total</i>
Month 1			
Month 2			
Month 3			

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

Form Completed by: \_\_\_\_\_  
 Title / Position: \_\_\_\_\_  
 Signature: \_\_\_\_\_  
 Date: \_\_\_\_\_  
 Phone: \_\_\_\_\_

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

**Part 70 Quarterly Report**

Source Name: GOTEC PLUS USA, LLC  
 Source Address: 1605 Riverfork Drive East, Huntington, Indiana 46750  
 Mailing Address: 1605 Riverfork Drive East, Huntington, Indiana 46750  
 Part 70 Permit No.: 069-7676-00018  
 Facility: SB-2  
 Parameter: VOC PTE  
 Limit: less than 25 tons per twelve (12) consecutive month period

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

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Usage (tons/month) <i>This Month</i>	VOC Usage (tons) <i>Previous 11 Months</i>	VOC Usage (tons) <i>12 Month Total</i>
Month 1			
Month 2			
Month 3			

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

Form Completed by: \_\_\_\_\_

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

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

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

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

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

**Part 70 Quarterly Report**

Source Name: GOTEC PLUS USA, LLC  
 Source Address: 1605 Riverfork Drive East, Huntington, Indiana 46750  
 Mailing Address: 1605 Riverfork Drive East, Huntington, Indiana 46750  
 Part 70 Permit No.: 069-7676-00018  
 Facility: SB-3  
 Parameter: VOC PTE  
 Limit: less than 25 tons per twelve (12) consecutive month period

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

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Usage (tons/month) <i>This Month</i>	VOC Usage (tons) <i>Previous 11 Months</i>	VOC Usage (tons) <i>12 Month Total</i>
Month 1			
Month 2			
Month 3			

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

Form Completed by: \_\_\_\_\_

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

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

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

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

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

**Part 70 Quarterly Report**

Source Name: GOTEC PLUS USA, LLC  
 Source Address: 1605 Riverfork Drive East, Huntington, Indiana 46750  
 Mailing Address: 1605 Riverfork Drive East, Huntington, Indiana 46750  
 Part 70 Permit No.: 069-7676-00018  
 Facility: SB-4  
 Parameter: VOC PTE  
 Limit: less than 25 tons per twelve (12) consecutive month period

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

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Usage (tons/month) <i>This Month</i>	VOC Usage (tons) <i>Previous 11 Months</i>	VOC Usage (tons) <i>12 Month Total</i>
Month 1			
Month 2			
Month 3			

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

Form Completed by: \_\_\_\_\_

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

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

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

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

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

**Part 70 Quarterly Report**

Source Name: GOTEC PLUS USA, LLC  
 Source Address: 1605 Riverfork Drive East, Huntington, Indiana 46750  
 Mailing Address: 1605 Riverfork Drive East, Huntington, Indiana 46750  
 Part 70 Permit No.: 069-7676-00018  
 Facility: SB-1, SB-2, SB-3, SB-4, DS-1, COE-1, COE-2, COE-3, COE-4, RCP, DC-1, & DG  
 Parameter: VOC PTE  
 Limit: less than 250 tons per twelve (12) consecutive month period

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

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Usage (tons/month) <i>This Month</i>	VOC Usage (tons) <i>Previous 11 Months</i>	VOC Usage (tons) <i>12 Month Total</i>
Month 1			
Month 2			
Month 3			

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

Form Completed by: \_\_\_\_\_

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

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

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

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

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

**Part 70 Quarterly Report**

Source Name: GOTEC PLUS USA, LLC  
 Source Address: 1605 Riverfork Drive, Huntington, Indiana 46750  
 Mailing Address: PO Box 1027, Huntington, Indiana 46750  
 Part 70 Permit No.: T 069-7676-00018  
 Facilities: Four (4) chain on edge machines (COE-7, COE-8, COE-9 and COE-10)  
 Parameter: VOC usage  
 Limit: No more than 164 tons per twelve (12) consecutive month period, with compliance determined at the end of each month

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

Month	VOC Usage	VOC Usage	VOC Usage
	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: \_\_\_\_\_

Form Completed by: \_\_\_\_\_

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

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

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

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

Attach a signed certification to complete this report.

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

**PART 70 OPERATING PERMIT  
QUARTERLY COMPLIANCE MONITORING REPORT**

Source Name: GOTEC PLUS USA, LLC  
Source Address: 1605 Riverfork Drive East, Huntington, Indiana 46750  
Mailing Address: 1605 Riverfork Drive East, Huntington, Indiana 46750  
Part 70 Permit No.: 069-7676-00018

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of each Deviation

Form Completed by: \_\_\_\_\_

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

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

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

Attach a signed certification to complete this report.

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

**PART 70 OPERATING PERMIT  
SEMI-ANNUAL COMPLIANCE MONITORING REPORT**

Source Name: GOTEC PLUS USA, LLC  
Source Address: 1605 Riverfork Drive East, Huntington, Indiana 46750  
Mailing Address: 1605 Riverfork Drive East, Huntington, Indiana 46750  
Part 70 Permit No.: 069-7676-00018

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted semi-annually. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of each Deviation

Form Completed by: \_\_\_\_\_

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

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

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

Attach a signed certification to complete this report.

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

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

<b>Source Description and Location</b>
--

<b>Source Name:</b>	<b>GOTEC PLUS USA, LLC</b>
<b>Source Location:</b>	<b>1605 Riverfork Drive East, Huntington, IN 46750</b>
<b>County:</b>	<b>Huntington</b>
<b>SIC Code:</b>	<b>3479</b>
<b>Operation Permit No.:</b>	<b>T 069-7676-00018</b>
<b>Operation Permit Issuance Date:</b>	<b>July 9, 1999</b>
<b>Minor Source Modification No.:</b>	<b>069-22306-00018</b>
<b>Minor Permit Modification No.:</b>	<b>069-22308-00018</b>
<b>Permit Reviewer:</b>	<b>CarrieAnn Paukowits</b>

This source was previously named Ken-Koat, Inc.

<b>Existing Approvals</b>
---------------------------

The source was issued a Part 70 Operating Permit **T 069-7676-00018** on July 9, 1999. The source has since received the following approvals:

- (a) Administrative Amendment 069-13557-00018, issued on December 13, 2000;
- (b) Review Request 069-11255-00018, issued on March 9, 2001;
- (c) Significant Source Modification 069-12898-00018, issued on May 9, 2001;
- (d) Administrative Amendment 069-12991-00018, issued on May 10, 2001;
- (e) Reopening 069-13321-00018, issued on January 29, 2002;
- (f) Significant Source Modification 069-18000-00018, issued on January 12, 2004;
- (g) Significant Permit Modification 069-18038-00018, issued on January 29, 2004; and
- (h) Applicability Determination 069-17051-00018, issued on March 16, 2005.

<b>County Attainment Status</b>
---------------------------------

The source is located in Huntington County.

Pollutant	Status
PM <sub>10</sub>	attainment
PM <sub>2.5</sub>	attainment
SO <sub>2</sub>	attainment

Pollutant	Status
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 (NO<sub>x</sub>) 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 NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. Huntington County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Huntington 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) Huntington 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.

<b>Source Status</b>
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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	< 250
PM <sub>10</sub>	< 250
SO <sub>2</sub>	< 250
VOC	512
CO	< 250
NO <sub>x</sub>	< 250

- (a) This existing source is a major stationary source, under PSD (326 IAC 2-2), because a 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 Technical Support Document for SPM 069-18038-00018, issued on January 29, 2004, which is the most recent approval issued to this source that included processes with emissions.

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)
MIBK	greater than 10
MEK	greater than 10
Formaldehyde	less than 10
Toluene	greater than 10
Xylene	greater than 10
Carbon Tetrachloride	less than 10
Trichloroethylene	greater than 10
1,2,4-Trimethylbenzene	less than 10
Ethyl benzene	greater than 10
<b>TOTAL</b>	<b>1503.85</b>

- (a) 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).
- (b) These emissions are based upon the Technical Support Document for T 069-7676-00018, issued on July 9, 2004, which is the most recent approval issued to this source that included processes with emissions.

**Actual Emissions**

The following table shows the actual emissions from the source. This information reflects the 2003 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	Not reported
PM <sub>10</sub>	0.0
SO <sub>2</sub>	0.0
VOC	44.0
CO	1.0
NO <sub>x</sub>	1.0

Pollutant	Actual Emissions (tons/year)
HAP (MEK)	4.38
HAP (1,2,4- Trimethylbenzene)	0.619
HAP (MIBK)	0.202
HAP (Toluene)	10.5
HAP (Xylenes)	2.36

#### Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by GOTEC PLUS USA, LLC on November 30, 2005, relating to the construction of four (4) identical chain on edge machines, identified as COE-7, COE-8, COE-9 and COE-10, at the existing metal coating source. These machines will replace two (2) previously permitted machines, also identified as COE-7 and COE-8. One (1) of the two (2) permitted machines (COE-7) was never fully installed and never operated. The other permitted machine (COE-8) only operated briefly. The two (2) permitted machines have been completely removed from the source. The Permittee will remove additional permitted chain on edge machines in the future. The proposed machines will exhaust to the existing thermal oxidizer, identified as CE-3. The following is a list of the newly proposed emission units and pollution control devices:

- (a) One (1) chain on edge machine, identified as COE-7, installed in 2006, equipped with high volume, low pressure (HVLP) spray applicators, with emissions controlled by an existing thermal oxidizer, identified as CE-3, and dry filters, exhausting to stack C3 and consisting of the following equipment:
  - (1) Two (2) topcoat application sections with a maximum topcoat application rate of 13.0 pounds per hour, total;
  - (2) One (1) primer application section with a maximum primer application rate of 8.5 pounds per hour; and
  - (3) One (1) electric heater.
- (b) One (1) chain on edge machine, identified as COE-8, installed in 2006, equipped with high volume, low pressure (HVLP) spray applicators, with emissions controlled by an existing thermal oxidizer, identified as CE-3, and dry filters, exhausting to stack C3 and consisting of the following equipment:
  - (1) Two (2) topcoat application sections with a maximum topcoat application rate of 13.0 pounds per hour, total;
  - (2) One (1) primer application section with a maximum primer application rate of 8.5 pounds per hour; and
  - (3) One (1) electric heater.
- (c) One (1) chain on edge machine, identified as COE-9, installed in 2006, equipped with high volume, low pressure (HVLP) spray applicators, with emissions controlled by an existing

thermal oxidizer, identified as CE-3, and dry filters, exhausting to stack C3 and consisting of the following equipment:

- (1) Two (2) topcoat application sections with a maximum topcoat application rate of 13.0 pounds per hour, total;
  - (2) One (1) primer application section with a maximum primer application rate of 8.5 pounds per hour; and
  - (3) One (1) electric heater.
- (d) One (1) chain on edge machine, identified as COE-10, installed in 2006, equipped with high volume, low pressure (HVLP) spray applicators, with emissions controlled by an existing thermal oxidizer, identified as CE-3, and dry filters, exhausting to stack C3 and consisting of the following equipment:
- (1) Two (2) topcoat application sections with a maximum topcoat application rate of 13.0 pounds per hour, total;
  - (2) One (1) primer application section with a maximum primer application rate of 8.5 pounds per hour; and
  - (3) One (1) electric heater.

**Enforcement Issues**

There are no pending enforcement actions related to this modification.

**Stack Summary**

The emissions from the four (4) proposed chain on edge machines will exhaust through the existing stack, identified as stack C3, with the following dimensions:

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
C3	Oxidizer	24.0	1.0	30,000	250

**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	18.4
PM <sub>10</sub>	18.4
SO <sub>2</sub>	0.00
VOC	327
CO	0.00
NO <sub>x</sub>	0.00

HAPs	Potential To Emit (tons/year)
MIBK	69.4
Formaldehyde	0.881
Ethylbenzene	30.8
MEK	66.5
Toluene	203
Xylene	123
TOTAL	340

This source modification is subject to 326 IAC 2-7-10.5 (d)(8), a modification that has a potential to emit greater than the thresholds under 326 IAC 2-7-10.5(d)(3) that adds an emissions unit or units of the same type that are already permitted and that will comply with the same applicable requirements and permit terms and conditions as the existing emission unit or units, except if the modification would result in a potential to emit greater than the thresholds in 326 IAC 2-2 or 326 IAC 2-3. In order to obtain a minor source modification, the applicant has agreed that the four (4) chain on edge machines, identified as COE-7, COE-8, COE-9 and COE-10, will comply with the emission limitations and standards currently in the permit for the two (2) chain on edge machines, also identified as COE-7 and COE-8, which were permitted in 2004 and have been removed from the source.

Additionally, the modification will be incorporated into the Part 70 Operating Permit through a minor permit modification issued pursuant to 326 IAC 2-7-12(b)(1), because it does not violate any applicable requirement, does not involve significant changes to existing monitoring, reporting, or record keeping requirements in the Part 70 permit, does not require or change a case-by-case determination of an emission limitation or other standard, does not seek to establish or change a Part 70 permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject, and is not a modification under any provision of Title I of the CAA.

**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>	Total HAPs
Four (4) chain on edge machines (COE-7, COE-8, COE-9 and COE-10)	0.921	0.921	0.00	18.7	0.00	0.00	38.8
Significant Level or Major Source Threshold	25	15	40	40	100	40	N/A

This modification to an existing major stationary source is not major because the emissions increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Since this source is considered a major PSD source and the unrestricted potential to emit of this modification is greater than forty (40) tons of VOC per year and fifteen (15) tons of PM<sub>10</sub> per year, this source has elected to limit the potential to emit of this modification as follows:

- (a) In order to obtain minor source and minor permit modifications, rather than significant source and significant permit modifications, the applicant has agreed that the four (4) chain on edge machines, identified as COE-7, COE-8, COE-9 and COE-10, will comply with the VOC emission limitation in the permit for the two (2) previously permitted chain on edge machines, also identified as COE-7 and COE-8. Pursuant to Condition D.7.3(a), the use of VOC, including coatings, dilution solvents, and cleaning solvents at the four (4) chain on edge machines (COE-7, COE-8, COE-9 and COE-10) shall be limited to 164 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month, and the proposed facilities shall use the existing thermal oxidizer (CE-3) at an overall control efficiency no less than 88.6%. Thus, the potential to emit VOC is limited to 18.7 tons per year, which is less than 40 tons per year, and the requirements of 326 IAC 2-2, PSD, are not applicable. Based on the latest stack test, the control efficiency of the thermal oxidizer is 92.66%. Therefore, the proposed machines are expected to comply with this rule. Testing of the oxidizer is required by this approval.
- (b) In order to obtain minor source and minor permit modifications, rather than significant source and significant permit modifications, the applicant has agreed that the four (4) chain on edge machines, identified as COE-7, COE-8, COE-9 and COE-10, will comply with the particulate emission limitation in the permit for the two (2) previously permitted chain on edge machines, identified as COE-7 and COE-8. Pursuant to Condition D.7.3(b), any change or modification that increases the solids delivered to the applicators to 750 tons per twelve (12) consecutive month period or more shall increase the potential to emit PM<sub>10</sub> to 15 tons per year, based on a transfer efficiency of 60% and a control efficiency of 95%, and shall require prior IDEM, OAQ, approval. Therefore, the requirements of 326 IAC 2-2, PSD, are not applicable. The transfer efficiency of the applicators for the new machines will be greater than 60%, the control efficiency of the dry filters is 95%, and the potential solids usage is 73.6 tons per year. Therefore, the four (4) chain on edge machines are expected to comply with this requirement. The values for PM and PM<sub>10</sub> in the table above represent the potential to emit based on the maximum solids usage rate, after control, by the dry filters.
- (c) The unrestricted potential PM emissions from this proposed modification are less than 25.0 tons per year.

Since one (1) chain on edge machine permitted in Significant Source Modification 069-18000-00018, issued on January 12, 2004, and Significant Permit Modification 069-18038-00018, issued on January 29, 2004, never operated, and the other only operated for a very limited amount of time, there are no contemporaneous decreases taken into account when determining PSD applicability for this modification. No contemporaneous decreases are required to make this modification minor 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 miscellaneous metal parts and products facilities 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. As currently required by the permit, 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 (9) months prior to the compliance date for 40 CFR 63, Subpart MMMM. 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 MMMM, 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)
Chain on edge machine (COE-7), VOC	Thermal Oxidizer	Y	81.8	6.00	100	N	N
Chain on edge machine (COE-7), PM <sub>10</sub>	Dry Filters	Y	4.60	0.230	100	N	N
Chain on edge machine (COE-8), VOC	Thermal Oxidizer	Y	81.8	6.00	100	N	N
Chain on edge machine (COE-8), PM <sub>10</sub>	Dry Filters	Y	4.60	0.230	100	N	N
Chain on edge machine (COE-9), VOC	Thermal Oxidizer	Y	81.8	6.00	100	N	N
Chain on edge machine (COE-9), PM <sub>10</sub>	Dry Filters	Y	4.60	0.230	100	N	N
Chain on edge machine (COE-10), VOC	Thermal Oxidizer	Y	81.8	6.00	100	N	N
Chain on edge machine (COE-10), PM <sub>10</sub>	Dry Filters	Y	4.60	0.230	100	N	N

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are not applicable to the four (4) proposed chain on edge machines.

<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 and 2-3 (PSD and Emission Offset)**

PSD and Emission Offset 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))**

The operation of each of the four (4) chain on edge machines, identified as COE-7 through COE-10, has the potential to emit 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, 326 IAC 2-4.1 would apply to each of the four (4) chain on edge machines, identified as COE-7 through COE-10. However, these four (4) chain on edge machines, identified as COE-7 through COE-10, are specifically regulated by NESHAP 40 CFR 63, Subpart M, which was issued pursuant to Section 112(d) of the CAA. Therefore, pursuant to 326 IAC 2-4.1-1(b)(2), this source is exempt from the requirements of 326 IAC 2-4.1.

The two (2) previously permitted chain on edge machines, also identified as COE-7 and COE-8, were also exempt from the requirements of 326 IAC 2-4.1.

**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 annually because the potential to emit VOC from this source is greater than 250 tons per year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

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

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicators at the four (4) proposed chain on edge machines, identified as COE-7 through COE-10, 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.

These requirements are the same as those for the previously permitted chain on edge machines.

- (b) Pursuant to 326 IAC 8-1-2 (b), the VOC emissions from each of the four (4) chain on edge machines (COE-7 through COE-10) shall be limited to no greater than the equivalent emissions, expressed as pounds of VOC per gallon of coating solids, allowed in (a).

This equivalency was determined by the following equation:

$$E = L / (1 - (L/D))$$

Where:

- L = Applicable emission limit from 326 IAC 8 in pounds of VOC per gallon of coating (3.5);  
D = Baseline solvent density of VOC in the coating and shall be equal to seven and thirty-six hundredths (7.36) pounds of VOC per gallon of solvent;  
E = Equivalent emission limit in pounds of VOC per gallon of coating solids, as applied.

Actual solvent density and VOC content shall be used to determine compliance of the surface coating operation using the compliance methods in 326 IAC 8-1-2 (a).

E = 6.67 pounds of VOC per gallon of coating solids, as applied.

This equivalency is not dependent on actual coatings used and is the same for all coating operations subject to the 3.5 pound per gallon VOC content limit in 326 IAC 8-2-9. Therefore, the requirement is the same for the four (4) proposed chain on edge machines as for the previously permitted chain on edge machines. Condition D.7.1(c) of the permit erroneously stated that the equivalency is 7.70 pounds of VOC per gallon of coating solids, as applied. That error is corrected in this minor modification.

- (c) Pursuant to 326 IAC 8-1-2(c), the overall efficiency of the thermal oxidizer shall be no less than the equivalent overall efficiency calculated by the following equation:

$$O = \frac{V - E}{V} \times 100$$

Where:

- V = The actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content of all coatings, as applied to the subject coating line as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids as applied.

- E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied. (6.67)
- O = Equivalent overall efficiency of the capture system and control device as a percentage.

In order to comply with 326 IAC 8-2-9, daily weighted average VOC content of all coatings used at the four (4) chain on edge machines, identified as COE-7, COE-8, COE-9 and COE-10, as applied, must not exceed 85.5 pounds per gallon of coating solids, when the overall control efficiency is equal to or greater than 92.2%. Previous stack tests have shown that the thermal oxidizer can achieve a control efficiency of at least 92.2%.

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate from the four (4) chain on edge machines, identified as COE-7 through COE-10, 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.

This is the same requirement as that currently in the permit for the previously permitted chain on edge machines, COE-7 and COE-8.

**Compliance Determination and Monitoring Requirements**

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 four (4) chain on edge machines, identified as COE-7, COE-8, COE-9 and COE-10, have applicable compliance determination conditions as specified below:

- (a) Pursuant to 326 IAC 8-1-2(a), the Permittee shall operate the thermal oxidizer to achieve compliance with the conditions in the permit.
- (b) Pursuant to 326 IAC 8-1-2(c) the overall control efficiency of the thermal oxidizer shall be no less than the equivalent overall efficiency calculated by the following equation:

$$O = \frac{V - E}{V} \times 100$$

Where:

- V = The actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content of all coatings, as applied to the subject coating line as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids as applied.
- E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.
- O = Equivalent overall efficiency of the capture system and control device as a percentage.

The Permittee can comply with this limit provided the daily weighted average VOC content of all coatings used at each of the four (4) chain on edge machines, identified as COE-7, COE-8, COE-9 and COE-10, as applied, is no more than 85.5 pounds per gallon of coating solids, and the overall control efficiency is no less than 92.2%.

- (c) Compliance with the VOC usage limitation shall be demonstrated within 30 days of the end of each month. This shall be based on the total volatile organic compounds emitted for the previous month, and adding it to previous 11 months total VOC emitted so as to arrive at VOC emissions for the most recent 12 consecutive month period. The VOC emissions for a month can be arrived at using the following equation for VOC usage:

$$\text{VOC emitted} = [(\text{VOC input}) \times (100 - \% \text{ overall control efficiency})] + [\text{uncontrolled VOC input}]$$

Emission Unit	Control Device	Timeframe for Testing	Pollutant	Frequency of Testing	Limit or Requirement
Chain on edge machines (COE-7, COE-8, COE-9 and COE-10)	Thermal Oxidizer	Within sixty (60) days of achieving maximum capacity, but no more than one hundred and eighty (180) days after initial startup of each of the chain on edge machines	VOC	5 years	Minimum 88.6% control efficiency for the PSD limit and 326 IAC 8-2-9 requirements

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

The four (4) chain on edge machines, identified as COE-7, COE-8, COE-9 and COE-10, have applicable compliance monitoring conditions as specified below:

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. The output of this system shall be recorded as an hourly average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports whenever the hourly average temperature of the thermal oxidizer is below 1400°F. An hourly average temperature that is below 1400°F is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

- (b) The Permittee shall determine the hourly average temperature from the most recent valid stack test that demonstrates compliance with limits in the permit, as approved by IDEM.
- (c) On and after the date the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports whenever the hourly average temperature of the thermal oxidizer is below the hourly average temperature as observed during the compliant stack test. An hourly average temperature that is below the hourly average temperature as observed during the compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (d) The Permittee shall determine fan amperage or duct pressure from the most recent valid stack test that demonstrates compliance with the limits in the permit, as approved by IDEM.
- (e) The duct pressure or fan amperage shall be observed at least once per day when the thermal oxidizer is in operation. When for any one reading, the duct pressure or fan amperage is outside the normal range as established in most recent compliant stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A reading that is outside the range as established in the most recent compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (f) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack (C3) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (g) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

These monitoring conditions are necessary because the thermal oxidizer and the dry filters for the chain on edge machines must operate properly to ensure compliance with 326 IAC 8-2-9 (Miscellaneous Metal Coating), 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), and 326 IAC 2-7 (Part 70), and to make the requirements of 326 IAC 2-4.1-1 (New Source Toxics Control) and 326 IAC 2-2 (PSD) not applicable. These monitoring conditions are the same as those required for the two (2) previously permitted chain on edge machines, also identified as COE-7 and COE-8, which have been removed.

<b>Proposed Changes</b>
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The changes listed below have been made to Part 70 Operating Permit No. T 069-7676-00018. Deleted language appears as ~~strike throughs~~ and new language appears in **bold**:

**Change 1:**

This source was previously owned by Ken-Koat, Inc. The source name has been changed to GOTEC PLUS USA, LLC. Therefore, the source name has been changed everywhere in the permit as follows:

~~Ken-Koat, Inc.~~ **GOTEC PLUS USA, LLC**

**Change 2:**

Because of the change in ownership, the responsible official has been changed in Section A.1, General Information. To avoid excessive administrative permit amendments, in case of changes in personnel, only job titles are listed in the permit. The Director of Sales and Administration has been designated as the Responsible Official. This position meets the requirements under 326 IAC 2-7-1(34)(A)(i) as a Responsible Official. Section A.1 has been revised as follows:

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

The Permittee owns and operates a stationary metal coating operation.

Responsible Official:	<del>Chris Robertson</del> <b>Director of Sales and Administration</b>
Source Address:	1605 Riverfork Drive, Huntington, Indiana 46750
Mailing Address:	PO Box 1027, Huntington, Indiana 46750
SIC Code:	3479
County Location:	Huntington
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major, under PSD Rules; Major Source, Section 112 of the Clean Air Act

**Change 3:**

The mailing address of IDEM, OAQ, has changed. The address has been revised in all places in the permit, as follows:

100 North Senate Avenue, ~~P.O. Box 6015~~  
Indianapolis, Indiana ~~46206-6015~~ **46204-2251**

**Change 4:**

Condition B.9, Compliance with Permit Conditions, has been moved to the cover page, and the remaining conditions in Section B have been renumbered.

~~B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]~~

~~(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:~~

~~(1) Enforcement action;~~

~~(2) Permit termination, revocation and reissuance, or modification; or~~

~~(3) Denial of a permit renewal application.~~

~~(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.~~

The following has been added to the cover page of the permit:

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

#### Change 5:

The name and phone number of the appropriate IDEM, OAQ Section has been revised in Condition B.25 (previously B.26), Annual Fee Payment:

#### B.2625 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~~ **Billing, Licensing, and Training** Section), to determine the appropriate permit fee.

#### Change 6:

The following changes have been made due to the addition of the four (4) chain on edge machines, identified as COE-7, COE-8, COE-9, and COE-10, and the removal of the two (2) previously permitted chain on edge machines, also identified as COE-7 and COE-8:

#### 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) dip and spin for metal inserts, designated as DS-1, with a maximum adhesive application rate of 5.68 pounds per hour, which exhausts to one (1) stack designated as S-18.
- (b) One (1) dip conveyor designated as DC-1, with a maximum application rate of 34.93 pounds per hour, which utilizes one (1) dryer, and is controlled by thermal oxidizer, CE-3, which exhausts to one (1) stack designated as C3.
- (c) One (1) dip conveyor designated as DC-2, with emissions controlled by thermal oxidizer, CE-3, with the following equipment:

- (1) One (1) coating tank with a maximum topcoat application rate of 12.00 pounds per hour, which exhausts to a stack designated as C3.
  - (2) One (1) primer tank with a maximum primer application rate of 8.20 pounds per hour, which exhausts to one (1) stack designated as C3.
  - (3) One (1) natural gas drying oven designated as OVEN-1, with a maximum heat input rate of 0.70 million Btu per hour, which exhausts to one (1) stack designated as C3..
- (d) One (1) ransburg coating process, designated as RCP, controlled by the thermal oxidizer, CE-3, with a maximum metal insert rate of 1000 pounds per hour with the following equipment:
- (1) Two (2) electrostatic paint booths, designated as EPB-1 and EPB-2 respectively, each with a maximum application rate of 11.42 pounds per hour, each exhausting to the thermal oxidizer (CE-3) and stack C3.
  - (2) One (1) natural gas fired oven, designated as OVEN-3, which exhausts to one (1) stack, designated as C4.
- (e) Four (4) HVLP spray booths for painting metal inserts, designated as SB-1, SB-2, SB-3 and SB-4, with a maximum adhesive application rate of 5.94 pounds per hour, 11.91 pounds per hour, 4.92 pounds per hour and 4.38 pounds per hour, respectively. All are equipped with dry filters for particulate matter control. SB-1 exhausts to one (1) stack designated as S-10, SB-2 exhausts to one (1) stack designated as S-11, SB-3 exhausts to one (1) stack designated as S-1, and SB-4 exhausts to one (1) stack designated as S-2.
- (f) One (1) open top degreaser, identified as DG, with a maximum trichloroethylene consumption rate of 12 gallons per day which exhausts internally.
- (g) Three (3) steel grit blasters, designated as SGB-1, SGB-2, and SGB-3, each with a maximum metal insert throughput of 1200 pounds per hour, controlled by a baghouse designated as CE-1, exhausting to one (1) stack designated as #C1.
- (h) One (1) aluminum oxide grit blaster, identified as ALOX-1, with a maximum metal insert throughput of 1200 pounds per hour, controlled by a baghouse designated as CE-2 and exhausting to a stack designated as #C2.
- (i) Two (2) HVLP chain on edge machines, designated as COE-3 and COE-4, with a maximum adhesive application rate of 9.38 pounds per hour, 21.51 pounds per hour and 16.08 pounds per hour, respectively. Each chain on edge machine is equipped with dry filters for particulate matter control. COE-3 and COE-4 exhaust to the thermal oxidizer, CE-3, to control VOC emissions, and stack C3.
- (j) One (1) HVLP chain on edge machine, designated as COE-5, with emissions controlled by thermal oxidizer, CE-3, with the following equipment:
- (1) Two (2) coating booths with a maximum topcoat application rate of 18.70 pounds per hour, which exhausts to one (1) stack designated as C3.
  - (2) One (1) primer booth with a maximum primer application rate of 4.27 pounds per hour, which exhausts to one (1) stack designated as C3.
  - (3) One (1) electric heater which exhausts to one (1) stack designated as C3.

- (k) One (1) chain on edge machine, identified as COE-6, equipped with high volume, low pressure (HVLP) spray applicators, with emissions controlled by a thermal oxidizer, identified as CE-3, and dry filters, exhausting to stack C3 and consisting of the following equipment:
- (1) Two (2) coating booths with a maximum topcoat application rate of 18.70 pounds per hour;
  - (2) One (1) primer booth with a maximum primer application rate of 4.27 pounds per hour; and
  - (3) One (1) electric heater.
- ~~(l) One (1) chain on edge machine, identified as COE-7, equipped with high volume, low pressure (HVLP) spray applicators, with emissions controlled by an existing thermal oxidizer, identified as CE-3, and dry filters, exhausting to stack C3 and consisting of the following equipment:~~
- ~~(1) Two (2) topcoat booths with a maximum topcoat application rate of 18.70 pounds per hour, total;~~
  - ~~(2) One (1) primer booth with a maximum primer application rate of 4.27 pounds per hour; and~~
  - ~~(3) Three (3) electric heaters.~~
- ~~(m) One (1) chain on edge machine, identified as COE-8, equipped with high volume, low pressure (HVLP) spray applicators, with emissions controlled by an existing thermal oxidizer, identified as CE-3, and dry filters, exhausting to stack C3 and consisting of the following equipment:~~
- ~~(1) Two (2) topcoat booths with a maximum topcoat application rate of 18.70 pounds per hour, total;~~
  - ~~(2) One (1) primer booth with a maximum primer application rate of 4.27 pounds per hour; and~~
  - ~~(3) Three (3) electric heaters.~~
- (l) One (1) chain on edge machine, identified as COE-7, installed in 2006, equipped with high volume, low pressure (HVLP) spray applicators, with emissions controlled by an existing thermal oxidizer, identified as CE-3, and dry filters, exhausting to stack C3 and consisting of the following equipment:**
- (1) Two (2) topcoat application sections with a maximum topcoat application rate of 13.0 pounds per hour, total;**
  - (2) One (1) primer application section with a maximum primer application rate of 8.5 pounds per hour; and**
  - (3) One (1) electric heater.**
- (m) One (1) chain on edge machine, identified as COE-8, installed in 2006, equipped with high volume, low pressure (HVLP) spray applicators, with emissions controlled by an existing thermal oxidizer, identified as CE-3, and dry filters, exhausting to stack C3 and consisting of the following equipment:**

- (1) Two (2) topcoat application sections with a maximum topcoat application rate of 13.0 pounds per hour, total;**
  - (2) One (1) primer application section with a maximum primer application rate of 8.5 pounds per hour; and**
  - (3) One (1) electric heater.**
- (n) One (1) chain on edge machine, identified as COE-9, installed in 2006, equipped with high volume, low pressure (HVLV) spray applicators, with emissions controlled by an existing thermal oxidizer, identified as CE-3, and dry filters, exhausting to stack C3 and consisting of the following equipment:**
  - (1) Two (2) topcoat application sections with a maximum topcoat application rate of 13.0 pounds per hour, total;**
  - (2) One (1) primer application section with a maximum primer application rate of 8.5 pounds per hour; and**
  - (3) One (1) electric heater.**
- (o) One (1) chain on edge machine, identified as COE-10, installed in 2006, equipped with high volume, low pressure (HVLV) spray applicators, with emissions controlled by an existing thermal oxidizer, identified as CE-3, and dry filters, exhausting to stack C3 and consisting of the following equipment:**
  - (1) Two (2) topcoat application sections with a maximum topcoat application rate of 13.0 pounds per hour, total;**
  - (2) One (1) primer application section with a maximum primer application rate of 8.5 pounds per hour; and**
  - (3) One (1) electric heater.**

## SECTION D.7 FACILITY OPERATION CONDITIONS

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

- (l) ~~One (1) chain on edge machine, identified as COE-7, equipped with high volume, low pressure (HVLP) spray applicators, with emissions controlled by an existing thermal oxidizer, identified as CE-3, and dry filters, exhausting to stack C3 and consisting of the following equipment:
  - (1) ~~Two (2) topcoat booths with a maximum topcoat application rate of 18.70 pounds per hour, total;~~
  - (2) ~~One (1) primer booth with a maximum primer application rate of 4.27 pounds per hour; and~~
  - (3) ~~Three (3) electric heaters.~~~~
- (m) ~~One (1) chain on edge machine, identified as COE-8, equipped with high volume, low pressure (HVLP) spray applicators, with emissions controlled by an existing thermal oxidizer, identified as CE-3, and dry filters, exhausting to stack C3 and consisting of the following equipment:
  - (1) ~~Two (2) topcoat booths with a maximum topcoat application rate of 18.70 pounds per hour, total;~~
  - (2) ~~One (1) primer booth with a maximum primer application rate of 4.27 pounds per hour; and~~
  - (3) ~~Three (3) electric heaters.~~~~
- (l) **One (1) chain on edge machine, identified as COE-7, installed in 2006, equipped with high volume, low pressure (HVLP) spray applicators, with emissions controlled by an existing thermal oxidizer, identified as CE-3, and dry filters, exhausting to stack C3 and consisting of the following equipment:
  - (1) **Two (2) topcoat application sections with a maximum topcoat application rate of 13.0 pounds per hour, total;**
  - (2) **One (1) primer application section with a maximum primer application rate of 8.5 pounds per hour; and**
  - (3) **One (1) electric heater.****
- (m) **One (1) chain on edge machine, identified as COE-8, installed in 2006, equipped with high volume, low pressure (HVLP) spray applicators, with emissions controlled by an existing thermal oxidizer, identified as CE-3, and dry filters, exhausting to stack C3 and consisting of the following equipment:
  - (1) **Two (2) topcoat application sections with a maximum topcoat application rate of 13.0 pounds per hour, total;**
  - (2) **One (1) primer application section with a maximum primer application rate of 8.5 pounds per hour; and**
  - (3) **One (1) electric heater.****
- (n) **One (1) chain on edge machine, identified as COE-9, installed in 2006, equipped with high volume, low pressure (HVLP) spray applicators, with emissions controlled by an existing thermal oxidizer, identified as CE-3, and dry filters, exhausting to stack C3 and consisting of the following equipment:
  - (1) **Two (2) topcoat application sections with a maximum topcoat application rate of 13.0 pounds per hour, total;**
  - (2) **One (1) primer application section with a maximum primer application rate of 8.5 pounds per hour; and**
  - (3) **One (1) electric heater.****
- (o) **One (1) chain on edge machine, identified as COE-10, installed in 2006, equipped with high volume, low pressure (HVLP) spray applicators, with emissions controlled by an existing thermal oxidizer, identified as CE-3, and dry filters, exhausting to stack C3 and consisting of the following equipment:
  - (1) **Two (2) topcoat application sections with a maximum topcoat application rate of 13.0 pounds per hour, total;**
  - (2) **One (1) primer application section with a maximum primer application rate of 8.5 pounds per hour; and****

**(3) One (1) electric heater.**

(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.7.1 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-9] [326 IAC 8-1-2]**

- (a) Pursuant to 326 IAC 8-2-9, the ~~owner or operator~~ **Permittee** shall not allow the discharge into the atmosphere of VOC in excess of three and five-tenths (3.5) for forced warm air dried coatings.
  
- (b) Pursuant to 326 IAC 8-1-2 (b), the VOC emissions from the ~~two (2)~~ **four (4)** chain on edge machines (COE-7, ~~and~~ COE-8, **COE-9 and COE-10**) shall be limited to no greater than the equivalent emissions, expressed as pounds of VOC per gallon of coating solids, allowed in (a).

This equivalency was determined by the following equation:

$$E = L / (1 - (L/D))$$

Where

- L = Applicable emission limit from 326 IAC 8 in pounds of VOC per gallon of coating;
- D = Density of VOC in coating in pounds per gallon of VOC;
- E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.

Actual solvent density shall be used to determine compliance of the surface coating operation using the compliance methods in 326 IAC 8-1-2 (a).

- (c) The pounds of VOC per gallon of coating solids shall be limited to less than ~~7.70~~ **6.67**.
  
- ~~(d) Pursuant to 326 IAC 8-1-2(c) the overall control efficiency of the thermal oxidizer shall be no less than the equivalent overall efficiency calculated by the following equation:~~

~~$$\Theta = \frac{V - E}{V} \times 100$$~~

~~Where:~~

- ~~- V = The actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content of all coatings, as applied to the subject coating line as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids as applied.
  - E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.
  - Θ = Equivalent overall efficiency of the capture system and control device as a percentage.~~

~~The overall efficiency of the thermal oxidizer shall be greater than 88.6%.~~

D.7.2 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (f), all solvents sprayed from the application equipment of the ~~two (2)~~ **four (4)** chain on edge machines (COE-7, ~~and~~ COE-8, **COE-9 and COE-10**) during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

D.7.3 PSD Minor Limit [326 IAC 2-2]

- (a) The use of VOC, including coatings, dilution solvents, and cleaning solvents at the ~~two (2)~~ **four (4)** chain on edge machines (COE-7, ~~and~~ COE-8, **COE-9 and COE-10**) shall be limited to 164 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month, and the proposed facilities shall use the existing thermal oxidizer (CE-3) at an overall control efficiency no less than 88.6%. Thus, the potential to emit VOC is limited to less than 40 tons per year, and the requirements of 326 IAC 2-2, PSD, are not applicable.
- (b) Any change or modification that increases the solids delivered to the applicators to 750 tons per twelve (12) consecutive month period or more shall increase the potential to emit PM<sub>10</sub> to 15 tons per year, based on a transfer efficiency of 60% and a control efficiency of 95%, and shall require prior IDEM, OAQ, approval. Therefore, the requirements of 326 IAC 2-2, PSD, are not applicable.

~~D.7.4 Hazardous Air Pollutants (HAPs) [326 IAC 2-4.1-1]~~

~~The Permittee shall operate the thermal oxidizer at all times when either of the two (2) chain on edge machines (COE 7 or COE 8) are in operation. This in conjunction with Condition D.7.1(d) shall make the requirements of 326 IAC 2-4.1-1, New Source Toxics Control, not applicable pursuant to 326 IAC 2-4.1-1 and 40 CFR 63.41.~~

D.7.54 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating manufacturing process 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. This requirement to operate the control is not federally enforceable.

D.7.65 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 the effective date of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products.~~ **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.7.15, Notification Requirements.**

D.7.76 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products [40 CFR Part 63, Subpart M] [40 CFR 63.3882] [40 CFR 63.3883] [40 CFR 63.3980]

- (a) The provisions of 40 CFR Part 63, Subpart M (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics

Website at <http://www.epa.gov/ttn/atw/misc/miscpg.html>. Pursuant to 40 CFR 63.3883(b), the Permittee must comply with these requirements on and after ~~the date 3 years after the effective date of 40 CFR Part 63, Subpart M~~ **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. **The permit shield applies to Condition D.1.15, 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, which are incorporated by reference.

**D.7.87 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 their control devices.

**Compliance Determination Requirements**

**D.7.98 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]**

- (a) Pursuant to 326 IAC 8-1-2(a), the Permittee shall operate the thermal oxidizer to achieve compliance with Conditions D.7.1, ~~D.7.3~~ and ~~D.7.4~~ **D.7.3**.
- (b) Pursuant to 326 IAC 8-1-2(c) the overall control efficiency of the thermal oxidizer shall be no less than the equivalent overall efficiency calculated by the following equation:

$$O = \frac{V - E}{V} \times 100$$

Where:

**V = The actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content of all coatings, as applied to the subject coating line as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids as applied.**

**E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.**

**O = Equivalent overall efficiency of the capture system and control device as a percentage.**

**The Permittee will comply with this limit provided the daily weighted average VOC content of all coatings used at each of the four (4) chain on edge machines, identified as COE-7, COE-8, COE-9 and COE-10, as applied, is no more than 85.5 pounds per gallon of coating solids, and the overall control efficiency is no less than 92.2%.**

**D.7.409 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]**

Within **sixty (60) days of achieving maximum capacity, but no more than** one hundred and eighty (180) days after initial startup **of each of the chain on edge machines**, the Permittee shall conduct a performance test to verify VOC control efficiency as per Condition D.7.1 for the thermal oxidizer using methods as approved by the Commissioner. This test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

**D.7.140 VOC Emissions**

Compliance with Condition D.7.3 shall be demonstrated within 30 days of the end of each month. This shall be based on the total volatile organic compounds emitted for the previous month, and adding it to previous 11 months total VOC emitted so as to arrive at VOC emissions for the most recent 12 consecutive month period. The VOC emissions for a month can be arrived at using the following equation for VOC usage:

$$\text{VOC emitted} = [(\text{VOC input}) \times (100 - \% \text{ overall control efficiency})] + [\text{uncontrolled VOC input}]$$

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

**D.7.121 Thermal Oxidizer Temperature**

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. The output of this system shall be recorded as an hourly average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports whenever the hourly average temperature of the thermal oxidizer is below 1400°F. An hourly average temperature that is below 1400°F is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a ~~violation of~~ **deviation from** this permit.
- (b) The Permittee shall determine the hourly average temperature from the most recent valid stack test that demonstrates compliance with limits in Conditions D.7.1, ~~D.7.3~~ and ~~D.7.4~~ **D.7.3(a)**, as approved by IDEM.
- (c) On and after the date the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports whenever the hourly average temperature of the thermal oxidizer is below the hourly average temperature as observed during the compliant stack test. An hourly average temperature that is below the hourly average temperature as observed during the compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a ~~violation of~~ **deviation from** this permit.

**D.7.132 Parametric Monitoring**

- (a) The Permittee shall determine fan amperage or duct pressure from the most recent valid

stack test that demonstrates compliance with limits in Conditions D.7.1, ~~D.7.3~~ and ~~D.7.4~~ **D.7.3(a)**, as approved by IDEM.

- (b) The duct pressure or fan amperage shall be observed at least once per day when the thermal oxidizer is in operation. When for any one reading, the duct pressure or fan amperage is outside the normal range as established in most recent compliant stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A reading that is outside the range as established in the most recent compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a ~~violation of~~ **deviation from** this permit.

#### D.7.143 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack (C3) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a ~~violation of~~ **deviation from** this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a ~~violation of~~ **deviation from** of this permit.
- ~~(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.~~

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

##### D.7.154 Record Keeping Requirements

- (a) To document compliance with Conditions D.7.1 and ~~D.7.3~~, the Permittee shall maintain records in accordance with (1) through ~~(6)~~ **(7)** below. Records maintained for (1) through ~~(6)~~ **(7)** shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC content and usage limits established in Conditions D.7.1 and ~~D.7.3~~.
- (1) The VOC content of each coating material and solvent used less water.
- (2) The daily weighted average VOC content of all coatings used at each of the four (4) chain on edge machines, identified as COE-7, COE-8, COE-9 and COE-10, in pounds of VOC per gallon of coating solids, as applied.**
- ~~(2)~~**(3)** The amount of coating material and solvent used on a monthly basis.
- (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
- (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

- ~~(3)~~(4) The monthly cleanup solvent usage;
  - ~~(4)~~(5) The total VOC usage for each month;
  - ~~(5)~~(6) ~~To document compliance with Condition D.7.12, t~~ The continuous temperature records (on an hourly average basis) for the thermal oxidizer and the hourly average temperature used to demonstrate compliance during the most recent compliant stack test; and
  - ~~(6)~~(7) ~~To document compliance with Condition D.7.13, d~~ Daily records of the duct pressure or fan amperage.
- (b) To document compliance with Condition D.7.4413, 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.~~
  - (c) ~~To document compliance with Condition D.7.8, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.~~
  - ~~(d)~~ All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.7.165 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) Initial notification. The Permittee must submit the initial notification no later than 1 year after the effective date of 40 CFR Part 63, Subpart Mmmm.
- (c) Notification of compliance status. The Permittee must submit the notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR 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.7.176 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 Title V 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 Title V permit the applicable requirements of 40 CFR 63, Subpart Mmmm, 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 ~~twenty-seven months after the effective date of 40 CFR 63, Subpart Mmmm~~ **April 2, 2006**.
- (c) The significant permit modification application shall be submitted to:

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

GOTEC PLUS USA, LLC  
Huntington, Indiana  
Permit Reviewer: CAP/MES

Page 26 of 27  
Source Modification No.:069-22306-00018  
Permit Modification No.:069-22306-00018

100 North Senate Avenue, ~~P.O. Box 6015~~  
Indianapolis, Indiana ~~46206-6015~~ **46204-2251**

**D.7.187 Reporting Requirements**

A quarterly summary of the information to document compliance with Condition D.7.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

The facility on the report form has been modified. The description of the limit has also been simplified so that it includes only the applicable VOC usage limit reported on that form. Changes are as follows:

- Facilities:** ~~Two (2)~~ **Four (4)** chain on edge machines (COE-7, ~~and~~ COE-8, **COE-9 and COE-10**)
- Limit:** No more than 164 tons per twelve (12) consecutive month period, with compliance determined at the end of each month, ~~equivalent to VOC emissions less than 40 tons per year when operating the thermal oxidizer at a control efficiency no less than 75.7%~~

**Conclusion and Recommendation**

The construction and operation of this modification shall be subject to the conditions of the attached proposed Part 70 Minor Source Modification No. 069-22306-00018 and Minor Permit Modification No. 069-22308-00018. The staff recommends to the Commissioner that this Part 70 Minor Source Modification and Minor Permit Modification be approved.

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

Company Name: **GOTEC PLUS USA, LLC**  
Address City IN Zip: **1605 Riverfork Drive East, Huntington, IN 46750**  
Minor Source Modification No.: **069-22306-00018**  
Minor Permit Modification No.: **069-22308-00019**  
Permit Reviewer: **CarrieAnn Paukowitz**  
Application Date: **November 30, 2005**

Material	Density (lb/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Material (gal/unit)	Maximum (unit/hour)	Flash-off (fraction)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (lbs/hr)	Potential VOC (lbs/day)	Potential VOC (tons/yr)	Particulate Potential (tons/yr)	VOC solids (lbs/gal)	Transfer Efficiency	Material Substrate
<b>COE-7</b>																		
<b>Primer</b>																		
Chemlock 205A	7.74	76.70%	0.0%	76.70%	0.0%	12.6%	0.65	1.00	1.0	5.94	5.94	3.86	93	16.9	1.28	47.12	75%	Metal
MEK	6.71	100.00%	0.0%	100.00%	0.0%	0.0%	0.52	1.00	1.0	6.71	6.71	3.49	84	15.3	0.00	n/a	75%	Metal
R-T-S	<b>7.28</b>	<b>86.24%</b>	<b>0.00%</b>	<b>86.24%</b>	<b>0.0%</b>	<b>7.0%</b>	<b>1.17</b>	<b>1.00</b>	<b>1.0</b>	<b>6.28</b>	<b>6.28</b>	<b>7.3</b>	<b>176</b>	<b>32.2</b>	<b>1.28</b>	<b>89.72</b>	<b>75%</b>	<b>Metal</b>
Chemlock 207	7.49	80.80%	0.0%	80.80%	0.0%	10.2%	0.66	1.00	1.0	6.05	6.05	4.00	96	17.5	1.04	59.62	75%	Metal
MEK	6.71	100.00%	0.0%	100.00%	0.0%	0.0%	0.53	1.00	1.0	6.71	6.71	3.55	85	15.5	0.00	n/a	75%	Metal
R-T-S	<b>7.14</b>	<b>88.82%</b>	<b>0.00%</b>	<b>88.82%</b>	<b>0.0%</b>	<b>5.6%</b>	<b>1.19</b>	<b>1.00</b>	<b>1.0</b>	<b>6.34</b>	<b>6.34</b>	<b>7.5</b>	<b>181</b>	<b>33.1</b>	<b>1.04</b>	<b>112.51</b>	<b>75%</b>	<b>Metal</b>
<b>Topcoat</b>																		
Chemlock 6253	8.37	74.10%	0.0%	74.10%	0.0%	15.2%	1.40	1.00	1.0	6.20	6.20	8.67	208	38.0	3.32	40.80	75%	Metal
Toluene	7.25	100.00%	0.0%	100.00%	0.0%	0.0%	0.18	1.00	1.0	7.25	7.25	1.32	32	5.8	0.00	n/a	75%	Metal
R-T-S	<b>8.24</b>	<b>76.72%</b>	<b>0.00%</b>	<b>76.72%</b>	<b>0.0%</b>	<b>13.5%</b>	<b>1.58</b>	<b>1.00</b>	<b>1.0</b>	<b>6.32</b>	<b>6.32</b>	<b>10.0</b>	<b>240</b>	<b>43.8</b>	<b>3.32</b>	<b>47.00</b>	<b>75%</b>	<b>Metal</b>
Y103600	7.60	85.00%	0.0%	85.00%	0.0%	12.0%	1.55	1.00	1.0	6.46	6.46	10.00	240	43.8	1.93	53.83	75%	Metal
Toluene	7.25	100.00%	0.0%	100.00%	0.0%	0.0%	0.20	1.00	1.0	7.25	7.25	1.46	35	6.4	0.00	n/a	75%	Metal
R-T-S	<b>7.56</b>	<b>86.65%</b>	<b>0.00%</b>	<b>86.65%</b>	<b>0.0%</b>	<b>10.6%</b>	<b>1.75</b>	<b>1.00</b>	<b>1.0</b>	<b>6.55</b>	<b>6.55</b>	<b>11.5</b>	<b>275</b>	<b>50.2</b>	<b>1.93</b>	<b>61.69</b>	<b>75%</b>	<b>Metal</b>
<b>COE-8</b>																		
<b>Primer</b>																		
Chemlock 205A	7.74	76.70%	0.0%	76.70%	0.0%	12.6%	0.65	1.00	1.0	5.94	5.94	3.86	93	16.9	1.28	47.12	75%	Metal
MEK	6.71	100.00%	0.0%	100.00%	0.0%	0.0%	0.52	1.00	1.0	6.71	6.71	3.49	84	15.3	0.00	n/a	75%	Metal
R-T-S	<b>7.28</b>	<b>86.24%</b>	<b>0.00%</b>	<b>86.24%</b>	<b>0.0%</b>	<b>7.0%</b>	<b>1.17</b>	<b>1.00</b>	<b>1.0</b>	<b>6.28</b>	<b>6.28</b>	<b>7.3</b>	<b>176</b>	<b>32.2</b>	<b>1.28</b>	<b>89.72</b>	<b>75%</b>	<b>Metal</b>
Chemlock 207	7.49	80.80%	0.0%	80.80%	0.0%	10.2%	0.66	1.00	1.0	6.05	6.05	4.00	96	17.5	1.04	59.62	75%	Metal
MEK	6.71	100.00%	0.0%	100.00%	0.0%	0.0%	0.53	1.00	1.0	6.71	6.71	3.55	85	15.5	0.00	n/a	75%	Metal
R-T-S	<b>7.14</b>	<b>88.82%</b>	<b>0.00%</b>	<b>88.82%</b>	<b>0.0%</b>	<b>5.6%</b>	<b>1.19</b>	<b>1.00</b>	<b>1.0</b>	<b>6.34</b>	<b>6.34</b>	<b>7.5</b>	<b>181</b>	<b>33.1</b>	<b>1.04</b>	<b>112.51</b>	<b>75%</b>	<b>Metal</b>
<b>Topcoat</b>																		
Chemlock 6253	8.37	74.10%	0.0%	74.10%	0.0%	15.2%	1.40	1.00	1.0	6.20	6.20	8.67	208	38.0	3.32	40.80	75%	Metal
Toluene	7.25	100.00%	0.0%	100.00%	0.0%	0.0%	0.18	1.00	1.0	7.25	7.25	1.32	32	5.8	0.00	n/a	75%	Metal
R-T-S	<b>8.24</b>	<b>76.72%</b>	<b>0.00%</b>	<b>76.72%</b>	<b>0.0%</b>	<b>13.5%</b>	<b>1.58</b>	<b>1.00</b>	<b>1.0</b>	<b>6.32</b>	<b>6.32</b>	<b>10.0</b>	<b>240</b>	<b>43.8</b>	<b>3.32</b>	<b>47.00</b>	<b>75%</b>	<b>Metal</b>
Y103600	7.60	85.00%	0.0%	85.00%	0.0%	12.0%	1.55	1.00	1.0	6.46	6.46	10.00	240	43.8	1.93	53.83	75%	Metal
Toluene	7.25	100.00%	0.0%	100.00%	0.0%	0.0%	0.20	1.00	1.0	7.25	7.25	1.46	35	6.4	0.00	n/a	75%	Metal
R-T-S	<b>7.56</b>	<b>86.65%</b>	<b>0.00%</b>	<b>86.65%</b>	<b>0.0%</b>	<b>10.6%</b>	<b>1.75</b>	<b>1.00</b>	<b>1.0</b>	<b>6.55</b>	<b>6.55</b>	<b>11.5</b>	<b>275</b>	<b>50.2</b>	<b>1.93</b>	<b>61.69</b>	<b>75%</b>	<b>Metal</b>
<b>COE-9</b>																		
<b>Primer</b>																		
Chemlock 205A	7.74	76.70%	0.0%	76.70%	0.0%	12.6%	0.65	1.00	1.0	5.94	5.94	3.86	93	16.9	1.28	47.12	75%	Metal
MEK	6.71	100.00%	0.0%	100.00%	0.0%	0.0%	0.52	1.00	1.0	6.71	6.71	3.49	84	15.3	0.00	n/a	75%	Metal
R-T-S	<b>7.28</b>	<b>86.24%</b>	<b>0.00%</b>	<b>86.24%</b>	<b>0.0%</b>	<b>7.0%</b>	<b>1.17</b>	<b>1.00</b>	<b>1.0</b>	<b>6.28</b>	<b>6.28</b>	<b>7.3</b>	<b>176</b>	<b>32.2</b>	<b>1.28</b>	<b>89.72</b>	<b>75%</b>	<b>Metal</b>
Chemlock 207	7.49	80.80%	0.0%	80.80%	0.0%	10.2%	0.66	1.00	1.0	6.05	6.05	4.00	96	17.5	1.04	59.62	75%	Metal
MEK	6.71	100.00%	0.0%	100.00%	0.0%	0.0%	0.53	1.00	1.0	6.71	6.71	3.55	85	15.5	0.00	n/a	75%	Metal
R-T-S	<b>7.14</b>	<b>88.82%</b>	<b>0.00%</b>	<b>88.82%</b>	<b>0.0%</b>	<b>5.6%</b>	<b>1.19</b>	<b>1.00</b>	<b>1.0</b>	<b>6.34</b>	<b>6.34</b>	<b>7.5</b>	<b>181</b>	<b>33.1</b>	<b>1.04</b>	<b>112.51</b>	<b>75%</b>	<b>Metal</b>
<b>Topcoat</b>																		
Chemlock 6253	8.37	74.10%	0.0%	74.10%	0.0%	15.2%	1.40	1.00	1.0	6.20	6.20	8.67	208	38.0	3.32	40.80	75%	Metal
Toluene	7.25	100.00%	0.0%	100.00%	0.0%	0.0%	0.18	1.00	1.0	7.25	7.25	1.32	32	5.8	0.00	n/a	75%	Metal
R-T-S	<b>8.24</b>	<b>76.72%</b>	<b>0.00%</b>	<b>76.72%</b>	<b>0.0%</b>	<b>13.5%</b>	<b>1.58</b>	<b>1.00</b>	<b>1.0</b>	<b>6.32</b>	<b>6.32</b>	<b>10.0</b>	<b>240</b>	<b>43.8</b>	<b>3.32</b>	<b>47.00</b>	<b>75%</b>	<b>Metal</b>
Y103600	7.60	85.00%	0.0%	85.00%	0.0%	12.0%	1.55	1.00	1.0	6.46	6.46	10.00	240	43.8	1.93	53.83	75%	Metal
Toluene	7.25	100.00%	0.0%	100.00%	0.0%	0.0%	0.20	1.00	1.0	7.25	7.25	1.46	35	6.4	0.00	n/a	75%	Metal
R-T-S	<b>7.56</b>	<b>86.65%</b>	<b>0.00%</b>	<b>86.65%</b>	<b>0.0%</b>	<b>10.6%</b>	<b>1.75</b>	<b>1.00</b>	<b>1.0</b>	<b>6.55</b>	<b>6.55</b>	<b>11.5</b>	<b>275</b>	<b>50.2</b>	<b>1.93</b>	<b>61.69</b>	<b>75%</b>	<b>Metal</b>
<b>COE-10</b>																		
<b>Primer</b>																		
Chemlock 205A	7.74	76.70%	0.0%	76.70%	0.0%	12.6%	0.65	1.00	1.0	5.94	5.94	3.86	93	16.9	1.28	47.12	75%	Metal
MEK	6.71	100.00%	0.0%	100.00%	0.0%	0.0%	0.52	1.00	1.0	6.71	6.71	3.49	84	15.3	0.00	n/a	75%	Metal
R-T-S	<b>7.28</b>	<b>86.24%</b>	<b>0.00%</b>	<b>86.24%</b>	<b>0.0%</b>	<b>7.0%</b>	<b>1.17</b>	<b>1.00</b>	<b>1.0</b>	<b>6.28</b>	<b>6.28</b>	<b>7.3</b>	<b>176</b>	<b>32.2</b>	<b>1.28</b>	<b>89.72</b>	<b>75%</b>	<b>Metal</b>
Chemlock 207	7.49	80.80%	0.0%	80.80%	0.0%	10.2%	0.66	1.00	1.0	6.05	6.05	4.00	96	17.5	1.04	59.62	75%	Metal
MEK	6.71	100.00%	0.0%	100.00%	0.0%	0.0%	0.53	1.00	1.0	6.71	6.71	3.55	85	15.5	0.00	n/a	75%	Metal
R-T-S	<b>7.14</b>	<b>88.82%</b>	<b>0.00%</b>	<b>88.82%</b>	<b>0.0%</b>	<b>5.6%</b>	<b>1.19</b>	<b>1.00</b>	<b>1.0</b>	<b>6.34</b>	<b>6.34</b>	<b>7.5</b>	<b>181</b>	<b>33.1</b>	<b>1.04</b>	<b>112.51</b>	<b>75%</b>	<b>Metal</b>
<b>Topcoat</b>																		
Chemlock 6253	8.37	74.10%	0.0%	74.10%	0.0%	15.2%	1.40	1.00	1.0	6.20	6.20	8.67	208	38.0	3.32	40.80	75%	Metal
Toluene	7.25	100.00%	0.0%	100.00%	0.0%	0.0%	0.18	1.00	1.0	7.25	7.25	1.32	32	5.8	0.00	n/a	75%	Metal
R-T-S	<b>8.24</b>	<b>76.72%</b>	<b>0.00%</b>	<b>76.72%</b>	<b>0.0%</b>	<b>13.5%</b>	<b>1.58</b>	<b>1.00</b>	<b>1.0</b>	<b>6.32</b>	<b>6.32</b>	<b>10.0</b>	<b>240</b>	<b>43.8</b>	<b>3.32</b>	<b>47.00</b>	<b>75%</b>	<b>Metal</b>
Y103600	7.60	85.00%	0.0%	85.00%	0.0%	12.0%	1.55	1.00	1.0	6.46	6.46	10.00	240	43.8	1.93	53.83	75%	Metal
Toluene	7.25	100.00%	0.0%	100.00%	0.0%	0.0%	0.20	1.00	1.0	7.25	7.25	1.46	35	6.4	0.00	n/a	75%	Metal
R-T-S	<b>7.56</b>	<b>86.65%</b>	<b>0.00%</b>	<b>86.65%</b>	<b>0.0%</b>	<b>10.6%</b>	<b>1.75</b>	<b>1.00</b>	<b>1.0</b>	<b>6.55</b>	<b>6.55</b>	<b>11.5</b>	<b>275</b>	<b>50.2</b>	<b>1.93</b>	<b>61.69</b>	<b>75%</b>	<b>Metal</b>
<b>TOTALS:</b>												<b>74.6</b>	<b>1790</b>	<b>327</b>	<b>18.4</b>			
<b>Control Efficiency:</b>												<b>88.6%</b>	<b>88.6%</b>	<b>88.6%</b>	<b>95.0%</b>			
<b>Emissions after controls:</b>												<b>8.50</b>	<b>204</b>	<b>37.2</b>	<b>0.921</b>			

**METHODOLOGY**

RTS Density (lbs/gal) = ((Da\*Va)+(Db\*Vb))/(Va+Vb)  
RTS Weight % H2O + Organics = ((Wa\*Da\*Va)+(Wb\*Db\*Vb))/((Da\*Va)+(Db\*Vb))  
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) \* Flash-off  
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day) \* Flash-off  
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hrs/yr) \* (1 ton/2000 lbs) \* Flash-off  
Particulate Potential Tons per Year = (units/hr) \* (gal/unit) \* (lbs/gal) \* (1-Weight % Volatiles) \* (Transfer efficiency) \* (8760 hrs/yr) \* (1 ton/2000 lbs)  
Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids) \* Flash-off  
Total = RTS

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

**Company Name: GOTEC PLUS USA, LLC**  
**Address City IN Zip: 1605 Riverfork Drive East, Huntington, IN 46750**  
**Minor Source Modification No.: 069-22306-00018**  
**Minor Permit Modification No.: 069-22308-00019**  
**Permit Reviewer: CarrieAnn Paukowitz**  
**Application Date: November 30, 2005**

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % MIBK	Weight % Formaldehyde	Weight % Ethylbenzene	Weight % MEK	Weight % Toluene	Weight % Xylene	MIBK Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Ethylbenzene Emissions (ton/yr)	MEK Emissions (ton/yr)	Toluene Emissions (ton/yr)	Xylene Emissions (ton/yr)	Total Emissions (ton/yr)
<b>COE-7</b>																
<b>Primer</b>																
Chemlock 205A	7.74	0.65	1.00	75.00%	1.00%	0.00%	2.00%	0.00%	0.00%	16.53	0.22	0.00	0.44	0.00	0.00	17.19
MEK	6.71	0.52	1.00	0.00%	0.00%	0.00%	100.00%	0.00%	0.00%	0.00	0.00	0.00	15.28	0.00	0.00	15.28
Chemlock 207	7.49	0.66	1.00	80.00%	1.00%	0.00%	5.00%	0.00%	0.00%	17.35	0.22	0.00	1.08	0.00	0.00	18.65
MEK	6.71	0.53	1.00	0.00%	0.00%	0.00%	100.00%	0.00%	0.00%	0.00	0.00	0.00	15.54	0.00	0.00	15.54
<b>Topcoat</b>																
Chemlock 6253	8.37	1.40	1.00	0.00%	0.00%	15.00%	0.00%	0.00%	60.00%	0.00	0.00	7.69	0.00	0.00	30.76	38.44
Toluene	7.25	0.18	1.00	0.00%	0.00%	0.00%	0.00%	100.00%	0.00%	0.00	0.00	0.00	0.00	5.77	0.00	5.77
Y0103600	7.60	1.55	1.00	0.00%	0.00%	0.00%	0.00%	85.00%	0.00%	0.00	0.00	0.00	0.00	43.82	0.00	43.82
Toluene	7.25	0.20	1.00	0.00%	0.00%	0.00%	0.00%	100.00%	0.00%	0.00	0.00	0.00	0.00	6.39	0.00	6.39
<b>COE-8</b>																
<b>Primer</b>																
Chemlock 205A	7.74	0.65	1.00	75.00%	1.00%	0.00%	2.00%	0.00%	0.00%	16.53	0.22	0.00	0.44	0.00	0.00	17.19
MEK	6.71	0.52	1.00	0.00%	0.00%	0.00%	100.00%	0.00%	0.00%	0.00	0.00	0.00	15.28	0.00	0.00	15.28
Chemlock 207	7.49	0.66	1.00	80.00%	1.00%	0.00%	5.00%	0.00%	0.00%	17.35	0.22	0.00	1.08	0.00	0.00	18.65
MEK	6.71	0.53	1.00	0.00%	0.00%	0.00%	100.00%	0.00%	0.00%	0.00	0.00	0.00	15.54	0.00	0.00	15.54
<b>Topcoat</b>																
Chemlock 6253	8.37	1.40	1.00	0.00%	0.00%	15.00%	0.00%	0.00%	60.00%	0.00	0.00	7.69	0.00	0.00	30.76	38.44
Toluene	7.25	0.18	1.00	0.00%	0.00%	0.00%	0.00%	100.00%	0.00%	0.00	0.00	0.00	0.00	5.77	0.00	5.77
Y0103600	7.60	1.55	1.00	0.00%	0.00%	0.00%	0.00%	85.00%	0.00%	0.00	0.00	0.00	0.00	43.82	0.00	43.82
Toluene	7.25	0.20	1.00	0.00%	0.00%	0.00%	0.00%	100.00%	0.00%	0.00	0.00	0.00	0.00	6.39	0.00	6.39
<b>COE-9</b>																
<b>Primer</b>																
Chemlock 205A	7.74	0.65	1.00	75.00%	1.00%	0.00%	2.00%	0.00%	0.00%	16.53	0.22	0.00	0.44	0.00	0.00	17.19
MEK	6.71	0.52	1.00	0.00%	0.00%	0.00%	100.00%	0.00%	0.00%	0.00	0.00	0.00	15.28	0.00	0.00	15.28
Chemlock 207	7.49	0.66	1.00	80.00%	1.00%	0.00%	5.00%	0.00%	0.00%	17.35	0.22	0.00	1.08	0.00	0.00	18.65
MEK	6.71	0.53	1.00	0.00%	0.00%	0.00%	100.00%	0.00%	0.00%	0.00	0.00	0.00	15.54	0.00	0.00	15.54
<b>Topcoat</b>																
Chemlock 6253	8.37	1.40	1.00	0.00%	0.00%	15.00%	0.00%	0.00%	60.00%	0.00	0.00	7.69	0.00	0.00	30.76	38.44
Toluene	7.25	0.18	1.00	0.00%	0.00%	0.00%	0.00%	100.00%	0.00%	0.00	0.00	0.00	0.00	5.77	0.00	5.77
Y0103600	7.60	1.55	1.00	0.00%	0.00%	0.00%	0.00%	90.00%	0.00%	0.00	0.00	0.00	0.00	46.40	0.00	46.40
Toluene	7.25	0.20	1.00	0.00%	0.00%	0.00%	0.00%	100.00%	0.00%	0.00	0.00	0.00	0.00	6.39	0.00	6.39
<b>COE-10</b>																
<b>Primer</b>																
Chemlock 205A	7.74	0.65	1.00	75.00%	1.00%	0.00%	2.00%	0.00%	0.00%	16.53	0.22	0.00	0.44	0.00	0.00	17.19
MEK	6.71	0.52	1.00	0.00%	0.00%	0.00%	100.00%	0.00%	0.00%	0.00	0.00	0.00	15.28	0.00	0.00	15.28
Chemlock 207	7.49	0.66	1.00	80.00%	1.00%	0.00%	5.00%	0.00%	0.00%	17.35	0.22	0.00	1.08	0.00	0.00	18.65
MEK	6.71	0.53	1.00	0.00%	0.00%	0.00%	100.00%	0.00%	0.00%	0.00	0.00	0.00	15.54	0.00	0.00	15.54
<b>Topcoat</b>																
Chemlock 6253	8.37	1.40	1.00	0.00%	0.00%	15.00%	0.00%	0.00%	60.00%	0.00	0.00	7.69	0.00	0.00	30.76	38.44
Toluene	7.25	0.18	1.00	0.00%	0.00%	0.00%	0.00%	100.00%	0.00%	0.00	0.00	0.00	0.00	5.77	0.00	5.77
Y0103600	7.60	1.55	1.00	0.00%	0.00%	0.00%	0.00%	85.00%	0.00%	0.00	0.00	0.00	0.00	43.82	0.00	43.82
Toluene	7.25	0.20	1.00	0.00%	0.00%	0.00%	0.00%	100.00%	0.00%	0.00	0.00	0.00	0.00	6.39	0.00	6.39

Total State Potential Emissions										<b>Totals:</b>	<b>69.4</b>	<b>0.881</b>	<b>30.8</b>	<b>66.5</b>	<b>203</b>	<b>123</b>	<b>340</b>
										<b>Control Efficiency:</b>	<b>88.6%</b>						
										<b>Emissions after Control:</b>	<b>7.91</b>	<b>0.100</b>	<b>3.51</b>	<b>7.58</b>	<b>23.2</b>	<b>14.0</b>	<b>38.8</b>

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